SUMMARY OF THE 5TH AMLA GENERAL BOARD MEETING IN SUPERVISORY (SUP) COMPOSITION

5th General Board Meeting

Date	10 December 2025
Time	09:00 – 15:05
Location	Online - remotely by video conference

INTRODUCTION

Discussion

The Chair opened the online meeting and invited General Board Members to declare any conflicts of interest. AMLA staff noted that a policy update would be delivered under the relevant agenda item later in the meeting.

Conclusion

No conflicts of interest were declared, the meeting was declared open, and the agenda sequence confirmed.

1. APPROVAL OF THE AGENDA

Discussion

The Chair sought comments on the agenda. No changes were proposed by the General Board Members.

Conclusion

The General Board approved the agenda.

2. APPROVAL OF 4TH GENERAL BOARD MINUTES IN SUP COMPOSITION

Discussion

The Chair asked General Board Members if they had comments on the draft minutes of the previous meeting. No changes were requested.

Conclusion

The General Board approved the minutes of the 4th General Board meeting in Supervisory composition.

3. GENERAL INTRODUCTION TO MANDATES, UPDATE ON POLICY WORK (POINT FOR INFORMATION)

Discussion

AMLA staff reported increased activity on policy mandates and indicated that some timelines may need adjustment. They highlighted three areas for a revised approach: allowing more time to align the Regulatory Technical Standards (RTS) on the central AML/CFT database with IT and data work; developing the non-financial-sector risk assessment methodology through a dedicated project with targeted engagement; and reprioritising the RTS on central contact points pending further assessment.

General Board Members welcomed the focus on proportionality, emphasised the needs of the non-financial sector, requested broader participation in working groups, and sought clarity on timelines. AMLA staff confirmed that working-group structures will be reviewed, reiterated that the non-financial-sector methodology will be tailored accordingly, and noted that discussions with the Commission on timelines are ongoing.

Conclusion

The General Board supported the proposed approach.

4. AMLA'S PROPOSED WAY FORWARD ON RISK ASSESSMENT METHODOLOGIES

a) **PRESENTATION OF AMLA'S APPROACH RELATED TO THE EBA'S WORK ON RTSS AND PRELIMINARY PLANS TO TAKE THE EBA FORWARD ON TESTING AND FINE-TUNING**

b) **APPROVAL OF DRAFT RTS UNDER ARTICLE 40(2) – FINAL TEXT**

c) **APPROVAL OF DRAFT RTS UNDER ARTICLE 12(7) – FINAL TEXT (POINT FOR DECISION)**

Discussion

AMLA staff presented two draft Regulatory Technical Standards — one on the common risk-assessment methodology under Article 40(2) and one on the selection methodology and materiality thresholds under Article 12(7). They noted that targeted clarifications had been made to support the timely start of the selection process, while certain elements such as indicator weights and thresholds would remain outside the standards to allow future adjustments. AMLA staff also outlined plans to test the model in 2026 through a dedicated working group using sample data from national authorities, ahead of the first selection cycle in 2027.

General Board Members expressed support for the RTSs and supported establishing a working group for testing and calibration.

Conclusion

The General Board approved the submission of both draft RTSs to the European Commission. The General Board endorsed the establishment of a working group on testing and calibration and welcomed a centralised and harmonised approach to data collection, data-quality controls, and communication.

Next steps

AMLA staff will transmit the RTSs to the European Commission, launch the testing and calibration working group and invite further nominations, request preliminary lists of potentially eligible entities on a best-effort basis, publish taxonomy, templates, and validation rules by the end of April, clarify the centralised data-collection approach ahead of September, and provide a communication plan and interpretive materials at the next meeting.

5. EUROPEAN BANKING AUTHORITY (EBA) HAND-OVER AND AMLA'S WAY FORWARD (POINT FOR INFORMATION)

Discussion

AMLA staff updated General Board Members on the hand-over from the European Banking Authority, covering the current business operation and planned IT migration of EuReCA, the hosting and transfer of the AML colleges platform, the receipt of documentation and reinforcement of expertise, and the intention to build AMLA's mandates on this legacy.

General Board Members stressed the need for proactive communication with stakeholders as the framework evolves.

Conclusion

General Board Members took note of the update and the planned communications and cooperation arrangements.

Next steps

AMLA staff will proceed with the migration of tools, maintain cooperation with the European Banking Authority, and issue joint communications in early January.

6. PRESENTATION FROM TWO MEMBER STATE SUPERVISORY AUTHORITIES ON RECENT AML CASES (POINT FOR DISCUSSION)

Discussion

AMLA staff introduced case presentations as a standing item. General Board Members heard examples of enforcement action in the crypto-asset sector, supervisory responses to a large card-fraud scheme, and measures addressing systemic reporting deficiencies and outsourcing weaknesses. General Board Members welcomed continued case-sharing and highlighted the value of focusing on practical implementation challenges.

Conclusion

General Board Members took note and supported the continuation of case presentations.

Next steps

AMLA staff will continue this series and consider targeted work on issues raised by new market participants.

7. IMPLEMENTING TECHNICAL STANDARDS (ITS) ON COOPERATION FOR DIRECT SUPERVISION (AMLA-R ART. 15(3)) – APPROVAL OF DOCUMENTS FOR PUBLIC CONSULTATION (POINT FOR DECISION)

Discussion

AMLA staff introduced, for approval, a consultation paper and draft Implementing Technical Standard (ITS) under Article 15(3) AMLA Regulation on cooperation arrangements for direct supervision.

Conclusion

General Board Members approved the launch of the consultation with a 6-week consultation period.

Next steps

AMLA staff will publish the consultation and prepare the final report for the second quarter of 2026.

8. CONSOLIDATED PLANNING OF THEMATIC REVIWS (POINT FOR INFORMATION)

Discussion

The Chair opened the item and invited AMLA staff to present the consolidated plan for thematic reviews in 2026 and the proposed approach to improve comparability and convergence.

AMLA staff reported strong engagement across sectors but noted significant differences in how subjects and obliged entities are defined, which limits comparability across jurisdictions. AMLA proposed a phased approach that would refine common definitions, promote consistent scoping and core question sets, identify opportunities for alignment, and assess where EU-level coordination could support joint thematic reviews in higher-risk areas.

General Board Members supported focusing on methodology and process in 2026, noting planning constraints and the need for clear scopes, definitions, and timelines.

Conclusion

General Board Members took note of the briefing and supported focusing on methodology in 2026, with joint reviews to be considered from 2027.

Next steps

AMLA staff will refine the methodology, set out a process and indicative timelines for alignment and potential joint reviews, and share outcomes of national reviews to support convergence.

9. OPERATIONAL RULES FOR THE ESTABLISHMENT OF INTERNAL COMMITTES (POINT FOR DECISION)

Discussion

The Chair opened the item and AMLA staff briefed General Board Members on Rules of Procedures and operational arrangements for the internal committees, associated reporting lines, and the fast-tracked establishment of a working group on enforcement.

General Board Members supported the proposals, requested clarifications on representation, participation, document circulation and scheduling, and asked that observer participation be reflected in the committees' terms of reference.

Conclusion

General Board Members endorsed the approach, confirmed the rapid launch of the enforcement working group, and agreed to adopt the Rules of Procedure subject to minor drafting adjustments.

Next steps

The Chair will invite nominations for co-chairs and members. AMLA staff will revise the documentation, circulate materials in advance of meetings, and proceed with written procedure for adoption.

10. ANY OTHER BUSINESS

Discussion

The Chair opened the item. General Board Members raised questions on addressing private sector guidance needs and the scope for national authorities to issue guidance. AMLA staff highlighted the importance of coordinated, consistent interpretation and indicated that an approach to guidance is being considered.

Conclusion

General Board Members took note of the discussion. The Chair closed the meeting and indicated that follow-up communications would be provided.

Next steps

AMLA staff will develop and share an approach to guidance and related communications.

ANNEX

Written procedures concluded by the General Board (in supervisory composition) until 9 December 2025:

- GBSUPX011 – Written procedure – Final schedule of GB meetings in 2026 - launched the 29/10/2025
- GBSUPX012 - 2025 - Written procedure - Draft minutes of the 4th GB meeting in SUP - launched the 17/11/2025

PARTICIPANTS

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- Cyprus
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- Estonia
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- France
- Germany
- Greece
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EUROPEAN COMMISSION

- EC

EU OBSERVER INSTITUTIONS

- EBA
- ECB
- EIOPA

EEA OBSERVER STATES

- Lichtenstein
- Norway

AMLA

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