

To whom it may concern,

The draft Guidelines appropriately acknowledge that Bitcoin addresses may qualify as personal data (§3.2) and that rights to erasure and rectification must remain enforceable (§4.2-4.3).

However, the sole technical safeguard proposed-irreversible anonymisation prior to on-chain recording-is directly prohibited or criminalised under the parallel EU AML framework:

- TFR 2023/1113: Mixers, tumblers, and privacy wallets are flagged as "high-risk factors"; full identification of both originator and beneficiary is mandatory.
- AMLR 2024/1624: CASPs must "not provide or maintain accounts or addresses intended to anonymise" crypto-asset transfers.
- French 'Narcotrafic' law: Presumes money laundering for any use of privacy-enhancing technologies.
- Dutch Tornado Cash ruling: Deems anonymisation tools inherently criminal.

Consequently, it is not feasible to comply simultaneously with the Guidelines (which demand anonymisation) and the AML rules (which prohibit it).

Without further clarification, this contradiction risks creating a regulatory deadlock in which any use of public blockchains becomes unlawful by design.

I respectfully urge the EDPB to examine the compatibility of the EU AML/CFT regime with the GDPR.