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CONSEIL DE L'EUROPE

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**MONEYVAL(2016)24**

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

**MONEYVAL**



**51<sup>st</sup> PLENARY MEETING  
Strasbourg, 27-29 September 2016**

**MEETING REPORT**

**MEMORANDUM**

**Prepared by the MONEYVAL Secretariat**

## Executive Summary

During the 52<sup>nd</sup> Plenary meeting, held in Strasbourg from 27-29 September 2016, the MONEYVAL Committee:

- adopted the 5th round MER and executive summary on Hungary, decided to place the country in enhanced follow-up and requested it to report back to the Plenary in December 2017;
- adopted the 4th round follow-up report by Latvia and decided to remove the country from the follow-up process;
- took note of the second follow up report by Bulgaria under the 4<sup>th</sup> round of mutual evaluations and invited the country to provide a further follow-up report at the 53<sup>rd</sup> Plenary (May 2017), while encouraging it to then seek removal from the follow-up process;
- took note of the first regular follow-up report by Liechtenstein, welcomed the reforms that took place and encouraged the country to seek removal from the follow-up process within two years;
- took note of the first regular follow-up report by Estonia and encouraged the country to seek removal from the follow-up process not later than two years from now;
- took note of the interim report by the Republic of Moldova and invited the country to seek removal from the follow-up process in December 2016;
- took note of the Bosnia and Herzegovina's 4th round expedited follow-up report, and suggested that the country seeks removal from the follow-up process within three years at the latest;
- took note of the compliance reports of the Czech Republic and Montenegro under the Compliance Enhancing Procedures and asked both countries to submit further compliance reports in December 2016;
- heard the update from the Secretariat on the follow-up procedure of the Terrorist Financing Fact-Finding Initiative;
- had an exchange of view with Judge Spano from the European Court of Human Rights on the recent Grand Chamber judgment of *Al-Dulimi and Montana Management v. Switzerland* of 21 June 2016;
- heard a presentation on recent changes to Recommendation 8 and its Interpretative Note.

The Committee of Experts on the evaluation of anti-money laundering measures and the financing of terrorism (MONEYVAL) held its 51<sup>st</sup> Plenary meeting from 27 to 29 September 2016 in Strasbourg under the chairmanship of Mr Daniel Thelesklaf (Liechtenstein). The agenda of the meeting is attached as Appendix I, the list of participants as Appendix II.

## **Day 1: Tuesday 12 April 2016**

### **Agenda item 1 – Opening of the Plenary Meeting**

1. The Chairman, Mr Daniel Thelesklaf, opened the Plenary by welcoming all participants.
2. The Director of Information Society and Action against Crime, Mr Jan Kleijssen, recalled the urgency of effectively combatting terrorism and its financing in light of the recent terrorist attacks in Europe. In this regard, he welcomed the continuing efforts of the Plenary, in particular in light of the follow-up process of the “Terrorist Financing Fact-Finding Initiative”. Mr Kleijssen reported about the high-level mission of MONEYVAL to the Czech Republic in June 2016 which had been conducted in a cooperative and constructive spirit. Being responsible for the Directorate in the Secretariat also dealing with issues related to information society, he encouraged the Plenary to resume discussion of the issue of virtual currencies, in light of recent proposals at EU level to increase transparency in this area. With regard to staff issues, Mr Kleijssen informed the Plenary about the on-going external recruitment procedure for a position in the MONEYVAL Secretariat, and encouraged delegations to put forward candidates for the two open vacancies for secondments in the Secretariat.

### **Agenda item 2 – Adoption of the agenda**

3. The Committee adopted the agenda as circulated (see Appendix I).

### **Agenda item 3 – Information from the Chairman**

4. The Chairman informed the Plenary about the correspondence with MONEYVAL jurisdictions since the 50<sup>th</sup> Plenary in April 2016.
5. He further reported to the Plenary about MONEYVAL’s high-level mission to the Czech Republic which took place from 8-9 June 2016. A MONEYVAL delegation, composed of the Chairman, the Director of Information Society and Action against Crime and the Executive Secretary, met with a number of high-level politicians (including the Minister of Justice) and senior civil servants to discuss the necessary legislative changes which are currently underway, in particular as far as the deficiencies identified by the FATF on terrorist financing are concerned. The Chairman thanked the Czech delegation for the cooperative and constructive spirit in which the high-level mission was conducted (for more information, see agenda item 5.2).
6. The Chairman reported about his exchange of views with the Standing Committee of the Parliamentary Assembly (Tallinn, 27 May 2016) and the Committee of Ministers (Strasbourg, 6 July 2016), the latter on the occasion of the adoption of MONEYVAL’s annual report 2015.

### **Agenda item 4 – Information from the Secretariat**

7. The Executive Secretary informed the Plenary about the publication of MONEYVAL’s annual report 2015 on the MONEYVAL website and the Council of Europe’s Portal, together with a video interview of the Chairman. He also informed the Plenary about the ongoing external vacancy recruitment procedure in the MONEYVAL Secretariat, as well as the two vacancies for secondments. He encouraged all members to consider submitting candidates for applications.
8. With regard to the calendar of activities and schedule of evaluations, the Plenary was informed about the state of the ongoing evaluation of the United Kingdom Crown Dependency of the Isle of

Man, the forthcoming onsite visit to Slovenia (7 – 19 November 2016), as well as the dates for the onsite visits to Andorra (6 – 18 March 2017) and Ukraine (28 March – 8 April 2017). The preparatory training for the two countries to be visited in the second half of 2017 (Albania and Latvia) would be held in October/November 2016. The Plenary was also informed that the Conference of Parties of the “Warsaw Convention” (CETS. 198), for which the MONEYVAL Secretariat is also responsible, would hold its 8<sup>th</sup> Plenary meeting from 25-26 October 2016, with the evaluation reports of Belgium and Armenia to be discussed and adopted at that meeting (see also below, agenda item 25).

9. The Executive Secretary reported on the FATF Plenary meeting in June 2016, in particular the adoption of the mutual evaluation reports of Austria, Canada and Singapore, the ongoing follow-up to the Terrorist Financing Fact-Finding Initiative, the discussion on transparency and beneficial ownership, as well as the most recent changes in the FATF standards, notably with regard to Recommendation 8 and its interpretive note to protect non-profit organisations from terrorist financing abuse (see also below, agenda item 16). He reported about the adoption of the Handbook to assist practitioners in their implementation of UNSCR 1373, as guidance for those involved in developing or reviewing domestic and foreign asset freezing requests and improve the global effective implementation of Recommendation 6 on targeted financial sanctions. While this handbook is not public, practitioners could get access to a secure website established to that effect, and members were invited to send the contact details of their practitioners to the MONEYVAL Secretariat by 31 October 2016.
10. The Plenary was informed about the MONEYVAL evaluators training on the 2012 FATF standards and 2013 methodology, which took place in Jerusalem from 31 May to 3 June 2016. 30 participants from 28 countries participated in the training. The Executive Secretary warmly thanked the Israeli delegation for having hosted the event, as well as the trainers (Mr John Ringguth, Mr Yehuda Schaffer, Mr Richard Walker and Mr Michael Stellini). He announced that the next training was tentatively scheduled for 12-15 May 2017, with the location to be determined.
11. The Executive Secretary further reported about the participation of the MONEYVAL Secretariat in other fora, in particular his exchange of views with several Council of Europe committees, including a general exchange of views with CODEXTER in May and (on the links between drug trade and terrorist financing) with the Pompidou Group in June. Together with Mr Michael Stellini, he had also taken part in a workshop organised by the Armenian authorities (17-18 May 2016) on AML/CFT measures and current challenges, where issues identified in the MER of Armenia were discussed with representatives of the central bank, the general prosecutor’s office, and the ministries of finance and justice as well as several LEAs. Mr Stellini also took part in an expert meeting on “Fostering Co-operation in Combatting Corruption and Money Laundering” on 5-6 September 2016 in Vienna, which was organised *inter alia* by the OSCE, the Office for Prevention and Fight Against Money Laundering of the Republic of Moldova and the EU High-Level Adviser in the field of Anti-Money Laundering in the Republic of Moldova and the United Nations Office on Drugs and Crime (UNODC). His presentation dealt with “Initiatives of the international organisations aimed at minimising risks of using off-shore companies for money laundering crimes”. Ms Astghik Karamanukyan participated in a workshop in Brussels on 30 June 2016 on the financing of terrorism, which was organised by the AME (Anti-Money Laundering Europe), a Brussels-based interactive public/private sector forum on EU financial crime issues, as well as the Royal United Services Institute. The event addressed the main elements of the “EU’s Action Plan to strengthen the fight against terrorist financing”. Ms Karamanukyan talked about the experience in asset freezing of MONEYVAL non-EU countries assessed under its 5<sup>th</sup> round of mutual evaluations. Finally, Ms Veronika Mets participated in a workshop on “Facing new challenges in combatting terrorist financing” held in Prague (19-20 September), which was organised *inter alia* by the Czech Ministry of Finance, the Council of Europe and Norway Grants. She talked about challenges in conducting national risk assessments with regard to terrorist financing.
12. The Executive Secretary invited delegations to express their interest to represent MONEYVAL in the forthcoming FATF Plenary in Paris (16-21 October 2016).

## **Agenda item 5 – Compliance Enhancing Procedures**

### **5.1 Report from Montenegro under step i of the Compliance Enhancing Procedures**

13. The Plenary considered a written analysis of a second compliance report prepared by the Montenegrin authorities on action being taken to address remaining deficiencies highlighted in the country's 4<sup>th</sup> round mutual evaluation report. In order to consider whether Step 2 of the Compliance Enhancing Procedures ("CEPS") should be applied, the authorities had been requested to report on progress, in particular, with: (i) implementation of the requirements of former SR.III; (ii) securing a commitment from the relevant Government minister(s) to make changes to AML/CFT legislation; and (iii) based on that commitment, provision of a revised timetable for the adoption of necessary legislative amendments.
14. It was noted that the Government of Montenegro had adopted a Decision in July 2016 under the Law on International Restrictive Measures ("Law on IRM") to take action against the Islamic State of Iraq and the Levant ("ISIL") and Al-Qaeda (and with them related individuals, groups, subjects and entities) in line with UNSCR 1267(1999). However, measures had not also been taken to address UNSCR 1988 (2011) and so there is no reference in the Decision to persons or entities that are designated by the 1988 Committee. There are also some inconsistencies between the Law on IRM and the Decision, and it is not certain that the Decision applies all parts of UNSCR 1267 (1999). Moreover, Montenegro had not yet taken measures to implement UNSCR 1373 (2001), though the authorities had now decided that they could do so through the Law on IRM.
15. Notwithstanding the above, it was noted that technical support had been provided by the Council of Europe on the implementation of FATF Recommendation 6 (which replaces SR.III). Following a roundtable discussion with the authorities, a technical paper had been prepared by a Council of Europe expert in July 2016 which made recommendations on the implementation of FATF Recommendation 6 and would be used to draft a "comprehensive document" with defined mechanisms for implementation of UNSCR 1267 (1999) and UNSCR 1373 (2001). The paper also included an action plan with target dates, the majority of which are in the final quarter of 2016. Whilst the document, technical paper, and action plan were still under consideration by a number of ministries and institutions, it was expected that they would be adopted by the Government in October 2016 (after national elections). In a letter to the Secretary General of the Council of Europe dated 26 July 2016, the Minister of Finance had explained that Montenegro would take all efforts to prepare the "comprehensive document" for adoption by the Government in a timely manner. However, a revised timetable for the adoption of amendments to AML/CFT legislation had not yet been prepared.
16. Whilst there had been only partial implementation of SR.III, and no commitment or timetable provided in respect of AML/CFT legislative amendments, the Secretariat considered that positive action was being taken to implement Recommendation 6 (which replaces SR.III), which has high-level political support. On this basis, it considered it premature to suggest the application of Step 2 under CEPS, since the Minister of Finance was aware of deficiencies and the necessary corrective measures to be taken.
17. The Chairman informed the Plenary about the discussion in the Bureau on this issue, which had supported delaying the taking of a decision on the application of Step 2 measures until the 52<sup>nd</sup> Plenary. In reaching this conclusion, they had been mindful also of forthcoming national elections and the short period of time between Plenaries. However, he stressed the importance of implementing Recommendation 6 in line with the action plan that had been prepared: any delays would lead to serious consideration in December 2016 of application of Step 2 measures.

#### *Decision taken:*

18. The Plenary agreed to consider progress again in December 2016 at the 52nd Plenary on the basis of a third compliance report, by which time: (a) the requirements of Recommendation 6 should have been implemented (or would be very close to implementation); and (b) the commitment and revised timetable requested for AML/CFT legislative changes should have been provided.

## **5.2 Report from the Czech Republic under step ii of the Compliance Enhancing Procedures**

19. The Plenary welcomed that the Czech Republic has made certain progress since the last compliance report in April 2016, including a high-level statement by the Minister of Justice to the Council of Europe's Secretary General to rectify the outstanding issues identified in the 4<sup>th</sup> round MER of 2011 and MONEYVAL's high-level mission in June 2016, which was conducted in a very cooperative and constructive spirit. The Plenary welcomed in particular that the Czech government has recognised the urgency of rectifying deficiencies under SR.II and has submitted draft amendments to the Criminal Code to the Parliament, to be adopted in an expedited procedure. As MONEYVAL will have to report at the latest in early January 2017 within the FATF's "Terrorist Financing Fact-Finding Initiative" in view of the FATF Plenary in February 2017 on the criminalisation of the FT offence in the Czech Republic, the Plenary urged the Czech Republic to finalise by the end of 2016 this legislative process, while respecting the constitutional requirements and procedures.
20. The Plenary considered that progress on the outstanding deficiencies identified in the 4<sup>th</sup> round MER of 2011 on R.1 also need to be urgently accelerated. It found that the Czech Republic should have the necessary changes in place sufficiently in advance of the 5<sup>th</sup> round mutual evaluation in 2018, in order to be able to demonstrate their efficient application.

### *Decision taken:*

21. Therefore, the Plenary encouraged the Czech Republic to continue its path with regard to SR.II and to accelerate addressing the deficiencies with regard to R.1, while retaining the option to apply Step 3 at a later stage. The Czech Republic was invited to report back at the 52<sup>nd</sup> Plenary (6-8 December 2016).

## **Agenda item 6 – Fourth round follow-up: first regular follow-up report by Estonia**

22. The Chairman invited the Secretariat to introduce the first progress report by Estonia under regular follow-up with respect to the 4th Round MER adopted in September 2014. The Secretariat recalled that the revised Rules of Procedure, adopted at the 50th Plenary in April 2016, did not require a written analysis by the Secretariat with respect to the first follow-up report submitted by the country. The Secretariat further explained that under the new Rules of Procedure, a country is expected to exit the regular follow-up after 4 years from the adoption of the MER, otherwise it would be placed under enhanced follow-up.
23. Turning to the report submitted by Estonia, the Secretariat highlighted the progress made with respect to core and key recommendations that had been rated as partially compliant in the MER. In particular, it noted that Estonia had put forward amendments to the Penal Code which would address all of the technical deficiencies with respect to Recommendation 3 on confiscation. The draft law was expected to enter into force shortly after the Plenary. It was positively noted that the Estonian courts had handed down the first FT conviction. However, the authorities were encouraged to bring the amendments to the FT offence into force as soon as possible. Other amendments to address deficiencies with respect to preventive requirements were in progress as part of the transposition of the EU's 4th AML Directive into domestic law.

### *Decision taken:*

24. The Plenary noted that Estonia had made satisfactory progress and adopted the progress report. Estonia was requested to report back to the Plenary in two years' time and invited the country to seek removal from the regular follow-up process in September 2018.

## **Agenda item 7 – Exchange of views with Judge Robert Spano (European Court of Human Rights) on the impact of the Grand Chamber judgment of the European Court of Human Rights in the case of *Al-Dulimi and Montana Management Inc. v. Switzerland* of 21 June 2016**

25. The Plenary heard a presentation by Judge Spano (Judge at the European Court of Human Rights, elected in respect of Iceland) on the recent Grand Chamber judgment in the case of *Al-Dulimi and Montana Management Inc. v. Switzerland* of 21 June 2016, concerning the

implementation of targeted financial sanction of the United Nations Security Council. Although the resolution at issue in *Al-Dulimi* (UNSCR 1483 of 22 May 2003, concerning Iraq) does not relate to the financing of terrorism or proliferation and consequently does not fall, the judgment is of high relevance for MONEYVAL delegations. The European Court of Human Rights had found in that judgment that the right of access to court (Article 6 of the European Court of Human Rights) had been violated, which could also occur in the future with the implementation of UNSCRs which fall within the realm of the FATF and MONEYVAL. Several delegations raised issues with regard to the compatibility of the 2012 FATF standards with the requirements under Article 6 ECHR as pronounced by the Court in that judgment.

26. The Plenary decided that the complexity of these issues deserved to be further discussed at the December meeting, and that meanwhile an *ad hoc* working group should draft a paper to facilitate members' task of reconciling their actions taken on the basis of the FATF standards with their obligations under the ECHR. This paper should be presented at the December meeting. Volunteers to participate in the *ad hoc* working group were invited to express their interest to the Secretariat. The *ad hoc* group will meet via a phone conference on 10 November 2016.

**Agenda items 8 – 10: Information on AML/CFT initiatives in MONEYVAL states and territories (tour de table), the European Union and other international fora**

27. The Plenary held a *tour de table* with regard to recent AML/CFT developments in its jurisdictions (for more information on the *tour de table*, see document MONEYVAL-Plenary 51(2016)INF8 of 28 October 2016). It also heard information about recent initiatives from the European Commission, the Egmont Group, the Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG), the Financial Action Task Force (FATF), the Group of International Financial Center Supervisors (GIFCS), the United Nations Office on Drugs and Crime (UNODC) and the World Bank.

**Agenda item 11 - Presentation of the Egmont STR project by Mr Richard Walker (United Kingdom Crown Dependency of Guernsey)**

28. In his capacity as international policy adviser to Guernsey's FIU, Mr Richard Walker gave a presentation about an ongoing project by the Egmont Group on STR reporting. The project will aggregate and analyse STR information by sector, by jurisdiction and by region in such a way that it can be used to provide examples for individual FIUs to help them reach conclusions on whether the number and pattern of STRs is consistent with peer jurisdictions and neighbouring jurisdictions. The survey focuses substantially on terrorist financing as well as money laundering, and to a large extent treats STRs made for these two purposes separately. As it is crucial for FIUs to have the most up to date information possible on terrorist financing issues so that they and other authorities can be as effective as possible, the survey aims to contribute significantly to this objective. Delegations were encouraged to respond to the survey, by giving fullest possible responses so that the best possible reports can be circulated to the membership.

**Day 2: Wednesday 28 September 2016**

**Agenda item 12 – Fourth round follow-up: first regular follow-up report by Liechtenstein**

29. The Secretariat was invited to introduce Liechtenstein's first progress report under regular follow-up with respect to the 4th Round MER adopted in April 2014. The Secretariat reminded the Plenary that the revised Rules of Procedure, adopted at the 50th Plenary in April 2016, did not require a written analysis by the Secretariat with respect to the first follow-up report submitted by the country. The Secretariat further explained that under the new Rules of Procedure, a country is expected to exit the regular follow-up at the latest after 4 years from the adoption of the MER, otherwise the country would be placed under enhanced follow-up.
30. The Secretariat noted that a new FIU Law had been adopted which addressed all the deficiencies

that restricted the FIU's access to information. In addition, financial secrecy provisions were clarified to ensure unrestricted access, as appropriate, to information by the FIU and other competent authorities. The authorities had taken measures to improve the implementation of preventive measures, particularly customer due diligence measures. Technical deficiencies concerning preventive measures were being remedied as part of a process to transpose the EU's 4th Round AML Directive into domestic law. The Secretariat noted that the prosecution service had intensified its efforts to challenge the high level of proof required by the courts with respect to the predicate offence underlying the laundering activity. While this was encouraging, no autonomous ML convictions had yet been achieved with respect to the laundering of proceeds generated by a foreign predicate offence. Therefore, the Plenary noted the importance to encourage the prosecution to continue confronting the courts with such cases.

*Decision taken:*

31. The Plenary noted that Liechtenstein had made satisfactory progress and adopted the progress report. Liechtenstein was requested to report back to the Plenary within two years' time and invited the country to seek removal from the regular follow-up process by September 2018.

#### **Agenda item 13 - Fourth round follow-up: interim follow-up report by the Republic of Moldova**

32. In line with the decision taken at the 50<sup>th</sup> Plenary in April 2016, the Republic of Moldova submitted an interim follow up report to this Plenary meeting. The information submitted by the authorities mostly concerned the on-going legislative reforms and details about the draft AML/CFT Law. The Plenary also welcomed the fact that this draft law was prepared with technical assistance provided by the Council of Europe.

*Decision taken:*

33. The Plenary took note of the developments in the Republic of Moldova with regard to the AML/CFT legislation and invited the country to seek removal from the regular follow-up process in December 2016.

#### **Agenda item 14 – Fourth round follow-up: application by Latvia to be removed from regular follow-up**

34. Following the decision taken at the 48<sup>th</sup> Plenary (September 2015) that Latvia should seek removal from the regular follow-up process once the deficiencies under SR.III are rectified (but no later than September 2016), Latvia provided the Secretariat with the second follow-up report on its progress made. Given that deficiencies underlying SR.III have been largely addressed with the adoption of new legislation on sanctions, and progress has been achieved on other non-key and core Recommendations, the Secretariat proposed to remove Latvia from the regular follow-up procedure. This proposal was supported by the Plenary.

*Decision taken:*

35. The Plenary decided to remove Latvia from the regular follow-up process. Latvia will undergo its 5<sup>th</sup> round mutual evaluation in the second half of 2017.

#### **Agenda item 15 – Fourth round follow-up: application by Bulgaria to be removed from regular follow-up**

36. Following the adoption of the 4th round MER in September 2013, Bulgaria was placed in regular follow-up and requested to report back to the Plenary after two years. The first progress report was adopted at MONEYVAL's 48th Plenary in September 2015, when Bulgaria was invited to report back in September 2016 while seeking removal from the regular follow-up process.
37. The Secretariat analysis of Bulgaria's second follow-up report concluded that the country had taken positive steps to remedy many of the deficiencies identified under several core and key recommendations (notably R.10; SR.II; R.3; SR.I; SR.III) which had been rated PC in the 2013 MER. However, it appears that, important shortcomings – notably concerning SR.II and R.3 - are



yet to be aligned with the MER recommendations. In view of that, the process of amending the Criminal Code initiated by the Ministry of Justice earlier this year could be a good opportunity to introduce the missing elements. This would concern primarily the criminalisation of all offences of the Annex to the FT Convention, as well as the abolition of the purposive element of the terrorism/FT offence. Moreover, the Criminal Code reform will also affect the country's compliance with R.3 and SR.III.

*Decision taken:*

38. The Plenary took the view that Bulgaria was not yet in a position to exit the regular follow-up procedure and that the on-going process of amending the Criminal Code should be awaited, given that further progress is needed in particular with respect to SR.II and R.3. Therefore, the Plenary decided to invite Bulgaria to submit a further progress report and to seek exit from the regular follow-up process at the 53rd Plenary in May/June 2017.

#### **Agenda item 16 – Recent changes in Recommendation 8 and its interpretative note: an overview**

39. The representative of the FATF Secretariat gave a presentation to the Plenary about recent changes to recommendation 8 and its interpretative note, adopted at the FATF Plenary in June 2016. FATF Recommendation 8 requires countries to review their laws and regulations to ensure that their non-profit sector cannot be abused for terrorist financing. Since the adoption of the 2012 FATF Recommendations, the NPO sector and the threat environment it operates in have evolved. This was reflected in the June 2014 FATF typologies report on “Risk of Terrorist Abuse in Non-Profit Organisations” and the 2015 “Best Practices Paper on Combating the Abuse of Non-Profit Organisations (Recommendation 8)”. Since then, the FATF has worked to refine Recommendation 8 to take into account the findings of these two reports. With considerable input from NPOs and private sector which included a consultation and dialogue meeting in April 2016 and two rounds of public consultations, the FATF adopted a revision FATF Recommendation 8 and its interpretive note. The revised standard aims to ensure that the implementation of Recommendation 8 is in line with the risk-based approach and does not disrupt or discourage legitimate non-profit activities.
40. With regard to MONEYVAL evaluations, the changed standards would not be used with regard to the forthcoming discussion of the mutual evaluation report of Hungary, and merely reflected in a footnote in the mutual evaluation report of the United Kingdom Crown Dependency of the Isle of Man, as the onsite visits for both jurisdictions had already been conducted. The new standard would however be used with regard to the evaluation of Slovenia, for which the onsite visit takes place in November 2016, and subsequent assessments. After the FATF Plenary in June, the MONEYVAL Secretariat had already informed the Slovenian delegation of this change.

#### **Agenda item 17 – FATF Terrorist Financing Fact-Finding Initiative: follow-up procedure within MONEYVAL regarding countries for which significant gaps were identified by the FATF**

41. The Secretariat presented its information paper with an update on the dedicated follow-up process within MONEYVAL to the Terrorist Financing Fact-Finding Initiative, undertaken by the FATF to identify jurisdictions in the global network with fundamental or significant gaps in their implementation of FATF Recommendations 5 and 6. The Secretariat described the progress reported by countries under the follow-up to remedy the gaps in their legal framework, and presented its proposal for the next steps in the follow-up procedure.
42. The Plenary adopted the information paper, and invited the Secretariat to present an analysis of the countries' progress at the 52<sup>nd</sup> Plenary in December 2016. The Plenary therefore requested delegations to keep the Secretariat informed on any further steps to remedy the significant gaps, by 18 November 2016 at the latest.
43. While welcoming the examples of important progress already made, the Chairman emphasised that further concrete steps are required by many of the concerned countries. He reiterated that countries are expected to have fully addressed the deficiencies by the time of the 53<sup>rd</sup> Plenary (May/June 2017) at the latest.

## **Agenda item 18 - Evaluators for the 5<sup>th</sup> round of evaluations: proposals by the Chair and the Secretariat**

44. The Secretariat informed the Plenary that, as of September 2016, there remain 30 onsite visits in MONEYVAL's fifth round of evaluations. Provided that each evaluation team is composed of 4-5 evaluators, MONEYVAL will require between 120-150 evaluators in the coming years to complete its 5<sup>th</sup> round of evaluations. As the MONEYVAL Secretariat has recently encountered difficulties to find suitable evaluators for the upcoming evaluations, the Chair and the Executive Secretary had tabled the issue for Plenary discussion to find possible solutions. Delegations agreed that, without evaluators, the peer review mechanism within MONEYVAL cannot work. In the absence of sufficiently qualified evaluators the quality of MONEYVAL's reports may suffer. The Plenary decided to continue the discussion at the December meeting, taking into account some ideas expressed during this discussion, as well as developments at FATF level where similar problems have arisen.

### **Day 3: Thursday 29 September 2016**

## **Agenda items 19-20 – Discussion on the draft 5<sup>th</sup> round Mutual Evaluation Report on Hungary**

45. The Chairman summarised the state of the discussions in the Working Group on Evaluations (WGE), and thanked all delegations which provided written comments prior to the meeting. He also recalled the importance of delegations actively participating in the review of the MER and in the WGE discussion. The Executive Secretary introduced the evaluation team and provided an overview of the key findings and priority actions set out by at the beginning of the draft MER. Professor Gilmore, who had presided over the WGE as one of its Co-Chairs, presented the discussion and decisions taken by the WGE on each key issue. He also gave detailed reasoning for those key issues which no longer needed to be discussed in the Plenary.
46. Key issue 1 – Immediate Outcome 1: The Co-Chair of the WGE summarised the discussion of the WGE on the rating of Immediate Outcome 1 and pointed out that there had been no consensus amongst the members of the WGE whether major rather than fundamental improvements are required. The Co-Chair presented the proposed amendments to the text of the MER. The Plenary agreed that the report should be amended. Some delegations made the case for an upgrade to "moderate" as the deficiencies identified in the report related to the assessment of the findings of the NRA which should not be substituted by the views of the assessment team. It was also pointed out that the country does not need to have a written methodology for conducting the NRA. Moreover, the absence of a national strategy to address the risks was due to the very recent date of the adoption of the NRA. Other delegations pointed out that, in the absence of mitigating measures, the rating should not be upgraded. Moreover, the MER had to focus at the time of the onsite visit, so that the evaluation team had been correct to negatively take into account the lack of a national strategy based on the outcome of the NRA. The evaluation team gave an overview on the country's understanding of the ML/FT risks, the manner in which the identified risks had been addressed and the adoption of mitigating measures. It reiterated its view that the current rating in the draft report was appropriate. Due to the lack of consensus in the Plenary whether major rather than fundamental improvements were needed, the Chair concluded that the rating remained at a "low" level of effectiveness.
47. Key issue 2 – Immediate Outcome 3: The Co-Chair of the WGE explained that the WGE had not found consensus whether fundamental rather than major improvements are necessary under Immediate Outcome 3. He outlined that a range of specific issues formed part of the discussions in the WGE. The Plenary agreed with the proposal of the WGE to incorporate amendments in the report to ensure consistency in the statistical data provided and to illustrate the scope and risk-sensitivity of the supervisory activities. Some delegations supported the conclusions of the evaluation team and indicated that there is a certain level of supervision of financial institutions and DNFBPs. The evaluation team clarified that the Immediate Outcome has been considered in terms of risk, materiality and context. More weight had been assigned to activities conducted through the banking sector. Hungary complements the prudential supervision risk assessment

with information on ML/FT risks, and targeted inspections are being conducted on specific topics which are considered as high risk. The Plenary agreed with the rating proposed by the evaluation team.

48. Key issue 3 – Immediate Outcome 9: The Co-Chair of the WGE reported that there had been no consensus whether the system to investigate FT needs fundamental (rather than major) improvements. In the absence of investigations and prosecutions for FT, delegations agreed that an assessment needed to focus on the structural elements. The assessment team and the assessed country both had stated that such mechanisms were sufficiently present to justify the current rating. Prevention is well-organised with the work of the TEK and the HFIU in terms of identifying and detecting potential FT cases. The relatively high number of HFIU reports indicated increased awareness, which however could not be translated into substantiated suspicions of FT as they were mostly based on red flag indicators. In the two investigations related to potential terrorist activity, the financial aspects were duly scrutinised. This view was supported by several delegations. On the other hand, some delegations had argued that there were several issues that suggested that the structural elements were not fully in place. Amongst those were weaknesses in the NRA as to the FT risk, the lack of routinely conducted parallel financial investigations and the remaining technical deficiencies in the criminalisation of FT. Due to the lack of consensus to downgrade the current rating, the Chairman concluded that the Plenary had decided that the current rating (“moderate”) would remain.
49. Key issue 4 – Immediate Outcome 2: The Co-Chair of the WGE reported that there had been no consensus whether Hungary’s system of international cooperation needed major (rather than moderate) improvements. Some delegations had argued in the WGE that there were issues identified in the draft MER that may present impediments to conclude whether international cooperation is constructive. Amongst those issues was the lack of statistics caused by an obsolete case management system and the cascading effect of issues identified under IO.5 with regard to BO information. On the other hand, the evaluation team, the assessed country and some delegations had argued that the above issues did not present any significant impediments to reach a conclusion on the level of effectiveness achieved by Hungary. Views expressed by the authorities and the generally positive feedback from other countries had been considered and used in order to support the current rating. During the Plenary discussion, several delegations underlined that opinion of an excellent cooperation, which led the Chairman to conclude that the “substantial” rating would remain.
50. Key issue 5 – Recommendation 32: The Co-Chair of the WGE reported that the WGE had a discussion on the correct interpretation of the “Note to Assessors” in R. 32. The WGE had been divided whether the absence of a declaration/disclosure system covering intra-communitarian (i.e. within the EU) movements of cash and BNI - as was the case for Hungary - should be considered a possible deficiency for an EU member state, for the purposes of technical compliance with criterion 32.1. The “Note to Assessors” states that: *“Recommendation 32 may be implemented on a supra-national basis by a supra-national jurisdiction, such that only movements that cross the external borders of the supra-national jurisdiction are considered to be cross-border for the purposes of recommendation 32. Such arrangements are assessed on a supra-national basis, the basis set out in Annex I.”* Numerous delegations opined that the wording of this note was plain and would allow EU member states to restrict their declaration/disclosure system to external borders only. However, the FATF Secretariat advised that the note had to be read in a manner that it did not take effect as long as arrangements for an assessment on a supra-national basis had not been reached and Annex I remained blank. In light of this interpretation by the FATF Secretariat, the Chair proposed that the Plenary should decide that criterion 32.1 was not met, and that as a result the rating for R.32 would be “partially compliant”. However, the rating would be automatically upgraded, and the MER accordingly amended, if: a) an agreement within the meaning of Annex I would be reached; or b) if Hungary introduces meanwhile a national disclosure/declaration system for intra-communitarian movements of cash and BNI. The proposal was accepted by the Plenary. Having however noted the numerous concerns expressed by its members on the interpretation which would currently require an intra-communitarian declaration/disclosure system, the Plenary urged the FATF to revise and clarify the language of the “Note to assessors” in R.32. It also decided that future evaluations in MONEYVAL of EU member states would be conducted in the same manner concerning R.32, as long as the current situation (and language of the “Note to Assessors”) remained in the absence of an arrangement

for a supranational assessment. The Plenary also called on all EU member states to finalise such arrangement.

51. Other issues – Immediate Outcome 6: With regard to Immediate Outcome 6, Hungary argued that it considered to have achieved this outcome to a large extent and only moderate improvements are needed. It was noted that the key findings and recommended actions were not fully in line with the recommendations relating to this immediate outcome. Hungary pointed out that the Plenary agreed to move one recommended action to Immediate Outcome 7, based on the proposal of the WGE, and noted that issues raised under Immediate Outcome 7 should not have had an impact on the rating of Immediate Outcome 6. The evaluation team clarified that, according to the standards, the number and nature of investigations and the way all the competent authorities make use of financial intelligence needs to be considered under Immediate Outcome 6. One delegation and the *ad hoc* scientific expert pointed out that recommended action on multi-disciplinary task forces across agencies shall not be considered under Immediate Outcome 6. The evaluation team further noted that the main issue under Immediate Outcome 6 is the manner in which recipients make use of the intelligence provided. It was also noted that money laundering is not pursued as a key priority by the investigative authorities and the very good quality intelligence produced by the HFIU is not sufficiently used. One delegation noted that Immediate Outcome 6 relates mainly to financial intelligence. Given that the position of Hungary was supported by several delegations, the Plenary agreed to upgrade the level of compliance of Immediate Outcome 6 to “substantial” and amend the wording of the analysis accordingly.

*Decision taken:*

52. The Plenary adopted the 5<sup>th</sup> round MER of Hungary and its executive summary, including the amendments agreed upon during the discussion and subject to further editorial changes. According to Rules 21 and 23 of MONEYVAL’s 5<sup>th</sup> Round Rules of Procedure, Hungary was placed in enhanced follow-up and requested to report back to the Plenary in December 2017.

#### **Agenda item 21 – Fourth round follow-up: first expedited follow-up report by Bosnia and Herzegovina**

53. The Secretariat presented its analysis of Bosnia and Herzegovina’s first expedited follow-up report. It noted that significant steps have been taken since the on-site visit to align legislation with CFT standards, through amendments to the FT offences at the levels of Bosnia and Herzegovina, the Federation of Bosnia and Herzegovina and the Brčko District, as well as through the very recent adoption of the Government Decision on Implementation of UNSCR 1373. The authorities stated that the final text of the decision had been changed before its adoption to remedy the gaps that were pointed out by the Secretariat in its analysis, which had been shared with the Bosnian authorities in advance.
54. In the Republika Srpska, a new Criminal Code (including the necessary amendments for the FT offence) is expected to be adopted in the second half of 2016. Regarding confiscation, progress appeared limited. The authorities have advised that the envisaged new Criminal Code of the Republika Srpska will include amendments for confiscation of derived and intermingled assets. On the preventive side, important progress has been made, especially through the clarification of CDD and STR obligations in the AML/CFT Law, as well as the issuance of additional guidance. However, the relevant by-laws still need to be amended in order to properly reflect the obligation to report suspicious funds independent of transactions. The authorities stated that this is expected to happen by the end of the year. Concerning the FIU, improvements were made related to its periodic activity reporting, operational independence (as guaranteed in the AML/CFT Law) as well as concerning mechanisms to obtain feedback upon disseminations to competent authorities. Progress was more limited with regard to supervision. In particular, many of the technical deficiencies which remain outstanding were related to measures for the prevention of criminals or their associates from holding a controlling interest or management function in financial institutions.

*Decision taken:*

55. In line with the new Rule 13 of the 4<sup>th</sup> round Rules of Procedure, which provides for an exit at the latest four years after the adoption of the MER and subsequent to a single interim report, the

Plenary invited Bosnia and Herzegovina to submit a further progress report and to seek to exit from the regular follow-up process at the latest in three years' time (i.e. by September 2019). An earlier application for exit would be encouraged (e.g. in September 2017 or 2018). In the meantime, the country is requested to keep the Plenary informed on its progress through the *tour de table* procedure, in particular on the envisaged new Criminal Code of the Republika Srpska, on the amendments to the by-laws related to R.13/SR.IV (STR), as well as on further measures to address the outstanding deficiencies under R.23 (supervision).

#### **Agenda item 22 – Report from the Gender Equality Rapporteur**

56. The Plenary heard a presentation from the Gender Equality Rapporteur, Ms Maja Cvetkovski, who provided an update on the latest developments of relevance in the Council of Europe. This included, *inter alia*: the recent publication of a factsheet by the Registry of the European Court of Human Rights concerning case-law on gender equality; recommendations prepared by the Council of Europe Gender Equality Commission to the Committee of Ministers on the implementation of the CoE Gender Equality Strategy (2014-2017); discussions and conclusions following three gender equality conferences held in 2016 (organised by Council of Europe in cooperation with the United Nations and the European Union); as well as an overview of the 2015 European Commission Report on Equality Between Women and Men in European Union.

#### **Agenda item 23 – Council of Europe Convention on Laundering, Search, Seizure and Confiscation of the Proceeds from Crime and on the Financing of Terrorism (CETS No. 198)**

57. The Secretariat informed the Plenary about the forthcoming 8th Plenary meeting of the Conference of the Parties (COP) to the “Warsaw Convention” (CETS 198). The meeting will take place from 25-26 October 2016. Its agenda includes the discussion of two assessment reports (Belgium and Armenia), as well as various follow-up reports. Other important items on the agenda include the revision of the COP Rules of Procedure, a mutual legal assistance template, an analysis of the self-executing articles of the Convention, as well as the draft Council of Europe Action Plan on Transnational Organised Crime.

#### **Agenda item 24 – Miscellaneous**

58. The Plenary agreed upon small editorial amendments to the 5<sup>th</sup> round rules of procedure. These concerned the date of the last revision of the universal procedure (February 2016) in Footnote 5 to Rule 7, as well as the alignment of the procedure for the Working Group on Evaluations (Appendix 5, paras. 6 and 8) with regard to the deadline for sending the key issues document (two weeks in advance of the Plenary).

59. MONEYVAL will hold its 52nd Plenary from 6-8 December 2016 as a three-day meeting. The Secretariat recalled that the 53<sup>rd</sup> meeting will take place in the week from 30 May – 3 June 2017. The dates for the 54<sup>th</sup> Plenary (week of 25-29 September 2017) and the 55<sup>th</sup> Plenary (week of 4-8 December 2017) were tentatively agreed. The Chair will inform the Plenary at a later stage if these meetings are held as three-day meetings, depending on the workload.

## **APPENDIX I**

### **Agenda of the Plenary**

**Day 1: Tuesday 27 September 2016 / 1er jour: mardi 27 septembre 2016**

#### **Morning 9.30 a.m. / matin 9h30**

- 1. Opening of the Plenary Meeting at 9h30 / Ouverture de la réunion plénière à 9h30**
  - 1.1 Address by Mr Jan Kleijssen, Director, Directorate Information Society and Action against Crime / Discours de M. Jan Kleijssen, Directeur de la Direction de la**

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 **Chairman's report of MONEYVAL's high-level mission to the Czech Republic (8-9 June 2016) / Rapport du Président sur la mission de haut niveau en République tchèque (8-9 juin 2016)**
  - 3.3 **Chairman's report of the exchanges of views with the Standing Committee of the Parliamentary Assembly (Tallinn, 27 May 2016) and the Committee of Ministers (Strasbourg, 6 July 2016) / Rapport du Président sur les échanges de vues avec le Comité permanent de l'Assemblée Parlementaire (Tallinn, 27 mai 2016) et avec le Comité des Ministres (Strasbourg, 6 juillet 2016)**
4. **Information from the Secretariat / Informations communiquées par le Secrétariat**
  - 4.1 **MONEYVAL calendar of activities 2016-2017 / Calendrier des activités en 2016 - 2017**
  - 4.2 **Report from the Secretariat on the June FATF meeting / Rapport du Secrétariat sur la réunion de juin du GAFI**
  - 4.3 **Reports on Secretariat attendance in other fora / Rapports du Secrétariat sur sa participation aux réunions d'autres institutions**
  - 4.4 **Planning for the upcoming evaluations / planning des évaluations à venir**
  - 4.5 **Financing and staffing / Financement et questions de personnel**
  - 4.6 **Future representation in FATF meetings / Représentations futures dans les réunions du GAFI**
5. **Compliance Enhancing Procedures / Procédures de conformité renforcée**
  - 5.1 **Report from Montenegro under step I of the Compliance Enhancing Procedures / Rapport du Montenegro au titre de l'étape (i) des Procédures de conformité renforcée**
  - 5.2 **Report from the Czech Republic under step II of the Compliance Enhancing procedures / Rapport de la République tchèque au titre de l'étape (ii) des Procédures de conformité renforcée**
6. **Fourth round follow-up: first regular follow-up report by Estonia / Suivi au titre du quatrième cycle : premier rapport de suivi régulier de l'Estonie**

**Afternoon 2.30 p.m. / après-midi 14h30**

7. **Exchange of views with Judge Robert Spano (European Court of Human Rights) on the impact of the Grand Chamber judgment of the European Court of Human Rights in the case of *Al-Dulimi and Montana Management Inc. v. Switzerland* of 21 June 2016 / Echange de vues avec le juge Robert Spano (Cour européenne des droits de l'homme) sur l'impact du jugement rendu par la Grande Chambre de la Cour européenne des droits de l'homme dans l'affaire *Al-Dulimi et Montana Management c. Suisse* du 21 juin 2016**
8. **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)**

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

- 9.1 **European Commission / Commission européenne**
- 9.2 **Secretariat General / Secrétariat Général**

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

- 10.1 **Council of Europe Development Bank / Banque de Développement du Conseil de l'Europe**
- 10.2 **EBRD / BERD**
- 10.3 **Egmont Group / Groupe Egmont**
- 10.4 **Eurasian Group on Combating Money Laundering and Terrorist Financing (EAG) / Groupe Eurasie sur le blanchiment d'argent et le financement du terrorisme (EAG)**
- 10.5 **FATF / GAFI**
- 10.6 **GIFCS / GSCFI**
- 10.7 **IMF / FMI**
- 10.8 **OSCE**
- 10.9 **UNODC / ONUDC**
- 10.10 **World Bank / Banque Mondiale**

**11. Presentation of the Egmont STR project by Mr Richard Walker (UK Crown Dependency of Guernsey) / Présentation du projet RTS du groupe Egmont par M. Richard Walker (Dépendance de la couronne britannique de Guernesey)**

**Day 2: Wednesday 28 September / 2ème jour: mercredi 28 septembre**

**Morning 9.30 a.m. / matin 9h30**

- 12. **Fourth round follow-up: first regular follow-up report by Liechtenstein / Suivi au titre du quatrième cycle : premier rapport de suivi régulier du Liechtenstein**
- 13. **Fourth round follow-up: interim follow up report by the Republic of Moldova / Suivi au titre du quatrième cycle: rapport de suivi intermédiaire de la République de Moldova**
- 14. **Fourth round follow-up: application by Latvia to be removed from regular follow-up / Suivi au titre du quatrième cycle : demande de la Lettonie de sortir de la procédure de suivi régulier**

**Afternoon 2.30 p.m. / après-midi 14h30**

- 15. **Fourth round follow-up: application by Bulgaria to be removed from regular follow-up / Suivi au titre du quatrième cycle: demande de la Bulgarie de sortir de la procédure de suivi régulier**
- 16. **Recent changes in Recommendation 8 and its Interpretative Note: an overview / Changements récents dans la Recommandation 8 et sa note interprétative : aperçu**
- 17. **FATF Terrorist Financing Fact-Finding Initiative: follow-up procedure within MONEYVAL regarding countries for which significant gaps were identified by the FATF / Initiative du GAFI sur la question terroriste: procédure de suivi au sein de MONEYVAL sur les pays pour lesquels le GAFI a identifié de sérieux manquements**
- 18. **Evaluators for the 5<sup>th</sup> round of evaluations: proposals by the Chair and the Secretariat / Évaluateurs pour le 5ème cycle d'évaluations : propositions du Président et du Secrétariat**

**Day 3: Thursday 29 September / 3ème jour: jeudi 29 septembre**

Morning 9.30 a.m. / matin 9h30

19. Discussion on the draft 5<sup>th</sup> round Mutual Evaluation Report on Hungary / Discussion du projet de rapport d'évaluation mutuelle du 5<sup>e</sup> cycle de la Hongrie

Afternoon 2.30 p.m. / après-midi 14h30

20. Continuation of the discussion on the draft 5<sup>th</sup> round Mutual Evaluation Report on Hungary / Suite de la discussion du projet de rapport d'évaluation mutuelle du 5<sup>e</sup> cycle de la Hongrie

21. Fourth round follow-up: first expedited follow-up report by Bosnia and Herzegovina / Suivi au titre du quatrième cycle : premier rapport de suivi accéléré de la Bosnie Herzégovine

22. Report from the Gender Equality Rapporteur (Ms Maja Cvetkovski) / Rapport de la Rapporteuse sur l'égalité entre les femmes et les hommes (Mme Maja Cvetkovski)

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

## APPENDIX II

### List of participants

#### Evaluated States and Jurisdictions / Etats et juridictions évalués

#### ALBANIA / ALBANIE

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