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**COMMITTEE OF EXPERTS
ON THE EVALUATION OF ANTI-MONEY LAUNDERING MEASURES
AND THE FINANCING OF TERRORISM**

MONEYVAL

48th PLENARY MEETING
Strasbourg, 14-18 September 2015

MEETING REPORT

MEMORANDUM

Prepared by the MONEYVAL Secretariat

EXECUTIVE SUMMARY

During the 48th plenary meeting, held in Strasbourg from 14 to 18 September 2015, the MONEYVAL Committee:

- adopted the evaluation reports on the 4th round assessment of the UK Crown Dependency of Guernsey and of Bosnia and Herzegovina;
- considered the situation in Bosnia and Herzegovina under Step 4 of the Compliance Enhancing Procedures and decided to withdraw the revised public statement. It also decided to remove Bosnia and Herzegovina from the Compliance Enhancing Procedures, on the basis that the country would continue reporting on the action plan resulting from its ninth compliance report within the fourth round expedited follow-up procedure;
- heard an update of the special report from Andorra on actions taken in response to the “Notice of Finding” under s. 311 of the PATRIOT Act (2001) by the US Treasury and decided that further updates would be provided by Andorra under the Tour de Table procedure;
- adopted the Secretariat’s analysis of progress made by Andorra under the enhanced follow-up process and decided to lift the application of enhanced measures;
- examined the 3rd follow-up report of Andorra and adopted the Secretariat’s analysis. Andorra’s reporting under the 4th round regular follow-up process was discontinued, with the note that any outstanding issues should be considered during the 5th round assessment by the evaluation team under the scoping exercise;
- examined the 6th follow-up report of Albania and adopted the analysis of the Secretariat. It decided to remove Albania from the regular follow-up process and concluded that the country shall be expected to present its first biennial up-date in September 2017, subject to the Plenary’s discretion should this fall within the one year period before the 5th round on-site visit;
- took note of the expedited follow-up report on the Czech Republic, interim follow-up reports on Bulgaria, Croatia, Latvia and the Slovak Republic, as well as the regular follow-up report on Georgia;
- examined and adopted the third progress report on Ukraine;
- discussed various aspects involving the Voluntary Tax Compliance scheme in Israel;
- took note of the publication of MONEYVAL’s Annual Report;
- took note of the ratification of the Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS 198) by the United Kingdom in April 2015;
- heard an update by the European Commission on the 4th AML Directive and other new initiatives of the European Union to fight money laundering and terrorism financing;
- heard a report by Mr Nicola Muccioli, San Marino, on his attendance to the IMF Conference on Risk Assessments;
- took note of the information about ongoing work on National Risk Assessments by Switzerland, the Isle of Man, Israel and Hungary;
- took note of an update by the FATF on the process and initial findings of the typologies project on transparency of beneficial ownership and associated risks;
- heard further information on the purposes and method of the FATF global data collection exercise in respect of the level of preparedness of states and territories to deal with terrorism and its financing;
- took note of the presentations concerning the role of gender equality rapporteurs;
- thanked warmly Mr John Ringguth, the outgoing Executive Secretary, and welcomed Mr Matthias Kloth, the incoming Executive Secretary.

The Committee of Experts on the evaluation of anti-money laundering measures and the financing of terrorism (MONEYVAL) held its 48th plenary meeting from 14 to 18 September 2015 in Strasbourg under the chairmanship of Dr Anton BARTOLO (Malta).

Day 1: Monday 14 September 2015

Agenda item 1 – Opening of the Plenary Meeting at 9h30 by Jan Kleijssen, Director of Information Society and Action against Crime

1. The Director of Information Society and Action against Crime, Mr Jan Kleijssen, opened the meeting. He recalled the increased threat posed by the so-called Islamic State in Iraq and Levant in Europe and emphasised the importance of the role of MONEYVAL within the Council of Europe in this respect.
2. He stressed the importance of the Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism CETS no. 198 and informed the Plenary of action foreseen at the plenary meeting in December 2015. The Plenary was also informed that the draft Additional Protocol to the Convention on the Prevention of Terrorism concerning foreign terrorist fighters was adopted by the Committee of Ministers on 19 May 2015. He invited MONEYVAL jurisdictions to become parties to that protocol as a matter of priority.
3. Mr Kleijssen further reminded the Plenary about the comprehensive Action Plan on the fight against violent extremism and radicalisation leading to terrorism adopted in March by the Committee of Ministers, which *inter alia* highlights the work of MONEYVAL with regard to the UN sanctions regime. The Plenary was also reminded that the G20 had called on the FATF (and all the members of the global AML/CFT network) to report by October 2015 on the global implementation of international standards concerning terrorist financing. Mr Kleijssen thanked all MONEYVAL delegations who provided responses to the questionnaire sent by MONEYVAL in this context.
4. Finally, Mr Kleijssen recalled the retirement of Mr John Ringguth, the Executive Secretary of MONEYVAL, and thanked him for his highly professional work and exemplary leadership of MONEYVAL. He then warmly welcomed the new Executive Secretary, Mr Matthias Kloth, who briefly introduced himself to the Plenary.

Agenda item 2 – Adoption of the Agenda

5. The Plenary was informed that Item 5 (Report on attendance by Mr. Nicola Muccioli to the IMF Conference on Risk Assessments) would be discussed later in the course of the week. The Committee otherwise adopted the agenda as circulated (see Appendix I).

Agenda item 3 – Information from the Chairman

3.1 Chairman's correspondence

6. The Plenary was informed about the Chairman's correspondence with San Marino, Bosnia and Herzegovina, Slovak Republic, the "former Yugoslav Republic of Macedonia", Lithuania, the FATF, Czech Republic, Georgia, Malta, Slovenia, Poland, Latvia, Ukraine, Israel, the Secretary General of the Council of Europe and Andorra.
7. Lithuania was requested to confirm the scheduled date of the next follow up report. Lithuania confirmed its intention to seek removal from regular follow-up in April 2016. San Marino was informed of the decision of the plenary to remove it from regular follow-up to the biennial update procedure. Andorra was reminded of the application of enhanced follow up and requested to present a subsequent report at the current plenary meeting.
8. Bosnia and Herzegovina was reminded that the 4th round MER was due to be discussed at the current plenary meeting and that it was, in this context, requested to report under the Compliance Enhancing Procedures only as far as it concerns the implementation of the action plan. Bosnia and Herzegovina was also informed about the publication of the revised the public statement.
9. The FATF was informed that the Plenary had decided to apply Step 4 of MONEYVAL's Compliance Enhancing Procedures to Bosnia and Herzegovina, thereby referring it for review to the International Cooperation Review Group (ICRG).

10. The Czech Republic was urged to adopt the draft amendments to the Criminal Code before the current Plenary meeting. The "former Yugoslav Republic of Macedonia" was requested to provide a further interim follow up report in April 2016 and invited to adopt the amendments to the Criminal Code before the end of this year. Georgia was requested to adopt the draft legislative amendments implementing the UN sanctions regime and invited to seek removal from regular follow up at the current plenary meeting. Malta was asked to seek removal from the regular follow up process at the current plenary meeting¹ and reminded of the decision of the plenary that it shall continue to update the plenary in relation to its VTC scheme in the future within the tour de table procedure. Slovenia was informed of the termination of the 4th round biennial update procedures in its respect due to the scheduled 5th round on-site visit. Poland was requested to submit an interim follow up report in December 2015, in particular in relation to deficiencies identified in the 4th round MER concerning legal aspects. Israel was reminded that it is expected to submit detailed information about its VTC programme for consideration at the current plenary meeting. Latvia was invited to provide a full follow up report for discussion at the current plenary meeting. Latvia responded that it will not seek removal from the regular follow up process in 2015.
11. The Slovak Republic was reminded that it is expected to submit a follow-up report at the current Plenary meeting.
12. The FATF President confirmed that Italy and France had been appointed as the FATF members of MONEYVAL for the next two years.
13. Following the adoption of the 4th round MER of Montenegro, the Secretary General of the Council of Europe had addressed a letter to the relevant authorities, informing them about the Committee's decision to apply Step 1 of the Compliance Enhancing Procedures.
14. Ukraine wrote to the Chairman asking for agreement to postpone the scheduled 5th round on-site visit from October 2016 to October 2017.

3.2 Presentation of the Annual Report

15. The Chairman informed the Plenary that the Committee of Ministers had noted positively MONEYVAL's Annual Report upon its presentation in June 2015. He then briefly presented to the Plenary the content of the report².

Agenda item 4 – Information from the Secretariat

4.1 Presentation of the incoming Executive Secretary

16. Mr Jan Kleijssen presented to the Committee Mr Matthias Kloth, who has taken up the function as Executive Secretary on 1 October 2015, following the retirement of the current Executive Secretary at the end of September 2015. Mr Kloth introduced himself to the Plenary.

4.2 MONEYVAL Secretariat changes

17. Mr John Ringguth, Executive Secretary, informed the Plenary about the arrival in September of two seconded officials, Ms Veronika Mets from Estonia and Mr Mehmed Yerlikaya from Turkey, and thanked their authorities.
18. The Plenary was also reminded of the urgent need for reinforcement of MONEYVAL staff. The Executive Secretary strongly encouraged applications for the call for seconded national officers, stressing the extension of the deadline to 3 November 2015.

4.3 MONEYVAL calendar of activities 2015 - 2016

19. The Plenary took note of the programme foreseen for the 49th Plenary meeting in December 2015. The Executive Secretary further informed the Plenary that the 5th round on-site visit to Hungary is scheduled to take place in March 2016 and the visit to the Isle of Man in May 2016.

4.4 Report from the Secretariat on June FATF meeting

20. The Secretariat reported on the decisions taken at the June FATF plenary meeting which took place in Brisbane, Australia. The Secretariat reiterated in particular MONEYVAL's decision to refer Bosnia and Herzegovina to the review under the ICRG procedures and that, following the adoption

¹ The application will be heard at the 49th Plenary (8-11 December 2015).

² For further details, please see the full report at http://www.coe.int/t/dghl/monitoring/moneyval/Activities/2014_AnnualReport_en.pdf

of the 4th round MER and the ratings received, Montenegro is listed in the pool of countries which may be potentially reviewed by the ICRG.

4.5 MONEYVAL evaluator training

21. The Plenary was informed that the MONEYVAL evaluator training for the 5th round of assessments will take place in November 2015 in Vaduz, Liechtenstein. Twenty-five experts will participate in the event. The Executive Secretary warmly thanked the Liechtenstein authorities for hosting the event.

4.6 Reports on Secretariat attendance in other fora

22. The Executive Secretary reported on his attendance at the International Banking Congress in St. Petersburg, Russia. He presented to the Plenary the outcomes of the discussions held therein and stressed in particular the importance of conducting a second survey on financial inclusion issues to be discussed by MONEYVAL in 2016.

23. The Plenary was also informed that Mr Michael Stellini from the Secretariat represented MONEYVAL at a Conference on Financing of Proliferation, which took place in Vienna, Austria, with a contribution on “How countries should prepare themselves for an evaluation on proliferation financing”.

24. Mr Andrey Frolov from the Secretariat attended the “Preventing Terrorist Abuse of Non-Profit Organizations” regional workshop in Sarajevo, Bosnia and Herzegovina. The aim of the seminar was to share information and experience on how to handle capacity gaps in monitoring non-profit organisations and how to prioritise further actions and measures to be implemented.

Agenda item 5 – Report on attendance by Mr Nicola Muccioli (San Marino) at IMF Conference on Risk Assessments (Syracuse, 27-30 April)

25. Mr Nicola Muccioli (San Marino) informed the Plenary about his participation in the IMF Conference on Risk Assessments (Syracuse, 27-30 April). As a conclusion, he stressed the importance of the pro-active role of the private sector in conducting national risk assessments. He underlined that the public sector should subsequently disseminate the results to the private sector.

Agenda item 6 – Global data exercise to ascertain the level of preparedness of states and territories to deal with terrorist financing and terrorism

26. The Executive Secretary updated the Plenary on the developments with regard to the FATF's report to the G20 on the global implementation of international standards concerning terrorist financing. He positively noted that all members of MONEYVAL participated in the data collection exercise and submitted replies to the circulated questionnaire. The Plenary was further informed that the FATF is currently analysing the data received by its Member States, and that the final report to the G20 would give a general overview of the implementation of the measures against terrorism financing.

Agenda item 7 – Presentation by the Secretariat on how the Working Group on Evaluations will operate in the 5th round and discussion

27. The Secretariat informed the Plenary of the manner the Working Group on Evaluations will operate within the procedures under the 5th round of evaluations. The Plenary was reminded of its decision to appoint Professor William Gilmore as one of the Co-chairs of the Working Group on Evaluations. It accepted two nominations by the Bureau for a second Co-chair, namely of Mr Nicola Muccioli (San Marino) and Mr Radoslaw Obczynski (Poland), who will alternate depending on their availabilities.

Agenda item 8 – Follow up by Andorra

8.1 Special Report from Andorra on actions taken in response to the “Notice of Finding” under s. 311 of the PATRIOT Act (2001) by the US Treasury

28. The Plenary heard an update on the Special Report from Andorra on actions taken in response to the “Notice of Finding”. It invited Andorra to continue providing up-dates to the Plenary on related developments within the Tour de Table process.

8.2 and 8.3 4th round enhanced follow up report of Andorra, Fourth round follow up: application by Andorra to be removed from regular follow up

29. The Plenary examined the country's third follow-up report, and the Secretariat's analysis of progress made by Andorra both under the request to exit the regular follow-up process and the status of Andorra under enhanced follow-up.
30. The Secretariat firstly introduced its analysis of the progress reported by Andorra under the enhanced follow up procedure, to which the country was subjected in April 2015. This monitoring process focused on selected areas, such as the criminalisation of the money laundering offence, and the supervisory and oversight system of financial institutions and DNFBPs.
31. The Committee noted positively the recent changes to the Criminal Code of July 2015 and the planned changes in the organisation of the courts, while reiterating its concerns with respect to results achieved in terms of ML investigations, prosecutions and convictions and possible bottlenecks in the system. As regards the supervisory and oversight system of financial institutions and DNFBPs, the Committee noted several positive developments and measures which aimed at improving the effective implementation of the AML/CFT supervisory regime, though expressing reservations on the effectiveness of the AML/CFT supervision, sanctions applied, and the adequacy of resources. It concluded that continuous efforts will be required to achieve long-term effectiveness as regards the investigation and prosecution of ML offences, as well as in respect of the AML/CFT supervisory action of FIs and DNFBPs by Andorran supervisors.
32. With respect to Andorra's report under the regular follow-up, the Committee agreed that Andorra made satisfactory progress in respect of remedying deficiencies identified in the implementation of the core and key recommendations, though some gaps remained. Most of the measures reported had recently entered into force, while several additional measures were under way or planned in order to strengthen the effectiveness of the system.

Decision taken

33. With respect to the enhanced follow-up procedure, the Plenary concluded that Andorra had largely addressed the deficiencies monitored under this process and decided to lift the application of enhanced measures.
34. With respect to regular follow-up, MONEYVAL considered the fact that the evaluation of Andorra under the 5th round was scheduled in 2016. It decided to discontinue Andorra's reporting under the 4th round follow-up process with the note that any outstanding issues highlighted both Secretariat analyses should be considered during the 5th round assessment by the evaluation team under the scoping exercise. The analysis of the Secretariat was adopted.

Agenda item 9 – Fourth round follow up: application by Albania to be removed from regular follow up

35. The 4th round MER on Albania was adopted in April 2011 and, as a result, Albania was placed in regular follow-up, requiring it to report back two years after the evaluation. A follow-up report was presented in September 2013 together with an application to exit regular follow-up. The Plenary decided that further steps needed to be taken and requested Albania to submit a further report in April 2014. Albania presented follow-up reports in April and September 2014. In July 2015, the country re-submitted its follow-up report, with a reaffirmation of its request to be removed from the regular follow up process. In order to be removed from the regular follow-up process, Albania was required to demonstrate that it had reached a level of or essentially equivalent to "compliant" or "largely compliant" in all Core and Key Recommendations.
36. The Secretariat presented its analysis. Albania adopted amendments to its Criminal Code which brought the criminal offences of money laundering and terrorism financing largely in line with international requirements. Increased effectiveness was demonstrated with regard to securing convictions for ML, in particular due to positive developments of the jurisprudence concerning the flexibility of burden of proof. In relation to R.5, action has been taken to remedy most of the deficiencies identified in relation to CDD measures; a comprehensive analysis of the implementation of the framework in practice will be undertaken during the next on-site visit. The changes to the incrimination of ML and TF offences, together with the amendments to the AML/CFT Law, remedied also largely the deficiencies under Recommendations 13, 35 and

Special Recommendations I and IV. Several positive steps have been taken by Albania to address the deficiencies under Recommendation 23. With respect to SR.III, Albania had made important progress, although concerns remained about the timeliness of the publication of the UN list of designated persons.

Decision taken

37. The Plenary concluded that Albania had made adequate progress in respect of all Core and Key recommendations analysed. It adopted the analysis of the Secretariat and the 6th follow-up report on Albania, which are subject to automatic publication in accordance with the Rules of Procedure. It decided to remove Albania from the regular follow-up process and concluded that Albania shall be expected to present its first biennial up-date in September 2017, subject to Plenary's discretion should this fall within the one year period before the 5th round on-site visit.

Agenda item 10 – Fourth round follow up: interim follow up report by Latvia

38. Following the adoption of the 4th MER in 2012, Latvia was placed into regular follow-up and was requested to submit a follow-up report by September 2014. Furthermore, Latvia was encouraged to seek removal from the follow-up process within three years after the adoption of the 4th round MER; that is in September 2015 or very soon thereafter. In September 2014, the Plenary acknowledged the progress achieved by Latvian authorities on law enforcement and financial aspects. However, it was underlined that no significant development was reported in particular on the technical side of SR.III and, in order for Latvia to achieve enough progress to seek removal from the follow-up process by September 2015, the remaining deficiencies identified in this respect should be addressed.
39. Latvia informed the Plenary that it did not envisage seeking removal from the follow-up procedure at the current plenary meeting. The authorities provided the Secretariat with the *draft Law on International Organizations' and National Sanctions*, which is expected to address the outstanding deficiencies identified under SR.III.

Decision taken

40. The Plenary took note of the interim follow-up report presented by Latvia and invited Latvia to take steps in order to remedy the shortcomings of the implementation of the UN targeted sanctions regime. Latvia was invited to present the developments in this matter at the next plenary meeting in December 2015 and to seek exit from regular follow-up no later than September 2016.

Agenda item 11 – Fourth round follow up: interim follow up report by the Slovak Republic

41. The Slovak Republic informed the Plenary that it did not consider seeking removal from follow-up at this stage. It presented to the Plenary an interim follow-up report on the steps undertaken to remedy the deficiencies identified in the 4th round MER. The Secretariat invited the authorities to adopt the legislative amendments and address the remaining deficiencies identified in order to be in a position to exit the follow up procedures.

Decision taken

42. The Plenary invited the Slovak Republic to report on further steps that have been taken at the plenary meeting in December 2015 and to seek removal from the regular follow-up process in April 2016.

Agenda item 12 – Gender Equality Rapporteur - Discussion of the role of a Gender Equality Rapporteur in MONEYVAL (Ms Carolina LASÉN DIAZ, Head of Gender Equality Unit, Council of Europe; Ms Liubov SAMOKHINA, GRECO Secretariat)

43. The Plenary took note of the presentations made by the Council of Europe Secretariat concerning the role of gender equality rapporteur and the work carried out by GRECO on this issue. Interested delegations were invited to put forward nominations for a MONEYVAL gender equality rapporteur, who could take part in the CoE November 2015 training in Strasbourg.

Agenda item 13 – Information from the European Union

13.1 European Commission

44. The representative of the European Commission provided a brief overview of the 4th AML Directive. The Plenary was informed that the European Parliament and the Council adopted the Directive (EU) 2015/849 on the prevention of the use of the financial system for the purposes of money laundering and terrorist financing in May 2015, and that it was published in the Official Journal of the EU in June 2015. Following publication, the Directive shall be implemented by Member States within two years. Moreover, the European Commission informed that Regulation (EU) 2015/847 of the European Parliament and of the Council of 20 May 2015 on information accompanying transfers of funds will enter into force in June 2017.
45. Additionally, the Plenary was informed on further areas of activity of the EU in the context of AML/CFT. The European Commission foresees to focus on three main issues: (i) the transposition of the directive; (ii) the adoption of implementing measures; and (iii) new initiatives to fight ML/TF.
46. Concerning the transposition of the Directive, a transposition workshop will be organised by the European Commission at the end of September 2015 to provide Member States with the needed support and to discuss interpretation issues.
47. Regarding implementing measures, the European Commission outlined the EU supranational risk assessment, which is being conducted by the European Commission with the view to identify, analyse and mitigate ML and TF risks affecting the internal market. The EU supranational risk assessment will be undertaken to the extent required to complement Member States' national risk assessments.
48. Concerning new measures to fight ML/TF, the European Agenda on Security was adopted on 28 April 2015 and has three pillars (fight against organised crime, fight against terrorism and fight against cybercrime), which each include an AML/CTF focus.
49. In addition, improving centralised tracking of financial operations is stressed within the fight against ML/TF due to its key role in identifying criminal and terrorist networks. Therefore, a European Terrorism Centre will be created within the EUROPOL. The system for facilitating the tracking shall be integrated within the EU FIU network.
50. Finally, the representative of the European Commission reiterated the importance of National Asset Recovery Offices in the context of cross border freezing and confiscation of criminal assets. He emphasised in this respect that mutual recognition of freezing and confiscation orders should be improved. It is foreseen in 2016 that the European Commission will undertake a feasibility study on common rules on non-conviction confiscation of property derived from criminal activities.

Agenda item 14 – Information on AML/CFT initiatives in other fora

Egmont Group

51. The Plenary took note of the meeting of the Egmont Group which took place in Bridgetown, Barbados, in June 2015. The meeting took place at the 20th anniversary of the Egmont Group. The Egmont Group also welcomed representatives from four new FIUs, Cuba, Cambodia, Nepal and Niger. It was stressed that for the first time representatives of the private sector also participated at the Egmont Plenary.
52. Additionally, the Egmont Group emphasised the utmost commitment of the Egmont Group to participate in the efforts of the global network to achieve greater international cooperation and exchange of operational information to combat ISIL and the phenomenon of foreign terrorist fighters.
53. Finally, the representative of the Egmont Group informed the Plenary that the Group is undertaking an in-depth analytic study on terrorist financing in relation to ISIL and FTFs which is foreseen to be finalised at the end of September 2015.

Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG)

54. The Plenary was informed that the EAG conducted in August 2015 a country-training in Kyrgyzstan. In September 2015, an international workshop on strengthening cooperation between FIUs and law enforcement agencies in combating the laundering of illicit proceeds from drug trafficking took place in Moscow, which was organised together with the UNODC. In addition, the EAG participates on the global data collection exercise with regard to the implementation of international standards on terrorist financing and foresees to analyse the information gathered before its plenary meeting in November 2015. The EAG also participated at the Conference on

Financing of Proliferation in Vienna, Austria. The next EAG plenary meeting will take place in November 2015.

FATF

55. The FATF briefly informed the Plenary of the main outcomes of the FATF plenary meeting which took place in Brisbane, Australia, in June 2015, and recalled that all the adopted documents are published on the website of FATF. This concerns in particular the following documents: the MER on Malaysia, the typologies report on ML/TF risks and vulnerabilities associated with gold, best practices on combating the abuse of non-profit organisations, and guidance for a risk-based approach to virtual currencies.
56. The FATF further presented to the Plenary the discussions held at the FATF plenary meeting concerning de-risking. The FATF representative clarified the position of the FATF in this respect and referred to the public statement on de-risking which was published on the FATF website.
57. Finally, the Plenary took note of the FATF/GAFILAT Joint Experts' Meeting on Money Laundering and Terrorist Financing Typologies held in Mexico City, Mexico on 7-9 September 2015. The meeting consisted of three sessions: a) "Special Workshop on FTF", b) "Misuse of Natural Resources and Diverting them for FT" and c) "Financial Management Strategies of Terrorist Organisations". The outcomes of this meeting will be used in the typologies project on Emerging Terrorist Financing Risks undertaken by the FATF.

GIFCS

58. The GIFCS informed the Plenary that GIFCS jurisdictions are currently focusing on the preparation of national risk assessments with tailored action plans and implementing the new adopted standards on the regulation of trust and corporate service providers. A further priority for the activities of GIFCS is systematic and timely asset recovery.
59. Representative of GIFCS also informed the Plenary of the active participation of GIFCS in the AML/CFT global network, in particular on its attendance at the plenary meetings of FATF, /APG, CFATF, participation at trainings for assessors for the evaluations under the revised 2012 FATF Methodology and the participation of GIFCS on the preparation of the FATF Guidance on Transparency and Beneficial Ownership. The upcoming meeting of GIFCS will be held in November 2015.

IMF

60. The IMF informed the Plenary about the technical assistance it is providing to the National Bank of Ukraine and the Ukrainian FIU in implementing its AML/CFT framework.
61. The IMF also presented its activities related to the impact of de-risking. Finally, it offered assistance with reviewing MONEYVAL draft reports under the 5th round of mutual evaluations.

World Bank

62. The World Bank informed the Plenary about the technical assistance projects that it is carrying out in MONEYVAL jurisdictions; in particular, eight MONEYVAL members – namely Monaco, San Marino, Latvia, Slovakia, Andorra, Moldova, Cyprus and Lichtenstein - are at different stages of the undertaking of the NRA, and three countries - namely Estonia, Serbia and Slovenia – have already concluded their NRAs. In addition, Malta, Slovenia, Isle of Man, Croatia, Montenegro and Macedonia are at the final stage and Azerbaijan will be at the final stage in December 2015. Requests from the Holy See, Bosnia and Herzegovina and Guernsey are currently pending.

Agenda item 15 – Information on AML/CFT initiatives in MONEYVAL States and territories (tour de table)

63. This item was postponed.

Day 2: Tuesday 15 September 2015

Agenda items 16 and 17 – Discussion of the draft 4th round Mutual Evaluation Report on UK

Crown Dependency of Guernsey

64. The Plenary examined the draft 4th round evaluation report on Guernsey. The Secretariat introduced the evaluation team, acknowledged the progress made by Guernsey since the IMF evaluation and provided an overview of the main findings of the report. The changes made to the report as a result of issues raised by the ad hoc review group (San-Marino) and the scientific experts during the pre-meeting with the Guernsey authorities were presented. The intervener countries were Serbia (legal aspects), Slovenia (financial aspects) and Estonia (law enforcement aspects).

Important issues raised

65. **Criminalisation of money laundering (R.1):** The Russian Federation suggested that the effectiveness bullet point concerning limited number of cases involving third party ML should be deleted and only the recommendation in this respect should remain, taking into consideration the statistics and information provided by the authorities after the onsite visit. The evaluator explained that the evaluation team welcomed that a conviction was achieved in a sophisticated ML case; however, the judgment in question was issued outside of the evaluation period and cannot serve as a basis for deletion of the bullet from the report. The Executive Secretary proposed that the information provided can be included in a footnote. The legal scientific expert supported this proposal.

66. **Legal Persons (R.33):** The scientific expert pointed out that the concern on identification and verification with regard to individual cells of protected cell companies should be reflected in the rating box, given that the assessors, although satisfied in terms of effectiveness, had doubts about the clarity of the legislative requirement. The evaluator explained that during the discussions the Guernsey authorities provided substantial information from the industry and industry associations and the evaluation team was convinced that effective implementation is warranted. Given that the FATF Recommendations do not explicitly require the identification of beneficial owners of each individual cell, the evaluation team considered that this issue should remain only as a recommendation.

67. **CDD (R.5):** The Guernsey delegation challenged the second bullet point claiming that it is an accepted international practice for financial institutions to treat other regulated financial institution as the customer for identification and verification purposes. The Guernsey authorities noted that, in the absence of a specific guidance from the FATF, international practice should be followed. In particular, Basel Guidance explains that where professional intermediaries open pooled accounts on behalf of a number of entities, there may be circumstances where the bank need not look beyond the intermediary for purposes of carrying out due diligence. The evaluator explained that currently there are no measures in place in Guernsey that would prevent criminals from abusing a collective investment scheme (CIS). Criminals could establish a private fund and when the CIS would interact with other financial institution, the latter will not request information on the ultimate beneficial owner of the CIS. The evaluator pointed out that there are no safeguards that would prevent a CIS from being abused as private asset vehicle, which are considered as high risk according the FATF Standards. Andorra noted that even if it is a common international practice, it is not in line with the FATF Standards and that the application of simplified CDD does not allow refraining from any of the main components. Jersey supported the approach taken by Guernsey in this matter and stressed that according to the Wolfsberg Principles, the fund is not required to perform own CDD measures on the investors and may allow the intermediary to open an omnibus account without the need to obtain any information on the underlying investors. The Isle of Man supported the position of Guernsey and Jersey. The United Kingdom stressed that this issue was not raised in the previous IMF report and that the key point is the nature of the investment control by the single investor. The financial scientific expert agreed with Andorra, and stressed that this not only refers to collective investment funds but also to collective investment schemes. The evaluation team repeated that the concern is mainly related to CIS which are narrowly held by few ultimate investors. The evaluation team proposed to limit the bullet by reference only to those CIS which are narrowly held and only marketed to limited number of ultimate investors. The Executive Secretary stressed that the Plenary is not bound by the IMF findings. The FATF requested clarifications as to whether financial institutions are acting as intermediaries in this case and indicated that simplified CDD under R.5 may only be applied in the case of justified grounds and it should be based on a formal risk assessment. The evaluator clarified that these provisions are applicable when the intermediary is a licensed financial institution, which is

- adequately supervised and additional safeguards are in place. Guernsey further emphasised that there is a robust regime in place to authorize the collective investment regime and it accepted the proposal of the evaluator to amend the recommendation. San Marino also supported the proposed amendment. The FATF asked if there is a way to estimate the number and volume of assets of high risk funds. Guernsey indicated that it gathers statistical data on the number of funds held in Guernsey and noted that Guernsey fund market is institutional rather than retail.
68. It was concluded to limit the bullet point to the situations where the CIS has a limited number of investors.
 69. Andorra proposed to include a recommendation that a copy of the trust deed in certain circumstances should be kept and, if it was not the practice during the onsite, include this issue as a bullet under effectiveness. The evaluator stated that the recommendation can be limited to high risk customers. Guernsey noted that the report reflects the measures that FIs undertake and that trustees are subject to prudential and ML supervision. Jersey supported the position of Guernsey and asked to clarify what particular problem will be addressed with this recommendation. The evaluator pointed out that there could be instances where the trustee, despite the fact of being licensed, is not willing to provide full information that includes the letter of wishes. The scientific experts on financial issues, Azerbaijan and France supported the position of Andorra. The evaluator also supported the proposal from Andorra to request that in high risk situations a copy of a trust deed or a letter of wishes is kept. No changes were made due to lack of clear consensus.
 70. **Supervision (R.23):** The scientific expert referred to the bullet points under R.5 which state that the list of factors implying the application of enhanced CDD omits a number of higher-risk situations which are relevant to some financial institutions in Guernsey and that the Financial Services Businesses (FSB) Regulations and the FSB Handbook provide for the discretion to refrain entirely from the application of certain CDD measures in defined circumstances. In this respect, he requested clarifications on supervisory actions applied in this regard. The evaluator clarified that R.24 was not reassessed in this evaluation round and that technical shortcomings identified under R.5 influence R.23. The evaluator further indicated that there were no actions undertaken by the supervisor to address the specific risks. Guernsey provided information on the actions undertaken based as a result of the IMF assessment.
 71. **STR (R.13, SR.IV):** Estonia asked to elaborate on the bullet point relating to reporting of attempted transactions. The evaluator pointed out that attempted transactions and suspicious activity do not coincide and there is no explicit requirement in the law or regulation. Guernsey stated that all possible situations are covered and attempted transactions are included in the legislation and referred in this respect to a letter circulated by the Attorney General of Guernsey. Liechtenstein asked to clarify if there is a prohibition to execute transactions which are known or suspected to be related to money laundering. Guernsey clarified that there is no similar prohibition in the legislation. The evaluator elaborated that although there is no requirement to prohibit the transaction there is a possibility to suspend the transaction until consent of the FIU is received. Israel supported the Guernsey interpretation. Albania pointed out that despite the fact that Albanian legislation also requires reporting on suspicious activity, Albania was recommended in the 4th round MER to explicitly include a requirement for reporting attempted transactions and therefore Albania supported the position of the evaluator. The scientific expert on legal aspects supported the position of Guernsey and proposed to include a reference to the opinion of the Attorney General and the legal advice from the counsel in a footnote and include the relevant documents in the annexes. The Isle of Man, Jersey and Russian Federation supported Guernsey's position. Hungary stated that a similar shortcoming was identified under the 4th round MER on Hungary and relevant legislation was subsequently amended. The United Kingdom noted that in the evaluation report on United Kingdom this issue was not considered as a deficiency, even though the legislation is similar. The World Bank expressed a view that the bullet point should be deleted. The FATF pointed out that the requirement can be considered as covered by the entirety of the different provisions in the legislation. It was agreed to remove the bullet point and upgrade the rating. Relevant footnote will be added as proposed by the scientific expert.
 72. **Financial Intelligence Unit (R.26):** Guernsey challenged the third factor underlying the rating. Guernsey authorities pointed out that they have full access on a timely basis to information necessary to undertake the functions of the FIU. The bullet addresses issues related to international cooperation with other FIUs and Guernsey claimed that analysis of international

assistance should be addressed under R.40 and SR.V and this bullet should therefore be deleted from R.26. The evaluator clarified that this issue was considered as impacting also on R.26 taking into account the international character of Guernsey as a financial centre. The Isle of Man supported the position of Guernsey. San Marino proposed to either amend the factor underlying rating to focus on the analytical function of the FIU or delete it. The World Bank requested clarifications as to whether the FIU can request information only based on a STR, or if additional information can also be requested from reporting entities based on information from the supervisors or law enforcement authorities. The evaluator clarified that there should be an initial disclosure, including STRs or disclosure from supervisors. Guernsey confirmed the answer provided by the evaluator. The World Bank pointed out that international standards do not set an obligation for an FIU to initiate a case based on a foreign request. Azerbaijan indicated that this issue relates not only to R.40, but also to criterion 26.4 and therefore this should be considered as a technical issue both under Recommendations 26 and 40. Estonia agreed with the opinion of the World Bank and supported removing the bullet point from R.26. Romania and France supported the position of Azerbaijan. France also pointed out that information from the tax authorities is not available in the context of international requests. The scientific expert on law enforcement aspects stated that the power of the FIU to request additional information should be considered under R.40. The scientific expert also noted that the requirement to obtain consent from the Director of Income Tax is a legal limitation of a power of FIU to request information and requested clarifications in this regard. The FATF pointed out that this issue can be discussed under criterion 26.10, but that there is no firm requirement under R.26 in this respect and it can be therefore considered as an effectiveness issue with a specific reference that the analytical capabilities of the FIU are limited by this provision. Liechtenstein pointed to the similarity with the Liechtenstein 4th round MER and indicated that this should not be considered under R.26 but R.40. The World Bank repeated that international cooperation of the FIU should not be considered under criterion 26.4, but under R.40. Bulgaria proposed to keep the bullet under R.26, but refer specifically to spontaneous disclosure from foreign FIUs. Romania pointed out that core functions of the FIU relate not only to activities connected with STRs, but also to other relevant information on ML or TF activities. The scientific expert clarified that other relevant information referred to in R.26.4 refers to CTRs, but international cooperation should be considered under R.40. Guernsey claimed that the Financial Intelligence Service (FIS) will always be able to provide assistance to foreign FIUs. The evaluator indicated that the provided clarifications related to practice and not legal limitations that the FIU has. Since no consensus was achieved, the bullet point remained unchanged.

73. The scientific expert asked to include clarifications in the text of the report concerning the requirement of consent from the Director of Income Tax, as this seems to be a legal limitation of a power of FIU to request information. The evaluator agreed to include a clarification in the report. Guernsey clarified that this requirement is a safeguard against abuse and in practice it has never impeded obtaining of information. The scientific expert noted that the power to request additional information should be a full power without any limitation. Guernsey clarified that once the information is supplied to the FIU, it does not prevent the FIU to undertake its functions; the only possible restriction can be dissemination of the information received by the FIU. France asked to clarify why it is indicated in the report that the FIS cannot access the database on international exchange of information for tax purposes and if this relates to all cases or if it requires the consent of the Director of Income Tax. Guernsey clarified that this relates to double taxation agreements.
74. Azerbaijan referred to the previous evaluation report prepared by IMF which recommended improving effectiveness of the disseminations by the FIU and asked what measures have been undertaken to implement this recommendation since the previous evaluation. The evaluator clarified that relevant information has been provided by the authorities to the evaluation team demonstrating effectiveness of the FIU. Azerbaijan pointed out that this information is not provided in the report and requested to include further information in this respect therein. The evaluator agreed with the proposal to add additional data.
75. The scientific expert pointed out that the language used in the rating boxes of R.40 and SR.V should be amended in order to indicate that assistance of the FIS “is” and not “might be” limited to the cases where there had been an STR filed in Guernsey on the subject of the request. The evaluators agreed with the proposal. Guernsey indicated that Guernsey is effective in this area. France supported the proposal from the scientific expert.

Decision taken

76. As a result of the discussion, the Plenary decided to amend the draft report and the summary to reflect the decisions taken during the discussions and the amendments set out in the room document.
77. The Plenary adopted the executive summary and the 4th round assessment visit report on Guernsey, with the agreed amendments and subject to consequential editorial changes. The executive summary and report as adopted are subject to automatic publication in accordance with the revised Rules of Procedure.
78. Pursuant to Rule 13 of the revised Rules of Procedure, Guernsey was placed under the biennial follow-up procedure. This process requires the country to provide, no later than two years after the adoption of the report (**September 2017**), a succinct update describing the new measures that have been adopted and implemented to deal with the identified deficiencies in relation to any of the 40+9 Recommendations that are rated PC or NC and relevant updated data or statistics under the 2003 FATF Recommendation 32.

Day 3: Wednesday 16 September 2015

Agenda item 18 – Presentation on on-going work on National Risk Assessments in FATF jurisdictions

18.1 Presentation of work so far by Switzerland

79. The Plenary took note of the information on on-going work on National Risk Assessment presented by Switzerland.

Agenda item 19 – Fourth round follow up: application by Georgia to be removed from regular follow up

80. Following the adoption of the 4th round MER in July 2012, Georgia was placed in regular follow-up and requested to report back to the Plenary after two years. The first follow-up report was adopted in September 2014. Since significant progress had only been achieved with respect to SR.II, the Plenary requested Georgia to submit a second follow-up report in April 2015.
81. Following the discussions on the second follow-up report in April 2015, the Committee agreed that progress has been made with regard to several core and key recommendations rated PC in the 4th round MER (Rec. 5, Rec. 23 and Rec. 26). However, the authorities were encouraged to address remaining deficiencies underlying SR.V and to adopt the draft amendments as soon as possible in order to address the technical deficiencies under SR.III. It was therefore, recommended to Georgia to continue implementing the recommendations made in the 4th Round MER and to seek removal from the regular follow-up process in September 2015.
82. Following the decision taken by the Plenary in April 2015, Georgia applied for removal from the regular follow-up process. The Secretariat presented a detailed analysis of the progress made for the seven MONEYVAL core Recommendations which were rated PC and 17 other Recommendations which were rated PC or NC.
83. Overall, it was concluded that since the adoption of the 4th round MER, Georgia has taken significant steps to remedy many of the identified deficiencies. However, given the current threats faced by the international community in relation to financing of terrorism, especially in the context of ISIL, it was emphasised that the absence of appropriate measures to freeze terrorist assets continues to raise concern.

Decision taken

84. Following the Plenary decision, Georgia was invited to take steps in order to remedy the shortcomings of the implementation of the UN targeted sanctions regime. Georgia was invited to seek exit from regular follow-up in December 2015.

Agenda item 20 – Fourth round follow up: 6th expedited follow up report of the Czech Republic

85. Following the adoption of the 4th Round MER in April 2011, the Czech Republic was placed in expedited follow-up and requested to report back to the Plenary in July 2012. Since then, the Czech Republic presented follow-up reports at MONEYVAL's 36th, 39th, 43rd, 45th, 47th plenary meetings. At the 47th plenary meeting in April 2015, given the continuous lack of progress on two core and three key recommendations, the Czech Republic was requested to report back at the current plenary meeting. The Plenary decided that, should the Czech Republic fail to demonstrate progress on core and key recommendations, a recommendation would be made to the Plenary to move the Czech Republic into enhanced follow-up and apply one of the steps under the Compliance Enhancing Procedures.
86. On the basis of the Secretariat's analysis of the 6th expedited follow-up report on the Czech Republic, it can be concluded that progress has been achieved by the Czech Republic in relation to Recommendation 23. Very limited progress was achieved by the Czech Republic with regard to the major outstanding deficiencies in relation to Recommendations 1, 3, 35 and SR.II. Amendments to the Criminal Code were adopted, their scope is however not sufficient to remedy the shortcomings identified in the 4th round MER. Given the continuous lack of progress on two core recommendations (R. 1 and SR. II) and two key recommendations (R. 3 and 35) and considered that the Czech Republic has been under the expedited follow-up process since the adoption of the MER in 2011, it was recommended to the Plenary to move the Czech Republic into enhanced follow-up and apply step 1 of MONEYVAL Compliance Enhancing Procedures.
87. The Czech Republic authorities explained their position with respect to SR.II and R.1 and agreed with the Secretariat's proposal. Czech Republic kindly requested MONEYVAL to send the letter under step 1 of the MONEYVAL Compliance Enhancing Procedures to the Ministry of Justice, as well as to the Ministry of Finance of the Czech Republic.

Decision taken

88. The Plenary took note of the follow-up report presented by the Czech Republic. The continuous lack of progress on two core recommendations (R. 1 and SR. II) and two key recommendations (R. 3 and 35) raises significant concerns, given that the Czech Republic has now been under the expedited follow-up process since the adoption of the MER in 2011. It was therefore decided to move the Czech Republic into enhanced follow-up and apply step 1 under the MONEYVAL Compliance Enhancing Procedures. The Czech Republic was requested to report back to the Plenary on progress made in April 2016.

Agenda item 21 – Fourth round follow up: first regular follow up report by Bulgaria

89. The Secretariat provided brief information on Bulgaria's first follow-up report. Given that Bulgaria did not seek to exit regular follow-up at this stage, full written analysis by the Secretariat was not required by the Rules of Procedure. With regard to the criminalisation of TF, amendments to the Criminal Code were adopted with a view to addressing some of the deficiencies under SR.II. Bulgaria reported that a further review of the provisions of the CC related to terrorism will be carried out in the framework of foreseen judicial reforms. A number of the shortcomings identified in the 4th round report with regard to SR.III were also addressed by the authorities. No measures have been taken to remedy the outstanding deficiencies in relation to Recommendation 3. All deficiencies under Recommendation 10 appear to have been addressed through amendments to the AML/CFT Law.

Decision taken

90. The Plenary invited Bulgaria to report back to the Plenary in September 2016 and to seek removal from the regular follow-up process.

Agenda item 22 – Fourth round follow up: first regular follow up report by Croatia

91. The Secretariat presented its analysis of Croatia's first follow-up report. With regard to the criminalisation of ML, the definition of property was brought in line with the definition in the FATF Glossary. However, there are still some technical issues which need to be addressed in relation to the scope of property which is subject to the ML offence. The authorities reported that amendments have been drafted to implement the recommendations of the 4th round MER in relation to provisional measures and confiscation. These drafts were, however, not provided for

the purposes of the assessment. The authorities indicated that following Croatia's accession to the EU on 1 July 2013, freezing mechanisms under the UN sanctions regime are applied through EU legislation. While some deficiencies identified in the 4th round MER in this respect will be therefore addressed through the application of EU mechanisms, concerns still remain as to whether Croatia is in a position to freeze the funds controlled indirectly by designated persons and to freeze funds of EU internals. Lack of progress with respect to deficiencies concerning preventive measures was attributed mainly to the fact that amendments of the preventive framework are foreseen to take place after the adoption of the 4th AML Directive³. Some shortcomings related to R.23 appear to be outstanding.

Decision taken

92. The Plenary requested Croatia to provide an interim follow-up report at the 50th Plenary in April 2016.

Agenda item 23 – Presentations on on-going work on National Risk Assessments in MONEYVAL jurisdictions

23.1 Presentation of work so far by the UK Crown Dependency of the Isle of Man

93. The Plenary took note of the on-going work on National Risk Assessments presented by the Isle of Man.

23.2 Presentation of work so far by Israel

94. The Plenary took note of the on-going work on National Risk Assessments presented by Israel.

Agenda item 24 – Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS198)

95. The Plenary positively noted the ratification of the Convention by the United Kingdom on 27 April 2015. The amendment to the Appendix of the Convention, which was adopted through the fast track procedure, is expected to enter into force in October 2015. It was reported that a letter was sent by the Secretary General of the Council of Europe to all Member States which have not yet signed or ratified the Convention. The Plenary decided that a tour de table should take place at the plenary meeting in December 2015 where jurisdictions which have not yet signed or ratified the Convention would present their progress on this matter.

96. The plenary was also informed that the next meeting of the Conference of the Parties to the Convention will be held on in the first week of November 2015.

97. The Executive Secretary informed the Plenary that the presentation of the activity report of the COP to the Rapporteur Group would take place in October 2015.

Day 4: Thursday 17 September 2015

Agenda item 25 – Voluntary Tax Compliance Schemes

25.1 Israel

98. The Plenary took note of the information presented concerning Israel's VTC programme.

Decision taken

99. Israel should submit to MONEYVAL information on the monitoring measures carried out by the supervisory authorities without delay in order to enable the Secretariat to conclude its analysis and make recommendations, where necessary. The authorities should continue supervising the implementation of the VTC programme to ensure that it is not abused for ML/FT purposes. In particular, the Israel Tax Authority, the Police, Attorney General's Office and the Israel Money-Laundering Prohibition Authority (IMPA) should continue to cooperate in order to identify any suspicions of ML/FT, and with a view to conduct ML/FT investigations and prosecutions, where so required. It was also agreed that the MONEYVAL Bureau shall reserve the right to take further

³ The 4th AML Directive was adopted on 20 May 2015.

action in relation to the VTC programme before MONEYVAL's 49th plenary meeting in December 2015, in accordance with paragraphs 15 and 16 of MONEYVAL's Procedures.

Agenda items 26 and 27 – Discussion of the draft 4th round Mutual Evaluation Report on Bosnia and Herzegovina

100. The Plenary examined the draft 4th round evaluation report on BiH. The Secretariat introduced the evaluation team, acknowledged the progress made by BiH since the 3rd round evaluation and provided an overview of the main findings of the report. The changes made to the report as a result of issues raised by the ad hoc review group (Azerbaijan) and the scientific experts during the pre-meeting with the BiH authorities were presented. The interveners were the Holy See (legal aspects), the Former Yugoslav Republic of Macedonia (financial aspects) and Slovak Republic (law enforcement aspects).

Important issues raised

101. **Non-Profit Organizations (SR.VIII)** BiH proposed to upgrade the rating for SR.VIII to PC considering that one technical bullet-point was deleted as a result of the discussions during the pre-meeting. The legal evaluator stated that the remaining bullet-points are sufficient to justify a NC rating. Croatia challenged the last bullet-point under SR.VIII. The evaluator expressed his view that it should remain. Due to a lack of consensus, the rating remained unchanged.

102. **Conventions (R.35) and Criminalisation of Terrorist Financing (SR.II)** The scientific expert, Professor William Gilmore, proposed to remove the bullet-point under R.35 and to maintain the issue as a deficiency only under R.36. The proposal was supported by the evaluator. The FATF pointed out that the remaining deficiencies under SR.II should be reflected under R.35. The evaluator agreed to include an additional bullet point in this respect. It was also decided to add two footnotes, one under SR.II and another one under R.35, to reflect the amendments of the CC of BiH with regard to the criminalisation of terrorist financing, which were adopted outside the evaluation period. The rating for R.35 remained unchanged.

103. **Customer Due Diligence (R.5)** BiH proposed to upgrade the rating given for R.5 stating that the rating is not consistent with other reports. The financial evaluator explained the position taken on the rating for R.5. The former Yugoslav Republic of Macedonia asked BiH to explain the shortcomings in relation to beneficial ownership requirements. The BiH authorities explained that, although some minor deficiencies still remain, they do not have significant negative impact on compliance with beneficial ownership requirements. Azerbaijan questioned the only one technical bullet-point and stated that although some elements in the requirement to apply CDD measures to all existing customers are missing, the requirement itself exists in the law. Azerbaijan also proposed to combine all four effectiveness bullet-points into one effectiveness bullet-point and to upgrade the rating for R.5 to LC to be consistent with the MER on Guernsey. Estonia proposed to move the deficiency on beneficial ownership requirements under technical issues and suggested to leave the PC rating. The FATF inquired of BiH and the evaluator about the share and the level of risk that clients with complex beneficial ownership structures pose to the financial system of BiH. The BiH authorities reported that they utilise a risk-based approach to the clients of financial institutions and that as a rule beneficial ownership structures are identified. France proposed to keep the rating as PC. Since no other delegation supported the BiH proposal, the rating remained PC.

104. **Resources, integrity and training (R.30)** BiH proposed to upgrade the rating given for R.30 and suggested to remove the 4th bullet-point as well as to delete the part on the absence of trainings provided by the Securities Commission of RS. The evaluator agreed to reword the 4th bullet-point and delete the part on the Securities Commission of RS. Since no other delegation supported the BiH proposal to upgrade the rating, it remained unchanged.

105. **Supervisors (R.29)** Azerbaijan proposed to upgrade the rating of R.29 to LC. The evaluator explained his position to stay with PC rating. Armenia suggested upgrading the rating to LC as the size of insurance sector in BiH is insignificant and has no substantial influence on the overall financial market. The scientific expert supported the position of the evaluator. Azerbaijan questioned the issue of effectiveness, taking into account the size of the insurance market and considering that the bullet-point only refers to non-banking sector. The FATF proposed to redraft the effectiveness bullet-point. The evaluator agreed with the FATF proposal to make the bullet-point more precise. The Secretariat intervened and pointed out existing shortcomings on supervision under R.17 which negatively affect R.29. Since there was no consensus on the BiH

proposal, the rating remained PC.

106. **Guidelines and Feedback (R.25)** Azerbaijan suggested redrafting of the first bullet-point under R.25 in order to provide higher clarity. The evaluator agreed to redraft the bullet-point.
107. **Correspondent banking (R.7)** The scientific expert raised concerns on R.7 and proposed to downgrade the rating to PC as some serious deficiencies remain. The evaluator explained that the rating is justified as the deficiencies are mostly related to non-banking financial institutions. Croatia and Bulgaria supported the position of the evaluator. The IMF referred to the effectiveness bullet-point and stated that as there are no correspondent relationships outside the banking sector then there is nothing to regulate. The World Bank inquired whether it is possible to have correspondent relationships outside the banking sector. The evaluator stated that it is possible, but never happened in practice. San-Marino noted that the requirement on correspondent relationships also covers securities sector which might be affected by the existing shortcomings. The scientific expert supported this concern. The World Bank proposed to delete the effectiveness bullet-point. FATF supported the proposal from the World Bank. The evaluator agreed to delete the effectiveness bullet-point. The rating remained unchanged.
108. **Suspicious transaction reporting (R.13)** Croatia proposed to delete the first bullet-point under R.13 stating that the bylaws do not cover “funds”. The law enforcement evaluator did not agree and explained his position. The World Bank asked the evaluator to clarify the bullet-point in relation to the provision covering the term “funds” in the AML/CFT Law. The evaluator explained his position and insisted that the bullet-point should be regarded as a technical issue. The BiH authorities provided clarifications on the implications of the new AML/CFT Law in this respect. The evaluator replied that the new AML/CFT Law was not applied in practice due to the absence of secondary legislation. Since no consensus was reached, the first bullet-point under R.13 remained.
109. **Sanctions (R.17)** Andorra proposed to delete the third bullet-point under R.17 on absence of criminal sanctions. The financial evaluator explained the position taken on the bullet-point. Andorra agreed with the evaluator’s comments. The evaluator proposed to remove the third bullet-point and to include a recommendation that the sanctioning system may benefit from having criminal sanctions for violation of the AML/CFT Law. The World Bank stated that the requirement to impose criminal sanctions under the AML/CFT Law goes beyond the FATF standards and that focus should be placed instead on the effective use of the available administrative and civil sanctions. The “former Yugoslav Republic of Macedonia” inquired about the proportionality of sanctions imposed in BiH. Croatia agreed with the position of the World Bank and raised concerns as to the imposition of criminal sanctions for violation of the AML/CFT Law. Germany agreed with the position of Croatia and the World Bank. Romania supported the proposal to delete the bullet-point and introduce it as a recommendation. The “former Yugoslav Republic of Macedonia” supported the deletion of the bullet-point. It was therefore decided to delete the third bullet-point under R.17 and to introduce a soft recommendation on the possible benefits of introducing criminal sanctions for AML/CFT breaches.
110. **Other DNFBPS and secure transaction techniques (R.20)** The IMF pointed out that the bullet-points under R.20 (which were taken from the 3rd round MER as R.20 was not reassessed in the 4th round) do not relate to the recommendation. The Secretariat agreed and stated that the bullet-points will be corrected in accordance with the 3rd round MER on BiH.
111. **Internal controls, compliance and audit (R.15)** The IMF proposed to reconsider the wording of the bullet-points under R.15. The financial evaluator did not agree with that proposal. Jersey stated that the FATF Standards under R.15 set requirements only with regard to internal auditing and proposed to delete the reference to external audit in relation to securities companies in the second bullet point. The financial evaluator agreed with the proposal.
112. **Unusual Transactions (R.11)** The IMF and the World Bank challenged the first bullet-point. The evaluator explained his position and the bullet-point remained unchanged.
113. **Financial Intelligence Unit (R.26)** BiH proposed to delete the technical bullet-point on the lack of publication of reports containing trends and typologies, as well as the second effectiveness bullet-point on concerns about the FIU access to all necessary information, and to upgrade the rating to LC. The law enforcement evaluator explained his position and insisted that the bullet-points should remain. The World Bank noted that the technical bullet-point is a minor one and agreed with the proposal to delete the second effectiveness bullet-point and to reconsider the

rating. The evaluator agreed to amend the technical bullet-point. The World Bank also proposed to redraft the first bullet-point under effectiveness. Croatia stated that the conclusions drawn from deficiencies in statistics are inadequately severe. It was decided by the Plenary to redraft the technical bullet-point and the first effectiveness bullet-point. Since no other delegation supported the BiH proposal to upgrade the rating, the rating remained PC.

114. **Cross-border Declaration and Disclosure (SR.IX)** The scientific expert on law enforcement aspects requested clarifications as to whether the measures for control of cross-border transportation of cash and bearer negotiable instruments are also applicable to cargo transportation and proposed to include a bullet point in this respect if cargo transportation is not covered. It was agreed to include the proposed bullet point in the report.

Decision taken

115. The Plenary adopted the executive summary and the 4th round MER on BiH with the changes agreed by the Plenary during the discussion and the changes set out in the room document, as well as subject to consequential editorial changes. The executive summary and report as adopted are subject to automatic publication in accordance with the revised Rules of Procedure. The Plenary decided to place BiH into expedited follow-up and it shall submit the first expedited follow-up report in September 2016. In addition, Bosnia and Herzegovina shall continue reporting on the Action Plan resulting from the 9th Compliance Report within the 4th round expedited regular follow-up procedure.

Agenda item 28 – Compliance Enhancing Procedures – Bosnia and Herzegovina

28.1 Report by Bosnia and Herzegovina

116. The Secretariat briefly recalled the development of application of the Compliance Enhancing Procedures in respect of BiH, as well as the steps taken by the country since the previous compliance report. As a result, it was proposed to lift MONEYVAL's public statement on BiH given the fact that the major outstanding issues have been addressed by the country. The Chairman proposed to the Plenary to integrate the outstanding issues assessed under BiH CEPs into the follow-up procedures resulting from the 4th round evaluation and to request BiH to report back to the Plenary in September 2016 in an expedited manner jointly under both processes. The Russian Federation supported the proposal and wished further success to BiH in the next follow-up reports. The Plenary agreed with the proposal. BiH thanked the Secretariat for the decision taken to withdraw the public statement on BiH and for placing the country into the regular follow-up and expressed its commitment to work closely with the FATF on the action plan.

28.2 Next steps

117. In light of the progress made and given that BiH will be subject to the 4th round follow-up process after the adoption of the MER at the 48th Plenary, the Plenary agreed to remove BiH from the CEPs. It was also agreed that the outstanding action points referred to in the 9th Compliance Report would be followed up, together with the deficiencies identified in the 4th round MER. It was decided that the revised public statement would be withdrawn, since the remaining deficiencies which formed the basis of the revised statement, particularly relating to Recommendations 1, 3 and SR II, had been largely addressed.

Day 5: Friday 18 September 2015

Agenda item 29 – Third round follow up: third progress report of Ukraine

118. The 3rd round MER on Ukraine was adopted on 19 March 2009. Ukraine submitted its first progress report to MONEYVAL in March 2010 and a fuller progress report in September 2010. The first and second progress reports were adopted, respectively, in September 2010 and December 2012. Ukraine was excused from a 4th round visit (scheduled for May 2014) due to its domestic situation. Pending the organisation of an evaluation visit under the 5th round, MONEYVAL decided that Ukraine would remain subject to the third round follow-up procedures and submit a 3rd round progress report in September 2015. The Plenary examined the follow-up

report submitted by Ukraine and the Secretariat analysis, covering the core recommendations and Recommendation 3, with the assistance of the delegation of the UK Crown Dependency of Isle of Man, acting as Rapporteur. The Secretariat summarised the developments made as well as remaining areas of concern. The Isle of Man raised a number of clarificatory questions on the other aspects of the progress report which were not covered by the analysis of the Secretariat.

119. In relation to R.1, the amendments which have been made to the Criminal Code and the Criminal Procedure Code have improved the legal framework, though certain gaps remained with respect to the ML offence, and the results reported raised questions as to the level of implementation in practice. As regards CDD obligations and record keeping requirements, almost all of the deficiencies identified in the 3rd round MER were remedied. With respect to R.13, adequate implementation by the non-banking sector of its reporting obligation had yet to be demonstrated, despite the authorities' efforts and awareness-raising activities carried out. In relation to SR. IV, the identified deficiencies were largely remedied. As concerns R.3, progress was also noted. The more extensive provisions on special confiscation did not appear to be available for ML nor for all categories of predicate offences, including TF. It was thus proposed that in the context of the fifth round evaluation of Ukraine by MONEYVAL, the evaluators would consider under their scoping exercise whether enhanced scrutiny should be given to the confiscation of proceeds and instrumentalities of crime.

Decision taken

120. The Plenary was satisfied with the information provided and the progress made and thus approved the progress report and the analysis of the progress on the core Recommendations. Pursuant to Rule 41 of the Rules of Procedure, the progress report should be subject to an update every two years between evaluation visits (i.e. March 2017). However, the Plenary will retain discretion in this respect, given that this date falls within the one year period before the scheduled 5th round on-site visit.

Agenda item 30 – Continuation of presentations on ongoing work on National Risk Assessments in MONEYVAL jurisdictions

30.1 Presentation of work so far by Hungary

121. The Plenary took note of the information on on-going work on the National Risk Assessment presented by Hungary.

Agenda item 31 – Presentation of the new “Additional Protocol to the Council of Europe Convention on the Prevention of Terrorism” by Mr Kristian Bartholin, Deputy Head of Counter Terrorism Division

122. This item was postponed.

Agenda item 32 – Typologies work

32.1 Update on FATF Typologies project on Transparency of beneficial ownership and associated risks

123. The Plenary took note of an update by the FATF on the process and initial findings of the typologies project on transparency of beneficial ownership and associated risks. Slovenia, Bosnia and Herzegovina, the Isle of Man and Bulgaria provided input to the study. Given the limited number of case studies provided to date it was reported that the decision on further action with respect to this study will be taken at the FATF Plenary in October 2015.

32.2 Future typologies work

124. In the light of the upcoming Workshop on Money Laundering Stemming from Corruption, which will take place in Warsaw in November 2015, the Plenary supported the proposal by the Executive Secretary to prepare a brief questionnaire in order to scope out the money laundering aspects in MONEYVAL states and jurisdictions in relation to grand corruption cases.
125. Poland briefly informed the Plenary about the details of the workshop and encouraged countries to participate. San-Marino and Guernsey supported the proposal of the Executive Secretary. The World Bank recalled the previous work undertaken on the issue of corruption and

informed that it will consider participating in this project.

126. It was decided by the Plenary that upon the receipt of information from the questionnaire, a decision will be taken with regard to future work on this issue.

32.3 Typologies work in other fora

127. The FATF informed the Plenary that a joint FATF/APG Typologies report on money laundering and terrorist financing risks and vulnerabilities associated with gold was recently adopted. It also reported that new proposals on future typologies studies are expected at the FATF October plenary meeting.

128. The EAG informed the Plenary about the status of two typologies projects recently initiated – one on money laundering and financial pyramids and the other on money laundering and corruption. EAG thanked Serbia and Poland for their input to these studies and confirmed its participation in the Warsaw Workshop on Money Laundering Stemming from Corruption.

Agenda item 33 – Ad Hoc Review Group of Experts for the next plenary and intervenors for next plenary

129. The Plenary decided on the following composition of the Ad Hoc Review Group of Experts and the intervenors for the discussion of the mutual evaluation report on Jersey at the 49th plenary meeting: France - Ad Hoc Review Group, Albania- intervenor on legal aspects, Armenia – intervenor on law enforcement aspects and Italy - intervenor on financial aspects. Lithuania shall act as Rapporteur for the second 3rd round progress report of the Holy See.

Agenda item 34 – Future representation in FATF meetings

130. The Plenary took note of the participation of representatives from Liechtenstein, San Marino and Poland as members of the MONEYVAL delegation to the FATF Plenary in October 2015 and invited other interested delegations to liaise with the Secretariat as soon as possible.

Agenda item 35 – Financing and staffing

131. The Plenary received an update on the financing and budget of MONEYVAL.

132. Mr Giovanni Ilacqua is stepping down at the end of 2015 as a scientific expert to MONEYVAL. As it was likely that he would be unable to attend the 49th Plenary in December, the Chairman took this opportunity to warmly thank Mr Ilacqua for his valued service and support to MONEYVAL over many years, and made a presentation to him on behalf of the Committee. The Committee joined the Chairman in wishing Mr Ilacqua great success in his future activities.

133. As this was the last plenary meeting of Mr John Ringguth in his capacity as Executive Secretary before his retirement at the end of September, the Chairman warmly thanked him for the important role that he has played in the work of MONEYVAL and made a presentation to him on behalf of the Committee. The Committee joined the Chairman in expressing to Mr Ringguth their best wishes for his retirement and gave him a standing ovation.

Agenda item 36 – Miscellaneous

134. No issues were discussed under this item.

APPENDIX I - Agenda

Day 1: Monday 14 September 2015 / 1^{er} jour : lundi 14 septembre 2015

Morning 9h30 / matin 9h30

1. **Opening of the Plenary Meeting at 9h30 by Jan Kleijssen, Director of Information Society and Action against Crime / Ouverture de la réunion plénière à 9h30 par Jan Kleijssen, Directeur de la Direction de la société de l'information et de la lutte contre la criminalité**
2. **Adoption of the Agenda / Adoption de l'ordre du jour**
3. **Information from the Chairman / Informations communiquées par le Président**
 - 3.1 **Chairman's correspondence / Correspondance du Président**
 - 3.2 **Presentation of Annual Report / Présentation du Rapport Annuel**
4. **Information from the Secretariat / Informations communiquées par le Secrétariat**
 - 4.1 **Presentation of the incoming Executive Secretary / Présentation du Secrétaire Exécutif entrant**
 - 4.2 **MONEYVAL Secretariat changes / Changements au sein du Secrétariat de MONEYVAL**
 - 4.3 **MONEYVAL calendar of activities 2015 - 2016 / Calendrier des activités en 2015 – 2016**
 - 4.4 **Report from the Secretariat on June FATF meeting / Rapport du Secrétariat sur la réunion de juin du GAFI**
 - 4.5 **MONEYVAL evaluator training / Séminaire de formation des évaluateurs de MONEYVAL**
 - 4.6 **Reports on Secretariat attendance in other fora / Rapports du Secrétariat sur sa participation aux réunions d'autres institutions**

International Banking Congress (Saint-Petersburg); OSCE Workshop (Sarajevo); Conference on the Financing of Proliferation of Weapons of Mass Destruction (Vienna)
5. **Report on attendance by Mr Nicola Muccioli (San Marino) at IMF Conference on Risk Assessments (Syracuse, 27-30 April) / Rapport sur la participation de M. Nicola Muccioli (Saint Marin) à la Conférence du FMI sur l'évaluation des risques (Syracuse, 27-30 avril)**
6. **Global data exercise to ascertain the level of preparedness of states and territories to deal with terrorist financing and terrorism / Exercice global de données sur le niveau de préparation des Etats et territoires pour gérer les questions de financement du terrorisme et de terrorisme**
7. **Presentation by the Secretariat on how the Working Group on Evaluations will operate in the 5th round and discussion / Présentation du Secrétariat sur la façon d'opérer du Groupe de Travail sur les Evaluations pendant le 5ème cycle et discussion**
8. **Follow up by Andorra / Procédures de suivi d'Andorre**
 - 8.1 **Special Report from Andorra on actions taken in response to the "Notice of Finding" under s.311 of the PATRIOT Act (2001) by the US Treasury / Rapport Spécial d'Andorre sur les actions prises par Andorre en réponse à "l'Avis de proposition de réglementation" émis par le Trésor américain en vertu de l'article 311 du PATRIOT Act (2001)**
 - 8.2 **4th round enhanced follow up report of Andorra / Rapport de suivi renforcé du quatrième cycle d'Andorre**
 - 8.3 **Fourth round follow up: application by Andorra to be removed from regular follow up / Suivi au titre du quatrième cycle: demande d'Andorre de sortir de la procédure de suivi régulier**

9. **Fourth round follow up: application by Albania to be removed from regular follow up / Suivi au titre du quatrième cycle : demande de l'Albanie de sortir de la procédure de suivi régulier**

Afternoon 14h30 / après-midi 14h30

10. **Fourth round follow up: interim follow up report by Latvia / Suivi au titre du quatrième cycle : rapport de suivi intermédiaire de la Lettonie**
11. **Fourth round follow up: interim follow up report by the Slovak Republic / Suivi au titre du quatrième cycle : rapport de suivi intermédiaire de la République Slovaque**
12. **Gender Equality Rapporteur - Discussion of the role of a Gender Equality Rapporteur in MONEYVAL (Ms Carolina LASÉN DIAZ, Head of Gender Equality Unit, Council of Europe ; Ms Liubov SAMOKHINA, GRECO Secretariat) / Rapporteur sur l'Égalité des Genres – Discussion sur le rôle d'un Rapporteur sur l'Égalité des Genres à MONEYVAL (Mme Carolina LASÉN DIAZ, Cheffe de l'Unité Égalité de genre, Conseil de l'Europe ; Mme Liubov SAMOKHINA, Secrétariat du GRECO)**

13. **Information from the European Union / Information de l'Union européenne**

- 13.1 **European Commission / Commission européenne**
13.2 **Secretariat General / Secrétariat Général**

14. **Information on AML/CFT initiatives in other fora / Informations sur les initiatives LAB/CFT d'autres institutions**

- 14.1 **Council of Europe Development Bank / Banque de Développement du Conseil de l'Europe**
14.2 **EBRD / BERD**
14.3 **Egmont Group / Groupe Egmont**
14.4 **Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG) / Groupe Eurasie sur le blanchiment d'argent et le financement du terrorisme (EAG)**
14.5 **FATF / GAFI**
14.6 **GIFCS / GSCFI**
14.7 **IMF / FMI**
14.8 **OSCE**
14.9 **UNODC / ONUDC**
14.10 **World Bank / Banque Mondiale**

15. **Information on AML/CFT initiatives in MONEYVAL States and territories (tour de table) / Informations sur les initiatives LAB/CFT des Etats et territoires de MONEYVAL (tour de table)**

Day 2: Tuesday 15 September 2015 / 2^{ème} jour : mardi 15 septembre 2015

Morning 9h30 / matin 9h30

16. **Discussion on the draft 4th round Mutual Evaluation Report on UK Crown Dependency of Guernsey / Discussion du projet de rapport d'évaluation mutuelle du 4^e cycle de la Dépendance de la Couronne du Royaume-Uni Guernesey**

Afternoon 14h30 / après-midi 14h30

17. **Continuation of the discussion on the draft 4th round Mutual Evaluation Report on UK Crown Dependency of Guernsey / Suite de la discussion du projet de rapport d'évaluation mutuelle du 4^e cycle de la Dépendance de la Couronne du Royaume-Uni Guernesey**

Morning 9h30 / matin 9h30

18. Presentation on ongoing work on National Risk Assessments in FATF jurisdictions /
Présentation des travaux en cours dans les juridictions du GAFI sur l'évaluation nationale des risques

18.1 Presentation of work so far by Switzerland / *Présentation du travail accompli jusqu'ici par la Suisse*

19. Fourth round follow up: application by Georgia to be removed from regular follow up / *Suivi au titre du quatrième cycle : demande de la Géorgie de sortir de la procédure de suivi régulier*

20. Fourth round follow up: 6th expedited follow up report of the Czech Republic / *Suivi au titre du quatrième cycle : 6ème rapport de suivi accéléré de la République Tchèque*

21. Fourth round follow up: first regular follow up report by Bulgaria / *Suivi au titre du quatrième cycle : premier rapport de suivi régulier de la Bulgarie*

Afternoon 14h30 / après-midi 14h30

22. Fourth round follow up: first regular follow up report by Croatia / *Suivi au titre du quatrième cycle: premier rapport de suivi régulier de la Croatie*

23. Presentations on ongoing work on National Risk Assessments in MONEYVAL jurisdictions /
Présentations des travaux en cours dans les juridictions de MONEYVAL sur l'évaluation nationale des risques

23.1 Presentation of work so far by the UK Crown Dependency of the Isle of Man /
Présentation du travail accompli jusqu'ici par la Dépendance de la Couronne du Royaume-Uni de l'Île de Man

23.2 Presentation of work so far by Israel/ *Présentation du travail accompli jusqu'ici par Israël*

24. Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS198) / *Convention du Conseil de l'Europe relative au blanchiment, au dépistage, à la saisie et à la confiscation des produits du crime et au financement du terrorisme (STCE No. 198)*

24.1 Action by Member States towards ratification / *Action des Etats Membres en matière de ratification*

24.2 Current state of signatures and ratifications / *Etat actuel des signatures et ratifications*

24.3 Information on the presentation to the Rapporteur Group (GR-J) / *Informations sur la présentation au Groupe de Rapporteurs (GR-J)*

[Bureau Meeting at the close of the afternoon's business / Réunion du Bureau à la clôture de la session de l'après-midi]

Day 4: Thursday 17 September 2015 / 4^{ème} jour : jeudi 17 septembre 2015

Morning 9h30 / matin 9h30

25. Voluntary Tax Compliance Schemes / Systèmes de régularisation fiscale volontaire

25.1 Israel / Israël

26. Discussion on the draft 4th round Mutual Evaluation Report on Bosnia and Herzegovina / Discussion du projet de rapport d'évaluation mutuelle du 4^e cycle de la Bosnie Herzégovine

Afternoon 14h30 / après-midi 14h30

27. Continuation of the discussion on the draft 4th round Mutual Evaluation Report on Bosnia and Herzegovina / Poursuite de la discussion du projet de rapport d'évaluation mutuelle du 4^e cycle de la Bosnie Herzégovine

28. Compliance Enhancing Procedures – Bosnia and Herzegovina / Procédures de conformité renforcée de la Bosnie Herzégovine

28.1 Report by Bosnia and Herzegovina / Rapport de la Bosnie-Herzégovine

28.2 Next steps / Prochaines étapes

Plenary dinner in the evening / Dîner à l'occasion de la session plénière

Day 5: Friday 18 September 2015 / 5^{ème} jour : vendredi 18 septembre 2015

Morning 9h30 / matin 9h30

29. Third round follow up: third progress report of Ukraine / Suivi au titre du troisième cycle : troisième rapport de progrès de l'Ukraine

30. Continuation of presentations on ongoing work on National Risk Assessments in MONEYVAL jurisdictions / Suite des présentations des travaux en cours dans les juridictions de MONEYVAL sur l'évaluation nationale des risques

30.1 Presentation of work so far by Hungary / Présentation du travail accompli jusqu'ici par la Hongrie

31. Presentation of the new “Additional Protocol to the Council of Europe Convention on the Prevention of Terrorism” by Mr Kristian Bartholin, Deputy Head of Counter Terrorism Division / Présentation du nouveau “Protocol additionnel à la Convention du Conseil de l'Europe pour la prévention du terrorisme” par M. Kristian Bartholin, Chef adjoint de la Division Anti-terrorisme

32. Typologies work / Travaux sur les typologies

32.1 Update on FATF Typologies project on Transparency of beneficial ownership and associated risks / Actualisation du projet typologique du GAFI relatif à la transparence de la propriété effective et les risques associés

32.2 Future typologies work / Travaux futurs sur les typologies

32.3 Typologies work in other fora / Travaux sur les typologies dans d'autres institutions

- FATF / GAFI

- EAG / GEA

- 33. Ad Hoc Review Group of Experts for the next plenary and intervenors for next plenary /**
Groupe d'examen ad hoc d'experts et les intervenants pour la prochaine réunion plénière
- 34. Future representation in FATF meetings /** *Représentations futures dans les réunions du GAFI*
- 35. Financing and staffing /** *Financement et questions de personnel*
- 36. Miscellaneous /** *Divers*

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