

## Position Paper by the Investment Migration Council (IMC)

### On the newly established European Anti-Money Laundering Authority

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12<sup>th</sup> May 2025

On 30 March 2024, the European Union adopted a comprehensive legislative package aimed at strengthening its framework for anti-money laundering and countering the financing of terrorism (AML/CFT). This legislative overhaul marks a significant step in the EU's efforts to reinforce financial integrity and security across Member States and includes provisions bringing investment migration programmes within the scope of EU's AML/CFT framework.

A key element of the reform is the establishment of a new EU-level Anti-Money Laundering Authority (AMLA), which will be based in Frankfurt, Germany. This institution is tasked with directly supervising certain obliged entities, coordinating national supervisors, and ensuring uniform implementation of AML/CFT rules across the EU. Recently, the European Parliament confirmed the structure of AMLA and approved the appointment of Ms. Bruna Szego as its first Chair, along with all Executive Board members.

The Investment Migration Council (IMC), as the only global association representing the full investment migration ecosystem, welcomes this new phase of institutional consolidation. We are a registered organisation with both the United Nations and the EU's Transparency Register, and we have long advocated for clear, proportionate, and transparent regulation of investment migration programmes.

We support a constructive legislative and oversight approach that recognises both the sovereign right of EU Member States to design and manage their immigration policies, and the need to ensure robust safeguards against misuse. Responsible investment migration programmes already incorporate risk-based due diligence measures that reflect international best practices. Aligning these with evolving EU rules will enhance both compliance and trust in the system.

In this context, the IMC has been closely monitoring the development of the legislative package and the establishment of AMLA. We welcome the public statements made by Chair Szego and the newly appointed Executive Board members of AMLA signaling a commitment to engage openly with all stakeholders. This willingness to pursue a collaborative and inclusive regulatory environment is both encouraging and necessary. The IMC looks forward to a constructive dialogue with AMLA and other relevant EU bodies once the authority's leadership is fully operational. We are ready to share our global expertise, contribute to policy discussions, and ensure that the implementation of these new rules strengthens—not stifles—legitimate investment migration frameworks.

Contact:  
[media@investmentmigration.org](mailto:media@investmentmigration.org)