SUMMARY OF THE 4TH AMLA GENERAL BOARD MEETING IN JOINT COMPOSITION

4th General Board Meeting

Date	14 October 2025
Time	10:00 – 12:45
Location	Frankfurt am Main, on-site

1. APPROVAL OF THE AGENDA

Discussion

The Chair presented the agenda for the meeting in Joint composition. General Board Members did not propose amendments and did not signal any conflicts of interest.

Conclusion

The General Board approved the agenda as proposed.

2. GENERAL BOARD MEETING DATES 2026 (POINT FOR DECISION)

Discussion

The Chair presented the proposed calendar of General Board meetings for 2026, noting planning assumptions related to deliverables and venue availability. General Board Members welcomed the forward planning and highlighted potential clashes with scheduled international engagements, specifically in February, April, late June and early July. Members asked that physical meetings in February be limited and that dates be adjusted to avoid these overlaps.

Conclusion

The General Board agreed that the calendar should be refined to minimise overlaps with such international engagements and to support broad participation.

Next steps

AMLA will revise the proposed dates and circulate an updated calendar to General Board Members for approval by written procedure.

3. AMLA DRAFT SINGLE PROGRAMMING DOCUMENT 2026-2028 (POINT FOR DISCUSSSION)

Discussion

The Chair introduced the draft Single Programming Document for 2026 to 2028, outlining planning assumptions, priority areas and delivery sequencing.

General Board Members welcomed the overall structure and clarity. The vast majority agreed on the priorities laid out and emphasized the need to follow a phased approach to address the financial sector and non-financial sector with a different timing, due to high heterogeneity of the latter. They encouraged careful calibration of ambition and asked that sequencing reflect resource constraints and the development of AMLA's risk methodology. The European Commission supported prioritising work most relevant for the supervisory community and the single rulebook and cautioned, however, against deprioritising the non-financial sector, given its importance for the co-legislators.

In her conclusion, the Chair emphasized that the NFS is indeed important to the AML system, and it is fundamental to get the risk assessment models and rules right. Given the huge heterogeneity of the NFS, careful, proportionate, and business-tailored drafting will be needed. Regarding the possible reprioritization of some (FS or NFS) mandates, this will need to be discussed and agreed with the European Commission.

Conclusion

The General Board took note of the draft and agreed that priorities and sequencing should be refined.

Next steps

General Board Members will provide written comments by 24 October 2025. AMLA will integrate feedback and circulate a revised draft, with adoption planned by the Executive Board by the end of November 2025 and publication thereafter.

4. SUGGESTED APPROACH FOR AML CONVERGENCE AND EFFECTIVENESS OF CRYPTO-ASSET SERVICE PROVIDERS (CASP) DURING TRANSITION TO MARKETS IN CRYPTO-ASSETS REGULATION (MICAR) (POINT FOR DISCUSSION)

Discussion

The Chair recalled that the initiative is part of the 2025 work program and seeks to promote convergence and effectiveness in the crypto-asset sector during the transition to the Markets in Crypto-Assets Regulation. The Chair outlined the objectives to map risks and practices in the near term and to prepare coordinated follow-up thereafter, and invited General Board Members to comment on scope, timing and expected outputs.

AMLA staff presented two-phase plan comprising evidence gathering and analysis with competent authorities and financial intelligence units leading to a strategic report, followed by joint thematic reviews or targeted analyses.

General Board Members expressed broad support and called for careful calibration of scope and timing, including consideration of the post-transition landscape and unauthorised activities. Members suggested broadening coverage beyond crypto-asset service providers to include asset-referenced tokens and electronic money tokens, monitoring developments in decentralised finance and crypto automated teller machines, and examining cross-border risks, the travel rule, nested and correspondent arrangements, and offshore jurisdictions. They emphasised complementarity with ongoing work by relevant authorities and cautioned against duplication. From a financial intelligence perspective, Members welcomed questionnaires and an expert network, while noting the network could follow initial analytical outputs.

Conclusion

The General Board agreed on the overall two-phase approach and on refining scope and sequencing to reflect feedback and resource considerations.

Next steps

AMLA will adjust the work plan and present an updated proposal at the next meeting, commence evidence gathering with competent authorities and financial intelligence units, and aim to deliver the first strategic analysis in spring 2026.

5. UPDATE ON AMLA ORGANIZATIONAL DEVELOPMENTS, INCLUDING HR AND IT (POINT FOR INFORMATION)

Discussion

The Chair noted that, due to time constraints, the item would be taken in written form and invited General Board Members to consult the presentation already shared and to submit any questions in writing to the Secretariat. General Board Members acknowledged the approach.

Conclusion

The General Board took note of the update and agreed to proceed without discussion at this meeting.

Next steps

AMLA will circulate the written update, respond to questions received from General Board Members, and propose a slot for a fuller update at a forthcoming meeting if required.

6. POLICY ON ETHICS AND CONFLICT OF INTEREST FOR AMLA STAFF AND SENIOR MANAGEMENT (POINT FOR DISCUSSION)

Discussion

The Chair recalled that the General Board must be consulted on the draft rules to prevent and manage conflicts of interest concerning the Chair and other members of the Executive Board under the AMLA Regulation, and invited General Board Members to comment on scope, applicability and implementation arrangements.

AMLA staff outlined the main features of the draft policy.

General Board Members sought clarifications on whether the policy applies to financial intelligence unit delegates and to prospective members of internal committees.

AMLA explained that questions regarding financial intelligence unit delegates will be addressed in the context of the rules for seconded national experts and the roles and obligations of financial intelligence unit delegates to be discussed at the next meeting, and that the policy does not apply to members of Internal Committees.

Conclusion

The General Board took note of the draft policy and the clarifications provided.

Next steps

AMLA will refine the draft as needed and proceed with the steps required for adoption, with a follow-up on financial intelligence unit delegates at the next meeting.

PARTICIPANTS

MEMBER STATES

- Austria - SUP and FIU
- Belgium - SUP and FIU
- Bulgaria - SUP and FIU
- Croatia - SUP and FIU
- Cyprus - SUP and FIU
- Czechia - SUP
- Denmark - SUP
- Estonia - SUP and FIU
- Finland - SUP
- 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 and FIU
- Lithuania - SUP and FIU
- Luxembourg – SUP and FIU
- Malta- SUP and FIU
- Netherlands - SUP and FIU
- Poland - SUP and FIU
- Portugal - SUP and FIU
- Romania - SUP
- Slovakia - FIU
- Slovenia - SUP and FIU
- Spain - SUP and FIU
- Sweden - SUP and FIU

EUROPEAN COMMISSION

- EC

OBSERVER INSTITUTIONS

- ECB
- EUROPOL
- EPPO
- EUROJUST
- OLAF
- EIOPA

EEA OBSERVER STATE

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

AMLA

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