Comment on page 33, paragraph 4:

According to this paragraph: ”Banks ….should apply the risk based approach as set out by the Financial Action Task Force (FATF)…” In my view it is more applicable to refer to the FATF Guidance for a Risk-Based Approach to Virtual Assets and Virtual Asset Service Providers. As far as I know at this moment it is technically not possible to monitor transactions like for fiat currencies, e.g. due to the use of “anonymous” wallets like Metamask. Requiring banks to achieve the same level will be disproportionate.

(see also https://www.fatf-gafi.org/publications/fatfrecommendations/documents/guidance-rba-virtual-assets-2021.html)