

AMLD6 and Beneficial Ownership Central Registers: New Access Rules in Ireland

September 2026

During 2026, Ireland introduced amendments to the access regimes applicable to both the Central Register of Beneficial Ownership of Trusts and the Central Register of Beneficial Ownership of Corporate Entities. These reforms represent a significant step in the transition from the previous EU AML framework set out under the Fourth and Fifth Anti-Money Laundering Directives¹ to the new regime established by the Sixth Anti-Money Laundering Directive (**AMLD6**)², which required Member States to implement the relevant access provisions by 10 July 2026.

The reforms set out in AMLD6 reflect the EU legislature's attempt to strike a more appropriate balance between beneficial ownership transparency and the fundamental rights to privacy and data protection following the judgment of the Court of Justice of the European Union in *WM and Sovim*³. As a result, AMLD6 no longer provides for unrestricted public access to central beneficial ownership registers.

Under AMLD6, access to the beneficial ownership registers is now available to three principal categories of persons:

- **Competent authorities** with direct access rights, including national competent authorities, law enforcement authorities, Financial Intelligence Units (FIUs), tax authorities, AML supervisory authorities and certain EU bodies, including AMLA, Europol, Eurojust, OLAF and the European Public Prosecutor's Office.
- **Obligated entities**, including banks, investment firms, trust and company service providers, auditors, accountants

and solicitors, which require access for the purposes of customer due diligence and compliance with anti-money laundering and counter-terrorist financing (AML/CFT) obligations.

- **Persons with a legitimate interest**, including categories of persons deemed by AMLD6 to have such an interest, such as journalists, civil society organisations, academia, prospective transaction counterparties and certain third-country authorities and obliged entities.

In addition, AMLD6 establishes a harmonised EU framework governing the verification of legitimate-interest applications and the mutual recognition of decisions across Member States.

To implement these reforms, two statutory instruments were introduced in Q3 of 2026 amending the Irish beneficial ownership framework:

- the European Union (Anti-Money Laundering: Beneficial Ownership of Trusts) (Amendment) Regulations 2026; and
- the European Union (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) (Amendment) Regulations 2026 (**together the "Irish 2026 Regulations"**).

Prior to the 2026 reforms, a person seeking access to beneficial ownership information under the Irish legitimate-interest regime generally had to establish:

1. that they were engaged in the prevention, detection or investigation of money laundering or terrorist financing;

1. Directive (EU) 2015/849 as amended by Directive (EU) 2018/843

2. Directive (EU) 2024/1640

3. *WM and Sovim SA v Luxembourg Business Registers* (Joined Cases C 37/20 and C 601/20)

2. that they required the information for those purposes; and
3. that the trust or corporate entity was connected with:
 - persons convicted of money laundering or terrorist financing offences; or
 - assets located in a high-risk third country.

The Irish 2026 Regulations replace this approach with the AMLD6 legitimate-interest framework. Access is no longer generally dependent on demonstrating a connection between the relevant trust or corporate entity and criminality or assets located in a high-risk third country. Instead, an applicant must demonstrate a legitimate interest in the prevention and combating of money laundering, its predicate offences or terrorist financing, with certain categories of applicants being deemed to satisfy that requirements.

Certain aspects of the new access regime under the 2026 Regulations, including the statutory timeframes within which the Registrar must deal with legitimate-interest applications, apply from 10 November 2026.

Conclusion

The 2026 amendments to Ireland's beneficial ownership regime represent an important milestone in the implementation of AMLD6. The reforms replace the previous Irish-specific access framework with a harmonised EU approach based on access by competent authorities, obliged entities and persons able to demonstrate a legitimate interest. In doing so, they seek to balance the objective of beneficial ownership transparency with the privacy and data protection rights of beneficial owners while ensuring that beneficial ownership information remains accessible for legitimate AML/CFT purposes.



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