

SUMMARY OF THE 7TH MEETING OF THE GENERAL BOARD IN FINANCIAL INTELLIGENCE UNIT (FIU) COMPOSITION

7th General Board Meeting

Date	4 February 2026
Time	11:00 – 12:30
Location	Frankfurt am Main, on-site

INTRODUCTION

Discussion

The Chair opened the meeting and welcomed participants, including members connected remotely due to travel disruptions and the observers in attendance. The Chair recalled the standard housekeeping elements, noting that the meeting was recorded for internal purposes.

The Chair invited members to declare any conflict of interest in relation to the agenda.

Conclusion

No conflicts were reported.

1. APPROVAL OF THE AGENDA

Discussion

The Chair presented the agenda for adoption and asked whether any General Board Member wished to raise objections or propose modifications. No General Board Member objected, and no amendments were requested.

Conclusion

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

2. APPROVAL OF THE MINUTES OF THE 5TH AMLA GENERAL BOARD MEETING IN FIU COMPOSITION

Discussion

The Chair introduced the item and recalled that the draft minutes had been circulated for comments, and that contributions submitted by countries had been incorporated. The Chair invited General Board Members to express any remaining concerns or request modifications.

No General Board Member raised objections or proposed further amendments.

Conclusion

The Chair confirmed that the minutes of the 5th meeting of the General Board in Financial Intelligence Unit composition were approved as presented.

3. FIU DELEGATE STATUS AT AMLA – RIGHTS AND OBLIGATIONS (POINT FOR DISCUSSION)

Discussion

The Chair introduced the item and recalled the importance of FIU delegates within AMLA's operational capacity. The Chair indicated that the opinion of General Board Members was thought on the decision on the Rights and Obligations of FIU delegates. The Chair then gave the floor to AMLA staff to present the item.

AMLA staff presented the draft decision on the rights and obligations of FIU delegates, highlighting the envisaged operational role, the need for planning certainty, and the alignment of rights and obligations with the framework for seconded national experts. AMLA staff presented the rationale for the draft decision on delegates' rights and obligations, linked to operational needs, planning certainty, and the status and integration of seconded national experts. Key elements include rights to access data and, where necessary with the delegating country's consent, national FIU data, with ICT devices provided by both AMLA and the delegating country; and obligations to comply with AMLA's functional authority, work exclusively on AMLA tasks, ensure prompt and technically feasible access to national databases, and maintain confidentiality beyond the secondment.

General Board Members discussed the balance between AMLA's functional authority and the continued responsibilities of delegating authorities. Concerns related to access to national data, the scope of exclusivity, and the need to preserve the delegates' link with their home authority were raised. Some General Board Members noted practical implications that should be considered, including the reimbursement of allowances, national administrative rules, the ability to task delegates to attend meetings at home, and the need to avoid misunderstandings that could hinder participation in joint analysis.

AMLA staff clarified that requiring delegates to follow AMLA's functional authority did not imply severing ties with their delegating country. AMLA staff stressed that access to national databases would always require the consent of the delegating country and that the intention was not to

circumvent national procedures. AMLA staff confirmed its willingness to revise the text and acknowledged the need to clarify that FIU delegates will be under the functional authority of AMLA when performing AMLA tasks, access to national databases will be subject to consent of FIUs as well as national confidentiality rules and FIU delegates might get involved in tasks of their FIUs in exceptional cases.

The Chair indicated that the comments would be integrated, and the text refined and shared through written procedure for opinion before it is set to the Executive Board for approval.

Conclusion and next steps

AMLA staff will:

- Revise the draft decision, taking into account comments raised by General Board Members.
- Circulate the revised version by written procedure before submission to the Executive Board for adoption.

4. STATE OF PLAY: WORKING ARRANGEMENTS (POINT FOR INFORMATION)

Discussion

The Chair introduced the item and recalled AMLA's mandate to conclude Working Arrangements with OLAF, Europol, Eurojust, and the European Public Prosecutor's Office (EPPO).

AMLA staff presented the state of play of the Working Arrangements with OLAF, Europol, Eurojust, and the EPPO, outlining progress on draft texts and key areas of cooperation such as strategic information exchange, and exchange of operational data for joint analyses.

General Board Members welcomed the update and raised questions on confidentiality, the interaction with national dissemination frameworks, and the importance of ensuring that Working Arrangements do not create unintended obligations for national Financial Intelligence Units. General Board Members expressed interest in reviewing the drafts before their adoption.

The Chair noted the General Board Members' comments and confirmed that they would be dully considered.

Conclusion and next steps

AMLA staff will:

- Finalise internal reviews of the draft Working Arrangements,
- Share revised drafts with partner organisations in the course of March, after which negotiations will proceed.

5. STATE OF PLAY: MUTUAL ASSISTANCE (POINT FOR INFORMATION)

Discussion

The Chair introduced the item and invited AMLA staff to present the state of play on the future mutual assistance mechanism.

AMLA staff explained that, given AMLA's start-up phase and limited staffing, assistance cannot yet be delivered at scale. They outlined the strategic objectives of the mechanism, aimed at enabling AMLA and countries to provide support where additional expertise, resources or coordination are needed, with a long-term view to harmonising practices and strengthening the EU AML/CFT framework. In light of current resource constraints, AMLA intends to launch a structured dialogue with countries and to issue a written request later in the year to gather information on needs, available expertise and conditions for providing assistance.

General Board Members highlighted the importance of addressing emerging legal issues at Union level, including those related to data access and data protection such as the concern regarding the preliminary ruling of the European Court of Justice on the FIU's access to bank accounts. Some Members sought clarity on the allocation of mission costs. Members also underlined the need to consider international coordination, subject to confidentiality safeguards. One member indicated their willingness to offer expertise to other FIUs.

The Chair acknowledged the points raised and confirmed that AMLA would revert with further clarifications.

Conclusion and next steps

AMLA will:

- Launch the dialogue with countries as planned, followed by a written request for information on needs and capacities.
- Further examine aspects raised by countries and return in an upcoming General Board meeting with clarifications.

6. PEER REVIEWS: REPORT CONTENT AND PUBLICATION POLICY (POINT FOR INFORMATION)

Discussion

The Chair recalled the adoption of the provisional rules of procedure for peer reviews (October 2025) and the approval of the 2026–2027 work plan and invited AMLA staff to present the proposed report structure, the call for participation in the 2026 pilot, and the publication approach.

AMLA staff outlined the purpose and structure of the peer review report, covering the executive summary, background, scope and methodology, results, good practices, areas for improvement, follow-up measures and annexes. A common template will be applied during the pilot and refined thereafter. The call for participation will follow an opt-out model to encourage broad participation

and will invite volunteers from FIUs to serve on review teams alongside AMLA staff. On publication, AMLA staff reported that they had consulted the European Commission to ensure compliance with the legal framework. Publication should focus on the results of the peer review, generally in non-anonymised form, with scope to exceptionally sanitise sensitive content to avoid operational risks.

General Board Members welcomed the initiative and raised safeguards concerning confidentiality and national security rules, noting that publication of sensitive information could expose FIUs to operational or political challenges. Comments also addressed the opt-out model, workload considerations for smaller FIUs, and the importance of complementing rather than duplicating international evaluations.

The Commission took the floor to clarify its interpretation of the publication requirement, in line with what was already reported by AMLA staff.

The Chair noted broad support for launching the pilot and confirmed that AMLA will proceed with the opt-out call for participation and the invitation for volunteers to join review teams. On publication, the Chair summarised that AMLA will publish the results, generally in non-anonymised form, with flexibility to exceptionally sanitise specific sensitive elements.

Conclusion and next steps

AMLA will launch the call for participation in mid-February.

ANNEX**Written procedures concluded by the General Board (in FIU composition) until 4 January 2026**

- GBFIUX018 – 2025 - Written procedure – FIU delegates
- GBFIUX019 – 2025 - Written procedure – Process for the selection, prioritisation and conduct of joint analyses
- GBFIUX020 – 2025 - Written procedure – Final schedule of the GB dates 2026

PARTICIPANTS

MEMBER STATES

- Belgium
- Bulgaria
- Croatia
- Cyprus
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Netherlands
- Poland
- Portugal

- Romania
- Slovakia
- Slovenia
- Spain
- Sweden

EUROPEAN COMMISSION

- EC

EU OBSERVER INSTITUTIONS

- EUROPOL
- OLAF

EEA OBSERVER STATES

- Iceland
- Lichtenstein
- Norway

AMLA

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