AMLA
Anti-Money Laundering Authority

PUBLIC

SUMMARY OF THE 5TH AMLA GENERAL BOARD MEETING IN JOINT COMPOSITION

5th General Board Meeting

Date	9 December 2025
Time	15:00 – 17:45
Location	Online - remotely by video conference

INTRODUCTION

Discussion

The Chair noted that no conflicts of interest were declared.

General Board Members highlighted the need for earlier circulation of documents and clearer version control to facilitate national coordination. AMLA staff indicated that documents will be sent eight working days in advance from 2026 and that versioning practices will be improved.

Conclusion

The General Board noted the points on document handling and the planned improvements.

Next steps

AMLA staff will implement earlier circulation and enhanced version control from 2026.

1. APPROVAL OF THE AGENDA

Discussion

General Board Members were invited to comment on the agenda. No comments were raised.

Conclusion

The agenda was approved.

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

Discussion

The General Board Members were invited to approve the minutes of the previous meeting in Joint composition. It was noted that a written procedure had been conducted and that no substantive comments were received.

Conclusion

The General Board approved the minutes.

3. PRESENTATION OF EXECUTIVE BOARD MEMBER CANDIDATE (POINT FOR INFORMATION)

Discussion

General Board Members heard a presentation by the candidate on professional background and priorities. The candidate highlighted cooperation, use of information technology, harmonisation based on best practices, a proportionate risk-based approach, and synergies between supervision and financial intelligence at European Union level. Risks identified included crypto-assets, cyber threats and sanctions evasion. Members held a short exchange on alignment with the simplification narrative and on practical synergies.

Conclusion

The General Board took note of the presentation.

Next steps

Consideration of the appointment was scheduled under the next agenda item.

4. DECISION OF THE AMLA GENERAL BOARD ON THE PROPOSAL TO THE EUROPEAN PARLIAMENT REGARDING THE EXECUTIVE BOARD MEMBERS APPOINTMENT (POINT FOR DECISION)

Discussion

General Board Members considered the proposal to transmit support for the candidate to the European Parliament. Members expressed broad support. One abstention was recorded, based on concerns about aspects of the selection process.

Conclusion

The General Board approved the proposal, with one abstention.

Next steps

AMLA staff will transmit the proposal to the European Parliament without delay.

5. SUGGESTED APPROACH FOR AML CONVERGENCE AND EFFECTIVENESS OF CRYPTO-ASSET SERVICE PROVIDERS (CASP) AND ELECTRONIC MONEY TOKEN/ASSET-REFERENCED TOKEN (EMT/ART) ISSUES DURING AND AFTER TRANSITION TO MARKETS IN CRYPTO-ASSETS REGULATION (MICAR) (POINT FOR DISCUSSION)

Discussion

General Board Members considered AMLA staff's initiative for the crypto assets sector. In a first phase, this initiative would consist in the issuance of two questionnaires addressed to anti money laundering supervisors and to financial intelligence units, the organisation of a workshop, and the drafting of a strategic analysis report. This report, to be published in the second half of 2026, will build a consolidated EU wide evidence base and provide a comprehensive assessment of the EU crypto assets landscape, drawing on the questionnaire responses, the workshop discussions and operational insights from the sector. It will offer a data driven overview of crypto related financial crime trends, risks, supervisory practices and emerging threats, and will conclude with a set of strategic recommendations to support supervisory convergence and enhance AML/CFT effectiveness across CASPs and EMT/ART issuers.

In a second phase, the initiative would involve joint thematic reviews and, where appropriate, joint analyses. This phase will focus on the post transitional period of MiCAR and enable AMLA to build a secure infrastructure for joint analysis. The joint thematic reviews will assess CASPs' and EMT/ART issuers' exposure to ML/TF risks and their compliance with applicable requirements, potentially involving all authorities supervising these entities as well as authorities supervising financial institutions offering crypto asset related services. The thematic work may concentrate on areas of heightened non-compliance risk identified through the questionnaire and the workshop, with the detailed scope to be determined following the analysis of the questionnaire responses. AMLA will also liaise with competent authorities planning national thematic reviews on CASPs in 2026 to explore possibilities for alignment with the joint thematic reviews.

General Board Members supported the approach and asked for clarification of scope, inclusion of the Transfer of Funds Regulation and targeted financial sanctions, alignment with international work on offshore service provider-provider risks, removal of redundancies and the addition of qualitative elements to the draft questionnaire. General Board Members suggested separate questionnaires to respective authorities where responsibilities are shared and proposed a regular forum for legal interpretation and supervisory cooperation.

Conclusion

The General Board noted the initiative and the planned next steps.

Next steps

AMLA staff will refine and circulate the questionnaires, organise the workshop, and prepare the strategic analysis report.

6. DRAFT SINGLE PROGRAMMING DOCUMENT (SPD) 2027-2029 (POINT FOR DISCUSSION)

Discussion

General Board Members considered AMLA staff's outline of the Single Programming Document for 2027 to 2029, covering governance, direct supervision readiness, coordination of supervision and financial intelligence, completion of the single rulebook, risk intelligence, stakeholder engagement and technology. Members requested a holistic mapping of Level 2 and Level 3 instruments, clear sequencing for data collection, prioritisation aligned with capacities, meaningful consultation windows and clear articulation of 2027 deliverables and timelines.

Conclusion

The General Board noted the direction and the planned timeline, and asked for detailed mapping, prioritisation, and clear external communication.

Next steps

AMLA staff will look into attaching a detailed mapping to the final SPD in 2026.

7. EXTENSION OF TIME AND PHASING OF TECHNICAL STANDRADS DEVELOPMENT (POINT FOR INFORMATION)

Discussion

General Board Members considered AMLA staff's update on adjusting timelines and phasing for technical standards. Members supported a flexible approach, asked that industry-facing consultations remain meaningful, and requested clear external communication and alignment of publication and application dates.

The Commission outlined the post-submission process and invited feasibility checks. AMLA staff confirmed that the exercise covers 2026 standards and that any phasing in 2026 would be limited to the obliged-entity risk standard.

Conclusion

The General Board noted the update and the planned approach to balancing quality, consultation, and delivery.

Next steps

AMLA staff will finalise dates with the European Commission, propose the plan to the General Board in January, and publish the agreed timeline thereafter.

8. ANY OTHER BUSINESS

Discussion

The Chair opened the session to address four topics.

First, the General Board Members discussed the recent selection process of Executive Board Members. Several members expressed concern about the process, citing the absence of a shortlist and limited information. They asked that future exercises preserve the role of the General Board and provide greater involvement and earlier documentation.

Second, the General Board agreed to launch in January a written procedure to collect targeted suggestions on the Rules of Procedure, with proposals to return in April.

Third, General Board Members noted adjustments to the 2026 calendar, including an extraordinary online meeting in January, and requested early communication of segment sequencing.

Fourth, AMLA staff informed members about the cessation of the start-up task force from next year and members recorded appreciation.

Conclusion

The General Board noted the discussions and agreed the next steps on the Rules of Procedure review and the meeting calendar.

Next steps

AMLA staff will launch the January written procedure, circulate the updated calendar and details of the January extraordinary meeting, and reflect the appreciation for task force support.

PARTICIPANTS

MEMBER STATES

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

EUROPEAN COMMISSION

- EC

EU OBSERVER INSTITUTIONS

- EBA
- ECB
- EIOPA
- EUROJUST
- EUROPOL

EEA OBSERVER STATES

- Iceland – SUP and FIU
- Lichtenstein – SUP
- Norway – FIU

AMLA

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