Hacia dónde evoluciona la regla

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En la fecha de cierre del estado normativo se apreciaban tres tendencias. En primer lugar, el GAFI había indicado en sus actualizaciones de 2024 y 2025 que presionaría a las jurisdicciones en cuanto a la implantación de la travel rule y al tratamiento de los monederos no alojados. Esa presión podría llevar a la MAS (Monetary Authority of Singapore, la autoridad monetaria y supervisora financiera) a endurecer su enfoque basado en el riesgo y acercarlo al requisito suizo de prueba de control.[1] En segundo lugar, el Reglamento de la Unión Europea sobre transferencias de fondos, aplicable desde el 30 de diciembre de 2024, aplica la travel rule a los proveedores de servicios de criptoactivos sin umbral alguno y exige verificar la titularidad de los monederos autoalojados por encima de 1000 EUR. El estándar de la UE se aproxima, por tanto, al suizo, lo que aumenta la presión sobre Singapur para converger.[2] En tercer lugar, los protocolos del sector se estaban consolidando: IVMS 101 se había adoptado de forma universal para el contenido y un pequeño número de redes eran interoperables entre sí, lo que resta excusas operativas para el incumplimiento.

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Notas

1. FATF, Targeted Update on Implementation of the FATF Standards on Virtual Assets and VASPs, junio de 2025, recomendaciones sobre la exigencia del cumplimiento de la travel rule. ↩
2. Reglamento (UE) 2023/1113, de 31 de mayo de 2023, relativo a la información que acompaña a las transferencias de fondos y de determinados criptoactivos, art. 14 y ss., aplicable desde el 30 de diciembre de 2024; véase la parte O, capítulo II. ↩

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