

COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

Strasbourg, 17 December 2021

MONEYVAL(2021)40

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

MONEYVAL

62nd PLENARY MEETING
Strasbourg, 15 - 17 December 2021

MEETING REPORT

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

EXECUTIVE SUMMARY

**During the 62nd Plenary meeting, held in Strasbourg from 15 - 17 December 2021,
the MONEYVAL Committee:**

- adopted the 5th round Mutual Evaluation Report and its Executive Summary on Croatia, and decided to subject the country to the enhanced follow-up procedure;
- adopted the 5th round Mutual Evaluation Report and its Executive Summary on Poland, and decided to subject the country to the enhanced follow-up procedure;
- adopted the 5th round first enhanced follow-up report on Cyprus¹;
- informed the Plenary on the 5th round enhanced follow-up reports of Andorra, the Czech Republic, Gibraltar, Lithuania and Serbia, adopted through written procedure (4th Intersessional Consultation), the follow-up reports of Latvia and Ukraine without technical compliance re-ratings; and the report on Romania on the exit from the 4th Round follow-up procedure;
- held the elections of the Chair, Vice-Chairs and Bureau members;
- adopted the typologies report on “AML/CFT Supervision in Times of Crisis and Challenging External Factors”;
- heard an update on the FATF workstreams and engagement;
- approved the proposal to assess the materiality of the MONEYVAL countries as part of the on-going horizontal review project and the basic set of materiality indicators and timelines;
- discussed the Voluntary Tax Compliance Programme of Ukraine;
- adopted the timeline of the follow-up reports to be considered via written procedure (prior to the 64th Plenary).

Reports adopted will be made available shortly under each jurisdiction’s profile, in accordance with MONEYVAL’s publication policy.

¹ Subject to the addition of a note to explain that the Plenary had not decided whether there is a shortcoming within the context of c.15.6 and c.15.9.

1. The Committee of Experts on the evaluation of anti-money laundering measures and the financing of terrorism (MONEYVAL) held its 62nd Plenary meeting from 15 - 17 December 2021 in a hybrid mode from Strasbourg under the presidency of Ms Elzbieta Frankow-Jaskiewicz (Poland). MONEYVAL's Working Group on Evaluations (WGE) met on 13 and 14 December 2021. The agenda of the meeting is attached as Appendix I, and the list of participants is attached as Appendix III.

Day 1: Wednesday 15 December 2021

Agenda item 1 – Opening of the Plenary Meeting

2. The Chair, Ms Elzbieta Frankow-Jaskiewicz, opened the Plenary by welcoming all participants and noting the intensive Agenda of the Plenary week.
3. Mr Jan Kleijssen, Director of Information Society and Action against Crime welcomed all delegations and noted the importance of MONEYVAL and expressed appreciation for its proactive approach in the Council of Europe. He noted that MONEYVAL conducted the largest number of onsite visits (*six*) in the Global Network since the start of the Covid-19 pandemic. Mr Kleijssen thanked MONEYVAL for the active engagement with the Financial Action Task Force (FATF) and its contribution to important initiatives related to enhancing regulation and amending the FATF Standards on designated non-financial businesses and professions (DNFBPs). Mr Kleijssen also informed the Plenary on the Council of Europe's observer status request to the FATF which would be considered during the next FATF Plenary in February 2022. Mr. Kleijssen underlined the synergies between the FATF and the Council of Europe on various issues related to data protection, artificial intelligence, cybercrime and human rights. He also thanked the FATF, FATF-Style Regional Bodies (FSRBs) and other regional partners for their cooperation with MONEYVAL. Mr Kleijssen emphasized the importance of the fight against terrorism and thanked MONEYVAL for its cooperation with the Counter-Terrorism Committee and other bodies of the Council of Europe as well as regional and international organizations. Mr. Kleijssen informed the Plenary about the adoption of CoE budget for a four-year term.
4. In her opening remarks the Chair welcomed the new Heads of Delegations of Slovakia and Germany. She also welcomed the new Head of the observer Delegation from the United States. The Plenary was informed of the decision to extend for another two-year term the mandate for the WGE Co-Chairs (Mr John Ringguth and Mr Nicola Muccioli).
5. Mr Giles Thomson, Co-Chair of the FATF Global Network Coordination Group (GNCG) welcomed all delegations and described MONEYVAL as one of the leading players in the FATF. He also noted the quality of the work done by MONEYVAL. Mr. Thomson noted the FATF's intention to build a mutually supportive framework between the FATF and FSRBs and informed the Plenary on the current FATF projects. He noted that the FATF intended to finalise and discuss the outcomes and proposals of the Ad hoc Group on Strategic Review (AGSR) in February 2022. He informed the Plenary that one of the outcomes of the AGSR is that the FATF is heading towards more frequent cycles of mutual evaluations, where greater focus

would be placed on effectiveness, rather than technical compliance with the FATF Standards. The AGSR also works on the ICRG process, which should become more inclusive and transparent. Mr. Thomson also noted the importance of the project aiming to mitigate the unintended consequences of the FATF Standards launched in February 2021 and thanked the Council of Europe for its contributions to the issues related to data protection and human rights. Mr. Thomson informed the Plenary on the work done by the FATF Policy Development Group (PDG) on amending the FATF Recommendation 24 (Transparency and beneficial ownership of legal persons). He also noted the negative impact of the Covid-19 pandemic, and commended MONEYVAL for its experience of conducting hybrid evaluations, compared to other FSRBs, which are not in the same position regarding the completion of the current evaluation round. Mr. Thompson announced a new GNCG-led project which aims to take a stock on how the Global Network works together, to understand how it governs itself, whether or not it is able to achieve strategic focus and how to align it with the regional perspectives of the FATF work.

Agenda item 2 – Adoption of the agenda

6. Proposed changes to the Agenda were adopted by the Committee.

Agenda item 3 – Information from the Chair

7. The Chair of MONEYVAL, Ms Frankow-Jaskiewicz, informed the Plenary about the correspondence with MONEYVAL jurisdictions since the 61st Plenary in April 2021.
8. The Chair welcomed Germany and the UK as the new rotating members nominated by the FATF for a two-year term.
9. The Chair informed the Plenary about the communication with CFATF regarding the mutual evaluation of Venezuela noting that MONEYVAL would participate in this process as a reviewer of the MER. The Plenary also took note of the information from the Chair on correspondence on the possible MONEYVAL engagement with the European non-profit organisations (NPO) sector. However, this engagement remains limited due to resource constraints of the MONEYVAL Secretariat.
10. The Chair acknowledged the progress made by MONEYVAL in meeting the objectives defined by its Strategy for 2020-2022. Overall, MONEYVAL is progressing on all of its strategic benchmarks, adapting to the constraints of the Covid-19 pandemic and other contextual factors.

Agenda item 4 – Information from the Secretariat

11. The Executive Secretary informed the Plenary about structural changes in the MONEYVAL Secretariat and new and temporary staff. The Executive Secretariat also thanked Malta for its recent voluntary contribution.
12. The Executive Secretary informed the Plenary about MONEYVAL's planned activities for 2022. In this regard he mentioned the two on-site missions to Estonia and Monaco which would be conducted in February and March. He also informed the Plenary about the Standards training which would be organised by MONEYVAL and the FATF Training Centre in 2022.

Agenda items 5 and 6 – Discussion on the draft 5th round Mutual Evaluation Report on Croatia

13. The Chair opened the discussion of the draft Mutual Evaluation Report (MER) on Croatia. The Secretariat introduced the evaluation team and provided an overview of the key findings and priority recommended actions (RAs). The Co-Chairs of the Working Group on Evaluations summarised the discussions held on the 13th of December in the WGE and presented the recommendations made to the Plenary on each key issue. An overview of the key issues (KIs) which no longer needed to be discussed in the Plenary (as agreement had been reached by all participants in the WGE) was provided for information. This concerned notably Key issue 4 on Immediate Outcome 3 (IO.3).
14. Key Issue 1 (IO.7): The Plenary approved amendments to Recommended Action (b) of IO.7 proposed as a result of the discussions in the WGE, aimed at a more balanced reflection on the expectations on the evolving jurisprudence on ML cases in line with international standards. Croatia presented arguments in support of a request for an upgrade of IO.7 from a “low” to a “moderate” rating. Croatia highlighted that the country (i) has extensive legal powers to enable identification and investigation of ML; (ii) investigates all types of ML per different types of predicate offences, including complex criminal investigations involving high proceeds of crime; (iii) the 2015 and 2016 Supreme Court Judgements do not set a precedent nor affect the interpretation of the current incrimination of ML offence by practitioners; (iv) conducts parallel financial investigations and secures confiscation. The assessment team (AT) clarified that its conclusions on the rating are based among other factors on the: (i) limited interpretation of ML offence; (ii) lack of prioritisation of ML offence and alignments with the risk profile of the country; (iii) high evidentiary threshold for prosecution of ML offence; (iv) undue delays in criminal proceedings for ML and other complex criminal cases; (v) low level of applied sanctions for ML offence. Poland and Romania supported an upgrade on the basis of the arguments provided by Croatia and noted that the RAs do not require fundamental change in the system. Germany, Israel, Italy, France, and UK noted that the rating is appropriate, taking into consideration the practical impact of the two Supreme Court Judgements on interpretation of the ML offence and focus of investigative efforts on predicate offence, and the risk profile of the country. All delegations and the European Commission (EC) agreed with the wording of amended RA(b). There was eventually no consensus to change the rating which thus remained as “low”.
15. Key Issue 2 (IO.2): The question before the Plenary was whether major or moderate improvements are needed regarding the effective implementation of IO.2 by Croatia. The country indicated that: it provides constructive assistance and has in place a robust legal framework; all requests, especially the ones requiring urgent actions, are dealt with in a timely manner; the country is proactive in seeking cooperation through informal channels, in line with its risk profile; and the international cooperation feedback acknowledges that Croatian cooperation is mostly satisfactory. The AT pointed out to the conclusions of the National Risk Assessment (NRA) on the international dimension of higher threats faced by Croatia and clarified that the lack of proactivity of the country to seek assistance, mostly through formal channels, in line with its risk profile, is considered to be a major shortcoming. In addition, the AT noted very limited efforts demonstrated in the area of seizure and confiscation. Six delegations (Estonia, Guernsey, Liechtenstein, Poland, San Marino and Slovakia)

supported an upgrade, on the basis that too much weight was given to Core Issue 8.2 and that the lack of a prioritisation mechanism had no impact on the system in practice. These delegations, as well as an observer (the EC), raised the issue of the horizontal consistency of the rating with the other mutual evaluation reports. The Plenary reached a consensus to upgrade the rating to a “substantial” level of effectiveness.

16. Key Issue 3 (IO.9): The Plenary discussed the extent to which the lack of understanding of the TF risk does impact Croatian LEAs’ efforts to identify, investigate and prosecute TF, and whether the demonstrated efforts are in line with the country’s risk profile and overall results merit a “low” rating. Croatia requested an upgrade since the country: (i) analysed the TF risks in the scope of two NRAs and other classified studies; (ii) has a national strategy reflecting on TF matters and legal framework which is in line with international standards to a large extent; (iii) and demonstrated domestic operational cooperation practices through several cases. The AT reflected on the main findings noting that: (i) the country did not demonstrate understanding of its TF vulnerabilities and threats; (ii) there is no developed cooperation framework for identification and investigation of TF cases, which holds on a case by cases basis; (iii) country does not explore all relevant sources of information to identify and investigate potential TF cases; (iv) the national strategy does not contain specific measures on TF. Cyprus, Georgia, Germany, the Holy See, Italy, Liechtenstein, Lithuania, Monaco, Montenegro, North Macedonia, Poland, Romania, Slovak Republic, Slovenia, and European Commission (EC) supported a request for upgrading the rating to “moderate”. Delegations suggested that the country has developed its understanding of the TF risk through two NRAs and there are no factors suggesting that the TF risk is not low in the country; Croatia has legal and institutional framework and a national strategy to tackle TF, and provided practical cases demonstrating capacities for identification of potential TF activity. Israel, France, the UK and the FATF Secretariat supported the current rating reflecting on the importance of the TF risk understanding in circumstances where there was no investigation and prosecution achieved for TF in the country; noted that in the context of TF, confidentiality requirements should not prevent the country from demonstrating their risk understanding; the country did not demonstrate having operational framework for investigation of TF. In addition, the FATF Secretariat confirmed the conclusion of the AT in the highlighted importance of an issue with limited appreciation of “funds” which might lead to missed opportunities; confirmed the horizontal consistency of the report with the other mutual evaluation reports; and also suggested adding a Recommended Action suggesting setting up a cooperation mechanism between the Security Intelligence Agency and the law enforcement agencies. Delegations supported the proposal to add a Recommended Action. The Plenary reached a consensus to upgrade the rating to a “moderate” level of effectiveness.
17. Key Issue 5 (IO.10): The Plenary discussed whether appropriate weight has been given to: the delays in implementation of the UNSCRs on TF in the absence of a domestic system; and to the lack of a comprehensive risk assessment for NPOs, targeted outreach, and a clear monitoring mechanism for NPOs. Croatia requested an upgrade of the rating to the level of “moderate” effectiveness on the basis of: (i) implementation of the UNSCRs via EU legislative framework; proactive steps taken by the reporting entities (REs) for application of TF TFS, and their knowledge and

understanding of TFS obligations including through detection of false positive matches; (ii) understanding of NPO risks on the basis of two NRAs, thematic annual analysis of Financial Inspectorate and STR analysis of the AMLO; promoting accountability and integrity of NPO sector; and (iii) horizontal consistency of the rating with other mutual evaluation reports. The AT clarified that while the strength of the system is the proactive approach taken by RE for application of sanctions, lack of domestic legal framework affects timeliness and capacity of authorities to implement UNSCRs, including designation of persons, communication of TFS to REs, mechanisms for the receipt and processing of reports by designated body, outreach and guidance to REs. In addition, noted that the efforts made by Croatia did not lead to identification of the subset of NPOs that fall under the FATF definition and are likely to be at risk of TF abuse by virtue of their characteristics. This has affected the implementation of the targeted measures towards the sector, lack of risk-based monitoring, insufficient outreach. Fourteen delegations (Azerbaijan, Bulgaria, Cyprus, Estonia, Hungary, Malta, Monaco, Montenegro, Poland, Romania, North Macedonia, San Marino, Slovenia, and Ukraine) and one observer (the EC) supported the request for an upgrade of the rating to ensure the horizontal consistency with other MERs, and considering that while delays occur, these are shorter than in some other jurisdictions and while more efforts are needed in the NPO sector, Croatia had already taken many steps for building its TF risk understanding in the sector and ensure accountability and integrity in the NPO sector. Three delegations (Jersey, Israel and Isle of Man) and three observers (France, the UK and the FATF Secretariat) supported the current rating on the basis of horizontal consistency with other reports and suggested also that deficiencies in implementation of UNSCRs and application of risk-based focused and proportionate measures to NPO sector required fundamental improvements. There was eventually no consensus to change the rating which thus remained as “low”.

18. Key Issue 6 (IO.11): Plenary conducted a discussion on the extent to which Croatia effectively implements TFS obligations related to PF taking into account the deficiencies identified in the system, and whether the rating “moderate” is appropriate. Croatia supported the current rating noting that: the EU legislative framework is more effective when implementing PF-related TFS; REs demonstrated knowledge and understanding of their PF-related TFS obligations and application of measures on their own initiative; there is operational supervisory framework in place and the Croatia National Bank, Financial Inspectorate, Croatia Financial Services Supervisory Agency target implementation of TFS within the scope of their inspections; National Strategy for the non-proliferation of weapons of mass destruction also contains measures for detecting and tracing proceeds of proliferation. The AT clarified that compared to the framework for implementation of TF related TFS the one set for PF-related TFS: is less impacted by delays in implementation; the response of the private sector remains a strength of the system; three supervisory authorities covering all REs but one demonstrated conducting inspections to ensure compliance of REs with respective requirements. Four delegations (Georgia, Germany, Poland and Romania) supported the current rating on the basis of the arguments provided by the country and the AT. One observer (the FATF Secretariat) stressed that: there is no domestic coordination mechanism on PF matters; the body responsible for implantation is not operational; CPF measures and functions, as well as monitoring, is not demonstrated. All of these factors should be

weighted more heavily in the rating. There was eventually no consensus to change the rating which thus remained as “moderate”.

19. The Chair called the membership to raise any other additional issues with regard to the MER of Croatia. The EC raised concerns with respect to Recommended Action a) under IO.5 requiring Croatia to carry out a risk assessment of foreign legal arrangements, noting that this goes beyond the FATF standards and methodology for IO5, and Recommendation 10 on CDD measures regarding legal arrangements due to concerns with the interpretation of the application of these requirements to non-trust jurisdictions. No other interventions were made in this respect. Due to time constraints, there was no further discussion on the raised issues. The Chair proposed to take note of the proposals and reflect them in the meeting report.

Decision taken

20. The Plenary adopted the 5th round MER of Croatia and its executive summary, including the amendments agreed upon during the discussion and subject to further editorial changes. Following the discussion and adoption of the MER, and according to Rules 21 and 23 of MONEYVAL’s 5th Round Rules of Procedure, Croatia was placed in enhanced follow-up and requested to report back in December 2023. The report will be final and published after the quality and consistency review of the Global AML/CFT network.

Agenda Item 7 – Fifth round follow-up: first follow-up report by Cyprus

21. Cyprus submitted its first update to the Secretariat under the enhanced follow-up process along with a request for re-ratings in relation to FATF Recommendations 8, 13 and 31. A summary report (incorporating the 1st enhanced follow up report) was prepared by the Secretariat based on conclusions set out in an analytical tool prepared by a rapporteur team (Gibraltar and Russian Federation). The above documents also included an assessment of compliance with those FATF Recommendations for which the Methodology has changed since the 5th Round evaluation: R.15. All documents had been circulated under MONEYVAL’s intersessional written process.
22. The mutual evaluation report of Cyprus was adopted in December 2019. The 1st follow-up report (FUR) analysed: (i) the progress of Cyprus in addressing the technical compliance (TC) deficiencies identified in its MER for FATF Recommendations 8, 13 and 31; and (ii) revised R.15.
23. The Secretariat presented an overview of one key issue that had been identified for discussion, namely on R.15. With regard to comments provided by Cyprus and the FATF Secretariat on earlier drafts of the FUR, input was requested from delegations on whether assessments of c.15.6 and c.15.9 should consider the extent to which host country preventive measures and supervision are applied to business done in or from a host country by a foreign virtual asset service provider (VASP) that is not registered or licensed in the host country. The Secretariat put forward two different options for discussion. Under option 1, the assessment of c.15.6 and c.15.9 in a host country would consider the extent to which host preventive measures and host supervision are applied to business that is done in or from a host country by a foreign VASP that is not licensed or registered by the host supervisor. Under option 2, the

assessment of c.15.6 and c.15.9 in a host country should be limited only to activities that are licensed or registered in that country.

24. The FATF Secretariat noted that, since R.15 had been amended quite recently, there was limited jurisprudence in MERs and FURs adopted by the FATF. They believed that the particular gap identified in the FUR should instead be addressed under c.15.3, with the question being the extent to which the exemption for business conducted remotely in Cyprus by VASPs registered elsewhere in the EEA was supported by a domestic risk assessment. They put forward a possible third option – where an assessment of host preventive measures and host supervision would be linked to VASP activities registered or licensed in a country based on that country’s assessment of ML/TF risk (which may exceed the minimum requirement set under c.5.4). They noted that Cyprus had not carried out a risk assessment at the time that it had provided its first update, which is a deficiency. The FATF did not disagree with the rating for R.15.
25. The Estonian delegation acknowledged that, whilst it was problematic to place supervisory requirements on just one country (home country), in practice, it was very difficult for a host country to identify business being conducted on a remote basis within its jurisdiction. It suggested that there should be more certainty in classifying where business conducted remotely should be considered to be undertaken: (i) the country from which the service is provided; or (ii) the country (or countries) to which the service is provided (i.e., where there are customers).
26. The Gibraltar delegation highlighted a case where the European Court of Justice had confirmed that services provided remotely into Spain from Gibraltar could be supervised by the Spanish supervisor.
27. The EC delegation noted how difficult it is to supervise something that does not have a physical establishment in a country. It called for a clear statement to be included in FATF guidance confirming that the home country has sole responsibility for supervision of a VASP that operates in more than one country, unless agreed otherwise between home and host supervisors.
28. The delegation from Liechtenstein queried the extent to which option 1 was applied by countries to financial institutions. It noted that MERs adopted for EEA countries had accepted the principle that responsibility for the supervision of services provided remotely within the EEA rests with the country from which the service is provided.
29. The Israeli delegation considered that it would be useful to extend the discussion on responsibility for supervision of remote business to other services provided on a cross-border basis.
30. The Jersey delegation noted that its regime already extends to the supervision of business conducted remotely therein and agreed that there would be value in defining what is meant by doing business in a country, as option 1 presents practical difficulties. It acknowledged that option 2 could increase global ML/TF risk where VASPs were established in low-capacity countries.

31. MONEYVAL delegations that spoke generally supported Option 2². At the same time, one delegation was in favour of Option 1³. Three delegations⁴ called for MONEYVAL to request the FATF for a clarification of this issue.
32. The Chair proposed to refer the key issue formally to the FATF through its feedback mechanism – requesting clarification on the extent to which host country preventive measures and supervision should be applied to business done in or from a host country (both remotely and through a physical establishment) by a foreign VASP that is not registered or licensed in the host country.

Decisions Taken

33. The Plenary adopted the FUR subject to the addition of a note to explain that the Plenary had not decided whether there is a shortcoming within the context of c.15.6 and c.15.9. It was noted that the resolution of the shortcoming would have no effect on the overall rating for R.15. It was noted that Cyprus will remain in enhanced follow-up and will continue to report back to MONEYVAL on progress to strengthen its implementation of AML/CFT measures. It was proposed to request Cyprus to report back in one year's time.
34. The Plenary agreed to refer the key issue formally to the FATF through its feedback mechanism.

² Cyprus, Estonia, Germany, Jersey, Liechtenstein and the EC

³ Gibraltar

⁴ Italy, Israel and Jersey

Agenda items 8 and 10 – Discussion on the draft 5th round Mutual Evaluation Report on Poland

35. The Mutual Evaluation discussion for Poland was Chaired by the MONEYVAL Vice-Chair Mr Alexey Petrenko.
36. The Chair opened the discussion of the draft Mutual Evaluation Report on Poland. The Secretariat introduced the evaluation team and provided an overview of the key findings and priority recommended actions. The Co-Chairs of the WGE summarised the discussions held on the 14th of December and presented the recommendations made to the Plenary on each of the five key issues discussed. Two KIs (IO.2 and R.5) related to the ratings with a view to upgrade, while three KI (IO.1, IO.4 and IO.11) covered the appropriateness of the given rating and the possibility of a downgrade. The ratings proposed by the AT were supported by the delegations in relation to IO.1, IO.4, IO.11 and R.5. Regarding KI.2 (IO.2), there was a consensus of the WGE that the rating granted by the AT was too harsh and that a substantial effectiveness rating was more appropriate. Due to time constraints, the WGE did not have the possibility to discuss KI.6 (R.40). Therefore, the Co-Chairs of the WGE concluded that: (i) the KIs related to IO.1, IO.2, IO.4, IO.11 and R.5 are brought to the Plenary for approval without substantive discussion, (ii) KI.6 (R.40) should be discussed as presented to the WGE in the Key Issues document. An overview of the amendments to the MER was introduced as a result of WGE discussions, and the five KIs on which an agreement was reached were provided for information in a written form.
37. The Chair summarised that since there was no opposition to the WGE proposal to maintain the ratings proposed by the AT in relation to IO.1 (KI. 1), IO.4 (KI.3), IO.11 (KI.4) and R.5 (KI.5) and to re-rate IO.2 (KI.2) to a “substantial” effectiveness rating, the proposal was endorsed by the Plenary.
38. Key issue 6 (R. 40): Poland requested an upgrade of the overall rating of R 40 notably on the basis of: (i) the spill-over effect of the deficiency identified under c.40.2 on at least three other criteria (c.40.1, c.40.3, 40.17), which, in the context of the substantial number of the international cooperation agreements concluded by the two authorities in question, would be of limited to no impact; (ii) the EU framework based on which, the possibility to refuse providing assistance in relation to offences below the one year sentence threshold, would not constitute an unduly restrictive condition (c.40.5). The AT noted that from a horizontal perspective, the rating was justified and provided more clarity on some of the identified shortcomings: (i) the lack of a legal basis for cooperation with foreign counterparts in the AML/CFT area for FI supervisors other than the FIU; (ii) the limitation and the lack of a clear process in all cases for timely execution of the requests by two law enforcement authorities; (iii) the legal limitation for the FIU to share classified information. Croatia, Cyprus, Germany, Italy, Lithuania, Poland, Romania, Slovakia, Slovenia, Ukraine, the EC and the EAG requested an upgrade for the overall rating, stating that the deficiencies identified call for minor rather than major improvements. The FATF Secretariat did not express a view on the rating, but recalled the importance of considering the context, also in view of the Israel MER where similar deficiencies were identified. Considering the consensus reached,

the Plenary approved the upgrade of R.40 from “partially compliant” to “largely compliant”.

39. The Chair called the membership to raise any other additional issues with regard to the MER of Poland. The FATF Secretariat challenged the rating of R.6 to which the AT brought further clarifications and no other objections were raised by the delegations. The FATF Secretariat, the EC and Poland challenged the rating on R.20 (rated by the AT as “partially compliant”) questioning whether a largely compliant rating would be more appropriate. The AT justified the underlying reasoning behind the rating and the delegations had no appetite to intervene in the favor of an upgrade. The aforementioned additional issues raised on R.6 and R.20 did not lead to further changes.

40. The MONEYVAL Chair invited the Plenary to adopt the MER.

Decision taken

41. The Plenary adopted the 5th round MER of Poland 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 5th Round Rules of Procedure, Poland was placed in enhanced follow-up and requested to report back to the Plenary in two years. The report will be final and published after the quality and consistency review of the global AML/CFT network.

Agenda Item 9 – Elections of the Chair, Vice-Chairs and Bureau members

42. The Executive Secretary informed the Plenary about amendments made to the procedure, through consultation, which align the MONEYVAL Rules of Procedure with its Statute stating that the MONEYVAL Chair, Vice-chairs and Bureau members shall be elected for a full two-year term twice. In accordance with the adopted amendments, it has been clarified, that elections held in June 2019 for a half-year term do not count for the candidates that have submitted their nominations for the current elections, who have the possibility to be elected to a full two-year term which will start in January 2022.

43. The Plenary re-elected Ms Elzbieta FRANKOW-JASKIEWICZ as the Chair of the MONEYVAL Committee. Mr Richard WALKER and Ms Astghik KARAMANUKYAN were elected as its Vice-Chairs, and Mr. Matis MAEKER and Mr. Ladislav MAJERNÍK as its Bureau Members.

Agenda Item 11 – Midterm review of Implementation of the MONEYVAL Strategy and Workplan 2020-2022

44. The Executive Secretary informed the Plenary on the progress of the Committee with the implementation of its Strategy for 2020-2022. In the areas of mutual evaluations, the Plenary was informed about some upcoming adjustments to the working methods for on-site visits, as well as some projects aimed at improving the quality and consistency of mutual evaluations. The review presented a reflection on the progress with typologies research, on MONEYVAL’s engagement with the FATF, FSRBs, as well as internal engagement within the Council of Europe on issues related to data protection, counterterrorism, cybercrime and others.

45. The implementation of the Strategy and the mid-term review highlight, on one hand, the continuing excellent work that MONEYVAL is doing on mutual evaluations and, on the other hand, on quality and consistency and working within the Global Network proactively.

Agenda item 13 – MONEYVAL typologies

46. The Project Leader (Poland) presented the outcome of the typologies report on “AML/CFT Supervision in Times of Crisis and Challenging External Factors” including the scope, the key findings and good practices identified.
47. A number of delegations made positive remarks on the content and utility of the report and supported its adoption. It was noted that the report provides important information on how to swiftly react and adapt supervisory activities when facing emergency situations (such as the COVID-19 sanitary crisis), or in other challenging circumstances which may require innovative monitoring arrangements such as remote supervision. The Chair mentioned that the typologies report raises numerous important topics of great practical use for supervisors and supported its adoption.
48. The Plenary adopted the typologies report which shall be shortly published on the MONEYVAL website.
49. The Secretariat recalled that the next typologies project proposal was already approved during the 60th Plenary, at the initiative of the Russian Federation. It was noted that the work is well paired with the initiatives of other stakeholders, namely the FATF within the Risk, Trends and Methods Working Group (RTMG) and the EGMONT Group. The Secretariat also noted that in December 2021, the Committee of Ministers adopted a recommendation aimed at analysing the risks in cryptocurrency as regards money laundering and tax evasion. The Plenary was invited to express its views on the expansion of the scope of the typologies project accordingly.
50. The Russian Federation took the floor and introduced an updated project proposal on typologies, aiming to analyse the use of cryptocurrency platforms in laundering the proceeds of illicit drug trade. According to the proposal, in the first quarter of 2022, the project team would be established, and the scope of the project would be agreed upon. The questionnaires would be sent in the second quarter of 2022. Upon receiving the answers, the analysis would be conducted in the third quarter of 2022. The report would be presented to the second 2022 Plenary meeting.
51. Delegations took the floor and expressed their views on the project proposal and the potential extension of the scope of the typologies work as per the Committee of Ministers’ proposal. Poland noted that project team might also explore cross-border transfers as well as the topic of person-to-person transactions as the main attribute of virtual assets. Gibraltar and Israel expressed reservations on the proposal to extend the scope of the project, noting that additional topics would add complexity to the issue. Israel volunteered to participate in the project team. The FATF supported the original focus of the project, recalled the current work that APG undertakes on a project related to the tax crime and reiterated the importance of coordination between FSRBs. The FATF Secretariat noted the on-going work in the Egmont Group to compile a list of VASPs and suggested that a similar exercise in coordination with the Egmont Group may be conducted by the Project team. The Chair noted that the

Cybercrime Division of the Council of Europe expressed interest in participating in the project team and invited all delegations to also join the project team.

52. The Plenary decided to endorse the project proposed by the Russian Federation.

Agenda item 14 – Voluntary Tax Compliance Programme of Ukraine

53. The 4th Intersessional Consultation adopted the report produced by the Secretariat together with the Scientific Experts and the Bureau, on the compliance of Ukraine's Voluntary Tax Compliance (VTC) programme with the FATF Standards, in particular with the four Principles outlined in the FATF Best Practices paper on VTC implementation from 2012. Due to the urgency of the VTC programme that came into force on 1 September 2021 and the seriousness of the shortcomings identified, Ukraine had been requested to implement, as quickly as possible, the first 7 recommendations (a-g) outlined in the Secretariat's Report and present their progress to the 62nd MONEYVAL Plenary.

54. According to the Procedures related to the implementation of voluntary tax compliance programmes and AML/CFT requirements by countries and territories evaluated by MONEYVAL, the Secretariat presented the recommendations outlined in the report. Following the Secretariat's presentation, the Ukrainian delegation provided a comprehensive outline of how their VTC programme complies with the four FATF Principles and described in detail all the measures taken to comply with recommendations (a-g).

55. Ukraine further advised that since the programme commenced only several months before the Plenary meeting, there was a limited use of this programme by Ukrainian taxpayers. Around 8 million euros in cash and 1 million in other assets have been declared and 57 declarants have submitted OSVD.

56. The World Bank supported the recommendations outlined in the Report and reiterated the importance for Ukraine to address the issues identified with their VTC programme. In particular, the World Bank stressed the importance to address deficiencies in banks verifying the source of funds of declared assets and establish a mechanism to verify the legitimate origin of assets other than cash and metals placed on bank accounts. Poland noted that Ukraine has made some progress on some of the recommendations in the Report.

57. The Chair concluded that while Ukraine has shown some progress in relation to compliance with recommendations (a-g) outlined in the Report, it is essential to continue addressing the deficiencies identified. According to paragraph 16(a) of Procedures related to the implementation of voluntary tax compliance programmes and AML/CFT requirements by countries and territories evaluated by MONEYVAL, the Plenary decided to apply additional measures where the Chairman of MONEYVAL shall send a letter to the relevant Minister(s) of Ukraine with a copy to the Secretary General of the Council of Europe, drawing attention to the issues of concern and the need for immediate action.

58. For the upcoming 63rd MONEYVAL Plenary, the Secretariat together with Ukraine will prepare a progress report describing to what extent Ukraine has addressed other remaining recommendations. Ukraine will be asked to present any new developments and changes to the risks and materiality of their VTC programme.

59. Ukraine also proposed to the Plenary to consider conducting a horizontal review of the implementation of VTC programmes across the MONEYVAL member jurisdictions, with the view to have a useful tool that would provide information for jurisdictions when deciding to implement a VTC programme. The FATF Secretariat, the World Bank and the Russian Federation supported the proposal made by Ukraine to conduct a horizontal review of prior experience and stressed the importance of early engagement with the MONEYVAL Secretariat and other relevant stakeholders domestic and international when considering to implement a VTC programme.
60. The Executive Secretary noted the proposal for a horizontal review, but informed about current workload limitations of the Secretariat. The earlier possible time for commencing such project would be the end of 2022/beginning of 2023.

Agenda item 15 – Update on FATF workstreams and engagement

61. The FATF Secretariat informed the Plenary on the on-going work, projects and timeframes within its working groups. The FATF noted that one of the main objectives is the completion of the 4th round of mutual evaluations without undue delays caused by the Covid-19 pandemic situation. The FATF Secretariat informed the Plenary that it has conducted its first hybrid onsite in the course of the mutual evaluation of France in July 2021. The MER of France would be presented to the next FATF Plenary in February 2022. The FATF Secretariat also informed the Plenary that AGSR is due to complete its tasks in 2022, providing limited changes to the FATF Standards and finalizing the FATF Methodology for the new round of evaluations as well as ICRG procedures. The FATF also noted that it considers dates for the mutual evaluations and plans to adopt its first MER by 2025. As regards the ICRG process, the FATF noted that Albania and Malta swiftly addressed their deficiencies. The FATF Secretariat also provided the update on the work of other FATF working groups, namely PDG and RTMG. With regard to the PDG project on developing Guidance for the real estate sector, the FATF Secretariat welcomed inputs and contributions to the work of the Project team from the MONEYVAL members. As for RTMG, the FATF Secretariat informed the Plenary on the work conducted on the Al-Qaeda/ISIS update in relation to the situation in Afghanistan. The FATF also welcomed MONEYVAL delegations to comment and express their opinion on another project carried out by the RTMG related to the issues of migrant smuggling.
62. The Plenary took note of the presentation made by the FATF. The Vice-President of MONEYVAL took the floor and emphasized a need for member countries to be more proactive and provide the FATF with information for concluding the update on Al-Qaeda/ISIS.

Agenda item 16 – Horizontal review of the 5th Round of MONEYVAL Mutual Evaluations

63. The Secretariat presented the outcomes of the Horizontal Review, and thanked the experts involved in the work. The Secretariat informed the Plenary that this Horizontal review is not meant to be a public document, but shall only be available on the secure website. Furthermore, it shall be a live document, being regularly updated by the Secretariat based on the outcomes on recent evaluations, and will be open to input by Scientific experts and suggestions by delegations.

64. The Russian Federation commended the Secretariat for the work conducted on the horizontal review and expressed their support in keeping the document up-to-date. Ukraine acknowledged the importance of a horizontal review of FATF and MONEYVAL countries. Slovakia noted the high value analysis performed by the Secretariat.
65. The FATF Secretariat highlighted that the horizontal review document should be used with caution, so as not to create the impression that it is creating new benchmarks, additional to the FATF standards. The Executive Secretary agreed with the FATF Secretariat and noted, that this review is a research document, not a standard or benchmark. It was noted that the basis for the horizontal review was the FATF Stocktake exercise, which is important for understanding common shortcomings in evaluation practices.
66. The EAG expressed their support of the MONEYVAL work and informed that they also conduct horizontal reviews, notably on R.8 and its impact on IO.10. Israel noted that deeper research and understanding of ML/TF is important, and in this regard commended the horizontal review effort, while noting the need to avoid being misperceived as an attempt to set a standard. The UK commended the work conducted by MONEYVAL and recalled that risks should be kept in mind when comparing countries. Jersey also expressed support of this initiative and added that horizontal reviews constitute a good basis for assessors, despite the fact that every country is different.
67. The Executive Secretary received all comments from delegations and proposed to elaborate more on the points suggested by the FATF Secretariat and other delegations in the introduction of the document.

Horizontal Review: data gathering on materiality indicators

68. The Secretariat introduced a proposal to assess the materiality of the MONEYVAL countries. This proposal forms a part of an on-going horizontal review project (see above). This initiative was brought forward based on findings and gaps in the horizontal review exercise; and was designed on the basis of the recent data gathering initiatives carried out by the FATF, as well as the FATF Methodology criteria on assessing materiality (paragraph 8 of the FATF Methodology). In order to assess the materiality of the MONEYVAL countries, the Secretariat has proposed a basic set of materiality indicators (quantitative data points), the vast majority of which are linked to the size of the country's economy, financial sector and cross-border exposure. The Plenary was invited to approve a basic set of materiality indicators and timelines for a pilot data-gathering exercise (covering 2021) with the expected feedback from the countries by April 1, 2022.
69. The Plenary supported the initiative, and 5 delegations (Isle of Man, Slovak Republic, Cyprus, FATF and Gibraltar) raised the following points: (1) deadlines for collecting the information; (2) scoping and possible inclusion of additional data points concerning DNFBPs; (3) unavailability of some data (e.g., value of payment operations carried out by VASPs, full time employees dedicated to financial investigations in the law enforcement authorities, etc.); (4) cross border exposure from the materiality exercise; (5) proposal to include more data factors on risks.

70. On the basis of the issues raised, it was decided that: (1) the materiality questionnaire will be submitted by January 31, 2022; deadlines for a pilot data collection exercise will be extended until July 1, 2022 (3 additional months are given to collect the data); in addition, it was decided that the period under review will cover 2020 instead of 2021, in order to ensure availability of data; (2) the Secretariat will review the current basic set of data points with a view to include additional information on the DNFBP sector; (3) the Secretariat has clarified that it will provide clear instructions on how to fill in the materiality questionnaire, along with the definitions of some data points and/or terms used to ensure uniform interpretation of the questions. In the event where data won't be available in the majority of the MONEYVAL countries, the Secretariat will disable these data points so that they are not taken into account for the purpose of the analysis; (4) it was clarified by the Secretariat that data points on cross border exposure forms a part of materiality assessment, as stipulated in the FATF Methodology under paragraph 8, thus should remain in the basic set of materiality indicators; (5) no additional risks-related data points were considered due to the fact that the materiality related assessment does not extend to assessing the risks, threats and/or vulnerabilities.

Agenda item 17 – Miscellaneous

Adoption of the timeline⁵ for the written procedure of follow-up reports for the 64th Plenary

71. For the 64th Plenary, six reports will be considered through written procedure. The FUR templates will be circulated to the jurisdictions on March 1, 2022 (nine months before the Plenary), with the expectation that the country will highlight the Recommendations for which there is an upgrade request on May 2, 2022 (seven months before the Plenary). The report will be expected to be submitted by the country by June 1, 2022 (six months before the Plenary) and will be provided to the rapporteurs for desk-based review, which would be provided to the Secretariat by July, 1 2022 (five months before the Plenary). The Secretariat will take over the FURs and prepare for each the Summary Report to be delivered to the jurisdiction by August 15, 2022. The FUR will be circulated to delegations for first-time approval by September 19, 2022 for two weeks. On the basis of the first comments received by October 3, 2022, the team will revise the document and circulate it by October 24, 2022. After compilation of a short list of issues, the document will be sent to delegations by November 21, 2022 (two weeks before the Plenary). The FUR reports will be presented to the Plenary planned for the week of December 5, 2022.

Agenda item 18 – Items for information

Follow-up reports adopted through written procedure (4th Intersessional Consultation)

- **Andorra: Third Enhanced Follow-up Report / Andorre : Troisième rapport de suivi renforcé**
- **Czech Republic: Second Enhanced Follow-up Report / République tchèque : Second rapport de suivi renforcé**

⁵ Please also refer to Appendix II.

- **Gibraltar: First Enhanced Follow-up Report / Gibraltar : Premier rapport de suivi renforcé**
- **Lithuania: Second Enhanced Follow-up Report / Lituanie : Second rapport de suivi renforcé**
- **Serbia: First Enhanced Follow-up Report / Serbie : Premier rapport de suivi renforcé**
- **Report of Romania on the exit from the 4th Round follow-up procedure / Rapport sur la Roumanie au sujet de la procédure de sortie du 4ème cycle**

Follow-up reports without technical compliance re-ratings: / Rapports de suivi sans réévaluation de la conformité technique :

- **Follow-up report of Ukraine / Rapport de suivi sur l'Ukraine**
- **Follow-up report of Latvia / Rapport de suivi sur la Lettonie**

Appendix I

AGENDA / ORDRE DU JOUR

62nd PLENARY AND WORKING GROUP MEETING / 62^{ème} SESSION PLÉNIÈRE ET RÉUNION DU GROUPE DE TRAVAIL

Palais de l'Europe and Videoconference / visioconférence

Day 1: Wednesday 15 december 2021 / 1^{er} jour : mercredi 15 décembre 2021

1. **Opening of the Plenary Meeting at 9.00 a.m. / Ouverture de la réunion plénière à 9h00**
 - **Jan Kleijssen, Director of the Information Society and Action against Crime Directorate of the Council of Europe / Jan Kleijssen, Directeur, Direction de la société de l'information et de la lutte contre la criminalité du Conseil de l'Europe**
 - **Giles Thomson, Co-Chair of the FATF Global Network Coordination Group / Giles Thomson, coprésident du groupe de coordination du réseau mondial du GAFI**
2. **Adoption of the Agenda / Adoption de l'ordre du jour**
3. **Information from the Chair / Informations communiquées par la Présidente**
 - Chair's correspondence / *Courrier de la Présidente*
4. **Information from the Secretariat / Informations communiquées par le Secrétariat**
5. **Discussion on the draft 5th round Mutual Evaluation Report on Croatia / Discussion sur le projet de rapport d'évaluation mutuelle de 5^{ème} cycle de la Croatie**

Afternoon 2.00 p.m. – 5.30 p.m. / après-midi 14h00 – 17h30

6. **Continuation of the discussion on the draft 5th round Mutual Evaluation Report on Croatia / Suite de la discussion sur le projet de rapport d'évaluation mutuelle de 5^{ème} cycle de la Croatie**
7. **Fifth round follow-up: first follow-up report of Cyprus / Suivi au titre du cinquième cycle : premier rapport de suivi de Chypre**

Day 2: Thursday 16 December 2021 / 2^{ème} jour : jeudi 16 décembre 2021

Morning 9.00 a.m. – 12.30 / matin 9h00 – 12h30

8. **Discussion on the draft 5th round Mutual Evaluation Report on Poland / Discussion sur le projet de rapport d'évaluation mutuelle de 5^e cycle de la Pologne**
9. **Elections of the Chair, Vice-Chairs and Bureau members / Elections des Président(e), Vice-Président(e) et membres du Bureau**

Afternoon 2.00 p.m. – 5.30 p.m. / après-midi 14h00 – 17h30

10. **Continuation of the discussion on the draft 5th round Mutual Evaluation Report on Poland** / *Suite de la discussion sur le projet de rapport d'évaluation mutuelle de 5^e cycle de la Pologne*
11. **Midterm review of Implementation of the MONEYVAL Strategy and Workplan 2020-2022** / *Examen à mi-parcours de la mise en œuvre de la stratégie et du plan de travail 2020-2022 de MONEYVAL*
12. **Closed session (only MONEYVAL member states and territories, FATF members and secretariat)** / *Séance à huis clos (uniquement les États et territoires membres de MONEYVAL, les membres du GAFI et le secrétariat)* :
 - **Budgetary issues** / *Questions budgétaires*
 - **Observer request by the Islamic Development Bank** / *Demande de statut d'observateur de la Banque islamique de développement*

Day 3: Friday 17 December 2021 / 3^{ème} jour : vendredi 17 décembre 2021

Morning 9.00 a.m. – 12.30 / matin 9h00 – 12h30

13. **MONEYVAL typologies** / *Point sur les typologies de MONEYVAL*
14. **Voluntary Tax Compliance Programme of Ukraine** / *Programme de conformité fiscale volontaire de l'Ukraine*
15. **Update on FATF workstreams and engagement** / *Point sur les travaux et l'engagement du GAFI*

Afternoon 2.00 p.m. – 5.30 p.m. / après-midi 14h00 – 17h30

16. **Horizontal review of the 5th Round of MONEYVAL Mutual Evaluations** / *Examen horizontal des évaluations mutuelles de 5^{ème} cycle de MONEYVAL*
17. **Miscellaneous / Divers**
 - Adoption of timelines for the written procedure of follow-up reports for the 64th Plenary
18. **Items for information** / *Points pour information*

Follow-up reports adopted through written procedure (4th Intersessional Consultation):

Rapports de suivi adoptés via procédure écrite (4^{ème} consultation intersessionnelle):

- **Andorra: Third Enhanced Follow-up Report** / *Andorre : Troisième rapport de suivi renforcé*
- **Czech Republic: Second Enhanced Follow-up Report** / *République tchèque : Second rapport de suivi renforcé*
- **Gibraltar: First Enhanced Follow-up Report** / *Gibraltar : Premier rapport de suivi renforcé*
- **Lithuania: Second Enhanced Follow-up Report** / *Lituanie : Second rapport de suivi renforcé*

- **Serbia: First Enhanced Follow-up Report** / *Serbie : Premier rapport de suivi renforcé*
- **Report of Romania on the exit from the 4th Round follow-up procedure** / *Rapport sur la Roumanie au sujet de la procédure de sortie du 4ème cycle*

Follow-up reports without technical compliance re-ratings: / *Rapports de suivi sans réévaluation de la conformité technique :*

- **Follow-up report of Ukraine** / *Rapport de suivi sur l'Ukraine*
- **Follow-up report of Latvia** / *Rapport de suivi sur la Lettonie*

Appendix II

Timeline for the follow-up process via written procedure to be adopted for the 64th Plenary

Timeline for the Follow-up Report (written procedure)					
Date	Weeks	Country	Rapporteur Team	MONEYVAL members, associate members, observers, FATF	Secretariat
1 March 2022	9 months				Send the F-U template to the Country
2 May 2022	7 months	Sent to the Secretariat request for re-rating of Recommendations			
1 June 2022	6 months	Submit the FUR			Circulated the F-U Report to the Rapporteur Team
1 July 2022	5 months		Prepare a desk-based review, and send to the Secretariat		
15 August 2022	16 weeks		Identify potential compliance or implementation issues which may deserve an increased focus and discussion in the Plenary and submit in writing to the secretariat a proposed list of issues.		Prepare a summary report and send to Country (give 2 weeks)
29 August 2022	14 weeks	Comment on the summary report			
19 September 2022	11 weeks				Circulate F-U with TC re-ratings to the network 1 st time (give 2 weeks)
3 October 2022	9 weeks			Provide written comments on the 1 st F-U Report	
24 October 2022	6 weeks				Circulate F-U with TC re-ratings to the network 2 nd time (give 1 weeks)
31 October 2022	5 weeks			Provide written comments on the 2 nd F-U Report	
21 November 2022	2 weeks				Compile a short list of the most significant issues together with the Rapporteur teams, and circulate to network.
5 December 2022	Plenary				
12 December 2022	1 week				Provide final follow-up reports with TC re-ratings to the FATF Secretariat and all other assessment bodies for consideration in the Q&C Review process.
16 January 2023	6 weeks				Publish the Enhanced FUR if re-rating occurred.

Appendix III

LIST OF PARTICIPANTS/ LISTE DES PARTICIPANTS

Evaluated States and Jurisdictions / *Etats et juridictions évalués*

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