



ACCIS Association of Consumer Credit Information Suppliers IVZW

Brussels, 22 January 2016

ACCIS Response to the Joint Consultation Paper Under Article 17 and 18(4) of Directive (EU) 2015/849

ACCIS (Association of Consumer Credit Information Suppliers) welcomes the opportunity to respond to the Joint Consultation Paper of the European Supervisory Authorities on the Joint Guidelines under Article 17 and 18 (4) of the new European Anti-Money Laundering Directive (Directive (EU) 2015/849). ACCIS strongly supports the draft Joint Guidelines as they provide valuable and clear guidance to credit institutions on the factors, measures and information to be considered when performing their obligation to assess money laundering and terrorism financing risks.

ACCIS, as an association representing Credit Reporting Service Providers (CRSPs) would like to underline the important role CRSPs can play supporting the implementation of the new Anti-Money Laundering legislation. Credit Reporting Service Providers (CRSPs) support their customers - credit and financial institutions - in complying with their anti-money laundering obligations. CRSPs provide to credit and financial institutions credit risk assessment, fraud prevention and ID verification services. Accurate, detailed and up-to-date credit information provided by CRSPs, as independent sources of information, can serve as a reliable tool for credit and financial institutions in their customer identification and customer due diligence process for the purpose of anti-money laundering and terrorist financing prevention. ACCIS firmly believes that credit information provided by CRSP should be included among the information sources that firms should consider in their customer due diligence (Title II, Paragraph 16, of the Joint Guidelines).

Therefore, ACCIS calls on the European Supervisory Authorities to explicitly include credit information provided by CRSPs among the sources of information to be considered by firms in their customer due diligence process, specified in Title II, Paragraph 16 of the draft Guidelines.

About ACCIS

ACCIS is an international non-profit trade association bringing together 50 credit reporting service providers (credit reference agencies) in 34 countries worldwide, including credit reference agencies in 20 EU Member States.

Credit reporting Service Providers are at the heart of financial systems, their core activity being to act as a third-party holder and provider of information about the credit behavior of consumers and (in some cases) businesses.

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ACCIS members provide data and solutions designed to support financial organisations, enabling access to credit for consumers and businesses, and as such, play a critical role in the lives of European citizens. The services provided by credit information suppliers support finance providers in making lending decisions based on accurate, consistent and verifiable data.

Yours sincerely,

Jeroen Jansen
Secretary-General
ACCIS (Association of Consumer Credit Information Suppliers)