

SUMMARY OF THE 8TH MEETING OF THE GENERAL BOARD IN FIU COMPOSITION

Date	30 April 2026
Time	09:30 – 16:00
Location	Online - WebEx

INTRODUCTION

Discussion

The Chair opened the meeting, informed members that the proceedings were recorded for internal purposes and invited declarations of conflicts of interest.

Conclusion

No conflicts were reported.

1. APPROVAL OF THE AGENDA

Discussion

The Chair proposed the adoption of the agenda. The Chair invited any comments or objections to the agenda, none were voiced.

Conclusion

The Chair concluded that the agenda of the meeting was adopted without changes.

2. APPROVAL OF THE MINUTES OF THE 7TH AMLA GB MEETING IN FIU COMPOSITION

Discussion

The Chair informed the General Board that the minutes have been previously approved through written procedure with no objections.

Conclusion

The General Board took note of the approval of the 7th General Board minutes in Joint composition.

3. JOINT ANALYSES METHODOLOGY (POINT FOR DECISION)

Discussion

AMLA staff presented the Joint Analyses Methodology, explaining that it aims to establish a common framework for the selection, prioritisation and conduct of joint analyses by FIUs at Union level. AMLA staff recalled that the methodology builds on earlier technical work within the FIU

platform and on extensive consultations with General Board Members, and that it is intended to provide a practical and balanced basis for launching joint analyses while allowing for adjustments over time. The main elements highlighted concerned increased transparency towards the General Board prior to the launch of each joint analysis, the supporting role of the Standing Committee, and transitional arrangements excluding third country participation during the initial phase. AMLA staff also informed Members that exchanges with data protection authorities were ongoing. General Board Members broadly welcomed the methodology as a key step towards operationalising joint analyses and expressed support for moving towards implementation without delay. The discussion focused on ensuring that the framework remains efficient, workable in practice and capable of delivering timely results. Members sought clarification on the treatment of third country FIUs, on the development of accompanying technical and practical guidance, and on how data protection requirements would be addressed during implementation. AMLA staff clarified that third country FIUs would not participate during the minimum viable product phase, confirmed that additional practical guidance would be developed, and recalled that the methodology could be reviewed and refined in light of operational experience.

AMLA's Chair summarised the discussion, noted the broad support expressed, and confirmed that the methodology was sufficiently mature to proceed to adoption.

Conclusion and next steps

The General Board approved the Joint Analyses Methodology, allowing AMLA to move forward with implementation and preparation for joint analyses.

4. LAUNCH OF THE PUBLIC CONSULTATION ON THE ITS ON THE FORMAT FOR FIU-TO-FIU EXCHANGES (ART. 31(2) AMLD) (POINT FOR DISCUSSION)

Discussion

AMLA staff introduced the draft implementing technical standards on the format for FIU-to-FIU exchanges, explaining that their objective is to harmonise the structure, content and consent rules governing information exchanges through FIU.net in order to improve efficiency, clarity and data quality. AMLA staff outlined the main elements of the proposal, including harmonised templates for different types of exchanges, standardised consent mechanisms and alignment with related technical standards.

General Board Members expressed broad support for launching the public consultation and recognised the operational importance of the initiative. The discussion focused on implementation challenges, in particular the need to ensure consistency of data fields across mandates and the effort required to achieve interoperability with national systems. Members also noted the value of gathering feedback from a wide range of stakeholders through the public hearing.

AMLA staff responded by clarifying that work on interoperability and data consistency was ongoing, including through cooperation with FIU.net developers and participation in relevant working

groups. AMLA staff confirmed that the public consultation would include an online public hearing taking place shortly after publication of the consultation paper and that all stakeholders would be able to participate. AMLA's Chair noted that the item concerned the launch of the public consultation rather than adoption of the standards, and invited any objections to proceeding as proposed.

Conclusion

AMLA's Chair concluded that there were no objections and that the public consultation on the draft implementing technical standards on the format for FIU-to-FIU exchanges would be launched as presented.

5. LAUNCH OF THE PUBLIC CONSULTATION ON THE ITS ON THE FORMAT FOR REPORTING OF INFORMATION BY THE FIUS TO EPPO (ART. 81(1) AMLR) (POINT FOR DISCUSSION)

Discussion

AMLA staff presented the draft implementing technical standards on the format for FIU reporting to EPPO, explaining that the initiative seeks to harmonise reporting practices and improve the efficiency and clarity of information transmission in cases falling within EPPO competence. The proposal introduces a common reporting template, promotes the use of machine readable formats and clarifies how restrictions of use should be indicated, while remaining technologically neutral as regards communication channels. General Board Members broadly supported the launch of the public consultation and acknowledged the operational value of a harmonised approach. The discussion highlighted the need to ensure realistic implementation timelines, alignment with other ongoing technical standards and sufficient clarity on technical specifications to support national information technology adaptations. Members also raised questions on the scope of permitted use of information by EPPO. AMLA's Chair summarised the discussion and confirmed that the consultation would provide an opportunity to gather feedback on these issues and to refine the proposal accordingly.

Conclusion and next steps

AMLA's Chair concluded that there were no objections to proceeding and that the public consultation on the draft implementing technical standards on the format for reporting of information by FIUs to EPPO would be launched.

6. LAUNCH OF THE PUBLIC CONSULTATION ON THE ITS ON THE FORMAT FOR REPORTING OF INFORMATION BY AMLA TO EPPO (ART. 41(2) AMLAR) (POINT FOR DISCUSSION)

Discussion

The Chair invited AMLA staff to introduce the agenda item concerning the launch of the public consultation on the Implementing Technical Standards setting out the format for reporting information by AMLA to the European Public Prosecutor's Office.

AMLA staff explained that the Implementing Technical Standards were developed in parallel with the standards on reporting by Financial Intelligence Units to the European Public Prosecutor's Office, given the similarity of the objectives and operational requirements. AMLA staff recalled that the mandate is based on Article 41(2) of the Anti-Money Laundering Authority Regulation and aims to ensure a harmonised, structured and efficient reporting framework for the transmission of the results of joint analyses.

AMLA staff outlined the main features of the draft standards, noting that the reporting template largely mirrors the template applicable to Financial Intelligence Units in order to ensure alignment and ease of use. The template builds on previous work carried out within the Financial Intelligence Unit platform and on the reporting, model used by the European Public Prosecutor's Office for other authorities. AMLA staff highlighted that the proposed format is designed to be machine-readable and to facilitate secure and efficient handling of information by the European Public Prosecutor's Office.

AMLA staff further explained that the Implementing Technical Standards provide for a flexible and technology-neutral communication channel. While the possibility of using FIU.net is envisaged should the European Public Prosecutor's Office connect to the system, alternative secure channels would remain available, in particular for the initial phase when such a connection may not yet be in place. The draft standards also include provisions requiring AMLA to indicate any applicable restrictions on the use of the information, without establishing new legal bases for such restrictions.

The Chair invited comments from the General Board. No General Board member requested the floor.

Conclusion and next steps

The General Board Members agreed to proceed with the launch of the public consultation on the Implementing Technical Standards as presented.

7. RTS 31(3) AMLD– STATE OF PLAY (POINT FOR INFORMATION)

Discussion

The Chair invited AMLA staff to provide an update on the state of play of the draft Regulatory Technical Standards under Article 31(3) of the Anti-Money Laundering Directive. AMLA staff explained that the draft standards aim to specify the relevance and selection criteria to be applied when determining whether a suspicious transaction report concerns another Member State and should therefore be transmitted as a cross-border report or a cross-border dissemination.

AMLA staff outlined the key elements of the proposed approach, notably the distinction between cross-border reports and cross-border disseminations and the differentiated treatment

applicable to each. It was explained that, for cross-border reports, the draft focuses on identifying objective criteria linked to the location of the customer, while for cross-border disseminations the draft introduces more restrictive criteria in order to ensure proportionate information sharing and to avoid unnecessary transmission of personal data.

AMLA staff further explained that the draft standards envisage a tiered structure for cross-border disseminations and provide that, at an initial stage, only a limited set of key information would be transmitted. The assessment of relevance would subsequently be carried out by the receiving authority, which would be able to request additional information if needed. AMLA staff also highlighted that the draft addresses scenarios where cross-border reports and cross-border disseminations may need to be transmitted simultaneously in order to ensure consistent information flows.

A General Board Member raised a point concerning the practical and consistent use of matching tools in the context of cross-border analysis. AMLA staff acknowledged the importance of the issue and explained that the draft standards seek to promote consistency by requiring the use of full matches for certain selection criteria, while taking note of the need for further consideration within the scope of the mandate.

Conclusion

The General Board Members took note of the update provided by AMLA staff on the draft Regulatory Technical Standards under Article 31(3) of the Anti-Money Laundering Directive and of the planned next steps, including the launch of a public consultation via written procedure.

8. STANDING COMMITTEE – STATE OF PLAY (POINT FOR INFORMATION)

Discussion

The Chair invited AMLA staff to provide an update on the establishment of the Standing Committee. AMLA staff reported on the work of the dedicated working group tasked with drafting the rules of procedure and explained that agreement had been reached on most elements of the framework.

AMLA staff outlined that two issues remained under discussion, namely the scope of the Standing Committee's mandate and the possibility for a member of the Executive Board to act as co-chair. General Board Members emphasised the practical importance of the Standing Committee as a support structure and called for its rapid establishment. Several General Board Members supported a pragmatic and balanced approach consisting of a broader mandate for the Standing Committee, allowing it to support the General Board across its tasks, combined with the involvement of a member of the Executive Board in a co-chairing role, while maintaining the Committee's advisory role.

The Commission representative indicated that, as a policy matter, the involvement of a member of the Executive Board would not be incompatible with the Regulation if supported by Member States, while noting that further legal clarification could be sought on the scope of the mandate.

Conclusion and next steps

The General Board Members took note of the update and expressed broad support for moving forward rapidly with the establishment of the Standing Committee on the basis of a balanced and pragmatic approach. AMLA staff were invited to reflect this approach in revised draft documents and to advance the process accordingly.

9. UPDATE ON FIU PILLAR WORKSTREAMS, 9.1. JOINT ANALYSES MINIMUM VIABLE PRODUCT, 9.2. FIU PEER REVIEWS 2026 – STATE OF PLAY, 9.3. FIU.NET TRANSFER – STATE OF PLAY (POINT FOR INFORMATION)

Discussion

The Chair invited AMLA staff to provide an update on the main workstreams currently underway within the FIU pillar, with a focus on operational readiness, cooperation mechanisms and infrastructure.

AMLA staff first presented the state of play concerning the Joint Analyses Minimum Viable Product. AMLA staff explained that this workstream aims to establish the minimum operational, technical and security conditions required to enable the launch of joint analyses between AMLA and Financial Intelligence Units. The presentation highlighted the minimum viable product approach, which prioritises security, data protection compliance and essential functionality for initial joint analyses, while allowing for further development over time. AMLA staff outlined progress made on defining internal workflows, secure communication and collaboration tools, and risk mitigation measures related to information security and data protection.

AMLA staff then presented an update on the FIU Peer Reviews 2026 pilot exercise. AMLA staff explained that the pilot is intended to serve as a learning and capacity building phase for the future peer review framework. The presentation covered the level of participation, the establishment of a peer review team composed of AMLA staff and nominated experts, and the methodological preparation carried out through a dedicated workshop. AMLA staff outlined the next steps of the exercise, including the distribution of a questionnaire, analysis of responses and subsequent drafting stages. General Board Members took note that participation is voluntary and that some Financial Intelligence Units had opted out due to resource constraints, recent or upcoming evaluations, while supporting the overall objective of the peer review framework.

Finally, AMLA staff presented an update on the FIU.net transfer. AMLA staff explained that this project concerns the transfer of both operational responsibility and technical ownership of FIU.net from the European Commission to AMLA. The presentation addressed the project governance structure, the involvement of key stakeholders, and the overarching objective of ensuring uninterrupted service, data security and continuity throughout the transition. AMLA staff outlined progress achieved, ongoing preparatory work and forthcoming milestones related to hosting, governance arrangements and operational handover.

Conclusion

The General Board Members took note of the updates provided by AMLA staff on the Joint Analyses Minimum Viable Product, the FIU Peer Reviews 2026 pilot exercise and the FIU.net transfer, and of the continued progress across all three workstreams.

10. ANY OTHER BUSINESS

Discussion

The Chair invited the General Board to raise any other business.

A General Board Member drew attention to a pending case before the Court of Justice of the European Union concerning the applicable data protection framework for the activities of Financial Intelligence Units, in particular the distinction between the General Data Protection Regulation and the Law Enforcement Directive. It was explained that the outcome of the case could have significant implications for the operational functioning of Financial Intelligence Units, including information processing, data retention and cooperation with law enforcement authorities and international partners.

The General Board Member recalled that a hearing was scheduled in the near future and invited other Member States to consider supporting a coordinated approach, including participation in the proceedings or alignment of arguments, in order to safeguard the effectiveness of the Financial Intelligence Unit framework. The possibility of holding an ad hoc exchange among General Board Members to facilitate coordination was proposed.

Several members intervened to underline the importance of the issue for all Financial Intelligence Units, given its potential impact on professional secrecy, operational autonomy and information exchange. Countries expressed interest in participating in a dedicated exchange of views and highlighted the value of developing a shared understanding and, where possible, common positions. Some countries referred to their national experience with access requests and the relevance of indirect access mechanisms and safeguards.

AMLA's Chair acknowledged the importance of the matter and confirmed AMLA staff's willingness to support an ad hoc exchange of views among General Board Members, within AMLA's mandate, in order to facilitate information sharing and coordination ahead of the upcoming hearing.

Conclusion

The Chair concluded that the General Board took note of the issue raised under any other business and of the expressed interest in further coordination. The Chair confirmed that AMLA staff would explore the organisation of an ad hoc exchange among General Board Members in the short term. AMLA staff will liaise with interested General Board Members to organise an ad hoc exchange of views on the data protection issues raised and the forthcoming proceedings before the Court of Justice of the European Union.

Annex - Written procedures concluded by the General Board (in FIU composition) until 30 April 2026

- GBFIUX021 – 2026 – wp – Draft minutes of the 5th GB meeting
- GBFIUX022 – 2026 – wp – Draft minutes of the 6th GB meeting
- GBFIUX023 – 2026 – wp – Estonia delegate approval
- GBFIUX024 – 2026 – wp – Review of GB RoPs
- GBFIUX025 – 2026 – wp – Call for participation in the 2026 FIU Peer Review
- GBFIUX026 – 2026 – wp – Draft minutes of the 7th GB meeting in JOINT composition of 4 February 2026
- GBFIUX027 – 2026 – wp – Draft minutes of the 7th GB meeting in FIU composition of 4 February 2026
- GBFIUX028 – 2026 – wp – FIU delegates status at AMLA
- GBFIUX029 – 2026 – wp – Draft minutes of the 7th GB meeting in FIU & JOINT of 4 February 2026
- GBFIUX030 – 2026 – wp – FIU Germany delegate approval
- GBFIUX031 – 2026 – wp – GB meeting dates

LIST OF PARTICIPANTS

MEMBER STATES

- Austria
- Belgium
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- France
- Finland
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Netherlands
- Malta
- Poland

- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden

EEA OBSERVER STATES

- Iceland
- Lichtenstein
- Norway

EU OBSERVER INSTITUTIONS

- EUROPOL
- EUROJUST

EUROPEAN COMMISSION

- EC

AMLA

- Chair
- Executive Board Members
- Executive Director
- AMLA staff