To whom it may concern,

The draft Guidelines rightly confirm that Bitcoin addresses may constitute personal data (§ 3.2) and that the right to erasure/rectification must remain effective (§ 4.2-4.3).

However, the only technical mitigation proposed, irreversible anonymisation before writing on-chain, is explicitly prohibited or criminalised by the parallel EU AML package:

- TFR 2023/1113 : mixers, tumblers or privacy wallets are a “high-risk factor”; full identification of the originator and the beneficiary.
- AMLR 2024/1624 : CASPs must “not provide or keep accounts or addresses designed to anonymise” crypto-asset transfers.
- French law "Narcotrafic" creates a presumption of money-laundering for any operation using privacy-enhancing techniques.
- Netherlands, Tornado Cash judgment treats anonymisation tools as inherently criminal.

Thus, it is not possible to simultaneously comply with the Guidelines (anonymise) and the AML framework (forbid anonymisation).

Without clarifications, it will trigger a regulatory impasse where any public-blockchain becomes unlawful by construction.

I respectfully urge the EDPB to question the compatibility of the AML/CFT structure in the EU with the GDPR.