

Strasbourg, 9 December 2023

C198-COP(2023)10

## **CONFERENCE OF THE PARTIES**

**Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198)**

**15<sup>th</sup> meeting, Strasbourg, 9-10 November 2023**

## **MEETING REPORT**

Memorandum prepared by the Secretariat  
Directorate General Human Rights and Rule of Law (DGI)

## **SUMMARY OF THE PROCEEDINGS**

The Conference of the Parties to the Council of Europe's Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS no. 198, hereafter: 'the Convention') held its fifteenth meeting in Strasbourg, from 9 to 10 November 2023, with Mr Ioannis Androulakis (Greece) as President. The agenda of the meeting, the decisions taken, and the list of participants are annexed to this report.

The report summarises the discussions on each agenda item and the decisions adopted by the Conference of the Parties (hereinafter COP 198).

### **Item 1. Opening of the meeting and Statement by Ms Hanne Juncher, Director of the Information Society and Action against Crime**

The President opened the meeting and welcomed the participants. In her opening statement, Ms Hanne Juncher, Director of Information Society and Action against Crime welcomed the finalisation of the ratification process by Estonia and Morocco, which brought the total number of Parties to the Convention to thirty-nine. Ms Juncher stressed that asset recovery remains a priority of the Council of Europe, which may continuously lead to the revision and development of its standards, based on the findings of the Organisation's well-developed monitoring mechanisms, such as MONEYVAL and COP 198. In addition, numerous technical assistance projects are implemented to support countries in their AML/CFT efforts. Ms Juncher informed participants of the outcomes of MONEYVAL Ministerial conference held in Warsaw in April 2023, resulting in the adoption of a High-level Declaration and MONEYVAL's strategy for the period 2023-2027. Both documents call for greater synergies between MONEYVAL and the COP 198. She emphasised the importance of the continuous promotion of the Warsaw Convention as well as of the application of its provisions in practice. The excellent cooperation with the FATF was also underlined, in light of the recently revised FATF standards and taking into account the contribution of the COP's President in that process.

Ms Juncher also informed the Plenary on the developments/steps taken in relation to EU's ratification of the Warsaw Convention, as well as the interest expressed by several non-Council of Europe states to join the Convention. She also informed the plenary that the 2024-2027 Council of Europe budget will be adopted by the Committee of Ministers soon after the COP plenary (late November 2023). The budget proposal also includes the establishment of a new committee of experts which will be responsible for drafting a protocol to the Warsaw Convention. Ms Juncher encouraged the COP198 experts' community to be fully engaged in this process.

### **Item 2. Adoption of the Agenda and order of business**

The agenda was adopted with proposed amendments to the order of business. The amendments concerned parts of item 11 of the agenda which were examined on day 1 (i.e., presentations of asset management systems by Italy and Croatia); and item 8 where a presentation will be made by the Scientific Expert only. The final agenda is included in Annex I.

### **Item 3. Communication by the President, Vice-President and Executive Secretary**

The President welcomed Estonia and Morocco, who joined the COP plenary for the first time as the Parties to the Convention. The Plenary was then informed of the activities since the 14<sup>th</sup> plenary in which the COP President and Vice-President were involved:

- (i) FATF Policy Development Group meetings (five meetings held on the period from February to October 2023) on the revision of the FATF's Recommendations on asset recovery – brief presentation was made on inputs provided by the COP in this process.
- (ii) FATF/Interpol FIRE II event (September 2023), which was a continuation of last year's initiative of the FATF President on strengthening asset recovery globally.
- (iii) exchange of views with the Council of Europe's Committee on Crime Problems (CDPC) in June 2023 where the President and the COP Executive Secretary presented the proposal for an additional Protocol to the CETS 198, as well as the draft Terms of Reference (ToR) of the Committee that would be tasked with the preparation of this Protocol.
- (iv) MONEYVAL High-Level Conference of Ministers responsible for anti-money laundering policies from the member states and territories of MONEYVAL (April 2023), to which the COP President contributed as one of the speakers in the high-level session; and
- (v) Latvian Chairmanship Conference on 'Future of Anti-Money Laundering' held in Riga (November 2023) where the COP President presented a forward-looking view on the provisions that the new Protocol to the Warsaw Convention could address.

The Vice-President informed the Plenary on her participation as a guest speaker to the Conference of "Supranational and national AML/CFT/CPF systems: challenges and prospects", that took place in online format in Ukraine (April 2023). At this occasion, she presented the COP activities, and relevant findings with regard to Ukraine's compliance with the Convention, as reflected in the Thematic Monitoring Reviews carried out from 2018 onwards.

The Executive Secretary informed the Conference of the Parties that the COP 198 secretariat supported the process of revision of the FATF standards on asset recovery and actively contributed to those meetings, alongside experts from other Parties to the Convention. COP's support was also instrumental in organising two FATF seminars: one on good practices in postponing suspicious transactions where several COP States Parties (France, Italy and the UK) presented their legislation and practical application of this measure; and the seminar on Non-Conviction Based Confiscation where the secretariat facilitated the participation of the European Court on Human Rights. The colleague from the court had an in-depth presentation of the court's practice in relation to cases which feature NCBC. In addition, four States Parties (Italy, Slovenia Malta and UK) presented their NCBC systems.

The Executive Secretary informed the Conference in relation to the work of the Secretariat, including staffing and budget. She referred also to the open call for a secondment of an official to the MONEYVAL and Criminal Asset Recovery Division, indicating that the selected official would also provide support to the work of the COP secretariat.

#### **Item 4. State of signature and ratification of the Warsaw Convention**

The Secretariat informed the COP on the outcomes of the meeting held with Kyrgyz authorities in relation to their expression of interest to join the Convention.

The representative of the European Union informed the COP 198 of the Union's intention to ratify the Convention and that the process would be expected to be finalised in 2024 . It was outlined

that the ratification of the Warsaw Convention is part of the EU's Strategy to tackle Organised Crime2021-2025<sup>1</sup>.

### **Item 5. Declarations and Reservations**

The Secretariat presented the findings of the Review of the Declarations and Reservations prepared in line with the decisions taken at the last meeting of the COP 198. Key changes to the document were discussed, including the specific findings of the thematic monitoring reviews. The aim of this exercise was to identify the States Parties whose systems go beyond declarations made by these Parties in relation to application of articles 3(4) and/or 7(2) I/19(1).

The review confirmed that for **Article 3(4)**, six State Parties (Germany, Italy, Poland, the Russian Federation, Slovenia and Ukraine) implemented the requirements of this article beyond the limitations declared when these Parties deposited the instruments of ratification. The review also confirmed that the declarations made by Georgia and the United Kingdom reflected the way these Parties apply Article 3(4).

With regard to **Article 7(2) (c)**, none of the four States Parties (Germany, Greece, the Russian Federation and the Slovak Republic) which declared their right not to apply it, implemented this provision.

With respect to **Article 19(1)** and the analysis of declarations made by Estonia, Germany, Greece and Türkiye, the review confirmed that their declarations are still valid. On the other hand, while the Russian Federation and the Slovak Republic did not make declarations in respect of Article 19, the fact that these countries declared not to apply Article 7(2 c) has a cascading effect on their non-application of Article 19(1).

Several State Parties provided updates on their status of reservations and declarations. Slovenia informed the Plenary that there is no consideration of withdrawing the declaration made with respect to Article 3(4).

The Slovak Republic provided updates on the process of withdrawal of the reservation made in respect of Article 7 (2 c). The Slovak delegation stated that the Government and the Parliament had approved the withdrawal of the declaration with the aim to fully apply this provision of the Convention. This development was welcomed by the Conference of the Parties and the President noted that this may usefully inspire other Parties. Their representative indicated that a formal approval is still required through the signature of the President, which, was expected shortly after the 15<sup>th</sup> COP meeting.

Ukraine reported that the withdrawal of the declaration in relation to Article 3(4) was yet to be discussed bilaterally, given that a process was underway for legislative amendments in relation to the reversal of the burden of proof.

Italy informed that no progress has been achieved in relation to the withdrawal of the declaration made to Article 3(4). Although the reversal of the burden of proof is possible under the circumstances as provided in the "Antimafia" legislation, at this stage, Italy was not reconsidering its declaration in relation to Article 3(4).

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<sup>1</sup> See [COM\(2021\) 170 final](#).

Poland announced their intention to withdraw the declaration made to Article 3(4) and they informed that the preparatory work is in progress.

Lastly, the UK informed that the Convention has been extended to the Isle of Man and that all relevant declarations were made at that occasion.

In line with what had been discussed in previous years and in line with the proposal made at the 14<sup>th</sup> plenary, the President concluded that some of the State Parties have expressed readiness to continue the process of reviewing their declarations. This concerned Article 3(4). In view of that, the President proposed if the Parties concerned agreed to that, he would write a letter to the competent authorities of these Parties to that effect.

Taking into account the conclusions of the thematic monitoring reports adopted so far, the COP to CETS 198 agreed to encourage several State Parties to review their declarations and that a letter to that effect should be addressed by the President to the relevant competent authorities in Poland, Slovenia, the Russian Federation and Ukraine.

#### **Item 6. Information provided by Parties and Observers on topical developments of relevance for the Conference of the Parties**

Several State Parties presented developments with respect to practical application of the different provisions of the Convention.

Bosnia and Herzegovina reported that two institutions, at the entities' level, were established in order to manage seized and confiscated property in accordance with the requirement of Article 6 of the Convention. Further actions were undertaken at the state level where working group were responsible for streamlining the process of establishing the asset management offices. The delegation also presented several examples of successful management of seized and confiscated property. In relation to the implementation of Article 25 of the Convention, the delegation informed that Bosnia and Herzegovina is currently negotiating agreements for assets sharing with Montenegro and Serbia.

Romania informed the Plenary about the implementation of several projects, developed in cooperation with foreign counterparts, whose main component is capacity building. The focus of these projects was mostly on financial investigations and asset recovery.

The UK provided an update on the recent legislative activities, which included a reform of the companies' register, new measures to prevent the abuse of limited partnerships, the introduction of additional powers to seize crypto assets and improvements aimed at more effective information sharing between the government and the private sector. Further information was provided in relation to the values of seized and confiscated assets as well as those seized within the civil forfeiture procedure.

The Russian Federation presented the case law of the Supreme Court and the case of practical implementation of Article 9 of the Warsaw Convention.

Ukraine provided information on the ongoing legislative amendments in the field of asset-sharing and for the purpose of an effective asset recovery mechanism.

Azerbaijan provided updates concerning the implementation of Article 11 of the Convention. Amendments to the Criminal Code were adopted which now provide for consideration of international recidivism when deciding on a penalty.

The Netherlands reported on an event that they organised recently, focusing on the fight against organised crime and non-conviction-based confiscation. The delegation also highlighted the initiative which resulted in establishing a European coalition against organised crime, together with colleagues from France, Germany, Italy, Belgium and Spain. This coalition adopted a joint action plan, which entailed further cooperation and exchange of best practices in ML and other related issues.

The Principality of Monaco informed the Plenary about recent developments in relation to their confiscation regime. A service has been established for the management of seized and confiscated assets and some case examples were presented.

The Republic of Moldova presented a recent case which led to confiscation of ill-gotten assets with a focus being made on challenges in a specific fraud case. The delegation also emphasised their active participation in international fora on asset recovery.

The Conference of the Parties invited State Parties to continue supporting the implementation of the Convention through similar activities in the future and inform the plenary on these developments.

## **Item 7. Monitoring the implementation of the Convention**

### **i. Estonia: Amendments to the 2018, 2019, 2020, 2021, 2022 thematic monitoring reports following the ratification by Estonia**

In line with Article 19bis of the Rules of Procedure, and reporting requirements for the new State Parties, the Secretariat carried out and presented the analysis of Estonia's compliance with the provisions of the Convention which were subject to Thematic Monitoring Reports since 2018.

The presentation was followed by an intervention by Estonia which, apart from presenting the key features of its compliance with articles under review, also suggested some changes in respect of the analysis of the implementation of articles 7 (2 c) and 19 (1). To that effect, the delegation highlighted that the LEAs have legal power to monitor bank accounts as well as to provide assistance to foreign counterparts when requested.

The Secretariat confirmed that the changes as proposed by Estonia were grounded. Plenary approved these changes.

The Conference of the Parties adopted new sections to its 2018-2022 Horizontal Review Reports in respect of Estonia's implementation of articles 3(4); 6; 7(2 c) and 19 (1); 9(3); 10 (1 and 2); 11; 14 and 25 (2 and 3), which will be published after the meeting.

### **ii. Draft timeline for reporting (2024-2026): Morocco and territories where States Parties extended the application of the CETS 198**

The Secretariat presented a proposed calendar for carrying out thematic monitoring reviews of the Parties which recently ratified the Warsaw Convention (Morocco), as well as the jurisdictions which have autonomous AML/CFT and asset recovery systems to which State Parties extended

the application of the Convention (Aruba, Curaçao and Sint Maarten (the Kingdom of Netherlands) and Jersey and Isle of Man (the UK)). The Conference of the Parties decided that in 2024, the Kingdom of Morocco and the country of Aruba of the Kingdom of Netherlands will be subject to the monitoring procedure set out in Article 19bis of the Rules of Procedure according to the timeline prepared by the Secretariat. In this context, they will undergo a review of compliance with the provisions of the Convention which were subject to the thematic monitoring reviews from 2018 onwards, which will be examined with a view to their adoption at the sixteen plenary meeting. For 2025, the same review will be carried out for Curaçao and Sint Maarten, and in 2026 for Jersey and the Isle of Man.

In relation to follow up reports, the calendar of activities included the selected States Parties, which would, within the timeframe foreseen by the Rules of Procedure, undergo this procedure for articles **7 (2c)/19(1)** (Austria, Denmark, France, Lithuania, Monaco and Spain), **3(4)** (Republic of Moldova, Monaco, Spain and San Marino), **10 (1)** (Russian Federation) and **10(2)** (Bulgaria, Croatia, Denmark, France, Montenegro, Russian Federation, Türkiye and the UK). In addition, specific timelines would be decided for Estonia (if any article would be selected for their follow up). Taking into consideration Austria's request, it agreed that Austria would report one year later than indicated in the proposed timeline for its follow up on Article 7(2 c)/19(1), given the date of the country's ratification of the Convention.

The Netherlands welcomed the timeline and promised further engagement with the Secretariat in order to streamline the process of the assessments of the independent states of the Kingdom of Netherlands to which the Convention was extended.

The document was approved as amended and will be distributed to all Parties.

**Item 8. Revision of the FATF Recommendations 4 and 38 in relation to measures 'to strengthen the toolkit available to law enforcement, asset recovery agencies and the criminal justice system more broadly to target criminal assets'**

The Scientific Expert presented a comparative analysis of the revised FATF standards and the Convention's provisions, drawing attention on possible areas where the new standards go beyond those of the Convention and vice versa. Issues such as provisional measures to secure confiscation, asset management, return and disposal of confiscated assets, non-conviction-based confiscation, reversal of burden of proof, suspension of suspicion transaction, international cooperation, sharing of confiscated assets, informal cooperation, etc. were all included in the analysis. As a result, a document was developed detailing each of these areas and their coverage in both the revised FATF standards (Recommendations 4 and 38) and the Warsaw Convention. Several State Parties took the floor expressing their views on the impact the revised standards will have. In view of that, several States Parties expressed their views on actions to be taken by the COP 198. The Netherlands and Austria called for the amendments of the Convention by introducing provisions such as those proposed by the amended Recommendations 4 and 38 in the planned Additional Protocol. The delegations also emphasised that the FATF Recommendations are soft law and thus do not constitute a legally binding instrument.

The Swedish delegation emphasised that they were members of the FATF working group which was in charge for the amendments of Recommendations 4 and 38. The delegation shared their concern that both revised Recommendations referred that their provisions should be applied in line with fundamental principles of domestic legislation. These principles are broadly interpreted by countries and this can have an effect on the application of the revised Recommendations.

The Croatian delegation stated that there is a difference between the FATF Recommendation and the provisions of the Convention, since the latter is binding and thus has to be applied by the States Parties. Fundamental principles of domestic law is also part of the EU legal framework and if they did not manage to make an agreement at the EU level, it is not surprising that such progresses was not achieved at the global network level.

Bosnia and Herzegovina raised concerns and questioned whether countries faced a risk by implementing the revised Recommendations in case they were not in line with the fundamental principal of domestic law, and if there were any security mechanisms to protect the right to property.

The President indicated that the issues raised by the delegations would remain relevant for the discussions on the future draft protocol. He referred to the draft Terms of Reference (ToR) of the Council of Europe committee in charge for drafting the additional protocol. This document makes reference to the human rights and rule of law standards of the CoE, as well as the case law of the ECHR. These standards would be a part of the discussions of the future Committee.

The Estonian delegation intervened stating that a reference to the fundamental principal of domestic law is used in 7 instances in the FATF standards, but the jurisdiction needs to justify the existence of such a principle in order to prove that it is reasonable not to apply certain standard. Azerbaijan stated that the fundamental principle of domestic law should be encompassed in the Constitution and that it might be useful to have a definition of this principal in the international standards in order to limit any ambiguous interpretation. They referred to the legal disputes in Azerbaijan whether the reversal of the burden of proof is contrary to their fundament principle in relation to the presumption of innocence.

The President recalled that the plenary had the possibility to hear the presentation of the ECHR on its interpretation of the reversal of the burden of proof and its relationship with human rights issues. Such examples as well as interpretations provided by the drafting committee can further limit the wide usage of the fundamental principle of domestic law as a justification for countries which do not to apply the standards.

The Executive Secretary explained that the revised FATF Recommendations are still pending publication. Consequently, the paper/comparative analysis prepared by the Scientific Expert would be published on the COP restricted website after the publication of the revised FATF standards.

The Conference of the Parties instructed the secretariat to communicate the presentation and the detailed mapping paper prepared by the Scientific Expert to the Parties and publish them in due course on the COP's restricted website.

#### **Item 9. Future planned work of the Council of Europe for the preparation of an additional protocol to the CETS no. 198**

The President presented to the Plenary the paper on added value and feasibility of preparing an additional protocol to the Warsaw Convention. He underlined that the existing CoE's framework provided a strong basis for further development of the standards in the field of asset recovery.

Three key areas were identified as subjects of the additional protocol. These are: (i) management of seized and confiscated assets; (ii) fostering of international cooperation in non-conviction based confiscation procedures; and (iii) enhancement of asset sharing between State Parties, which would also ensure prior consideration to be given to the victims of crime. The President also



informed the Plenary that the draft ToR enable to cover other issues if deemed necessary. The Executive Secretary informed the Plenary of the process of adoption of the Terms of reference and related budget by the Committee of Ministers. The future committee of experts on criminal asset recovery will work under the authority of the Committee of Ministers and of the European Committee on Crime Problems (CDPC), and that it would engage with other CoE committees, including the COP 198, which should designate a representative to contribute to its work.

The CDPC Secretariat explained that the CDPC is the Council of Europe steering committee which deals with all crime related issues. It was also the committee responsible for approving the draft Warsaw Convention. In cases where additional expertise is needed, the committee relies on the other bodies and experts. In this particular case, it is expected that they would mostly rely on the COP198.

The Russian Federation expressed concern that NCBC may violate human rights, further suggesting that wording “if consistent with fundamental principle of domestic legal system” shall be introduced. They expressed the view that the provisions of the additional protocol should ensure that human rights are taken into account. Furthermore, they requested amendments in the information document circulated to clarify that the Russian Federation is not member of MONEYVAL nor was involved in the process of adoption of the MONEYVAL Declaration. Finally, the delegation asked about the possibility for a non- member to take part in the work of the future drafting committee. The Executive Secretary stated that the Information Note is not a document to be adopted by the plenary. Its purpose is to provide the rationale why the protocol is needed, and it made references not only to MONEYVAL but to a range of other Council of Europe committees. Given the request of the Russian Federation to delete references to MONEYVAL, the Executive Secretary proposed that a generic footnote is made in the text noting that the parts where MONEYVAL or other Council of Europe Committees are mentioned do not concern the Russian Federation as the latter does not take part in their work. The proposal was accepted by the Russian Federation and the footnote would be added in the text.

With regard to the negotiation of the future protocol, the Executive Secretary also explained that the terms of reference of the Committee as decided by the Committee of Ministers clarify which States can take part in the drafting process. Interested non-member states of the Council of Europe could be invited to contribute to the work of the Committee by putting forward a request to that effect to the Committee of Ministers. Also, the Russian Federation, as a non-member State of the Council of Europe, could also contribute to the process whenever consultations are initiated and to which the COP 198 is invited and decides to contribute with a common position.

Taking into account the President’s proposal, the Conference of the Parties authorised the Bureau to appoint the COP expert(s) which should be engaged in the work of the committee of experts on criminal asset recovery on behalf of the Conference of the Parties as soon as the latter is established.

## **Item 10. Follow up procedure: Report on progress made by the State Parties**

### **i. Articles 11 and 25 (2 and 3)**

In accordance with the decision taken in the 14<sup>th</sup> COP Plenary Meeting, the Secretariat carried out an analysis of progress made by (i) Montenegro, the Russian Federation, Serbia, and Türkiye on implementation of Article 11; (ii) by Armenia, Azerbaijan and Serbia on Article 25 (2 and 3); and (iii) by North Macedonia and San Marino on paragraph 2 of Article 25.

The analysis as prepared and presented by the Secretariat revealed that none of the selected countries made sufficient progress in order to address the requirements of Article 11. With regards to Article 25 (2 and 3), Azerbaijan introduced legislative changes implementing both paragraphs, while San Marino made progress in addressing the requirements of Article 25 (2). Other three countries (Armenia, Serbia and North Macedonia) did not introduce legislative amendments or other measures to meet the requirements of Article 25 (2 and 3).

The President reminded the Plenary about the decision adopted last year in relation to the next steps to be undertaken in the case of no progress in implementing selected Articles by the State Parties in this follow up cycle.

The Russian Federation made several observations on the text of the report, stating that the language of the report in relation to the Russian Federation did not give enough credit to the authorities' efforts to address the shortcomings, such as the fact that there is a draft legislation in place. In their view, the conclusions were not fully in line with the analysis.

The Deputy Executive Secretary explained that the text of the report adequately reflected the findings and emphasized all endeavors undertaken by the Russian Federation, such as introducing legislative amendments which were still pending adoption. However, since the legislation had not yet been adopted, it could not be concluded that sufficient progress was achieved. He further emphasized that the same language has been used in addressing similar issues for other State Parties, such as Armenia and Montenegro.

The Russian Federation further expressed their objection to the conclusion that “no sufficient progress has been made” since they considered such wording discouraging.

The Scientific Expert made two proposals to be introduced to amend the conclusion (i) “the Russian Federation has to make further progress to implement Article 11”; (ii) “The Russian Federation has not yet implemented Article 11”.

The Russian Federation agreed for the first option to be used in the report and Plenary further agreed that the same language would be introduced for some other countries which were in a similar situation, such as Montenegro.

The Serbian delegation informed the Plenary that a working group was established with the aim to amend the criminal legislation and that the COP198 recommendations would be taken into consideration and implemented. Legislative amendments were expected to be adopted by the end of 2024.

Türkiye reiterated statements expressed within the discussion of the previous follow up report on Article 11, providing case examples of the court decisions where sanctions were not reduced due to the recidivism of the offender. The delegation also questioned why Türkiye was in a follow up process, since in their view, the country sufficiently applied the provisions of Article 11.

The Deputy Executive Secretary explained that all responses were duly analysed, and that Türkiye did not demonstrate enough progress related to the application of the international recidivism, reiterating the findings and reasoning of the follow up report.

The Scientific Expert also took a floor and supported the analysis and conclusion made by the Secretariat. In his view, the analysis was in line with the requirements of Article 11 since the language of the provision calls for heavier sanction in case of international recidivism. Türkiye's

authorities, on the contrary, provided arguments that defendants would not benefit from the alleviating sanction in case international recidivism was established.

Considering the aspects raised by Türkiye the President suggested that it may be useful to update the Interpretative Note on Article 11 to provide further clarity to Parties on the Convention's provisions. The Conference of the Parties decided to update the Interpretative Note on Article 11. The Scientific Expert agreed to prepare the revision of the Interpretative Note.

## **ii. Article 14**

In accordance with the decision of the 14<sup>th</sup> COP meeting, the Secretariat carried out an analysis on the progress made by the Russian Federation in relation to the application of Article 14 of the Convention. The report found that the draft legislation, as presented by the Russian Federation, took into consideration the requirements of Article 14. Given the fact that the draft legislation was not yet adopted, nor in force, the analysis concluded that insufficient progress had been made.

The Russian Federation noted that in the introductory part on Article 14 there is a statement reflecting the draft law, but the final conclusion is that the Russian Federation continued not to apply this article. The delegation asked for further clarification on actions required. In addition, they suggested to use the same wording for the conclusion of this paragraph as the one proposed under Article 11. This proposal was then approved by the Plenary.

The Deputy Executive Secretary explained that Article 14 is a straightforward provision and that measures to postpone domestic suspicious transactions shall be available to the FIU. In view of that, the country is expected to enforce the legislation which would grant the FIU with such a power.

The Conference of the Parties adopted the follow up reports in respect of Armenia, North Macedonia, Montenegro, the Russian Federation, Serbia, and Türkiye, which would be published after the meeting. Taking into account the conclusions set out in the reports concerning several States Parties (Armenia, North Macedonia, Montenegro, the Russian Federation, Serbia, Türkiye), it decided to invite the President of the Conference of the Parties to write a letter to the Parties' Heads of Delegations and Permanent Representatives to the Council of Europe, in application of Rule 19bis (25) of the Rules of Procedure covering situations where the Conference considers that a Party has not satisfactorily made progress. It also agreed that it would consider further measures if the respective provisions of the Convention (as referred to in the Follow-Up report) are not applied to a satisfactory level until the next Plenary, including, where appropriate, a high-level visit. Consequently, Armenia, North Macedonia, Montenegro, the Russian Federation, Serbia, and Türkiye were invited to report on progress made at the sixteenth meeting of the Conference of the Parties.

## **Item 11. Article 6: Cases of practical implementation of the Convention by State Parties - Tour de table**

Further to the 2022 thematic monitoring review on Article 6, the following State Parties were identified as those having the most developed asset management systems: Italy, Croatia, France, Romania, Malta, Belgium, UK and Hungary. Apart from Hungary, all other State Parties volunteered to present their asset management systems at the 15<sup>th</sup> plenary. This agenda item was examined on both days: on the first day, Italy and Croatia presented their systems, while on day 2 the presentations were made by Romania, Malta, Belgium, France and the UK. Due to lack of time, the Netherlands agreed to only share its presentation with other States Parties.

The Conference of the Parties instructed the secretariat to publish the presentations and other documents provided by these Parties on the on the COP198 restricted web and make them available to all participants to the 15th meeting.

### **Item 12. Workplan and priority actions of the Conference of the Parties for 2024-2025**

The Executive Secretary presented the COP198 objectives and actions for the period 2024-2026, on the basis of the elements set out in the Council of Europe programme and budget. This document includes three key objectives which should inform the COP's priorities and streamline its work in the period to come: (i) support the effective implementation of the Convention by Parties through continuous monitoring process; (ii) ensure the continued relevance of the Warsaw Convention and identify areas of priority focus for the work on the future additional protocol; and (iii) support signatures, ratifications and entries into force of the Convention. Each objective includes set of actions, implementation of which is instrumental for achieving these objectives. The actions, inter alia, concerned Thematic Monitoring Reviews on the new States Parties' application of the Convention and follow up reporting; development of new Interpretative notes, including the reviews of the existing ones; organisation of thematic events in the States Parties with the aim to discuss new trends and good practice in implementation of the Convention. etc. The plenary welcomed this initiative and State Parties expressed their readiness to support these actions.

### **Item 13. Elections**

Pursuant to the Rules of Procedure, the COP held elections for the Presidency, Vice presidency and positions of bureau members, for terms starting in January 2024. There were two voting rounds for the Presidency of which there were 33 votes in each. Based on the results of the second round, Ms Oxana Gisca (Republic of Moldova) was elected as President of COP 198 with 20 votes for a first two years' term.

Ms Claudia Elion (the Netherlands) was elected with 27 votes as Vice President for a first two years' term. Mr Azer Abassov (Azerbaijan) and Mr Aram Kirakossian (Armenia) were reelected as Bureau members for a further two-year term. Mr Muhammed Karaca (Türkiye) was elected as a Bureau member for a first two years' term.

### **Item 14. Other Business**

The Conference of the Parties thanked warmly Mr Ioannis Androulakis for his active Presidency and steer for the past four years, for his substantive contribution to the work of the Committee and for promoting actively the Convention's standards internationally.

### **Item 15. List Adoption of decisions**

The Conference of the Parties adopted the list of decisions, as it appears in Annex II of the present report.

### **Item 16. Future meetings**

The 16<sup>th</sup> meeting of the COP 198 was proposed to be held in November 2024. The exact dates would be confirmed in consultation with the President and circulated to the delegations in due time.

## Annex I.

### AGENDA / ORDRE DU JOUR

<p><b>1. Opening of the meeting (9.30 am)</b></p> <p>Welcome statement by Ms Hanne Juncher, Director, Information Society and Action against Crime Directorate</p>	<p><b>Ouverture de la réunion (9h30)</b></p> <p>Discours de bienvenue par Mme Hanne Juncher, Directrice, Direction de la société de l'information et de la lutte contre la criminalité</p>
<p><b>2. Adoption of the agenda and order of business</b></p> <p>The Conference of the Parties is invited to examine and adopt the agenda and the order of business.</p>	<p><b>Adoption de l'ordre du jour et des travaux</b></p> <p>La Conférence des Parties est invitée à examiner et à adopter l'ordre du jour et l'ordre des travaux.</p>
<p><b>3. Information from the President, Vice-President and the Executive Secretary</b></p> <p>The Conference of the Parties is invited to take note of the information provided by the President and by the Secretariat about any developments since the last meeting, and of any implications it may have for the Conference of the Parties' operation and activities.</p>	<p><b>Informations communiquées par le Président, la Présidente et la Secrétaire exécutive</b></p> <p>La Conférence des Parties est invitée à prendre note des informations fournies par le Président et par le Secrétariat sur les développements intervenus depuis la dernière réunion, et de leurs implications éventuelles sur le fonctionnement et les activités de la Conférence des Parties.</p>
<p><b>4. State of signatures and ratifications of the Warsaw Convention</b></p> <p>i. Action taken by member states of the Council of Europe towards ratification of the Warsaw Convention: <i>tour de table</i></p> <p>ii. Action taken by the European Union towards ratification of the Warsaw Convention</p> <p>The President will invite representatives of member states which have not yet signed or ratified the convention<sup>2</sup> and the European Union to inform the Conference of the Parties of measures taken or planned towards becoming a Party to the Convention.</p>	<p><b>État des signatures et ratifications de la Convention de Varsovie</b></p> <p>i. Mesures prises par les Etats membres du Conseil de l'Europe en vue de la ratification de la Convention de Varsovie : <i>tour de table</i></p> <p>ii. Mesures prises par l'Union européenne en vue de la ratification de la Convention de Varsovie</p> <p>Le Président invitera les représentants des États membres qui n'ont pas encore signé ou ratifié la convention<sup>3</sup> et l'Union européenne à informer la Conférence des Parties des mesures prises.</p>
<p><b>5. Declarations and reservations</b></p> <p>An oral update will be provided by the Secretariat on any changes to the declarations and reservations since the last meeting. Parties are invited to share experience on the application of reservations and declarations.</p>	<p><b>Déclarations et réserves</b></p> <p>Une mise à jour orale sera fournie par le Secrétariat sur les changements apportés aux déclarations et aux réserves depuis la dernière réunion. Les Parties sont invitées à partager leur expérience sur l'application des réserves et des déclarations.</p>
<p><b>6. Information provided by Parties and Observers on topical developments of relevance for the Conference of the Parties</b></p> <p>Parties and observers are invited to present</p>	<p><b>Informations fournies par les parties et les observateurs sur des sujets d'actualité</b></p> <p>Les Parties et les observateurs sont invités à présenter des informations sur les développements législatifs, des cas ou jugements importants, les</p>

<sup>2</sup> Andorra, Czech Republic, Finland, Iceland, Ireland, Liechtenstein, Luxembourg, Norway, Switzerland.

<sup>3</sup> Andorre, République tchèque, Finlande, Islande, Irlande, Liechtenstein, Luxembourg, Norvège, Suisse.

<p>information on legislative developments, major cases or judgments, important events, training provided to other countries, including by international organisations etc. (brief interventions- 3 minutes per intervention).</p>	<p>événements importants, la formation dispensée à d'autres pays, y compris par des organisations internationales, etc. (interventions brèves – 3 minutes par intervention).</p>
<p><b>7. Monitoring the implementation of the Convention</b></p> <p><b>i. Estonia: Amendments to the 2018, 2019, 2020, 2021, 2022 thematic monitoring reports following the ratification by Estonia – for adoption</b></p> <p>The President will invite the Secretariat and the country assessed to present the report and its findings. The Conference of the Parties is invited to examine and adopt the report.</p> <p><b>ii. Draft timeline for reporting (2024-2026): Morocco and territories where States Parties extended the application of the CETS 198</b></p> <p>The Secretariat will present the timeline for preparation of the reports. The Conference of the Parties is invited to take note of the information provided and invite Morocco and the territories concerned to comply with the proposed timeline.</p>	<p><b>Suivi de la mise en œuvre de la convention</b></p> <p><b>i. Estonie : Modifications des rapports de suivi thématiques 2018, 2019, 2020, 2021, 2022 suite à la ratification par l'Estonie - pour adoption</b></p> <p>Le Président invitera le secrétariat et le pays évalué à présenter le rapport et ses conclusions. La Conférence des Parties est invitée à examiner et à adopter le rapport.</p> <p><b>ii. Projet de calendrier (2024-2026): Maroc et territoires où les États parties ont étendu l'application du STCE 198</b></p> <p>Le Secrétariat présentera le calendrier de préparation du rapport. La Conférence des Parties est invitée à prendre note des informations fournies et à inviter le Maroc et les territoires concernés à respecter le calendrier proposé.</p>
<p><b>8. Revision of the FATF Recommendations 4 and 38 in relation to measures 'to strengthen the toolkit available to law enforcement, asset recovery agencies and the criminal justice system more broadly to target criminal assets'</b></p> <p>The President will invite the he scientific expert to present a comparative mapping of the revised FATF standards and the Convention's provisions as well as any potential impact.</p>	<p><b>Révision des recommandations 4 et 38 du GAFI en ce qui concerne les mesures visant à "renforcer les outils mis à la disposition des services répressifs, des agences de recouvrement des avoirs et du système de justice pénale en général pour cibler les avoirs criminels"</b></p> <p>Le Président invitera l'expert scientifique à présente une cartographie comparative des normes révisées du GAFI et des dispositions de la Convention, ainsi que tout impact potentiel.</p>
<p><b>9. Future planned work of the Council of Europe for the preparation of an additional protocol to the CETS no. 198</b></p> <p>The President and the Executive Secretary will provide an oral update, followed by an exchange of views with States Parties on the identified issues to be addressed by the negotiation process, as well as any considerations regarding the modalities to ensure an active contribution by the Conference of the Parties throughout the process of negotiation.</p>	<p><b>Travaux futurs prévus par le Conseil de l'Europe pour la préparation d'un protocole additionnel à la STCE n° 198</b></p> <p>Le Président et la Secrétaire exécutive feront une mise à jour sur cette activité future, avant de procéder à un échange de vues avec les États Parties sur les questions identifiées qui doivent être abordées dans le cadre du processus de négociation, ainsi que sur toute considération concernant les modalités d'une contribution active de la Conférence des Parties tout au long du processus de négociation.</p>
<p><b>10. Follow up procedure: Report on progress made by the States Parties:</b></p>	<p><b>Procédure de suivi : rapport sur les progrès réalisés</b></p>

<p>i. <b>Articles 11 and 25 (2 and 3) of the Convention</b> (for adoption);</p> <p>ii. <b>Article 14</b> (for adoption)</p> <p>The Secretariat will present the draft report on progress made by the States Parties<sup>4</sup> reporting under this procedure and its findings, followed by a discussion with the Parties. The Conference of the Parties is invited to examine and adopt the report and the recommendations contained therein.</p>	<p>par les États Parties dans la mise en œuvre des :</p> <p>i. <b>articles 11 et 25 (2 et 3) de la Convention</b> (pour adoption)</p> <p>ii. <b>article 14</b> (pour adoption)</p> <p>Le Secrétariat présentera le projet de rapport sur les progrès accomplis par les États Parties<sup>5</sup> dans le cadre de cette procédure et ses conclusions, suivi par un échange avec les Parties. La Conférence des parties est invitée à examiner et à adopter le rapport et les recommandations qu'il contient.</p>
<p><b>11. Article 6: Cases of practical implementation of the Convention by State Parties - Tour de table</b></p> <p>As a follow up to the 2022 thematic review, the President will invite selected State Parties<sup>6</sup> to present measures taken to ensure the proper management of frozen or seized property, followed by questions and an exchange of views.</p>	<p><b>Article 6: Cas d'application pratique de la Convention par les États Parties - Tour de table</b></p> <p>Dans le cadre du suivi de l'examen thématique de 2022, le Président invitera certains États parties<sup>7</sup> à présenter les mesures prises pour assurer la bonne gestion des biens gelés ou saisis, suivi de questions et d'un échange de vues.</p>
<p><b>12. Workplan and priority actions of the Conference of the Parties for 2024-2025</b></p> <p>The Conference of the Parties is invited to discuss and agree on the priority areas in the next biennium, in particular with respect to its monitoring function to ensure the proper implementation of the Convention of the Parties. The discussion will be supported by a review paper prepared by the Secretariat.</p> <p>Parties are also invited to express opinions or questions which may require the Conference of the Parties to consider preparing an interpretative note.</p>	<p><b>Plan de travail et actions prioritaires de la Conférence des Parties pour 2024-2025</b></p> <p>La Conférence des Parties est invitée à discuter et à convenir des actions prioritaires pour la prochaine période biennale, en particulier en ce qui concerne sa fonction de contrôle pour assurer la bonne mise en œuvre de la Convention des Parties, sur la base d'un document d'examen préparé par le Secrétariat.</p> <p>Les Parties sont également invitées à exprimer des opinions ou des questions qui pourraient amener la Conférence des parties à envisager la préparation d'une note interprétative.</p>
<p><b>13. Elections</b></p> <p>Heads of delegation, or their substitute, will be invited to vote, pursuant to the rules set out in the Rules of procedure, to elect the President, Vice-President and three bureau members.</p>	<p><b>Élections</b></p> <p>Les chefs de délégation, ou leur substitut, sont invités à voter, conformément aux règles énoncées dans le règlement intérieur, pour élire le président, le vice-président et trois membres du bureau.</p>
<p><b>14. Other business</b></p>	<p><b>Divers</b></p>
<p><b>15. Future meetings</b></p> <p>The members of the Conference of the Parties will be invited to agree on the proposal to hold the 16<sup>th</sup> meeting from 14 to 15 November 2024.</p>	<p><b>Réunions futures</b></p> <p>Les membres de la Conférence des Parties sont invités à se prononcer sur la proposition de tenir la</p>

<sup>4</sup> In respect of Article 11: **Montenegro, Russian Federation, Serbia, Türkiye**; in respect of Article 25 : **Armenia, Azerbaijan, North Macedonia, San Marino, Serbia**; in respect of Article 14: **Russian Federation**

<sup>5</sup> En ce qui concerne l'article 11 : **Monténégro, Fédération de Russie, Serbie, Türkiye** ; en ce qui concerne l'article 25 : **Arménie, Azerbaïdjan, Macédoine du Nord, Saint-Marin, Serbie**; en ce qui concerne l'article 14: **Fédération de Russie** ;

<sup>6</sup> These are: Belgium, Croatia, France, Hungary, Italy, Malta, the Netherlands, Romania, Spain and the United Kingdom.

<sup>7</sup> Il s'agit de : Belgique, Croatie, France, Hongrie, Italie, Malte, Pays-Bas, Roumanie, Espagne et le Royaume-Uni.

	16e réunion du 14 au 15 novembre 2024.
<b>16. Adoption of decisions</b> The Conference of the Parties will adopt the list of decisions.	<b>Adoption des décisions</b> <b>La Conférence des Parties</b> adoptera la liste des décisions.



## ANNEX II.

### LIST OF DECISIONS C198-COP 15<sup>TH</sup> PLENARY MEETING

At its fifteenth meeting (Strasbourg/online, 9 - 10 November 2023), which was chaired by Mr Ioannis Androulakis (President of the Conference of the Parties, Greece), the Conference of the Parties (COP) to the Council of Europe's Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS no. 198, hereafter: 'the Convention'):

1. noted the welcome remarks of Ms Hanne Juncker, Director of Information Society and Action against Crime Directorate of the Council of Europe, who underlined the current and continued relevance of the Convention, of the monitoring work of the Conference of the Parties and the complementarity of the COP's work with that of the Financial Action Task Force (FATF) and MONEYVAL, noting the objective set out in MONEYVAL's Strategy on anti-money laundering, combating the financing of terrorism and proliferation financing (2023-2027) to develop further synergies between MONEYVAL and the Conference of the Parties;
2. adopted the agenda of the meeting;
3. welcomed Estonia and Morocco, who joined this meeting as Parties to the Convention and newly nominated heads of delegations and representatives;
4. took note of the information provided by the President and the Executive Secretary regarding the high-level events to which they took part, notably the High-level meeting of ministers and high-level officials of MONEYVAL members and territories (Warsaw, Poland, 25 April 2023), the second FATF-Interpol Roundtable Engagement (FIRE, Lyon, September 2023) to which several Parties contributed, the active participation to several meetings of the Financial Action Task Force aimed at revising the international asset recovery standards, and the information provided regarding the dialogue with the Kyrgyz authorities regarding the Convention's provisions, implementation and accession modalities;
5. took note of the Vice-President's participation as a guest speaker to the Conference "Supranational and national AML/CFT/CPF systems: challenges and prospects", held in Lviv, Ukraine on 27 April 2023.
6. heard an update from the representative of the European Union on the planned process aimed at ratifying the Convention by the end of 2024;
7. discussed the state of declarations and reservations to the Convention, adopted the review and agreed, *inter alia*, to call on States Parties to review and/or withdraw their declarations made in relation to articles 3(4), 7 (2 c) and 19 (1) of the Convention. Taking into account the conclusions of the thematic monitoring reports adopted so far, it also agreed to encourage several State Parties to review their declarations and that a letter to that effect should be addressed by the President to the relevant competent authorities in Poland, Slovenia, the Russian Federation and Ukraine;
8. took note of information provided by Azerbaijan, Bosnia and Herzegovina, Monaco, Croatia, Romania, the United Kingdom, Ukraine, the Netherlands, the Republic of Moldova

and the Russian Federation on recent legislative developments, major cases of co-operation among States Parties, trainings and awareness raising events. It invited State Parties to continue supporting the implementation of the Convention through similar activities in the future and inform the plenary on these developments;

9. examined Estonia's implementation of the Convention under its thematic monitoring procedure, pursuant to Article 19bis of the Rules of Procedure, and adopted new sections to its 2018-2022 Horizontal Review Reports in respect of Estonia's implementation of articles 3(4); 6; 7(2 c) and 19 (1); 9(3); 10 (1 and 2); 11; 14 and 25 (2 and 3);
10. decided that in 2024, the Kingdom of Morocco and the country of Aruba of the Kingdom of Netherlands will be subject to the monitoring procedure set out in Article 19bis of the Rules of Procedure according to the timeline prepared by the Secretariat, and that their reports will be examined by the Conference of the Parties with a view to their adoption at the sixteenth plenary meeting;
11. Adopted the follow-up report on articles 11, 25 and 14, and took into account the progress made by Azerbaijan and San Marino. It heard the information provided by Türkiye, the Russian Federation and Serbia and decided to introduce some editorial changes in the conclusions concerning Russian Federation's compliance with articles 11 and 14.
12. Taking into account the conclusions set out in the reports concerning several States Parties (Armenia, North Macedonia, Montenegro, the Russian Federation, Serbia, Türkiye), it decided to invite the President of the Conference of the Parties to write a letter to the Parties' Heads of Delegations and Permanent Representatives to the Council of Europe, in application of Rule 19bis (25) of the Rules of Procedure covering situations where the Conference considers that a Party has not satisfactorily made progress. It also agreed that it would consider further measures if the respective provisions of the Convention (as referred to in the Follow-Up report) are not applied to a satisfactory level until the next Plenary, including, where appropriate, a high-level visit. Consequently, Armenia, North Macedonia, Montenegro, the Russian Federation, Serbia, and Türkiye were invited to report on progress made at the sixteenth meeting of the Conference of the Parties;
13. Considering the aspects raised by Türkiye in the context of the assessment of the implementation of Article 11 (Previous decisions), and the explanations provided by the scientific expert, it decided to update the Interpretative Note on Article 11, with the support of the scientific expert;
14. heard a presentation by Mr Paolo Costanzo, scientific expert, on a comparative mapping of the revised FATF standards on asset recovery and the Convention's provisions, and discussed the potential impact, if any, on the monitoring procedures of the COP once the new evaluation round will be initiated by the FATF, MONEYVAL and other FSRB style bodies. Instructed the secretariat to communicate the presentation and the detailed mapping paper prepared by the scientific expert to the Parties and publish them on the COP's restricted website;
15. held a discussion, following presentations by the President and the Executive Secretary, on future developments in relation to the Council of Europe's standard-setting work aimed at elaborating an additional protocol to the Convention. Took note of the planned set up of a committee of experts on criminal asset recovery, working under the authority of the Committee of Ministers and of the European Committee on Crime Problems (CDPC), to

undertake this work from 2024-2026, and which would be expected to cooperate closely with the COP. It authorised the Bureau to appoint the COP expert(s) which should be engaged in the work of the committee on behalf of the Conference of the Parties.

16. heard presentations and exchanged views with Belgium, Croatia, France, Italy, Malta, Romania, and the United Kingdom on these Parties' asset management systems. It instructed the secretariat to publish the presentations and other documents provided by these Parties on the COP's restricted website.
17. elected, by secret ballot, Ms Oxana Gisca (Republic of Moldova) as President of the COP198 and Ms Claudia Elion (The Netherlands) as Vice-President for a first two years' term starting in January 2024; elected as Bureau member from January 2024 Mr Muhammed Karaca (Türkiye) for a first two years' term, and re-elected Mr Azer Abassov (Azerbaijan) and Mr Aram Kirakossian (Armenia) for a last term of two years;
18. approved the objectives and proposed priority actions for 2024-2026, taking duly note that the Programme and Budget is yet to be adopted by the Committee of Ministers, and invited the Bureau to review and develop further its workplan once the budget is approved;
19. decided to hold its next meeting in Strasbourg in November 2024 and instructed the Secretariat to confirm the dates of its next meeting as soon as possible.
20. thanked warmly Mr Ioannis Androulakis for his active Presidency and steer for the past four years, for his substantive contribution to the work of the Committee and for promoting actively the Convention's standards internationally.

**ANNEX III.  
LIST of PARTICIPANTS**

<b>STATES PARTIES</b>			
<b>ALBANIA</b>	<b>In-person</b>	Diana STILLO	Head of International Treaties and Judicial Cooperation Unit Ministry of Justice
<b>ARMENIA</b>	<b>In-person</b>	Aram KIRAKOSSIAN	Head of the International Relation Division of the Financial Monitoring Center of the Central Bank of Armenia
<b>AUSTRIA</b>	<b>In-person</b>	Wolfgang PEKEL	Deputy Head of Department Federal Ministry of Justice General Directorate for Criminal Law
<b>AZERBAIJAN</b>	<b>In-person</b>	Azer ABBASOV	Director of Legal Department, Financial Monitoring Service
	<b>In-person</b>	Mehman ALIYEV	Senior specialist at Risk assessment and methodology unit of Legal department of Financial Monitoring Service of the Republic of Azerbaijan
<b>BELGIUM</b>	<b>In-person</b>	Jean Sébastien JAMART	Attaché juridique, Service Public Fédéral Justice
<b>BOSNIA AND HERZEGOVINA</b>	<b>In-person</b>	Haris VRANJ	State investigation and protection agency / Financial intelligence department (FIU BiH)
	<b>In-person</b>	Sanela LATIĆ	Ministry of Justice of Bosnia and Herzegovina

<b>BULGARIA</b>	<b>Apologized</b>	Tea PENEVA	Chief expert Cooperation in Criminal matters Department International legal cooperation and European affairs Directorate Ministry of Justice of the republic of Bulgaria
<b>CROATIA</b>	<b>In-person</b>	Danka HRZINA	Deputy Municipal State Attorney in Zagreb General State Attorney's Office of the Republic of Croatia
<b>CYPRUS</b>	<b>In-person</b>	Chrystalla PAPOUI	Counsel of the Republic of Cyprus
<b>ESTONIA</b>	<b>In-person</b>	Henrik MAGI	Advisor Financial Information and Intelligence Policy Department Ministry of Finance
<b>FRANCE</b>	<b>Apologised</b>	Margaux GUILLMOT	Cheffe de mission Ukraine/GAFI Sous-direction de la justice pénale spécialisée Direction des affaires criminelles et des grâces – Ministère de la Justice
	<b>Virtual</b>	Naomi KENIFRA	Ministère de la Justice
	<b>Virtual</b>	Aurélien LETOCART	Magistrat coordonnateur des antennes de Paris et Fort-de-France de l'AGRASC
<b>GEORGIA</b>	<b>In-person</b>	Tamta KLIBADZE	Head of Secondary Unit at Methodology, International and Legal Department of Financial Monitoring Service of Georgia
	<b>In-person</b>	Aleksandre MUKASASHVILI	Deputy head of Investigative Unit of the Prosecutor General of Georgia
<b>GERMANY</b>	<b>Virtual</b>	Jürgen MÜLLER <i>Head of delegation</i>	Desk officer Federal Ministry of Justice
	<b>Virtual</b>	Thomas LAUT	Desk officer Federal Ministry of Justice
<b>GREECE</b>	<b>In-person</b>	Ioannis ANDROULAKIS <i>Chair</i>	Advisor to the Hellenic Ministry of Justice Assistant Professor of Criminal Law & Criminal Procedure University of Athens

	<b>Physical</b>	Sotirios TSOUVALAS	Presiding judge
<b>HUNGARY</b>	<b>In-person</b>	Akos KARA	Head of Department Department of Criminal Law Codification Ministry of Justice
<b>ITALY</b>	<b>Virtual</b>	Nicola PIACENTE	Chief Prosecutor Como, Designated by the Ministry of Justice
	<b>In-person</b>	Raffaele FESTA	Deputy to the Permanent Representative Permanent Representation of Italy to the Council of Europe
<b>LATVIA</b>	<b>In-person</b>	Alvīne PAŠTORE	Lawyer, Criminal Law Department, Ministry of Justice of Latvia
<b>LITHUANIA</b>	<b>In-person</b>	Audrius VALEIKA <i>Head of delegation</i>	Deputy Director of the Financial Crime Investigation Service Ministry of Interior
	<b>In-person</b>	Živilė ŠADIANEC	Chief Investigator of Compliance Division Money Laundering Prevention Board Ministry of Interior
<b>MALTA</b>	<b>In-person</b>	Dejan DARMANIN <i>Head of Delegation</i>	Office of the Attorney General
	<b>In-person</b>	Clara GALDIES	Senior Legal Officer, Legal & International Relations - Legal Affairs, Financial Intelligence Analysis Unit
	<b>In-person</b>	Kenneth CAMILLERI	Lawyer, Office of the Attorney General
<b>MOROCCO</b>	<b>In-person</b>	Badr TAIABI	Expert en matière de LBC/FT, rattaché au Pôle des Investigations et du Renseignement Financier à l'ANRF
	<b>Virtual</b>	Issa KATABA	Magistrat Ministry of Justice
	<b>In-person</b>	Hicham BENMARK	Vice-Consul chargé des affaires politiques multilatérales Consulat Général du Royaume du Maroc à Strasbourg

<b>REPUBLIC OF MOLDOVA</b>	<b>In-person</b>	Oxana GISCA <i>Vice-Chair</i>	Office of Prevention and Fight Against Money Laundering Government of Republic of Moldova
	<b>In-person</b>	Andrian MUNTENAU	Deputy Director FIU
<b>MONACO</b>	<b>In-person</b>	Julie KUIJPERS	Chef de Division au sein de la Direction des Services Judiciaires
<b>MONTENEGRO</b>	<b>In-person</b>	Olivera IVANOVIC	Independent Police Advisor
<b>NETHERLANDS</b>	<b>In-person</b>	Bert VENEMA	Policy Officer Asset Recovery and Confiscation at the Ministry of Justice and Security
	<b>In-person</b>	Claudia ELION	Senior policy advisor on international affairs Fiscal Intelligence and Investigation Service Tax Administration Utrecht
<b>NORTH MACEDONIA</b>	<b>In-person</b>	Gordana MILEVSKA	Head of unit Unit for international legal assistance in criminal matters Department for International Legal Assistance
<b>POLAND</b>	<b>In-person</b>	Małgorzata MAJZEL	Chief specialist in the International Cooperation Unit, Department of Financial Information, Ministry of Finance (Polish FIU)
<b>PORTUGAL</b>	<b>Virtual</b>	António Pedro DA FONSECA DELICADO <i>Head of Delegation</i>	Legal Advisor, Directorate General for Justice Policy, Ministry of Justice
	<b>Virtual</b>	Hélio Rigor RODRIGUES	Prosecutor of the Republic/Adviser to the General Prosecutor Office
	<b>Virtual</b>	José BRAGUÊS	Criminal Police / Chief-Inspector / Financial Information Unit (UIF)
	<b>Virtual</b>	Ana Marcolino	Director of the Portuguese Asset Management Office
<b>ROMANIA</b>	<b>In-person</b>	Răzvan BOȘTINARU	HEAD of DELEGATION Legal specialised personnel assimilated to magistrates, Department for Crime Prevention, Ministry of Justice

	<b>In-person</b>	Roxana NIȚU	Head of Cooperation and International Relations Service
	<b>In-person</b>	Cornel Virgiliu CALINESCU	General Director, National Agency for the Management of Seized Assets
<b>RUSSIAN FEDERATION</b>	<b>Virtual</b>	Alexey LYZHENKOV <i>Head of Delegation</i>	Deputy Director Department on the Issues of New Challenges and Threats Ministry of Foreign Affairs of the Russian Federation
	<b>Virtual</b>	Mr Ivan Yarovoy	Senior Prosecutor of the Organizational and Analytical Division Organizational and Legal Department General Department of International Legal Cooperation Prosecutor General's Office of the Russian Federation
	<b>Virtual</b>	Vera IVANTSOVA	Second Secretary Department on the Issues of New Challenges and Threats Ministry of Foreign Affairs of the Russian Federation (Executive Secretary of Delegation)
<b>SAN MARINO</b>	<b>In-person</b>	Monsieur l'Ambassadeur Eros GASPERONI	Représentant Permanent de Saint-Marin auprès du Conseil de l'Europe
	<b>Virtual</b>	Giorgia Ugolini	Magistrate at the Court of the Republic of San Marino
<b>SERBIA</b>	<b>In-person</b>	Jovan ĆOSIĆ	Assistant minister of justice, Sector for Normative Affairs
<b>SLOVAK REPUBLIC</b>	<b>In-person</b>	Branislav BOHACIK <i>Head of Delegation</i>	Prosecutor, head of delegation General Prosecutor's Office of the Slovak Republic International Department
	<b>Virtual</b>	Michaela KRUMPAL VIDOVENCOVA	Senior police officer Financial Intelligence Unit of the Police Force



	<b>Virtual</b>	Radka MONCOLOVÁ	European and Foreign Affairs Division Ministry of Justice of the Slovak Republic International Law Department
<b>SLOVENIA</b>	<b>In-person</b>	Branka GLOJNARIC <i>Head of Delegation</i>	Secretary Office for Money Laundering Prevention of the Republic of Slovenia
	<b>Virtual</b>	Klemen PRINCES	Undersecretary Ministry of Justice
<b>SPAIN</b>	<b>Apolgoised</b>	Miriam BAHAMONDE BLANCO	Fiscal / Senior Prosecutor Adviser of the Directorate General for International Legal Cooperation and Human Rights Ministry of Justice
<b>SWEDEN</b>	<b>In-person</b>	Victor HENSJÖ <i>Head of Delegation</i>	Head of Delegation Deputy Director (legal expert) Division for Criminal Law Ministry of Justice
<b>TÜRKIYE</b>	<b>In-person</b>	Muhammed KARACA	Rapporteur Judge, Ministry of Justice of the Republic of Türkiye
	<b>Virtual</b>	Selçuk DOĞAN	MASAK (Turkish FIU), Assistant Treasury and Finance Expert
<b>UKRAINE</b>	<b>Physical</b>	Nataliia STRUK	Chief Specialist of the Division for Transfer of the Sentenced Persons and Execution of Judgments of the International Legal Assistance Department of the International Law Directorate of the Ministry of Justice of Ukraine.
<b>UNITED KINGDOM</b>	<b>In-person</b>	Robert JONES	Senior Policy Advisor Criminal Finances Team

<b>STATUTORY PARTICIPANTS</b>		
Dora SCHAFFRIN	<b>In-person</b>	<b>EUROPEAN UNION</b> First Secretary Permanent Representation of the European Union to the Council of Europe
<b>SCIENTIFIC EXPERT</b>		
Paolo COSTANZO	<b>In-person</b>	Head Analysis and Institutional Relations Directorate Financial Intelligence Unit Banca d'Italia
<b>COUNCIL OF EUROPE SECRETARIAT</b>		
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