

The Government of Denmark wishes to express its support for the work of the Conference of INGOs (CINGO) and welcomes this opportunity to provide its viewpoints on its 1st report on Denmark.

We appreciated the visit of the CINGO-delegation to Denmark in May 2026.

The Government of Denmark wishes to make use of the possibility to provide some additional information. These will be presented in line with the chronology of the findings and recommendations in the report.

*Section 17: Denmark is estimated to have approximately 100,000 voluntary associations. Because registration is not constitutive for ordinary associations, no official statistics exist concerning the total number of legally existing associations or the proportion that have obtained a Central Business Register (CVR) number.*

Danish comment: It is correct that there are no official statistics on the total number of associations in Denmark, as not all associations are registered with the Central Business Register. For information – as of 21 September 2026 - 36,449 ordinary associations and 84,962 voluntary associations have obtained a Central Business Register number.

*Section 24. Registration is not constitutive for the exercise of freedom of association. However, it becomes necessary where an organisation wishes to acquire certain legal or practical capacities, including opening a bank account, employing staff, entering into contractual relationships or receiving public funding. In practice, many organisations therefore register voluntarily through the Danish Central Business Register (CVR).*

Danish comment: The Danish Financial Supervisory Authority has noted that it is not a legal requirement in the Danish Anti-Money Laundering Act to register an association in order to open a bank account.

*Section 28. Several participants nevertheless observed that recent developments in European anti-money laundering legislation are likely to affect the practical operation of newly established organisations. Although these requirements originate primarily from European Union legislation rather than Danish policy, compliance obligations concerning beneficial ownership, customer due diligence and banking procedures have become increasingly relevant for voluntary organisations, particularly associations operating internationally. Several organisations indicated that access to banking services has become more complex, especially for organisations working with partners in conflict-affected or high-risk jurisdictions. These concerns mirror developments reported elsewhere in Europe and illustrate the unintended consequences that financial regulation may have for legitimate civil society activities. During the meeting with representatives of the ministries, the delegation was informed that efforts are underway to simplify the application of anti-money-laundering requirements to associations, although no further details were available at the time of the visit.*

Danish comment: The Danish Financial Supervisory Authority would like to draw attention to the Guidance on risk assessment of associations, latest version dated August 2025, see [Guidance](#). The Guidance has been developed to facilitate the process when obliged entities, e.g. financial institutions subject to the Anti-Money Laundering Act, have to assess associations in relation to the risk of money laundering and terrorist financing. The Guidance thus eases the burdens for both associations and financial institutions, when associations wish to open a bank

account. It can also be mentioned that work is underway to develop a digital CVR solution for associations.

*Section 32. The delegation also notes a positive recent policy development. In August 2025, the Danish Government presented an initiative to reduce administrative burdens for volunteer associations and strengthen civil society. Building on recommendations developed in consultation with stakeholders, the proposal comprises 30 initiatives aimed at simplifying financial administration, reducing documentation requirements, improving cooperation between associations, banks and municipalities, and creating a more enabling framework for voluntary engagement. The initiative reflects the Government's recognition that excessive administrative requirements may divert time and resources away from the core activities of civil society organisations. Although implementation remains ongoing, the proposal has generally been welcomed by civil society organisations as an important step towards reinforcing the enabling environment for voluntary associations.*

Danish comment: The Danish Financial Supervisory Authority would like to highlight that a working group lead by Finance Denmark, encompassing public authorities and sector organisations, identified a number of common solutions to relieving the administrative burdens of associations and entities in relation to Anti-Money Laundering legislation. The results of the working group were published in a catalogue of ideas dated June 2021, see [Catalogue of ideas](#).