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AMLA
ANTI-MONEY LAUNDERING AUTHORITY

Frankfurt, 18 July 2025

General Board of AMLA

Summary of the meetings in FIU, joint, and supervisory compositions of 13 and 14 May 2025

Held in Frankfurt am Main

Meeting of the General Board in FIU composition on 13 May 2025, Frankfurt, Germany

1. Adoption of the agenda

Outcome: the agenda was approved, with no potential conflict of interest being signalled by Members (in accordance with the Rules of Procedure).

2. State of play of FIU Delegates, follow up on Written Procedure

Issue: In her introduction, the Chair recalled that the framework that will apply to the FIU delegates seconded to AMLA will be based on (i) the “*Profile and Function of the FIU delegates group*” and (ii) the “*Designation process of FIU delegates*”, already approved in written procedure by the General Board in FIU composition; two additional documents, namely (iii) the “*HR Rules for Seconded National Experts, including FIU Delegates*” and (iv) the “*Rights and Obligations of FIU Delegates*” will be submitted for approval to the Executive Board.

A member of the *FIU Team* provided an overview of the preparatory works undertaken by the relevant workstream.

Outcome: The General Board took note of the information on the state of play of FIU delegates.

3. Start of negotiations of the Working Arrangements with OLAF, Europol, Eurojust and the EPPO (AMLA-R, Art. 94)

Issue: In her introduction, the Chair recalled that Article 94(2) of the AMLA Regulation foresees the conclusion of working arrangements with the European Anti-Fraud Office (OLAF), the EU Agency for Law Enforcement Cooperation (Europol), the EU Agency for Criminal Justice Cooperation (Eurojust) and the European Public Prosecutor’s Office (EPPO). A member of the *FIU Team* presented the first steps taken, clarifying that there was no deadline foreseen in the Regulation apart from the one deriving from the need to develop by 27 June 2026, in consultation with EPPO, implementing technical standards relating to the format of the reporting of information to them.

Discussion: Some members shared their FIUs’ respective experiences with the signature of working arrangements or MoUs with the institutions in question. Regarding the EPPO, the question was raised whether the non-participation of three member states in its framework would have any impact on the arrangement to be concluded with AMLA. More generally, members highlighted how their relations with the four counterparts differed from FIU to FIU and asked for clarification on how this could impact the working arrangements. Overall, the start of the negotiations with the four authorities was widely supported by members.

Outcome: The General Board took note of the state of play regarding the negotiations of working arrangements with OLAF, Europol, Eurojust and the EPPO.

4. FIU Work Plan and Coordination Framework

Issue: The Chair introduced the item by recalling the steps in the adoption process, including the fact that a second discussion would take place at the next meeting of the General Board in June before the final approval by the Executive Board and submission to the EU Parliament and Council.

A member of the *FIU Team* first recalled AMLA's main goal of improving support and coordination, through enhancing intelligence sharing and harmonizing analyses approaches across member states; AMLA should help them use their intelligence in a more coordinated yet decentralized way. Regarding specifically the FIU Pillar's workplan, a first draft had been presented at the FIU Platform in March leading to the establishment of two working groups, one on FIU Delegates, another on the Support and Coordination Framework where discussions had started in relation to peer reviews, mediation, joint analyses and mutual assistance. Taking into account that AMLA-Regulation required the FIU Pillar to be operational as from 1 July 2025, a first pilot joint analysis would probably take place by the end of the year; as for the peer reviews, for the time being they would focus on understanding best practices between FIUs.

Discussion: The FIU Work Plan was welcome as 'ambitious' by a number of members, with some adding that this made prioritisation even more necessary.

The importance of developing synergies between the FIU and supervisory authorities, especially in exchanging information on systemic issues was stressed, with virtual Ibans provided as an example. There should be a focus on the tools and procedures to put in place for this purpose, and the European level was the right one to address this.

Some members focused on the importance of procedures and methodologies for joint analyses, not least as the experience showed that joint analyses took a very long time. It was also crucial to develop IT tools to ensure confidentiality and security of the exchanged data.

Regarding peer reviews, according to some members, AMLA could play an important role to explain and defend the EU model of FIUs within international bodies, such as FATF and Moneyval. Furthermore, AMLA peer reviews should be used as a tool to share good practices, and harmonize EU standards on that basis, also taking into account the high scores of some of EU FIUs in FATF evaluations.

Outcome: The General Board took note of, and commented on the draft FIU Work Plan; members were invited to submit further comments, if any, in writing. A revised version would be discussed at the next meeting of the General Board in June (before its final adoption by the Executive Board).

5. AMLA Committee Structure and establishment of the Standing Committee (AMLA-R, Art. 58)

Issue: In her introduction the Chair recalled that this item was a follow-up to the first meeting in joint composition (on 11 March 2025) where the issue had been raised when and how committees foreseen in AMLA-R could start supporting the General Board. A member of the *Governance Team*) then presented a number of proposals which covered AMLA's Committee structure as a whole, including the establishment of Standing Committees, and the case for dedicated rules of

procedure for all committees and their sub-structures. A member of the *FIU Team* focused on the FIU Standing Committee foreseen under AMLA-R article 58(4), its distinct features and the process proposed to address its establishment, as well as other committees reporting exclusively to the General Board in FIU composition.

Discussion: Some members did not support the case for a joint Standing Committee supporting the General Board, in both compositions, on IT business solutions, Suptech, and Regtech on the grounds that IT issues faced by FIUs were specific; this however did not rule out exchanging experiences. Some others however did.

The implication of establishing committees in terms of available resources at FIUs was also mentioned.

Finally, there were some comments on the specific status of the ‘Standing Committee’ expected to support the General Board in FIU composition in accordance with AMLA-R art. 58(4).

On the suggestion to establish a joint Standing Committee on IT business solutions, Suptech, and Regtech, the Chair pointed out that technology was reshaping the way both supervision and FIU activities are being conducted and that there was a case for discussing these issues horizontally.

Outcome: The General Board took note of the proposals regarding the establishment of AMLA’s Committee Structure, as well as the process for the establishment and governance of the FIU Standing Committee and internal committees under the General Board in FIU composition. More elaborate proposals will be presented at future meetings, also taking into account the discussion on AMLA’s Committee structure to take place, the following day, in supervisory composition.

6. EEA/EFTA States

Issue: In her introduction the Chair recalled that, under this item, three decisions were needed regarding (i) the status of the EEA/EFTA States, Iceland, Liechtenstein and Norway in the General Board, (ii) their involvement in the FIU pillar, and (iii) the nomination of FIU delegates by EEA/EFTA States.

6.1 Decision of the GB in FIU composition on the Observer status for EEA/EFTA States

Issue: A member of the *Governance Team* recalled that the EEA / EFTA States took part as non-voting members in the relevant EU settings including the EBA Anti-Money Laundering Standing Committee (AMLSC) and the EC FIUs’ Platform. Their participation in AMLA required the incorporation into the EEA Agreement and legal transposition of the new AML package, a process which would require time. Based on AMLA-R and the Rules of Procedure of the General Board, on top of representatives of OLAF, Europol, Eurojust and the EPPO, the ECB Supervisory Board, and the ESAs, the General Board could admit ‘other observers’ if this was supported by a two-thirds majority of its voting members. Against this background, it was proposed to grant them this status in the General Board and in its sub-structures on a temporary basis until the AML Package would be integrated into the EEA Agreement.

Discussion: Members who intervened supported granting the EEA/EFTA States the status of observers. One of them sought and received confirmation that the decision could be discontinued in case the General Board would be dissatisfied with the involvement of EEA/EFTA States.

Outcome: The General Board approved the participation on a temporary basis of representatives of the three EEA / EFTA States as observers in AMLA's General Board in FIU composition, and its sub-structures, as follows: 25 votes in favour, 2 abstentions.

6.2 Decisions on the participation of EEA/EFTA States in AMLA FIU Pillar Support and Coordination Framework, and on the nomination of FIU Delegates

Issue: A member of the *FIU Team* presented the FIU specific dimension of the matter. There was a proposal to allow EEA/EFTA States to fully participate in the AMLA-FIU Pillar, which implied participating in joint analyses, receiving AMLA support such as mediation, trainings, etc...Another one was about allowing them to appoint FIU delegates only after having incorporated the AML Package into the EEA agreement, even if the General Board decided to grant them the observer status (see previous point).

Discussion: Concerns were raised regarding the legal basis to include EEA/EFTA States already now in the FIU pillar, including being part of joint analysis and of the standing committee, also taking into account that Liechtenstein and Iceland were not yet part of the FIU.net.

Outcome: The General Board (1) approved the full participation of the EEA/EFTA States in the AMLA FIU Pillar - subject to double-checking the legal basis - as follows: 24 votes in favour, 3 abstentions; and (2) decided to allow the EEA/EFTA States to delegate a member of their staff to AMLA once they have incorporated the AMLA package into the EEA Agreement unanimously.

Meeting of the General Board in joint composition on 14 May 2025, Frankfurt, Germany

1. Approval of the agenda

Outcome: the agenda was approved, with no potential conflict of interest being signalled by Members (in accordance with the Rules of Procedure).

2. European Commission / EBA information about the state of play of ongoing workstreams

Issue: Under this item, the European Commission and the EBA reported on the state of play in their respective AML/CFT related work.

The representative from the European Commission focused his intervention on the workstreams that are to be transferred to AMLA, as well as the work that would remain with the Commission. The first category included the FIU.net and policy work carried out by FIU Platform until now, as well as the non-financial sector coordination work for Level 2 measures; what would remain with

the Commission included the assistance to member states in AMLD6 transposition and the development of its own Level 2 mandates concerning mainly beneficial ownership registers, bank account registers, high-risk third countries, politically exposed persons and the collection of statistics, as well as the 2 specific mandates on the calculation of fees and the procedure for the imposition of pecuniary sanctions and periodic penalty payments. It was important to initiate the preparation of the FIU.net transfer to AMLA as soon as possible, targeting completion of the transfer by July 2027 at the latest, ideally at the beginning of 2027.

Regarding the non-financial sector, the Commission referred to the work conducted within the dedicated expert group created to work on all the Level 2 mandates (risk assessment, CDD and administrative sanctions) that the EBA has also been developing for the financial sector. The expert group is scheduled to expire in October this year.

In her presentation, the representative from the EBA first emphasized the objective to continue aligning as much as possible the EU prudential and AML frameworks. She presented the EBA AML Work Programme for 2025, the state of play on the Call for Advice (CfA) received from the European Commission in March 2024, the related public consultation which was on-going, and recalled the objective to submit its response to the Commission by end October 2025. The on-going transfer of AML/CFT (i) systems (incl. EuReCa), (ii) data, and (iii) documents to AMLA was also mentioned, as well as the MoU to be signed by the ESAs with AMLA, as a basis for future cooperation.

Discussion: Almost all members who took the floor emphasized the importance of technology as a game changer reshaping not only the financial sector, but also the way criminals operate, as well as the way supervisors should conduct their activities. For some there was a unique opportunity for AMLA to harness its full potential. This did not mean starting from scratch as some tools already existed (for instance in terms of transaction monitoring) and one first step could be about improving the interlinking across member states. The importance taken by the simplification agenda, and the need to reach out to the private sector, were also raised.

The Chair concluded by confirming the top priority status of technology, as well as the importance of a risk-based approach (including a macro-perspective) and proportionality in AML/CFT supervision, also to ensure that private sector compliance costs are duly taken into account. She recalled that AMLA will apply better regulation principles as envisaged in the AMLA regulation, including impact analyses and public consultations that will allow to assess costs and benefits. However, she also recalled that the overall aim of the AML package is to ensure that the framework is robust, uniform and effective, and that AMLA's work will have to find the right balance to achieve these goals.

Outcome: The General Board took note of on-going AML/CFT work at the European Commission, and the EBA.

3. State of play and way forward - Building of AMLA (business, administration)

Issue: The Head of AMLA Task Force/interim Executive Director of AMLA introduced this item by providing the state of play on the establishment of the new Authority.

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Among the five building blocks described in the work programme, recruitment was key. While AMLA might not be able to reach the goal of 120 staff by end-2025, mentioned in the legislative statement included in AMLA-Regulation, the final figure was likely to be close to that given the on-going large recruitment procedures, including the one for AML senior experts which was about to be completed. Reference was also made to other on-going selection procedures for policy officers and economists, as well as the plan to launch vacancies for middle management positions either just before or just after the summer. The recruitment plan for the rest of the year was likely to be one of the first decisions to be taken by the Executive Board when it is established.

The IT building block addressed three types of requirements. The need for a digital workspace, based on the Cloud, was deemed completed, thanks to the support of the Commission DG DIGIT. For applications to run document management, HR and budget processes, AMLA was also expected to use European Commission tools. By the end of October, AMLA was expected to be equipped with the necessary tools to operate efficiently. Regarding IT business solutions geared to the specific needs of AMLA, mid-term and long-term reflections had been initiated. These solutions aim at equipping AMLA with automated data gathering and analytical capabilities leveraging the advanced technology, including AI. Important elements were still missing, notably the sources and exact data sets that will feed the databases, the details of the risk methodology, and, importantly, the views of the incoming Executive Board e.g. on sensitive matters such as data governance.

With regard to the budget, at the moment, AMLA was still operating under the European Commission umbrella, using the financial circuits of DG FISMA. AMLA should become fully autonomous as from 1st January 2026. Reference was also made to the substantial financial support provided by the German authorities during AMLA's early years.

Regarding AMLA's seat, a final agreement had been reached with the landlord of the *Messeturm* including the signature of the lease contract. It was an intense negotiation because it involved a commitment for the next fifteen years, but also a very interesting one as a joint project also involving EIOPA, strongly supported as such by the EU budgetary authority. AMLA staff was expected to move to the definitive floors around September / October and the conference floor, where the physical meetings of the General Board will be held, should be ready around March 2026.

With regard to communication activities, reference was made to the website and the active LinkedIn account; both were useful to circulate information on AMLA in general as well as the Chair's activities taking into account that she was already engaged in many public events, some linked to the 'road show' to NCAs.

The intervention was concluded by recalling that the official role of the Commission was the establishment and initial operation of the Authority. Accordingly, the role of the Task Force was expected to start diminishing in the coming months, before coming to an end by the end of the year. As from January 2026, AMLA would be fully autonomous.

Discussion: Members welcomed the presentation and an ambitious work plan.

Regarding the recruitment process, most comments focused on ensuring diversity and equal opportunities in the ongoing recruitment processes between candidates of all EU Member States. This included factoring in the specific challenges of low-capacity authorities. Linked to this,

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candidates of small countries brought specific assets such as the capacity of going the extra mile and often a more creative approach and mindset. More generally, aiming at AMLA being truly representative of all 27 countries, bringing in the different perspectives, was essential, not only in terms of policy but also in its management and staffing. Linked to the level-playing field considerations, some members requested not to use too much the EU agencies channel of recruitment.

Further remarks were made on the publication of the work programme. As it will be the first time that AMLA publishes such a document and presents itself to the public, the text should be written for the general public. More information should be added on the objectives and tasks of AMLA so that they can be understood by a non-expert audience.

Another issue raised by several members was linked to the reference to the simplification agenda. While there is a link between risk-based approach and simplification, it should be acknowledged that there will be some adaptation costs to implement the new EU AML framework.

The issue of budgetary independence was also picked up with reference to the recourse to fees to be collected on obliged entities; this was a crucial but also complex process, for which AMLA should draw on the experience of both the SSM and SRB.

Finally, in relation to ICT, some members expected AMLA to clarify what tools it expects to use and for what purposes, since these decisions will also have a huge impact on the NCAs.

To follow-up on the comments, the Chair indicated that a new version of the workplan would be shared and discussed in June. This second version will include a part on operational activities of AMLA, which will start in July, also taking into account that there would be more information on medium and long term activities in the *Single Programming Document*. On recruitment, the Chair recalled her motto and support to diversity in terms of gender, geographical balance, and skills (ie having not only AML experts, but also statisticians, mathematicians, macroeconomists, crypto experts, payment experts, etc...); she also mentioned that most of the recruitments will be opened to the public, with vacancies through the EU agencies channel only used exceptionally.

Outcome: The General Board took note of, and commented on the draft AMLA Work Programme; members were invited to submit further comments, if any, in writing. A revised version will be discussed at the next meeting of the General Board in June (before its final adoption by the Executive Board).

4. AMLA Visual identity

Issue: A member of the *Communication Team* recalled the steps taken since November 2024, leading to the current option, emphasising its main features.

Discussion: Members who took the floor congratulated the communication team for the preparatory work. There were also questions on the considerations underlying some choices.

Most members who took the floor expressed support for the proposal since it was recognizable and helped distinguish AMLA from other EU agencies.

Outcome: the logo proposal was approved as follows:

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- FIU composition: 25 in favour, 0 against, 2 abstentions
- Supervisory composition: 25 in favour, 0 against, 2 abstentions

Documentation: no documentation under this item (apart from the presentation which was circulated after the meeting together with other presentations).

Meeting of the General Board in supervisory composition on 14 May 2025, Frankfurt, Germany

1. Approval of the agenda

Outcome: the agenda was approved, with no potential conflict of interest being signalled by members (in accordance with the Rules of Procedure).

2. AMLA Work Programme 2025 - Supervisory pillar

Issue: In her introduction, the Chair indicated that, following the discussions in FIU and joint compositions, this item would focus on the chapters detailing the policy and operational activities in relation to the *Supervisory Processes Team* and the *Risks and Measures Team*.

A member of the *Supervisory Processes Team* presented the work done so far by this workstream including (i) the establishment of two working groups and of a pool of experts available for matters related to the different categories of obliged entities, (ii) the preparatory work, including interactions with the European Commission and the EBA, (iii) the identification of “super-priorities”, and (iv) the other short-term mandates that were part of the European Commission Call for Advice, before concluding on the main challenges faced, namely the short legal deadlines and the need to ensure a smooth continuation of the work initiated by the EBA and the European Commission.

A member of the *Risk and Measures Team* presented the work conducted by this workstream which would also rely on two recently established working groups, emphasising the difficulty of accommodating basic concepts, that were quite familiar in the financial sector, to the non-financial industry, such as the concept of business relationship. Another challenge was to adapt the business wide risk assessment to the size of the obliged entities, without losing any substance.

Discussion: Many members congratulated AMLA staff for the work done so far, the presentations, and the ambitious workplan. In this respect, the capacities and limited resources of NCAs to appoint members for all working groups were mentioned, together with the necessity of having some guidelines for them.

One of the main concerns related to the need to further work on the methodology for the selection of the forty entities.

Regarding risk assessment methodologies in general, the point was made that member states were evaluated against different methodologies from FATF, MONEYVAL, and the EBA, and this represented a challenge which AMLA should help address.

The simplification narrative and the balance between AMLA targets and the requirement to minimise the compliance burden whenever possible were also raised.

The Chair thanked members for their useful and constructive comments, which they would have the possibility to complement through a written procedure. As the workplan was ambitious and the deadlines very tight, the contribution from the member states was even more crucial. The Chair shared the reflections on the challenges raised by the work on the methodology for the selection of the 40 obliged entities, including the need for AMLA to work on it further.

Outcome: The General Board took note of, and commented on the draft work programme; members were invited to submit further comments, if any, in writing (for which a dedicated written procedure folder would be opened on the extranet). A revised version will be discussed at the next meeting of the General Board in June (before its final adoption by the Executive Board).

3. AMLA Committee structure (AMLA-R Art. 58)

Issue: In her introduction the Chair recalled that this item was a follow-up to the first meeting in joint composition (on 11 March 2025) where the issue had been raised when and how committees foreseen in AMLA-R could start supporting the General Board. A member of the *Governance Team* then presented a number of proposals which covered AMLA's Committee structure as a whole. For background, a member of the *FIU Team* also provided a quick outline of the issues linked to the establishment of the Standing Committee foreseen under AMLA-R article 58(4) to support the General Board in FIU composition.

Discussion: The exchanges which followed showed support for the establishment of Standing Committees in general and a clear governance structure, but also the need to better reflect on some issues.

While the number of Standing Committees proposed (five) was deemed ambitious at the current stage, the business case of each one of them was not challenged; more specifically, there was clear support for the establishment of a Joint Standing Committee on IT, Suptech, and Regtech also in the light of earlier discussions on top priorities, as well as for the distinction between the financial sector and non-financial sector for the Standing Committees dealing with supervisory practices..

Some pointed to the complexity, others to the resources available at national level to support the Standing Committees. The issue of who should chair them was also raised.

The Chair concluded this first discussion by recalling the value added of Standing Committees as a bridge between work streams at technical level and the General Board, ensuring that the latter could focus on the most strategic issues, in line with the role currently played by the EBA AMLSC vis-à-vis the Board of Supervisors. This implied involving staff which had more seniority than the technical level and could address policy options. Overall, it emerged from this discussion that the

dossier was not considered an urgent one; accordingly, the Chair suggested that the General Board would receive a more elaborate proposal, reflecting this preliminary input, in the coming months.

Outcome: The General Board took note and commented on the preliminary proposals regarding the establishment of AMLA's Committee structure.

4. State of play of MoUs with ESAs and ECB (AMLAR, Art. 92)

Issue: In her introduction, the Chair recalled the legal requirement for AMLA to conclude Memoranda of Understanding with the ESAs (EBA, EIOPA, ESMA), and with the European Central Bank, by 27 June 2025. A member of the *Supervisory Processes Team* presented the work undertaken by first pointing out that while the focus of the MoU with the ESAs (which had opted for a joint text) was on cooperation for setting standards, the main feature of the MoU with the ECB was the exchange of supervisory information. The drafting of the MoUs was at an advanced stage. The AMLA expert concluded by adding that AMLA-Regulation also provided for the conclusion of further MoUs, but the focus had been drawn on the MoUs with the ESAs and the ECB due to the timing constraints.

Outcome: The General Board took note of the information on the state of play of the MoUs with the ESAs and the ECB.

5. Decision of the GB in supervision composition on the Observer status for EEA/EFTA States

Issue: In her introduction, the Chair recalled that, under this item, a decision was needed regarding the status of the EEA/EFTA States, namely Iceland, Liechtenstein, and Norway in the General Board, and its sub-structures. A decision supporting their participation as observers had been taken the previous day by the General Board in FIU composition.

A member of the *Governance Team* recalled the background to this dossier, as well as the possibility - based on AMLA Regulation and the Rules of Procedure - for the General Board to admit, on top of representatives of OLAF, Europol, Eurojust and the EPPO, the ECB Supervisory Board and the ESAs, 'other observers' if approved by a two-thirds majority of its voting members. Against this background, it was proposed to grant them this status in the General Board and in its sub-structures on a temporary basis until the AML Package would be integrated into the EEA Agreement.

Discussion: Members supported the proposal to grant the EEA/EFTA States the status of observers.

Outcome: The General Board in supervisory composition approved the participation on a temporary basis of representatives of the three EEA/ EFTA States as observers in AMLA's General Board and its sub-structures, as follows: 27 votes in favour.
