SUMMARY OF THE 9TH MEETING OF THE GENERAL BOARD IN FIU COMPOSITION

Date	30 June 2026
Time	09:30 – 13:45
Location	Frankfurt am Main, EIOPA premises

INTRODUCTION

The Chair confirmed that no conflicts of interest had been declared and that the meeting could proceed in accordance with the agenda and applicable voting procedures.

1. APPROVAL OF THE AGENDA

Discussion

The Chair presented the agenda and invited General Board Members to provide comments or raise objections. No comments or objections were raised.

Conclusion

The Chair concluded that the agenda was adopted without amendments.

2. APPROVAL OF THE DRAFT ITS (I) ON THE FORMAT FOR FIU-TO-FIU EXCHANGES (ART. 31(2) AMLD), (II) ON THE FORMAT FOR REPORTING OF INFORMATION BY THE FIUS TO EPPO (ART. 81(1) AMLR) AND (III) ON THE FORMAT FOR REPORTING OF INFORMATION BY AMLA TO EPPO (ART. 41(2) AMLAR) - (POINT FOR DECISION)

Discussion

The Chair introduced the agenda item concerning the approval of three draft Implementing Technical Standards (ITS) relating to the format for FIU-to-FIU exchanges under Article 31(2) of the AML Directive (AMLD), the reporting of information by FIUs to the EPPO under Article 81(1) of the AML Regulation (AMLR), and the reporting of information by AMLA to the EPPO under Article 41(2) of the AMLA Regulation (AMLAR). The Chair recalled that the draft texts had been discussed previously and had undergone public consultation. The General Board was invited to approve the final drafts prior to their submission to the European Commission.

AMLA staff presented the final draft ITSs and outlined the main amendments introduced following the public consultation and legal review. Regarding the ITS on FIU-to-FIU exchanges, it explained that the draft establishes standardized templates and harmonized data fields for different categories of exchanges, with the objective of improving consistency and efficiency in cross-border cooperation. AMLA staff highlighted the introduction of provisions on supplementary exchanges and further clarifications concerning cross-border disseminations. A phased implementation approach was proposed, with certain requirements becoming applicable in 2027 and the mandatory use of machine-readable fields from 2028 to allow sufficient time for technical adaptation and interoperability developments.

AMLA staff then presented the two ITSs concerning reporting by FIUs and AMLA to the European Public Prosecutor's Office (EPPO). The standards establish harmonized reporting templates and support the use of machine-readable formats, while preserving flexibility regarding secure communication channels. A phased implementation timeline is introduced for both ITSs, with the reporting obligations and standardized templates becoming applicable from 10 July 2027, and the mandatory use of machine-readable reporting formats from 10 July 2028. This will allow sufficient time for the necessary IT developments and system adaptations.

Three General Board members took the floor to express support for the three draft ITSs and welcome the efforts to enhance standardization and cooperation across the Union. One of them welcomed the provisions on supplementary exchanges while two of them raised concerns regarding the phased implementation timeline, noting that the phasing proposed and the period before full interoperability is achieved could result in additional manual work for FIUs and create operational burdens. One of them also stressed the importance of ensuring that implementation deadlines consider the availability of the necessary technical specifications and of continuing work towards greater use of structured data fields.

The European Commission supported the approval of the draft ITSs while underlining the importance of complying with existing obligations during the transitional period.

The Chair asked whether all General Board Members agreed with the adoption of the three draft ITSs, and no objections or abstentions were raised.

Conclusion

The General Board approved the three draft Implementing Technical Standards concerning:

- The format for FIU-to-FIU exchanges under Article 31(2) AMLD,
- The format for reporting information by FIUs to the EPPO under Article 81(1) AMLR,
- The format for reporting information by AMLA to the EPPO under Article 41(2) AMLAR.

3. FIU STANDING COMMITTEE – VOTE ON MEMBERSHIP AND CO-CHAIRMANSHIP - (POINT FOR DECISION)

Discussion

The Chair introduced the agenda item concerning the election of the members and Co-Chair of the FIU Standing Committee. The Chair recalled that the General Board was invited to vote on two matters, namely the election of the nine Standing Committee members and the election of the FIU Co-Chair.

AMLA staff presented the key steps leading to the establishment of the Standing Committee. AMLA staff recalled that the General Board had previously agreed on the scope of the Committee's mandate and the co-chairmanship arrangements. Following the adoption of the relevant Rules of Procedure on 15 June 2026, the Committee was formally established, and an AMLA Executive Board Member was designated as one of its Co-Chairs. AMLA staff further explained that a call for nominations for both Committee membership and the FIU Co-Chair position had been launched, with the list of candidates circulated to General Board members in advance of the meeting.

AMLA staff explained that the election of the nine Standing Committee members would take place in two stages under a staggered mandate system. In the first stage, five candidates would be elected for a three-year term, while in the second stage, four candidates (including those applying for the three- year term but not being elected for that) would be elected for a two-year term. Seven candidates expressed interest in the three-year term and two for the two-year term. AMLA staff noted that this approach was designed to ensure continuity of the Committee's work and preserve institutional knowledge over time. AMLA staff also outlined the voting arrangements, including the use of secret ballots for both the membership and co-chairmanship elections.

The Chair then launched the voting procedure for the Standing Committee members. Following the first round of voting, four candidates remained for the four seats subject to a two-year mandate. The Chair proposed appointing the remaining candidates without an additional ballot, and no objections were raised by the General Board.

The Chair subsequently opened the election for the FIU Co-Chair position. Following the vote, the elected Co-Chair thanked the General Board for its confidence and expressed commitment to supporting AMLA, the Standing Committee and cooperation among FIUs. The AMLA Executive Board Member serving as Co-Chair welcomed the outcome of the election, underlined the importance of the Standing Committee in supporting the work of the General Board, and looked forward to close cooperation with the elected members. The Chair congratulated the newly elected Co-Chairs and Standing Committee members.

Conclusion

The General Board elected:

- The nine members of the FIU Standing Committee in accordance with the applicable Rules of Procedure,
- The FIU Co-Chair for a two-year term.

4. THE FIUNION HUB (POINT FOR DISCUSSION)

Discussion

The Chair introduced the proposal for the FIUnion Hub and invited AMLA staff to present the initiative.

AMLA staff explained that the Hub is intended to support both operational and non-operational cooperation among FIUs by providing a secure environment for exchanges, facilitating the identification of best practices and operational challenges, and offering logistical and administrative support. The Hub would remain FIU-led, with AMLA providing coordination and expertise where appropriate.

Members welcomed the proposal and expressed support for its objective of strengthening cooperation among FIUs. They highlighted the importance of clearly defining the Hub's scope and its relationship with other cooperation mechanisms, in particular the future joint analysis framework. Several members also underlined the value of the Hub in facilitating discussions on cross-border risks and emerging trends.

In response, AMLA staff clarified that the FIUnion Hub is intended as a flexible cooperation platform that complements, but does not replace, the joint analysis framework. The Hub could support cooperation in cases where joint analysis is not necessary or feasible and could also serve as a forum for broader strategic discussions. It was also confirmed that participation in the Hub would not constitute a prerequisite for participation in joint analysis activities.

Conclusion

The General Board welcomed the proposed FIUnion Hub and supported further work on the initiative.

AMLA staff will refine the proposal considering the comments received and submit a revised version to the General Board for approval through a written procedure.

5. PRIORITY AREAS FOR JOINT ANALYSIS (POINT FOR DECISION)

Discussion

The Chair introduced the agenda item and invited AMLA staff to present the proposal.

AMLA staff recalled that, pursuant to Article 40(2) of the AMLA Regulation, the General Board is required to establish a list of priority areas for joint analysis. The proposed priorities had been developed through consultations with FIUs, contributions from EU bodies and agencies, relevant external reports and internal AMLA assessments. The list would support both the future case selection framework and AMLA's own joint and strategic analysis activities. The list was designed as a dynamic tool, to be reviewed regularly considering operational experience and emerging risks, with the current version proposed to remain valid until December 2027.

Members welcomed the proposal and supported the objective of establishing a common framework for joint analysis. Several stressed the importance of ensuring that future prioritisation exercises remain risk-based and increasingly informed by operational experience and data. Some members also noted that the proposed priority areas varied in terms of granularity and suggested that future iterations should further reflect EU-wide priorities and emerging threats.

Members nevertheless emphasised the importance of moving swiftly towards the operational phase of joint analysis. It was suggested that initial work should focus on practical and well-defined topics to build experience and demonstrate the value of the framework. One member proposed a technical adjustment by incorporating third-party payments under the broader priority area relating to cross-border money laundering through the banking sector. The Chair agreed to reflect the proposed adjustment.

AMLA staff confirmed that the proposed list was intended as a flexible starting point and would evolve based on operational experience and feedback from FIUs and reiterated that preparations for the launch of joint analysis remain on track for the fourth quarter of 2026.

Conclusion

The General Board approved the list of priority areas for joint analysis, subject to the technical adjustment discussed during the meeting.

AMLA staff will update the list accordingly and continue preparations for the launch of joint analysis activities in the fourth quarter of 2026.

The priority areas will be reviewed regularly considering operational experience and emerging risks, with a revised list to be developed in 2027.

6. ECJ CASE C-222/25 – FOLLOW-UP (POINT FOR INFORMATION)

Discussion

The Chair invited a Board Member to provide an update on Case C-222/25 before the European Court of Justice.

He reported on the oral hearing, thanked several Member States for their participation and AMLA, the Chair and Member States for the coordination efforts undertaken ahead of the proceedings. He also noted that the preparatory exchanges had helped establish a largely aligned position among the participating countries and contributed positively to the conduct of the hearing.

He observed that the Court demonstrated a strong understanding of the role and functioning of FIUs, as well as of the principles governing international FIU cooperation. It was noted that a significant part of the hearing focused on the applicable data protection framework for FIUs and, in particular, the relationship between the Law Enforcement Directive and the General Data Protection Regulation. The member explained that, irrespective of the legal framework ultimately found to apply, there appeared to be broad agreement on the need for FIUs to benefit from safeguards protecting sensitive information from disclosure to data subjects. Questions were also discussed regarding the extent to which the safeguards available under the General Data Protection Regulation could provide protections comparable to those foreseen under the Law Enforcement Directive.

The European Commission concurred with the description of the hearing and highlighted the importance of awaiting the Advocate General's Opinion, expected in October 2026, before drawing conclusions on the implications of the case. Members agreed that any future consideration of possible actions should be based on the guidance provided by the Court.

The Chair thanked the Member States that had contributed to the proceedings and underlined the importance of the issues under discussion for the future data protection framework applicable to FIUs.

Conclusion

The General Board took note of the update on Case C-222/25 and exchanged views on the issues discussed during the oral hearing.

The General Board agreed to revert to the matter following the publication of the Advocate General's Opinion.

7. ANY OTHER BUSINESS

Under Any Other Business, a General Board member informed of an initiative aimed at coordinating the needs of FIUs using the goAML platform developed by the United Nations Office on Drugs and Crime (UNODC). The member explained that a number of EU FIUs rely on goAML and that forthcoming Union-wide AML/CFT requirements may require the development of additional functionalities and templates within the system. In this context, the member suggested that interested FIUs could engage jointly with UNODC to promote the development of common features and ensure that future regulatory requirements are appropriately supported by the platform.

Several members welcomed the initiative and recognised the importance of ensuring that goAML evolves in line with the new AML/CFT framework. They noted that many FIUs depend on the platform and that coordinated requests from a larger group of users could help increase the visibility and prioritisation of development needs. Reference was also made to ongoing cooperation within the international and regional goAML user communities.

Members further highlighted the importance of engaging with UNODC at an early stage to support the implementation of future AMLA instruments and harmonised reporting requirements, and suggested that close cooperation with AMLA and the European Commission could strengthen the dialogue with UNODC

The Chair welcomed the initiative and confirmed AMLA's willingness to support coordination among interested FIUs. The European Commission also expressed its support and indicated its readiness to contribute to discussions with UNODC where appropriate.

Conclusion

The General Board took note of the initiative concerning future developments of the goAML platform.

Interested FIUs will continue to coordinate their engagement with UNODC regarding potential enhancements to the system, with AMLA and the European Commission expressing their willingness to support these efforts.

Annex - Written procedures concluded by the General Board (in FIU composition) until 30 June 2026

- GBFIUX032 - 2026 - WP - FIU Delegate Lithuania
- GBFIUX033 - 2026 - wp - FIU delegate Malta
- GBFIUX034 - 2026 - wp - FIU delegate Finland
- GBFIUX035 - 2026 - wp - FIU delegate Ireland
- GBFIUX036 - 2026 - wp - FIU delegate Greece
- GBFIUX037 - 2026 - wp - Minutes of the 8 GB in FIU and Joint Composition for Comments
- GBFIUX038 - 2026 - wp for comments - Draft AMLA Annual Report 2025
- GBFIUX039 - 2026 - wp - FIU delegate Hungary
- GBFIUX040 - 2026 - wp - for approval - Rules of Procedure of the FIU Standing Committee
- GBFIUX041 - 2026 - wp - FIU SC - Call for nominations of members and FIU Co-Chair
- GBFIUX042 - 2026 - wp for approval - Draft Minutes of the 8th GB Meeting in FIU and Joint Composition
- GBFIUX043 - 2026 - wp - Launch of the Public Consultation on the RTS under Article 31(3) AMLD
- GBFIUX044 - 2026 - wp - FIU Delegate Denmark
- GBFIUX045 - wp - Call for nominations for the informal Expert Group on PfIS

LIST OF PARTICIPANTS

MEMBER STATES

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

EEA OBSERVER STATES

- Iceland
- Lichtenstein
- Norway

EU OBSERVER INSTITUTIONS

- EUROPOL
- EUROJUST
- OLAF

EUROPEAN COMMISSION

- EC

AMLA

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