AMLA
Anti-Money Laundering Authority

PUBLIC

SUMMARY OF THE 4TH AMLA GENERAL BOARD MEETING IN FINANCIAL INTELLIGENCE UNITS (FIU) COMPOSITION

4th General Board Meeting

Date	14 October 2025
Time	14:00 – 16:00
Location	Frankfurt am Main, in person

1. APPROVAL OF THE AGENDA

Discussion

The Chair proposed that, following up on a request raised by several members at previous meetings, under ‘Other matters’, the European Commission would report on the confirmation of the possibility for AMLA to conduct joint analyses before the Directive is transposed.

Conclusion

Subject to adding the above point, the agenda was approved, with no potential conflict of interest being signalled by members.

2. RULES OF PROCEDURE FOR MEDIATION (POINT FOR DECISION)

Discussion

The Chair noted that the draft reflects exchanges at the previous General Board meeting and in the mediation sub-group. AMLA staff presented the principles, steps and safeguards of the mediation mechanism, including confidentiality and data protection.

Members asked to clarify the role of the FIU Standing Committee, to add joint analysis as a trigger for mediation, to consider informing the concerned FIU of AMLA’s assessment and the participation of involved FIUs in the written procedure, and to define criteria for urgency. It was recalled that the involvement of the Standing Committee is for the General Board to decide.

The Chair proposed to integrate these comments and then launch a written procedure for decision and indicated that the Standing Committee’s rules of procedure would be placed on the agenda of the next FIU-composition meeting.

Conclusion

Comments will be incorporated and the draft Rules of Procedure for Mediation between FIUs will be revised before a written procedure for decision.

3. PROCEDURAL GUIDANCE FOR MUTUAL ASSISTANCE (POINT FOR INFORMATION)

Discussion

The Chair recalled that the topic was discussed in June and that the Procedural Guidance for Submitting a Request for Mutual Assistance is an AMLA working document prepared with the subgroup on mutual assistance and shared with the FIU coordination and support workstream.

AMLA presented the aim, scope and content of the guidance and noted that it will be published on AMLA's website.

Members encouraged collaboration with Egmont, asked that any discussion of shortcomings be used solely for technical assistance, and cautioned against unintended disclosure of proprietary information through IT tools. AMLA clarified that it is already engaging with Egmont and that the tool is designed to support EU FIUs with appropriate data protection safeguards.

Conclusion

The General Board took note of the state of play.

4. PROVISIONAL PEER REVIEW RULES OF PROCEDURE (POINT FOR DECISION)

Discussion

The Chair recalled the transitional framework for the first peer reviews and noted that the draft incorporates feedback from previous exchanges and the sub-group on peer reviews. AMLA staff outlined the objectives of the provisional rules and the voluntary, test-and-refine approach intended for the transition period.

General Board Members broadly supported the framework, emphasizing mutual learning and the sharing of good practices. They asked for clarity on confidentiality and publication, suggested using smaller or rotating reviewer pools, adjusting review duration, and keeping follow-up proportionate and flexible.

AMLA staff confirmed that outstanding operational matters, including publication modalities and team composition, will be addressed in a peer review work plan to be presented in December.

Conclusion

The General Board approved the provisional rules of procedure by consensus.

Next steps

A written procedure will be launched inviting Financial Intelligence Units to propose priority themes for the first two peer reviews. AMLA will present a comprehensive peer review work plan for 2026–2027 at the December 2025 meeting.

5. CALL FOR PROPOSAL FOR JOINT ANALYSIS PRIORITY AREAS (POINT FOR INFORMATION)

Discussion

The Chair recalled AMLA's obligation to draw up an annual list of priority areas for Joint Analysis.

AMLA staff outlined the process for the call for proposals and the timeline for presenting the consolidated list for adoption at the December meeting, together with the related procedural guidance for the pilot.

Conclusion

The General Board took note of the state of play.

Next steps

AMLA will launch a written procedure inviting Financial Intelligence Units to submit proposals for priority areas. A consolidated list will be prepared for adoption at the December 2025 meeting.

6. AMLA'S ACCESS TO FIU.NET (POINT FOR INFORMATION)

Discussion

The Chair noted progress towards enabling AMLA to access the FIU.net for carrying out joint analyses under the relevant provisions of the AMLA Regulation.

AMLA staff reported that its technical connection to the FIU.net was nearing readiness and that arrangements for the future takeover were being prepared within the appropriate advisory forum.

General Board Members stressed the need to start developing, in 2026, a comprehensive policy for transferring, hosting and managing the network in view of AMLA's taking it on board in 2027. They highlighted trust-critical matters, including data protection and retention, information technology security, potential use of the network to disseminate information to other European Union bodies with prosecutorial or anti-fraud responsibilities, and interoperability across the tools used by Financial Intelligence Units. The European Commission informed members that an agreement with AMLA would be signed on 15 October 2026 and noted that requests from Financial Intelligence Units in candidate countries to join would be for the General Board in Financial Intelligence Unit composition to decide, taking associated costs into account.

Conclusion

The General Board took note.

7. ANY OTHER BUSINESS

Discussion

The representative of the European Commission provided the views of the European Commission's Legal Services on the possibility for AMLA to coordinate or run Joint analyses from the very beginning, with no need to wait for the Directive to be transposed in all Member States.

The directly applicable provisions of the AMLA Regulation provide the legal basis for exchanging the information necessary to perform joint analyses, including personal data where required, consistent with the European Union data protection framework. It was further clarified that the information-sharing provision in the sixth Anti Money Laundering Directive is not a precondition in this context, as the AMLA Regulation serves as the specific legal basis for cooperation between AMLA and Financial Intelligence Units.

Conclusion

The General Board took note.

ANNEX

Written procedures concluded by the General Board (in FIU composition) until 14 October 2025

- Written procedure for **approval** on the "Records of proceedings (for the European Parliament) of the meeting of the General Board (in FIU composition) of 13-14 May 2025" (GBFIU/X/25/09), 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" (GBFIU/X/25/10), with a deadline of 11 July 2025.
- Written procedure for **comments** following up on the meeting of 18 June 2025 on the document on the "Designation of the appointed FIU Delegate" (GBFIU/X/25/11), with a deadline of 17 July 2025.
- Written procedure for **approval** on the "Records of proceedings (for the European Parliament) of the meeting of the General Board (in FIU composition) of 18 June" (GBFIU/X/25/12), with a deadline of 29 July 2025.
- Written procedure for **comments** following up on the meeting of 18 June 2025 on the document on the "Designation of the appointed FIU Delegate" (GBFIU/X/25/13), with a deadline of 24 September 2025.
- Written procedure for **comments** following up on the meeting of 14 October 2025 on the document on the "Designation of the appointed FIU Delegate" (GBFIU/X/25/14), with a deadline of 17 October 2025.

PARTICIPANTS

MEMBER STATES

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

EUROPEAN COMMISSION

- EC

EEA OBSERVER STATES

- Norway
- Lichtenstein
- Iceland

AMLA

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