

MiCA, the Travel Rule, the AMLR and eIDAS 2.0

What the EU asks of a crypto-asset service provider, or any crypto business serving EU customers, from 2026 to 2028: the rules, the dates, the data points and a readiness plan.

MiCA transition ended 1 Jul 2026

Travel Rule: no minimum

AMLR: 10 Jul 2027

EUDI Wallet: end 2027

AT A GLANCE

The MiCA licence is now mandatory

The transitional period for existing firms ended on 1 July 2026 at the latest. Crypto-asset services in the EU need a CASP authorisation or an Art. 60 route, passported from one home regulator.¹²

One EU rulebook for KYC from 10 July 2027

The AMLR applies directly in every member state. On 1 October 2026 AMLA announced its final draft due diligence standards as submitted to the Commission.^{6 8}

Every in-scope transfer carries identity

The Travel Rule has applied since 30 December 2024 to transfers involving an EU CASP, with no minimum amount, plus an ownership check on self-hosted wallets above EUR 1,000.⁴

Digital ID joins onboarding

Each member state provides an EUDI Wallet by 24 December 2026. Firms required by law or contract to use strong user authentication for online identification, other than micro and small enterprises, accept it on request by 24 December 2027 (working dates).^{12 13}

01 THE SHORT VERSION

Four things to know

MICA · REGULATION (EU) 2023/1114

The licence window has closed

Article 143(3) let firms already operating under national law continue until 1 July 2026 at the latest, and each member state could shorten that period. All of those periods are over.¹²

TRAVEL RULE · REGULATION (EU) 2023/1113

Identity travels with every transfer

Originator and beneficiary information goes with each in-scope crypto transfer, "regardless of their amount", and ownership of a self-hosted wallet is assessed above EUR 1,000.⁴

AMLR · REGULATION (EU) 2024/1624

KYC becomes one EU rulebook

From 10 July 2027 the same data points, verification means and refresh cycles apply in all member states, with no national transposition.⁶

EIDAS 2.0 · REGULATION (EU) 2024/1183

Digital ID moves forward in the queue

The EUDI Wallet is issued at assurance level high. Under AMLA's draft standards, remote document checks are a justified fallback when the customer cannot reasonably show a document face to face and has no qualifying eID.^{12 7}

02 THE REGULATORY CLOCK

Dates that drive your roadmap

DATE	RULE	WHAT CHANGES	STATUS
30 Dec 2024	MiCA · TFR	The CASP regime and the crypto Travel Rule apply ¹⁴	In force
17 Jan 2025	DORA	Digital operational resilience rules apply, authorised CASPs included ¹⁴	In force
1 Jan 2026	DAC8	Crypto providers collect tax reporting data on EU users ¹⁵	In force
1 Jul 2026	MiCA	Transitional period over; Art. 60 routes and a narrow Art. 61 exception remain ¹²	In force
1 Oct 2026	AMLA	AMLA says its final draft due diligence standards were submitted; proposed to apply six months after entry into force ^{7 8}	Draft
24 Dec 2026	eIDAS 2.0	Each member state provides at least one EUDI Wallet (working date) ^{12 13}	Upcoming
1 Jan 2027	DAC8	Tax residence self-certification due for existing users ¹⁵	Upcoming
10 Jul 2027	AMLR	The single EU anti-money laundering rulebook applies directly ⁶	Upcoming
24 Dec 2027	eIDAS 2.0	Firms required by law or contract to use strong user authentication for online identification accept the wallet on request; micro and small firms excluded ^{12 13}	Upcoming
2028	AMLA	Direct supervision of up to 40 selected financial institutions or groups active in at least six member states ^{10 11}	Upcoming

eIDAS dates are working dates computed from the first wallet implementing acts (in force 24 December 2024); a strict reading could tie them to later acts.

03 RULE BY RULE

What each regulation asks of you

In force **MiCA** Regulation (EU) 2023/1114 · Markets in Crypto-Assets

MiCA is the licence: authorisation, governance, conduct, custody and stablecoin rules. The KYC substance comes from the AML framework.¹⁶

WHAT IT MEANS FOR YOU

- **Authorisation is mandatory.** No crypto-asset services in the EU without it (Art. 59(1)). Art. 60 routes for banks and listed firms; Art. 61 only at an EU client's own exclusive initiative.¹
- **Passporting.** Serve clients throughout the EU after notifying your home authority; start in a host country on receiving its communication, at the latest on the 15th calendar day after notifying (Arts. 59(7), 65(4)).¹
- **AML in the file.** The application describes controls "to identify, assess and manage risks, including money laundering and terrorist financing risks" (Art. 62(2)(i)).¹
- **Fines.** For breaches of the CASP rules (Arts. 59, 60, 64, 65 to 83), maximum fines on a company of at least EUR 5,000,000 and at least 5% of total annual turnover; member states may go higher (Art. 111(3)).¹
- **Stablecoins.** E-money tokens are offered by authorised issuers that published a white paper, or with their written consent (Art. 48(1)). ESMA expected restrictions by the end of January 2025, with "sell only" until the end of March 2025.¹³

WHAT YOUR CUSTOMERS NOTICE

- Fewer providers, and more questions from the ones that remain.
- Custody terms that explain how they authenticate (Art. 75).¹
- Stablecoin menus limited to tokens with an authorised issuer.

In force **Travel Rule** Regulation (EU) 2023/1113 · Transfer of Funds Regulation (TFR)

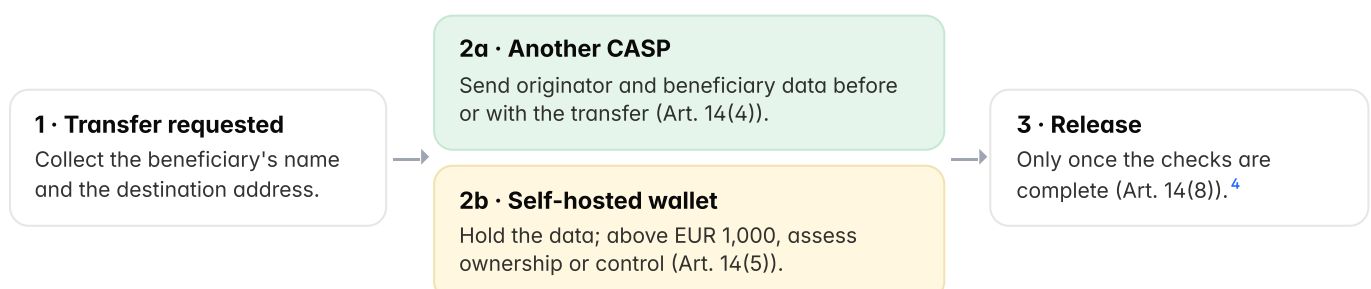
Transfers where the CASP of either party has its registered office in the EU carry originator and beneficiary information, with no minimum amount. Person-to-person transfers without a CASP and CASP own-account transfers are outside it (Art. 2). EBA Travel Rule Guidelines apply from 30 December 2024.^{4 5}

WHAT IT MEANS FOR YOU

- **Send the data first or together.** "In advance of, or simultaneously or concurrently with, the transfer", securely (Art. 14(4)).⁴
- **Originator:** name, ledger address, address with document and customer numbers, or date and place of birth. **Beneficiary:** name and ledger address. Both: account number where used, LEI where available (Art. 14(1)-(2)).⁴
- **Self-hosted wallets and missing data.** Ownership checks above EUR 1,000 on both sides (Arts. 14(5), 16(2)); for missing data, reject or return, or request it before release (Art. 17).⁴

WHAT YOUR CUSTOMERS NOTICE

- Being asked who they are paying, and through which provider.
- Requests for evidence on whether they own or control a wallet.
- Transfers held when the other side cannot be reached.



10 Jul 2027

AMLR

Regulation (EU) 2024/1624 · Anti-Money Laundering Regulation, plus AMLA standards

The AMLR replaces national transpositions with one directly applicable rulebook. CASPs are obliged entities as financial institutions (Art. 3(2), Art. 2(1)(6)). AMLA's final report on the draft due diligence standards is dated 30 September 2026; on 1 October 2026 AMLA said they had been submitted to the Commission. They are not law until adopted and published.^{6 7 8}

WHAT IT MEANS FOR YOU

- **EUR 1,000 for occasional crypto transactions.** Full due diligence from EUR 1,000, single or linked; below it you still identify and verify the customer (Art. 19(3)).⁶
- **Linked transactions.** AMLA's draft, for CASPs offering exchange or transfer services (MiCA Art. 3(1)(16)(c), (d), (j)): consider at least a one-month window; three or more transactions in 12 months point to a business relationship (draft Arts. 3(2), 2(4)).⁹
- **No anonymity.** No anonymous crypto-asset accounts, and none that allow anonymisation, including through anonymity-enhancing coins (Art. 79(1)).⁶
- **Refresh cycles.** At most 1 year for higher-risk customers and 5 years for others (Art. 26(2)); existing files brought up to standard within those periods (draft Art. 28).^{6 7}
- **PEP checks before onboarding.** Draft Art. 17(1)(a), outside the Art. 44 cases, building on AMLR Art. 20(1)(g).^{6 7}
- **Beneficial owners.** Verify through reliable sources and consult the central registers in addition (Art. 22(7)).⁶

WHAT YOUR CUSTOMERS NOTICE

- A "verify with your digital ID" option ahead of the document upload.
- Address and tax number questions they may not have been asked before.
- Periodic re-verification requests on existing accounts.
- Business customers asked for evidence on owners beyond a register extract.

04 AMLR DATA POINTS

Data to obtain for every individual, Article 22(1)(a)

01 · (i)

All names and surnames

02 · (ii)

Place and full date of birth

03 · (iii)

Nationalities

or statelessness and refugee or subsidiary protection status

04 · (iii)

National identification number

where applicable

05 · (iv)

Usual place of residence

or a postal address if there is no fixed address with legitimate residence in the EU

06 · (iv)

Tax identification number

where available

Collected, then identity verified by the Art. 22(6) means; AMLA's draft Art. 5 asks firms to verify at least one nationality when several are declared. The document number and expiry are not in Art. 22(1)(a); AMLA's draft Art. 6(1) lists them among the features of a document that counts as "equivalent".^{6 7}

AMLA DIRECT SUPERVISION · AMLAR

Up to 40 groups, from 2028

Financial institutions and CASPs active in at least six member states with a high residual risk profile qualify. Selection starts by 1 July 2027; AMLA supervises up to 40 directly in 2028.^{10 11}

WHEN THE AMLA STANDARDS BITE

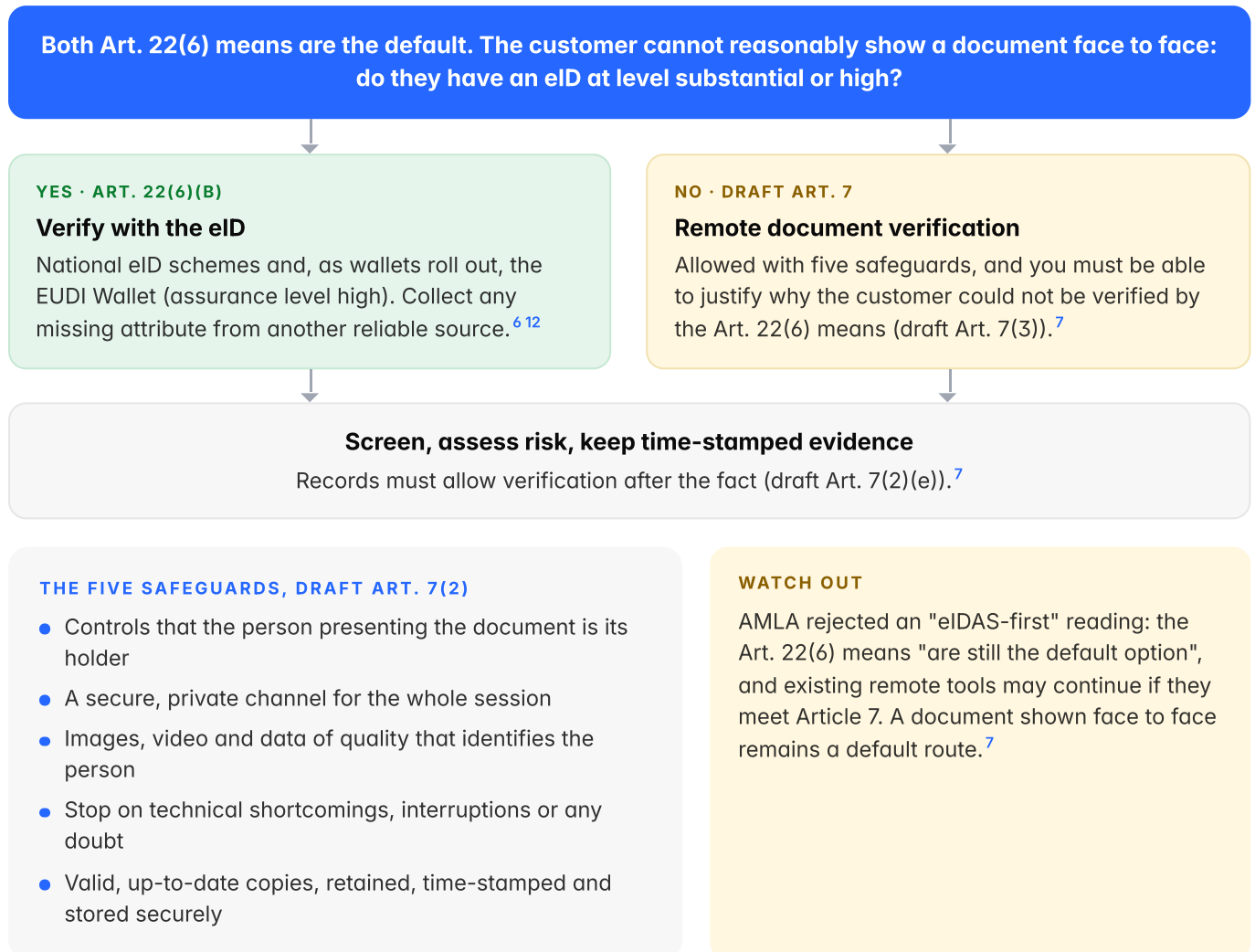
Six months after entry into force

Once adopted and published, the drafts are proposed to apply six months after entry into force. Existing customers move to the new standard within the 1- and 5-year periods of Art. 26(2) (draft Art. 28).^{7 8}

AMLR ARTICLE 22(6) AND AMLA DRAFT STANDARDS, ARTICLE 7

Remote identification: which route, and when

Article 22(6) gives two means: an identity document with reliable and independent sources where relevant, or an eID at assurance level substantial or high. AMLA's draft Article 7 covers a customer who cannot reasonably present a document face to face.^{6,7}



Dec 2026 · Dec 2027

eIDAS 2.0

Regulation (EU) 2024/1183 · European Digital Identity framework

Every member state provides at least one European Digital Identity Wallet, issued at assurance level high, with selective disclosure of attributes (Arts. 5a(1), 5a(4)(a), 5a(11)).¹²

WHAT IT MEANS FOR YOU

- 24 Dec 2026:** each member state provides a wallet (working date).^{12,13}
- 24 Dec 2027:** private relying parties required to use strong user authentication for online identification, banking and financial services included, accept the wallet "only upon the voluntary request of the user". Micro and small enterprises are excluded (Art. 5f(2)).^{12,13}
- Register** as a relying party where you are established (Art. 5b(1)); wallet use stays voluntary (Art. 5a(15)).¹²

WHAT YOUR CUSTOMERS NOTICE

- Onboarding from a phone wallet, with no document photo.
- A consent screen listing exactly which attributes you receive.
- National eIDs they already use, offered next to the document route.

05 CHEAT SHEET

Obligation, source, date, and who does what

Didit supplies checks and evidence. The licence, the risk assessment, the route policy and every decision stay with your team.

#	OBLIGATION	SOURCE	APPLIES FROM	DIDIT PROVIDES	YOUR TEAM KEEPS
1	Hold a CASP authorisation and notify host states	MiCA Arts. 59, 65, 143(3)	1 Jul 2026 at the latest	Not a Didit task	Licence, home regulator, notifications
2	Strong authentication and key protection	DORA Art. 9(4)(d)	17 Jan 2025	Not a Didit task	Authentication and key policy
3	Originator and beneficiary data with each in-scope transfer	TFR Art. 14(1), (2), (4)	30 Dec 2024	Travel Rule exchange in IVMS 101 over the open Travel Rule Protocol, with email fallback	The release decision per transfer
4	Self-hosted wallet ownership above EUR 1,000	TFR Arts. 14(5), 16(2)	30 Dec 2024	Ownership proof by message signing on EVM, Solana, Bitcoin and Tron wallets	Risk-based measures and the outcome
5	Transfers with missing data	TFR Art. 17	30 Dec 2024	Exchange status tracked per transfer	Reject, return or request the data before release
6	Tax data on EU users	DAC8	1 Jan 2026	Tax residency questionnaire template, proof of address	Self-certifications and tax reporting
7	Due diligence on occasional transactions from EUR 1,000	AMLR Art. 19(3)	10 Jul 2027	Identity verification and AML screening per customer	Thresholds and linked-transaction rules
8	Collect the Art. 22(1) data; verify identity under Art. 22(6)	AMLR Art. 22(1), (6)	10 Jul 2027	ID verification, national eIDs, proof of address, database validation	The data map and the route policy
9	Remote document checks with five safeguards	Draft RTS Art. 7	Proposed: six months after entry into force	14,000+ document types, NFC chip reading, liveness, face match, session PDF report	Why the document route was used
10	PEP status determined, before onboarding under the draft	AMLR Art. 20(1)(g); draft RTS Art. 17(1)(a)	10 Jul 2027; draft: proposed	1,300+ lists, daily re-screening; wallet screening in transaction monitoring	PEP approval and risk decisions
11	Beneficial owners verified beyond the register	AMLR Art. 22(7)	10 Jul 2027	Business verification with beneficial owners and linked identity checks	Ownership and control assessment
12	Refresh customer data every 1 or 5 years	AMLR Art. 26(2)	10 Jul 2027	Daily AML re-screening; repeatable verification sessions	Risk classes and the refresh calendar
13	No anonymous crypto-asset accounts, or accounts allowing anonymisation, incl. through anonymity-enhancing coins	AMLR Art. 79(1)	10 Jul 2027	Not a Didit task	Asset and account policy
14	Accept the EUDI Wallet on request	eIDAS Art. 5f(2)	24 Dec 2027 (working date)	Six national eIDs live; EUDI Wallet acceptance is coming soon	Relying-party registration

06 READINESS PLAN

What to do before July 2027

Oct to Dec 2026

Foundations

- ☐ Confirm your MiCA authorisation and host-state notifications
- ☐ Collect DAC8 self-certifications from existing users by 1 Jan 2027
- ☐ Close Travel Rule gaps: reachability, the EUR 1,000 check, time-outs

Jan to Mar 2027

Routes and records

- ☐ Map each Art. 22(1) data point to a source
- ☐ Add an eID route where you have volume
- ☐ Rank customers by risk; set 1- and 5-year refresh cycles

Apr to Jun 2027

Test

- ☐ Test remote document checks against the five safeguards
- ☐ Add a beneficial owner source next to the register
- ☐ Run PEP checks before onboarding

Jul to Dec 2027

Switch over

- ☐ Move policies to the AMLR on 10 July 2027
- ☐ Register as a relying party
- ☐ Test EUDI Wallet acceptance before 24 Dec 2027

Ongoing

Watch

- ☐ Track the Official Journal: the AMLA standards can still change
- ☐ Keep thresholds configurable
- ☐ Watch AMLA's 2027 selection if you serve six or more states

07 HOW DIDIT HELPS

From onboarding to every transfer

Didit is used by 3,000+ companies to verify people and businesses in 220+ countries and territories. Prices per check at didit.me/pricing.

Both AMLR routes

Documents (14,000+ types), NFC chip reading, passive and active liveness, face match: \$0.33 per full KYC check. MitID, BankID Sweden, iDIN, Finnish Trust Network, Smart-ID and Mobile-ID in the same workflow, with a document fallback. EUDI Wallet acceptance is coming soon.

AML screening

1,300+ sanctions, PEP and watchlists for \$0.20 per check. Ongoing monitoring with daily re-screening for \$0.07 per person per year.

Business verification

Company registry data, beneficial owners and linked identity checks for each owner or officer.

Transaction monitoring

Real-time rules for fiat and crypto, wallet screening, alerts, cases and report preparation for the financial intelligence unit, which you file.

Travel Rule

Exchange in the IVMS 101 format over the open Travel Rule Protocol, with an email fallback, plus self-hosted wallet ownership proof by message signing.

Evidence and control

Audit logs, a PDF report per session, retention from 1 month to 10 years, white label. SOC 2 Type 1 and Type 2, ISO/IEC 27001:2022, iBeta Level 1 PAD.

Map your EU flows against this guide

Set up eID and document routes, screening and Travel Rule checks, and test them on your own corridors.

Start free business.didit.me

Talk to us didit.me/get-a-demo

08 SOURCES

Primary sources reviewed for this guide

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- 2 **List of grandfathering periods decided by Member States under Article 143 of MiCA**, ESMA.
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- 7 **Final Report, draft RTS under Article 28(1) AMLR**, AMLA, 30 September 2026, draft Arts. 6, 7, 17, 28, 29.
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- 8 **AMLA finalises key standards for the private sector**, AMLA press release, 1 October 2026.
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- 9 **Final Report, draft RTS under Article 19(9) AMLR**, AMLA, draft Arts. 2(4), 3(2).
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- 10 **Regulation (EU) 2024/1620 establishing AMLA (AMLR)**, Arts. 12, 13, 106.
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- 11 **Explainer: direct supervision by AMLA**, AMLA.
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- 12 **Regulation (EU) 2024/1183 (eIDAS 2.0)**, Arts. 5a, 5b, 5f.
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- 13 **Commission Implementing Regulation (EU) 2024/2977**, published 4 December 2024.
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- 14 **Regulation (EU) 2022/2554, Digital Operational Resilience Act (DORA)**, Arts. 2, 9, 64.
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- 15 **Council Directive (EU) 2023/2226 (DAC8)**, Art. 2 and Annex VI.
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- 16 **MiCA page and interim MiCA register**, ESMA.
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