PUBLIC

# SUMMARY OF THE 4TH AMLA GENERAL BOARD MEETING IN SUPERVISORY (SUP) COMPOSITION

## 4th General Board Meeting

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| **Date** | 13 October 2025 |
| **Time** | 15:30 – 18:15 |
| **Location** | Frankfurt am Main, on-site |

### 1. ADOPTION OF THE AGENDA

**Discussion**

The Chair presented the agenda for the meeting in Supervisory composition, invited General Board Members to propose any amendments and to declare any interests in line with the Rules of Procedure. General Board Members did not request changes and did not signal conflicts of interest.

**Outcome**

The General Board approved the agenda as proposed.

### 2. INFORMATION ON THE TAKEOVER OF EUROPEAN COMMISSION WORKSTREAM ON THE NON-FINANCIAL SECTOR (POINT FOR INFORMATION)

**Discussion**

The Chair recalled the preparatory work undertaken since April 2024 and confirmed that responsibility for the non-financial sector workstreams was handed over to AMLA in September 2025. The Chair noted that questions on timing and scope would be linked to the discussion under Joint composition on the Single Programming Document and invited General Board Members to comment on approach and consultation.

AMLA staff outlined ongoing preparations on draft regulatory standards for the non-financial sector, covering the risk assessment methodology for obliged entities, the assessment of the gravity of breaches of anti-money laundering and counter-terrorist financing obligations, and customer due diligence requirements.

AMLA staff described the planned process using working groups and the expert network and sought views on conducting a public consultation.

General Board Members expressed broad support for launching a public consultation and favoured separating the financial-sector and non-financial-sector processes to tailor the work and avoid delays. Members highlighted sector specificities, the need to deepen understanding across diverse activities, and cautioned against aiming for the lowest common denominator or directly reusing financial-sector frameworks for the non-financial sector. It was noted that splitting processes is legally feasible where justified, while statutory deadlines remain unchanged.

**Conclusion**

The General Board took note of AMLA's assumption of the non-financial sector workstreams and endorsed a phased, proportionate approach, with strong stakeholder engagement.

**Next steps**

AMLA will continue preparations, determine the consultation approach, and reflect Members' input. Follow-up will be provided in the Joint composition discussion on planning and sequencing.

## 3. UPDATE FROM THE EUROPEAN BANKING AUTHORITY (EBA) ON THEIR WORK ON AML/CFT (POINT FOR DISCUSSION)

**Discussion**

In her introduction, the Chair indicated that this item would focus on the AML/CFT work conducted by the EBA and on how AMLA aims to build on this.

A presentation by the EBA outlined transition priorities, namely ensuring continuity of activity, transferring systems, data and knowledge, and strengthening cooperation arrangements. AMLA staff described progress on receiving deliverables, preparing to finalise mandates stemming from the call for advice, transferring the central reporting database and related tools, and integrating documentation to support future work.

General Board Members thanked those involved in the transition and asked AMLA to move swiftly on the risk assessment methodology for the financial sector and the selection for direct supervision, focusing on calibration, thresholds and weights rather than revisiting data points. Members supported establishing an AMLA-coordinated working group, called for timely communication to industry and national authorities, and underlined the value of public consultation. On customer due diligence, Members stressed a risk-based and proportionate approach and cautioned against adding requirements that would go beyond what is necessary.

The Chair highlighted the importance of a robust, uniform risk model to support supervisory convergence and welcomed continued stakeholder engagement in relation to customer due diligence, noting that some aspects may require further discussion after the handover.

**Conclusion**

The General Board took note of the update and the priorities for the transition.

### Next steps

AMLA will refine the risk methodology, consider establishing a dedicated working group, communicate the roadmap and consultation approach, continue the transfer of systems and documentation, and report back with further progress.

## 4. QUESTIONNAIRE ON THEMATIC REVIEW (ART. 9 AMLA-R) (POINT FOR INFORMATION)

### Discussion

The Chair recalled that, under Article 9 of the AMLA Regulation, AMLA will circulate a questionnaire to gather thematic reviews planned by supervisory authorities for 2026, and invited General Board Members to comment on scope, timing and submission arrangements.

AMLA presented the structure and purpose of the questionnaire and explained that the results will inform a consolidated plan to be submitted to the General Board at the December meeting.

General Board Members welcomed the initiative and the opportunity to share plans across authorities. It was confirmed that all thematic reviews should be included, and that submissions are to be made by supervisory authorities. Some Members raised concerns about the submission deadline given internal scheduling cycles.

AMLA clarified that the timeline follows the Regulation and that provisional entries are acceptable where final plans will be agreed after the deadline.

### Conclusion

The General Board took note of the forthcoming questionnaire and the approach to consolidation.

### Next steps

AMLA will circulate the questionnaire, receive submissions from supervisory authorities, and prepare a consolidated overview for the December meeting.

## 5. SET-UP OF INTERNAL COMMITTEES OF THE GENERAL BOARD IN SUPERVISORY COMPOSITION (POINT FOR DECISION)

### Discussion

The Chair recalled that the proposal builds on the discussion held in May and the comments received from General Board Members. The Chair indicated that, subject to approval, operational procedures would be submitted in December with a view to launching the internal committees at the beginning of 2026, and invited Members to focus on representation, chairing arrangements, and mandates.

AMLA staff presented the proposed framework covering representation and co-chairing, and the mandates for the first two committees. General Board Members welcomed joint chairing to strengthen ownership, flexible membership, and attention to the specificities of the non-financial sector.

Members asked that committees steer, rather than duplicate, existing working groups, concentrate on strategic matters without pre-empting General Board discussions, and prioritise the most urgent deliverables given the breadth of mandates. Members also supported the involvement of observers in the committees.

**Conclusion**

The General Board approved by consensus the establishment of an internal committee on private-sector standards and an internal committee on the functioning of the supervisory system.

**Next steps**

AMLA will submit operational rules for approval in December, launch calls for co-chairs and nominations and finalise rules of procedure for the committees.

## 6. UPDATE ON AMLA'S WORK IN POLICYMAKING AND IN COMMENCING INDIRECT SUPERVISION (POINT FOR INFORMATION)

**Discussion**

The Chair invited General Board Members to focus comments on the state of play of policy mandates and the early steps to commence indirect supervision, including the central AML/CFT database and cooperation instruments.

AMLA staff presented the progress across level-two and level-three mandates and outlined preparations for public consultation where relevant.

General Board Members welcomed the update and asked for greater granularity in the reporting of sanctions and breaches within the central database, clear technical requirements to enable automation by national authorities, and safeguards consistent with the General Data Protection Regulation. Members underlined the importance of timely coordination on cooperation instruments for direct supervision and for home-host interactions. Some also noted difficulties in agreeing on Article 19(9) of the Regulatory Technical Standards of the Anti-Money Laundering Regulation on thresholds and criteria to identify business relationships, occasional transactions and linked transactions, pointing to divergent interpretations at national level. Members encouraged AMLA to continue stakeholder engagement and to ensure proportionate, risk-based requirements.

**Conclusion**

The General Board took note of the update and highlighted priorities on the central database, cooperation instruments, and clarification of threshold criteria.

**Next steps**

AMLA will refine the drafts for regulatory and implementing technical standards, detail technical specifications for data reporting and automation, address data-protection considerations, prepare consultation materials where applicable, and report back on progress.

## ANNEX

**Written procedures concluded by the General Board (in supervisory composition) until 13 October 2025:**

- Written procedure for **approval** on the "Records of proceedings (for the European Parliament) of the meeting of the General Board of 13-14 May 2025" (GBSUP/X/25/8), with a deadline of 3 July 2025,
- Written procedure for **comments** following up on the meeting of 18 June 2025 on the document on the "minutes of the 3rd General Board meeting" (GBSUP/X/25/9), with a deadline of 11 July 2025,
- Written procedure for **approval** on the "Records of proceedings (for the European Parliament) of the meeting of the General Board of 18 June" (GBSUP/X/25/10), with a deadline of 29 July 2025.

## PARTICIPANTS

### MEMBER STATES

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain

### EUROPEAN COMMISSION

- EC

### EU OBSERVER INSTITUTIONS

- EIOPA
- ECB
- EBA

### EEA OBSERVER STATES

- Iceland
- Norway
- Lichtenstein

### AMLA

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