SUMMARY OF THE 5TH AMLA GENERAL BOARD MEETING IN FINANCIAL INTELLIGENCE UNITS (FIU) COMPOSITION

5th General Board Meeting

Date	9 December 2025
Time	09:00 – 12:15
Location	Online - remotely by video conference

INTRODUCTION

Discussion

The Chair outlined the procedure for requesting the floor and invited General Board Members to declare any conflicts of interest.

Conclusion

No conflicts of interest were declared, and the meeting proceeded.

1. APPROVAL OF THE AGENDA

Discussion

The Chair invited General Board Members to approve the agenda.

Conclusion

The agenda was approved.

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

Discussion

The Chair informed Board Members that a written procedure had been conducted, and one substantive comment was incorporated into the final text. No further comments were raised.

Conclusion

The minutes of the previous meeting were approved.

3. STATE OF PLAY OF THE TRANSFER OF THE FIU.NET FROM THE EUROPEAN COMMISSION TO AMLA (POINT FOR INFORMATION)

Discussion

The Chair introduced the item and invited AMLA staff to provide an update.

AMLA staff set out the timeline to July 2027, the priority to maintain continuity of service, the transitional role of the Advisory Group, the post-transfer integration within AMLA with data ownership remaining with Financial Intelligence Units, and the ongoing work on infrastructure, security, and data protection.

General Board Members discussed the future governance model and involvement of Financial Intelligence Units and expressed support for the proposed timeline.

Conclusion

The General Board took note of the update.

Next steps

AMLA staff will continue implementation and provide the next update to the General Board in April 2026.

4. REQUIRED PROCESS AND FEATURES FOR THE LAUNCH OF JOINT ANALYSES (POINT FOR INFORMATION)

Discussion

The Chair introduced the item and invited AMLA staff to provide an update.

AMLA staff outlined the intention to launch pilot joint analyses in the second half of 2026, to consolidate methods, criteria, and procedures in a single document with transitional clauses for the pilot, and to use FIU.net with incremental improvements where feasible.

General Board Members supported the objective and asked for clarity on interim tooling, secure storage, and hosting options, and sought assurance that participation remains voluntary and that resource contributions are at the discretion of each Financial Intelligence Unit.

AMLA staff confirmed the timeline, the voluntary nature of participation, the circulation of the consolidated document in early January, and that a reminder on priority areas would be issued.

Conclusion

General Board members noted the update.

Next steps

AMLA staff will circulate the consolidated document, issue the reminder on priority areas, continue operational readiness work and report back at the next meeting.

5. PEER REVIEW WORKPLAN (POINT FOR DISCUSSION)

Discussion

The Chair invited AMLA staff to present the 2026 to 2027 peer review work plan.

AMLA staff outlined two successive one-year reviews with teams composed of AMLA staff and Financial Intelligence Unit representatives, the proposed themes of resource adequacy for 2026 and reporting quality with analytical tools for 2027, a light overview of remaining points, and the intention to issue a call for volunteers in January and to hold a preparatory workshop.

General Board Members supported the approach and raised questions on confidentiality and publication of outputs, the participation of Financial Intelligence Unit delegates, selection criteria for reviewers, provision of training, and the timing of invitations. One Member suggested retaining flexibility to revisit the 2027 theme.

Conclusion

The Chair noted the discussion and the broad support.

Next steps

AMLA staff will proceed with the call for volunteers, the preparatory workshop, options on confidentiality and publication, and the possibility to revisit the 2027 theme based on lessons learned.

6. FIU DATA COLLECTION AND MAPPING (POINT FOR INFORMATION)

Discussion

The Chair invited AMLA staff to provide an update on the initiative to collect and map information on Financial Intelligence Units.

AMLA staff outlined the objective to establish a comprehensive and regularly maintained view of the legal frameworks, organisation, and activities of Financial Intelligence Units to support peer reviews, mutual assistance, and other tasks under the applicable legal framework. AMLA staff explained that a dedicated data platform would be developed for entry and viewing by Financial Intelligence Units, with content structured for comparability and aligned, where relevant, with existing exercises and statistical collections. Collection would be led by Financial Intelligence Unit delegates with verification by the respective authorities to minimise administrative burden.

General Board Members asked about transparency, consent for viewing entries among Financial Intelligence Units, access and publication modalities.

AMLA staff confirmed that the platform aims to be transparent for the community, that consent for viewing would be sought as good practice, and that modalities would be presented to the General Board.

Conclusion

The General Board noted the update.

Next steps

AMLA staff will present the draft questionnaire in April 2026, prepare the platform and temporary solutions, and return with proposals on access and publication modalities.

7. PROPOSAL FOR THE WAY FORWARD ON THE ESTABLISHMENT OF THE STANDING COMMITTEE FOR THE FIU PILLAR (ART. 58(4) AMLAR) (POINT FOR DECISION)

Discussion

The Chair invited AMLA staff to present a way forward for establishing the Standing Committee.

AMLA staff proposed a dedicated Working Group comprising AMLA staff, Financial Intelligence Unit representatives and legal advisors from the European Commission to finalise a consolidated draft of the Rules of Procedure, with an eight-week target and possible limited flexibility.

General Board Members supported the approach, emphasised the urgency and the need to safeguard the autonomy of Financial Intelligence Units, and asked about the availability of the European Commission's legal services.

Conclusion

The Chair noted the support and confirmed that the proposal was approved.

Next steps

AMLA staff will set up the Working Group, issue invitations, coordinate with the European Commission's legal services and return with a consolidated proposal within the agreed timeframe.

8. STATE OF PLAY: RIGHTS & OBLIGATIONS OF FIU DELEGATES (POINT FOR INFORMATION)

Discussion

The Chair invited AMLA staff to provide an update.

AMLA staff reported that the human resources policy package, including rules for Seconded National Experts and Financial Intelligence Unit delegates, is in final drafting. AMLA indicated that the section on rights and obligations of FIU delegates will be submitted to the General Board for consultation by written procedure prior to adoption.

General Board Members welcomed the progress and requested that the broader package be shared to support transparency and informed comments.

AMLA staff confirmed that the package would be shared for information when ready, with formal consultation on the specific section.

Conclusion

The Chair noted the update.

Next steps

AMLA staff will conduct the written consultation on the rights and obligations section, share the broader package for information, and proceed to adoption by the Executive Board thereafter.

9. ANY OTHER BUSINESS

Discussion

The Chair invited items under "Any other business".

General Board Members supported holding a joint discussion at the next meeting on crypto-asset analytics and related tooling with relevant Union bodies.

Conclusion

The Chair noted the points.

Next steps

AMLA staff will arrange the joint discussion for February.

ANNEX

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

- GBFIUX014 - 2025 - Written procedure - Mediation RoP - launched the 24/10/2025
- GBFIUX015 - Written procedure– Final schedule of GB meetings in 2026 - launched the 29/10/2025
- GBFIUX016 - Written procedure- Approval of the Belgian FIU delegate - launched the 30/10/2025
- GBFIUX017 - 2025 - Written procedure- Draft minutes of the 4th GB meeting in FIU - launched the 17/11/2025

PARTICIPANTS

MEMBER STATES

- Austria
- Belgium
- Bulgaria
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Luxembourg
- Malta
- Netherland
- Poland
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden

EUROPEAN COMMISSION

- EC

EU OBSERVER INSTITUTIONS

- EPPO
- EUROJUST
- EUROPOL

EEA OBSERVER STATES

- Iceland
- Lichtenstein
- Norway

AMLA

- Chair
- Executive board members
- Executive Director
- AMLA staff