The Ministerial Committee of the Monetary Union of Central Africa (UMAC), meeting in an extraordinary session on 28 September in Paris,


Having regard to the Convention on the Monetary Union of Central Africa (UMAC) of 5 July 1996;

Having regard to Additional Act No. 09/00/CEMAC-086/CCE02 of 14 December 2000 creating the GABAC;

Having regard to Additional Act No. 26/CEMAC-CCE-11 of 6 November 2012 on the appointment of Mr Désiré Geoffroy MBOCK as the Permanent Secretary of the GABAC;

Having regard to Regulation No. 01/CEMAC/UMAC/CM of 2 October 2010 revising Regulation No. 02/CEMAC/UMAC/CM of 14 April 2002 on the organisation and operation of the Task Force on Money Laundering in Central Africa (GABAC);

Having regard to Regulation No. 01/CEMAC/UMAC/CM of 11 April 2016 on the prevention and suppression of money laundering and the financing of terrorism and proliferation in Central Africa;

Having regard to Directive No. 01/CEMAC/UMAC/CM of 12 DEC 2016 on the sample text on the creation, organisation and operation of the committee for the coordination of national policies aimed at combating money laundering and the financing of terrorism and proliferation in each Member State of the GABAC, known as the "Coordinating Committee";

Having regard to Resolution No. 03, adopted in a plenary session of the Members of the GABAC, which decided on the draft regulation on the procedural manual for the second round of mutual evaluations of the Member States of the GABAC;

Having regard to the Internal Regulation of the GABAC, adopted by Resolution No. 10 in an ordinary plenary session of the GABAC Members on 5 September 2016;

Having regard to the FATF Standards which constitute the benchmark on combating money laundering and the financing of terrorism and proliferation;

 Whereas the evaluation methodologies adopted by the FATF constitute the benchmark for the evaluation of the legal and institutional systems in countering money laundering and terrorism financing;

Having regard to the opinion of the Board of Governors of the Bank of Central African States, submitted in Resolution No. 05 during its ordinary meeting of 14 September 2016.
And on the proposal of the Permanent Secretary of the GABAC;

UNANIMOUSLY ADOPT THE REGULATION WHICH READS AS FOLLOWS:

Article 1:

A Procedural Manual for the second round of mutual evaluations of the Member States of the GABAC is hereby established.

Article 2:

The Procedural Manual mentioned in Article 1 is contained in the annex to this Regulation of which it forms an integral part.

Article 3:

This regulation and the annex mentioned in Article 2 are drawn up in a single original in the French, English and Spanish languages. In the event any discrepancy between the different versions, the French text shall prevail.

Article 4:

This Regulation shall enter into force from the date of its signature and will be published in the Official Community Gazette.

Done at Bangui, on 12 DEC 2016

Chairperson of the Ministerial Committee

[Signature]

[Signature]
TASK FORCE ON MONEY LAUNDERING
IN CENTRAL AFRICA

Annex to Regulation No. 02/16/CEMAC/UMAC/CM of 12 DEC 2016 on the procedural manual for the second round of mutual evaluations by Member States of the GABAC

PROCEDURAL MANUAL
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**LIST OF ACRONYMS, ABBREVIATIONS AND DEFINITIONS**

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<th>Description</th>
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<tbody>
<tr>
<td>AML/CFT</td>
<td>Anti-money laundering and countering the financing of terrorism</td>
</tr>
<tr>
<td>CEMAC</td>
<td>Economic and Monetary Community of Central Africa</td>
</tr>
<tr>
<td>DAR</td>
<td>Detailed Assessment Report</td>
</tr>
<tr>
<td>FATF</td>
<td>Financial Action Task Force</td>
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<tr>
<td>FSAP</td>
<td>Financial Sector Assessment Programme</td>
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<tr>
<td>FSRB</td>
<td>FATF-style Regional Body</td>
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<tr>
<td>FSSA</td>
<td>Financial-System Stability Assessment</td>
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<tr>
<td>GABAC</td>
<td>Task Force on Money Laundering in Central Africa</td>
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<tr>
<td>IFI</td>
<td>International Financial Institution</td>
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<tr>
<td>IMF</td>
<td>International Monetary Fund</td>
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<td>MER</td>
<td>Mutual Evaluation Report</td>
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<td>METHODOLOGY</td>
<td>The 2013 FATF assessment methodology</td>
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<tr>
<td>ML/TF</td>
<td>Money laundering / terrorism financing</td>
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<tr>
<td>NAFI</td>
<td>National Agency for Financial Investigation</td>
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<tr>
<td>PERMANENT SECRETARIAT</td>
<td>the GABAC Permanent Secretariat</td>
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<td>PERMANENT SECRETARY</td>
<td>the GABAC Permanent Secretary</td>
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<td>PLENARY</td>
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<td>ROSC</td>
<td>Report on the Observance of Standards and Codes</td>
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<td>UMAC</td>
<td>Monetary Union of Central Africa</td>
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<td>WGEC</td>
<td>Working Group on Evaluations and Compliance</td>
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I. INTRODUCTION

1. The Task Force on Money Laundering in Central Africa (GABAC), an institution under the aegis of the Economic and Monetary Union of Central Africa (CEMAC) which specializes in anti-money laundering and countering the financing of terrorism (AML/CFT), has formally recognised the Financial Action Task Force (FATF) Recommendations which are the international standards in AML/CFT. This recognition has been repeated on numerous occasions, the most recent being in Regulation No. 01/CEMAC/UMAC/CM of 11 April 2016 on the prevention and suppression of money laundering and the financing of terrorism and proliferation in Central Africa, which now covers the financing of the proliferation of weapons of mass destruction. One of the missions of the GABAC is to conduct the mutual evaluations of the systems of those States within its purview. The Member States of the GABAC have agreed to implement the FATF Recommendations under a coordinated and concerted approach within the CEMAC and to be subjected to peer evaluations. This evaluation process by peers is known as "mutual evaluation"; it is to be conducted by the GABAC by virtue of paragraphs 2 and 3 of Article 4 of Regulation No. 01/10/CEMAC/UMAC/CM of 2 October 2010 revising Regulation No. 02/02/CEMAC/UMAC/CM of 14 April 2002 on the organisation and operation of the Task Force on Money Laundering in Central Africa (GABAC).

A first round of mutual evaluations of the Member States of the CEMAC was performed between 2008 and 2016 in accordance with the procedural manual adopted by the Ministerial Committee on 2 October 2011, which was based on the FATF 40+9 Recommendations. In 2012, the FATF Recommendations were revised and the adoption of a new methodology requires the adaptation of the GABAC Procedural Manual.

2. This manual describes the processes and procedures governing the second round of GABAC mutual evaluations. These evaluations are to be conducted on the basis of the FATF Recommendations (2012)¹ and the Methodology for assessing technical compliance with the FATF Recommendations and the effectiveness of the AML/CFT systems², as amended, and pursuant to the Universal Procedures adopted by the FATF in October 2013 and its subsequent amendments. The manual covers the following topics:

   a) Scope, objectives and principles of mutual evaluations;
   b) Changes to the FATF standards;
   c) Second-round schedule for mutual evaluations of the GABAC;
   d) Procedures and stages of the evaluation process;
   e) Evaluation of new members;
   f) Joint FATF evaluations;
   g) IFI-led evaluations and their coordination with the FSAP process;
   h) Follow-up of mutual evaluations.

II. SCOPE, OBJECTIVES AND PRINCIPLES OF MUTUAL EVALUATIONS

3. As stated in the Methodology, mutual evaluations comprise two interdependent components: technical compliance and effectiveness. The objective of the technical compliance component is to verify whether the laws, regulations and other required measures are in force and the institutional AML/CFT framework is in place. The effectiveness component determines whether the AML/CFT mechanisms are functioning, as well as the success of each country in obtaining the desired results.

¹ http://www.fatf-gafi.org/media/fatf/documents/recommendations/Recommendations_GAFI.pdf
4. The mutual evaluations of the GABAC are governed by a certain number of principles as follows:

a. Produce objective and clear mutual evaluations within the time frames established by these procedures;
b. Ensure that all assessed countries undergo equal scrutiny, so that the mutual evaluation reports and their respective executive summaries are as consistent as possible, especially with regard to their conclusions, results and observations;
c. Ensure that all assessed countries undergo equal, transparent scrutiny under the mutual evaluation process;
d. Ensure that the evaluations are of quality and performed equally and consistently with regard to those carried out by the competent organisations and bodies (FATF, World Bank, IMF, FATF-style Regional Bodies);
e. Encourage the implementation of AML/CFT measures that comply with international standards;
f. Identify and promote good practices;
g. Inform the governments and the private sector of vulnerabilities in the AML/CFT systems;
h. Ensure that the evaluation process is sufficiently simple and effective so that unnecessary delays and duplications are avoided and resources are efficiently used.

III. CHANGES TO THE FATF STANDARDS

5. As part of a dynamic process, the work of the FATF could lead to new modifications to the Recommendations, interpretative notes or Methodology. All countries should be assessed on the basis of the FATF Recommendations and interpretative notes, as well as the Methodology in force at the commencement of the current cycle. The report must clearly state whether an assessment occurred at a time when the international standards had recently been modified. In order to ensure equal treatment and to protect international financial systems, compliance with the factors that were changed after the mutual evaluation must be assessed as part of the follow-up process (see Chapter IX infra).

IV. SCHEDULE FOR THE SECOND ROUND OF MUTUAL EVALUATIONS

6. The Permanent Secretariat will prepare a schedule for the mutual evaluations which will state the fixed or proposed dates of the on-site visits and the date for discussing the draft MER by the GABAC Technical Committee. The schedule and the progress of the evaluations will be based on the following criteria:

a. the Permanent Secretariat, with the Member States, will arrange the possible dates for the on-site visit and for the MER discussion by the Technical Committee, and will inform the Plenary of the dates;
b. countries that have undergone a recent evaluation by the IFI should not be considered a priority;
c. the expected date of any FSAP work should be taken into account.

7. Given the limited resources of the GABAC, the number of Member States, and the mutual evaluations to be performed, the GABAC will discuss at least one MER per year.
V. PROCEDURES AND STAGES OF THE EVALUATION PROCESS

8. The GABAC mutual evaluation procedures must comply with the Universal Procedures for AML/CFT Evaluations and take into account, insofar as permitted by such procedures, the specific characteristics of the GABAC and its Member States. At least ten (10) months prior to the on-site visit, the GABAC Permanent Secretariat, in conjunction with the assessed country, will set the mutual evaluation dates, in accordance with the schedule in Appendix 1. A certain amount of flexibility is available in setting the dates of the mutual evaluation in order to take into account meetings and other events organised by the GABAC, as well as to organise the on-site visit at the most convenient time. The stages of the GABAC mutual evaluation process are described in detail below. Appendix 1 contains a sample schedule charting the stages of the process.

A. MUTUAL-EVALUATION PREPARATION SEMINAR

9. The first stage of the mutual evaluation process is the organisation of a seminar that will assist each country to prepare fully for the forthcoming mutual evaluation. This seminar will be organised by the GABAC Permanent Secretariat; it should be held at least three months before the start of the document review on technical compliance (i.e. 9 months before the on-site visit). The FATF, its associated members, along with the World Bank and the IMF, will provide the GABAC Permanent Secretariat with instructional support that is necessary to conduct such a seminar, the content of which should be adapted to the specific characteristics of each country.

B. PREPARATION FOR THE ON-SITE VISIT

10. The assessed country will inform the GABAC Permanent Secretariat of which official language of the CEMAC it wishes the mutual evaluation to be conducted in.

11. Where the evaluation language chosen is not French, which is the working language under the provisions of the Regulation on the internal rules of the GABAC, and insofar as it does not impact the timetable of the evaluation, the assessed country must supply all legislative and regulatory texts and any other documents necessary for its evaluation in French, as well as bear all costs for the translation of the different reports and enquiries of the assessors into the chosen language for the evaluation.

12. It is the responsibility of the assessed country to show its compliance with the FATF Recommendations and the effectiveness of its AML/CFT system. As a consequence, the assessed country must supply the assessment team with all relevant information during the evaluation process. If necessary, the assessment team must be allowed to request or obtain access to documents, data and any other pertinent information. All information and documents must be supplied by the assessed country in electronic form, if possible, and the assessed country must ensure that the laws, regulations and any other documents are provided in the language in accordance with the provisions of the paragraph above.

i. Updates to technical compliance information

13. The assessed country must keep its information up-to-date in order to supply the necessary data for the preparatory works prior to the on-site visit, in particular the understanding of the country's own ML/TF risks, the identification of issues that could be the subject of greater attention during the on-site visit, and the preparation of the draft MFR. The country must supply the necessary information and updates to the Permanent Secretariat at
least six (6) months before the on-site visit. Beforehand, the Permanent Secretariat ought to establish an informal dialogue with the assessed country.

14. In some countries, AML/CFT issues are handled not only at the national level, but also at the state/provincial or local level. Such countries must state which AML/CFT measures fall within the responsibility of the state/provincial or local authorities and supply an accurate description of those measures. The assessors must also be aware that AML/CFT measures can be at one or more governmental levels; they must examine and consider all relevant measures, including those taken at the state/provincial or local level. Likewise, the assessors must take into account the supranational laws and regulations that apply to a country.

15. The country must use the Questionnaire on Technical Compliance Updates (See Appendices 3 and 3A) to provide the relevant information to the assessment team. Like previous reports, the questionnaire is used by the assessment team as the basis for a document review of technical compliance. The questionnaire assists the assessed country in the provision of relevant information on: (i) the institutional framework; (ii) the risks and context; and (iii) the measures taken by the country to fulfill the criteria of each Recommendation. As well as the questionnaire, the country can submit any other information deemed useful.

ii. Information on effectiveness

16. The country will supply information in relation to effectiveness on the basis of the eleven (11) Immediate Outcomes of the Methodology at least four (4) months prior to the on-site visit. It will describe in detail how it handles the essential issues of each of the eleven Immediate Outcomes. It is important that the country provides a complete and accurate description (notably, examples of information, data and other factors) which presents the effectiveness of its AML/CFT system.

iii. Composition and training of the assessment team

17. Evaluation teams should generally comprise four assessors (a legal expert, two financial experts, and a law enforcement expert), who are primarily from the Member States of the GABAC. They will be assisted by the GABAC Permanent Secretariat. Depending on the country and the ML/TF risks, assessors with a particular expertise or additional assessors may be employed. In selecting the assessors, the following factors must be taken into account: (i) operational experience and experience in mutual evaluations; (ii) language; (iii) the nature of the legal system (civil or common law) and the institutional framework; (iv) the specific characteristics of the assessed country (size and composition of the economy and financial sector, geographical location, trade relations and cultural ties) in order to ensure that the assessment team has all the necessary knowledge and competences. The assessors must have very sound knowledge of the FATF Recommendations and they must have participated, at least, in an assessor training seminar on the 2013 Methodology before conducting a mutual evaluation. Ideally, at least one of the assessors should have prior experience in mutual evaluations.

18. The GABAC Permanent Secretariat will select the assessors from a pool of qualified assessors (i.e., assessors who have taken an assessor training course on the 2013 Methodology). No assessor who is a native of the assessed country may be appointed. The selection should take place at least six (6) months prior to the on-site visit. The GABAC

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3 The financial experts must have expertise in the preventive obligations that are applicable to financial institutions and designated non-financial businesses and professions.
Permanent Secretariat will inform the assessed country of the composition of the assessment team as soon as all of its members have confirmed their participation.

19. The Permanent Secretariat may request the participation of an assessor from another FSRB and/or the FATF, under the principle of reciprocity.

20. Considering the nature and importance of the peer evaluation process, the Permanent Secretariat will strive to ensure reciprocity of the evaluation process. The Permanent Secretariat will prepare a list of assessors and keep it up-to-date. Each Member State must ensure the availability of its trained experts for a mutual evaluation in the event of a request by GABAC for their participation.

iv. Responsibilities of the Permanent Secretariat

21. The Permanent Secretariat shall:

a) provide support to the assessment team and the assessed country;

b) monitor the objectivity and consistency of the evaluation;

c) ensure compliance with the mutual evaluation procedures;

d) assist the assessors and the assessed country in the interpretation of the standards, Methodology and procedures, in accordance with the decisions of the FATF;

e) ensure that the assessors and the assessed country have access to the relevant documentation;

f) ensure that all assessors have access to the relevant materials and arrange regular conferences, whether by telephone or any other means of communication, with the aim of simplifying the distribution of information and of establishing open communication between the assessors.

g) coordinate the evaluation process and the other tasks mentioned in this manual.

v. Responsibilities of the assessment team

22. The assessment team's essential function is to prepare, as a group, an independent report (containing analyses, conclusions and recommendations) in relation to the country's compliance with FATF standards on technical compliance and effectiveness. A successful AML/CFT evaluation requires, at the very least, the combination of expertise in finance, law, and the application of the law, especially when it concerns the assessment on effectiveness. The assessors must therefore perform a fully collaborative evaluation, so that all assessed aspects are comprehensively investigated. Every assessor is expected to contribute to all parts of the assessment, even if that assessor only has to take the initiative or primary responsibility in those subjects falling within his/her own field of expertise. An outline of the assessors' respective primary responsibilities will be shared with the assessed country; however, the group as a whole remains accountable for the evaluation. Therefore, the assessors must be actively involved in all fields of the report, beyond those under their primary responsibility.

23. It is important that the assessors are able to devote their time and expertise to: the examination of all documents (including information relating to updates on the technical
compliance and effectiveness) and the issues and requests raised prior to the on-site visit; the preparation and execution of the evaluation; the preparation of the MER; and, the participation in meetings (i.e., on-site visit, face-to-face meetings, Technical Committee discussions). They must also respect the particular deadlines.

24. The mutual evaluation is a dynamic, continuous process. The assessment team, with the support of the Permanent Secretariat, must be in continuous contact and consultation with the assessed country from six months before the on-site visit. The NAFI will be the point of contact for the GABAC in the assessed country.

vi. Document review of technical compliance

25. Prior to the on-site visit, the assessment team, with the support of the Permanent Secretariat, will perform a document review on the country’s level of technical compliance, along with any circumstantial factors and ML/TF risks. This review will use the information furnished by the country for updating the technical compliance, pre-existing information extracted from the country’s previous MER and follow-up reports, as well as any other sources of credible and reliable information. Such information will be meticulously examined. Nevertheless, the assessment team may highlight, during its review of preceding MERs, any strengths and weaknesses that were not previously noted. In the event that the assessors draw conclusions differing from those of the previous MERs and follow-up reports (and if the standards and legislation have not changed), they must state the reasons for the different conclusions.

26. The Technical Compliance Annex will be prepared by the Permanent Secretariat on the basis of the detailed analysis performed by the assessors. Accordingly, the assessors will state whether each criterion is compliant, largely compliant, partially compliant or not compliant, along with the reasons. When the Permanent Secretariat prepares the Technical Compliance Annex, it must also take into account the quality and consistency of the previous MERs. Once the document review is completed, the assessment team will submit to the country an initial draft of the Technical Compliance Annex (without any ratings or recommendations) three (3) months before the on-site visit. This initial draft should include a description, analysis and provisional list of noted technical deficiencies. The country has one (1) month to provide clarification and comments on the annex.

27. For their evaluation, the assessors will take into account the laws, regulations and other relevant AML/CFT measures that are in force or will be in force by the end of the on-site visit. Where legislative bills or proposals for other measures, which will amend the AML/CFT system, are available, the MER (including recommendations to the country) may refer to them; however, such factors may not be taken into account in the conclusions of the evaluation or in the ratings.

vii. Assessment of international cooperation

28. Six (6) months prior to the on-site visit, the Permanent Secretariat will send an invitation to all members of the GABAC, FATF and FSRBs to provide information on their experiences with the assessed country with regard to international cooperation and any other information that such members would like to see discussed during the on-site visit. This invitation will be addressed to the FATF and FSRBs on the basis of reciprocity.

29. The assessment team and the country may also request feedback from those countries that were provided with or petitioned for international cooperation by the assessed country.
This feedback on international cooperation with the assessed country may address: (i) the general experience; (ii) positive examples; and (iii) negative examples. The responses received will be made available to the assessment team and the assessed country.

viii. Identification of issues that may require increased scrutiny during the on-site visit

30. During the on-site visit, the assessment team will assess the country's level of effectiveness in relation to each of the eleven (11) Immediate Outcomes. Before the on-site visit, the assessment team may, on the basis of its preliminary analysis of technical compliance and effectiveness, identify the issues to which they will pay additional attention during the on-site visit and in the MER. On this issue, the assessment team should consult the assessed country. The Observers will also be invited to submit any comments that could assist the team in focusing on those issues that deserve increased scrutiny. These issues should generally relate to effectiveness but they may also concern technical compliance.

31. In the event of issues requiring increased scrutiny during the on-site visit, the assessment team must obtain and examine the pertinent information and commence discussions on those issues four (4) months prior to the on-site visit. The assessment team will consult with the assessed country at least two (2) months prior to the on-site visit. The assessed country must then supply additional information on those issues. Although a prerogative of the assessment team, such issues must be agreed, insofar as possible, with the assessed country and described in a draft memo, also known as a guideline memo. This memo will briefly describe (in no more than two (2) pages) the fields identified as lower or high risk and necessitating lower or increased attention. The guideline memo and all relevant information (e.g., the country's risk assessment) will be submitted to the assessed country and the external reviewers (see Chapter V, Section D (iii) Quality and consistency inspection, infra). After considering the information supplied and their general knowledge of the assessed country, the external reviewers will provide their observations on the reasonable nature of the guideline memo to the assessment team. The assessment team will study the merits of the external reviewers' comments and, where necessary, revise the guideline memo in consultation with the assessed country. The final version of the memo, as well as any request for additional information on the identified issues, will be sent to the assessed country one month before the on-site visit. The assessed country should respond to any issue that requires increased scrutiny. It may also decide to give a briefing on the risk and its context at the start of the on-site visit in order for the assessors to better assess the country's understanding of its own risks.

32. To expedite the mutual evaluation process and facilitate the on-site visit, the assessment team will, one week before the on-site visit, prepare a revised draft of the Technical Compliance Annex, the text on technical compliance for the MER, as well as the outlines of the preliminary conclusions/key issues on effectiveness to be discussed during the visit. In order to facilitate the discussion during the on-site visit, the revised draft of the Technical Compliance Annex will be provided to the assessed country at that time.

ix. On-site visit timetable

33. The assessed country (through the designated point of contact) will collaborate with the Permanent Secretariat in order to prepare a draft timetable and coordinate the logistics of the on-site visit. The assessment team must be notified of the draft timetable and the particular logistical arrangements at least two (2) months prior to the on-site visit. With the aim of simplifying the preparation for the on-site visit, the assessment team will prepare, two (2)
months prior to the on-site visit, a preliminary analysis on effectiveness which will identify
the key issues. (See also Appendix 2 for the list of authorities and businesses typically
involved with the on-site visit.)

34. The draft timetable will take into account the issues that will be under increased
scrutiny by the assessment team. If possible, meetings should take place on the premises of
the system under assessment as this allows the assessment team to meet the widest range of
staff members while providing easier access to information. For some assessments, travel
between different sites may take time. Thus, every day, the meetings should not be held in
more than two (2) or three (3) different locations, unless the meeting points are very close.
The timetable must be finalised at least three (3) weeks before the on-site visit. If necessary,
the assessment team can request the holding of additional meetings during the on-site visit.

35. The time required for interpreting and translating the documents must be taken into
consideration as appropriate. During the on-site visit, a well-prepared professional interpreter
may be required in order to provide interpretation into the language of the assessment.
However, for the efficient use of time, it is preferable to hold the meetings in the language of
the evaluation.

x. Confidentiality

36. All information and documents provided: (i) by the assessed country during the mutual
evaluation (e.g., technical compliance updates and information on effectiveness, documents
describing the AML/CFT system, measures taken or risks found, including those subject to
increased scrutiny, or responses to the assessors’ question); (ii) by the Permanent Secretariat
or the assessors (e.g., the assessors’ reports, the draft mutual evaluation report); and (iii) by
the external reviewers insofar as they relate to the comments provided as part of consultations
or reviews, must be treated as confidential. Such information and documents must be used
only for the specific stipulated purposes and must not be made public, unless the assessed
country and the GABAC (and, where appropriate, the author of the document) consent to such
publication. This duty of confidentiality applies to the assessment team, the Permanent
Secretariat, the external reviewers, the observers and the officials of the assessed country, as
well as any other person that may have access to the information or documents. Furthermore,
at least four (4) months before the on-site visit, the assessment team’s members and the
external reviewers must sign a non-disclosure agreement, which will include a conflict-of-
interest declaration.

C. THE ON-SITE VISIT

37. The on-site visit offers the best opportunity to clarify the issues relating to the country’s
AML/CFT system, and the assessors must be fully prepared to assess the eleven Immediate
Outcomes of the system’s effectiveness and clarify any pending issue on technical
compliance. The assessors must also grant extra attention to those fields with identified high
risks of ML/TF. They must be aware of the diverse situations and risks and that the assessed
country can adopt different approaches in the fulfilment of the FATF standards and the
creation of an effective system. They must therefore be open-minded and flexible, and avoid
comparisons with their own national requirements.

38. Experience has shown that the visit requires a minimum of seven to eight days. An
example of an on-site visit could be as follows:
a) A half-day preparatory meeting, between the Permanent Secretariat and the assessment team, during which the country's understanding of its own risks, among other topics, is discussed;

b) Seven to eight days of meetings with representatives of the assessed country, including an introductory meeting focused on risk understanding and a feedback meeting. Time may be set aside for additional or follow-up meetings if, during the set timetable, the assessors identify new issues that require investigation, or if they need more detailed information on an already-discussed issue;

c) One to two days for the assessors to work on the draft MER (assisted by the Permanent Secretariat), ensure that all important issues raised during the assessment appear in the report, and discuss and agree on the ratings and key recommendations. The assessment team must provide a written summary of its key recommendations to the officials of the assessed country during the feedback meeting.

39. The length of the on-site visit will be staggered over at least ten (10) working days; it may be extended for large countries and complex countries.

40. It is important that the assessment team can demand and hold meetings with relevant entities during the on-site visit. The assessed country and the particular entities that are met should ensure the availability of their staff for each meeting. The assessed country must furnish the assessment team with an office, a photocopier, a printer and basic office materials, as well as Internet access, for the period of the on-site visit. The assessed country is accountable for the safety of the assessment team.

41. Meetings with the private sector or other non-governmental representatives are an important part of the on-site visit. The assessors must have the opportunity to meet such bodies or persons without the presence of a government representative as the latter may prove to be an obstacle to an open discussion. The assessment team may also demand that the meetings with certain governmental bodies be open to those bodies alone.

D. AFTER THE ON-SITE VISIT – PREPARATION OF THE DRAFT MER AND EXECUTIVE SUMMARY

42. There must be a minimum of twenty-seven (27) weeks between the end of the on-site visit and the Technical Committee's discussion of the MER. The timely preparation of the MER and its executive summary⁴ requires the close collaboration of the assessors with the Permanent Secretariat and the country. The time period may be extended or adjusted according to the date of the Technical Committee's discussion. In exceptional cases, and where justified by circumstances (with the consent of the assessed country), a shorter period can be envisaged.

43. The stages on the finalisation of the draft report for its examination by the Technical Committee and the approximate time required for each part, are detailed below (see also Appendix 1). For the purpose of facilitating communication between the assessment team and

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⁴ The templates for the MER and executive summary are available in the annexes of the Methodology. The assessors must observe the provided instructions, especially with respect to the number of pages of the report (maximum of 100 pages for the MER and 60 pages for the Technical Compliance Annex).
the assessed country, the Permanent Secretariat must arrange regular conferences between the parties, either by telephone or any other form of communication, especially after the circulation of the updated draft MER. During the drafting of the initial and second drafts of the MER, the assessors must describe as much as possible (i) how the information submitted by the assessed country has been taken into account; and (ii) whether additional information is still necessary.

i. Initial draft MER

44. The assessment team will have six (6) weeks to coordinate and improve the initial draft MER (including the key conclusions and priority recommendations). The initial draft MER should contain the preliminary conclusions and the ratings. It will be sent to the assessed country, which will have four (4) weeks to examine it and offer comments to the assessment team. During that time, the assessment team must be prepared to respond to any questions or requests for clarification from the assessed country.

ii. Second draft MER and draft executive summary

45. Upon receipt of the country’s comments on the initial draft MER, the assessment team will have four (4) weeks to study the received comments and amend the draft MER, as well as to prepare the executive summary. The second draft MER and the executive summary will be sent to the assessed country and the external reviewers (approximately 14 weeks after the on-site visit). Just as in the initial draft, the assessors must describe as much as possible how submitted information has been taken into consideration in their analysis.

iii. Quality and consistency examination

46. The quality and consistency of the report will be examined as part of the mutual evaluation process. The principal functions of the external reviewers are to ensure that the MER is of an acceptable and consistent quality, and assist the assessment team and the assessed country by examining and providing them with relevant observations on the guideline memo, the draft MER (including appendices) and the executive summary through the following methods:

   a) commenting on the proposals of the assessment team relating to the scope of the on-site visit;

   b) providing the correct interpretation of the FATF standards and the correct application of the Methodology (including risk assessments, the incorporation of conclusions on technical compliance and effectiveness, and the areas in which the analysis and conclusions are identified as clearly deficient);

   c) verifying that the description and the analysis are consistent with the conclusions (including ratings), and that, based on these conclusions, the reasonable priority recommendations are formulated for the purpose of improving the system;

   \[\text{\footnote{The executive summary should describe the principal ML/TF risks, the strengths and weaknesses of the assessed country’s system, along with the priority actions to be implemented by the country for the improvement of the AML/CFT system.}}\]
d) highlighting potential inconsistencies with previous decisions of the GABAC and the FATF on issues relating to, where appropriate, the technical compliance and effectiveness;

e) verifying that the entire report is coherent and comprehensive.

47. Such an examination requires the expertise of a voluntary, qualified group of experts. This group will contain experts from among the GABAC, FATF, FSRBs, as well as from among the members of the secretariats of the FATF, FSRBs and IFIs. To avoid possible conflicts of interest, the external reviewers chosen for the review must be from countries other than those of the assessors and their identities will be made known in advance to the country and assessors. There should be generally three reviewers per evaluation; each one may focus on one particular part of the report.

48. The external reviewers must have the time and expertise required to examine the guideline memo and the quality of the second draft MER in relation to its internal coherence and consistency with the FATF standards and previous MERs of the GABAC and FATF. To do so, the external reviewers must receive a copy of the country's remarks on the initial MER draft. They must have access to all documents and the country's updated technical compliance on its own assessment of risks. To ensure the transparency of the examination, all comments by the external reviewers will be disclosed to the assessors and the assessed country. The external reviewers will have three (3) weeks to study the second draft MER and provide the assessment team with their comments. These comments will be communicated to the assessed country. The external reviewers examining the quality and consistency of the report do not hold decision-making powers or the authority to change the draft. It is incumbent on the assessment team to study the comments of the external reviewers and to then decide whether the draft should be modified. The assessment team will prepare a short memo for the Technical Committee on the changes made to the draft report, which were based on the external reviewers' comments, and to the decisions taken.

49. At the same time as the examination process, the assessed country will have the opportunity to submit detailed comments on the second draft MER. After three (3) weeks, the assessed country's comments on the second draft MER and the remarks of the external reviewers will be placed on the agenda of a face-to-face meeting.

50. Considering the nature of the peer-examination process, the Permanent Secretariat will ensure that the mutual character of the process is maintained and that qualified experts are appointed as external reviewers. The list of external reviewers will be kept and updated by the Permanent Secretariat.

iv. Face-to-face meeting

51. As stated in paragraph 48, the assessment team and assessed country will have three (3) weeks to: study the comments of the external reviewers and the country in relation to the second draft report and the executive summary draft; discuss changes to the drafts of the MER and executive summary as well as any unresolved issues; and, identify the issues to be discussed at the face-to-face meeting.

52. The face-to-face meeting (or video/telephone conference) is an important method of assistance for the assessed country and the assessment team in their resolution of pending issues. Consequently, where required by the assessed country, the assessment team (with the Permanent Secretariat) and the country will hold a face-to-face meeting to discuss the second
draft MER and the draft executive summary. During this meeting, the assessment team and the country must work to resolve any disagreements on issues of technical compliance and effectiveness as well as identify possible problems that the Technical Committee will have to prioritize. The face-to-face meeting will be held at least eight (8) weeks before the Technical Committee’s meeting (i.e. about twenty (20) weeks after the on-site visit).

53. Following the face-to-face meeting, the assessment team will study whether other changes should be made to the drafts of the MER and executive summary.

v. Identification of issues to be discussed by the Technical Committee

54. The revised drafts of the MER (third draft) and executive summary to be discussed by the Technical Committee will be sent to all members and observers of the Technical Committee at least five (5) weeks before the Technical Committee’s meeting. The delegations will have two (2) weeks to present their comments on the drafts of the MER and executive summary and highlight any issues they would like to have discussed by the Technical Committee. The comments must relate to the evaluation’s substantive issues or aspects of a multi-faceted or high-level nature. All received comments, including those from the assessed country, will be disclosed to all participants in the Technical Committee. No changes to the draft MER may be made during this period before its examination by the Technical Committee.

55. On the basis of the MER, executive summary and received comments, the Chairperson and Vice-chairperson of the WGEC in collaboration with the assessed country and assessment team, under the coordination of the Secretariat, will prepare a list (generally, five (5) to seven (7)) of priority issues and substantive issues that should be discussed during the Technical Committee’s meeting. This list will take into account the fundamental issues raised by the country, the delegations or the assessment team, which the assessed country and delegations are most anxious to discuss, as well as any issues on interpretation or consistency with other MERs adopted by the GABAC and the FATF. At the end of the WGEC meeting and following consultation with the Chairperson of the Technical Committee, the list of substantive issues to be discussed by the Technical Committee will be circulated.

56. The final list of issues for discussion, prepared by the WGEC, will be sent to the delegations two (2) weeks before the Technical Committee’s discussion. Any modifications to the MER and executive summary will be made after the Technical Committee’s meeting and those changes will take into account the decisions of the Technical Committee.

vi. Adherence to the schedule

57. The purpose of the schedule is to specify what has to be done so that the reports are prepared within sufficient, reasonable time frames for their discussion by the Technical Committee. As a result, it is important that all parties involved abide by the deadlines.

58. Delays can have a significant impact on the ability of the Technical Committee to examine the report diligently. The evaluation schedule has been prepared so as to leave sufficient time between the on-site visit and the discussion of the Technical Committee; adherence to the deadlines helps ensure that the assessment team and assessed country have adequate time to prepare the different drafts of the MER and executive summary. By accepting to participate in the mutual evaluation process, the country and assessors undertake to abide by the established deadlines and provide, within the agreed time frames, responses, reports or any other document, which are full and accurate. In cases that such time frames are
not complied with, the following actions may be taken (depending on the nature of the failure):

a) failure by the assessed country to fulfil its obligations during the evaluation process – the Permanent Secretary will write to the relevant ministers of the GABAC and the assessed country. The Technical Committee will be informed of the reasons for the postponement of the MER’s discussion, where appropriate. The adjournment of the discussion may be made public. Finally, the assessment team may have to finalise the report on the basis of the information available at the time;

b) failure by an assessor or external reviewer to fulfil his/her obligations during the evaluations process – the Permanent Secretary will write to the assessor and responsible minister or to the external reviewer and the responsible body;

c) failure by the Permanent Secretariat to fulfil its obligations during the evaluation process – the Permanent Secretary will refer the matter to the relevant ministers of the assessed country who will agree on arrangements for extending the deadlines. The assessment team and all other actors in the process will be informed of the extension.

59. The Permanent Secretariat will keep the Chairperson of the GABAC informed of any failure, whether on the part of the assessed country, an assessor, an external reviewer or the Permanent Secretariat, so that the Chairperson can act accordingly in a timely manner. The Technical Committee will also be informed of such failures if they lead to an application for the delay of the MER’s discussion.

E. WGECC MEETING

60. Prior to each plenary of the Technical Committee in which an MER will be under discussion, its draft and the final list of priority and substantive issues will be examined during a meeting of the WGECC. The WGECC will examine the substantive issues, identify the areas worthy of discussion in the plenary and streamline the list, in order to set and shape the order of discussion in the plenary. The report from the Chairperson of the WGECC will highlight the recommendations that are suitable for submission to the plenary.

F. DISCUSSION BY THE TECHNICAL COMMITTEE

61. The discussion on each MER and executive summary by the Technical Committee will focus on substantive and high-level issues; it will principally focus on effectiveness. Important technical issues, where appropriate, will also be examined. Sufficient time must be reserved to discuss the assessed country’s response to the mutual evaluation and other issues. The discussion should last, on average, three (3) to four (4) hours and proceed as follows:

a) The assessment team briefly presents, in high-level terms, the key issues and conclusions of the report. The assessment team may intervene or comment on any issues concerning the MER or executive summary;

b) The assessed country makes a brief opening statement.
c) The Technical Committee examines the list of key issues identified by the WGEC, which should be briefly presented by the Chairperson of the Working Group;

d) Around half the time allocated to the MER discussion is devoted to a discussion on the overall situation of the assessed country's AML/CFT system, its ML/TF risks, the priority actions and recommendations expressed in the executive summary, the country's response to the mutual evaluation, including any measures already taken, and the principal outcomes;

c) Other issues raised by the Technical Committee may be studied.

G. ADOPTION OF THE MER AND ITS EXECUTIVE SUMMARY

62. At the end of the discussion, the MER and its executive summary are submitted for adoption by the Technical Committee. The Permanent Secretariat will inform the Chairperson of the GABAC and the assessed country of the adoption. The adopted report is then subject to additional checks for typographical mistakes or other similar errors.

63. If the MER and its executive summary are not adopted, the assessors, the country and the Permanent Secretariat will prepare amendments to address the issues raised by the Technical Committee. Where substantive changes are required, either because additional information must be added or because the report must be substantially modified, the Technical Committee may decide to: (a) postpone the adoption of the report and decide to have a new discussion on the modified report at the next meeting of the Technical Committee; or, (b) where the necessary changes are less significant, adopt the report with the reservation that it be modified, and the amended report will subsequently be approved by a written procedure. The assessment team will ensure that all modifications decided on by the Technical Committee are carried out by the Permanent Secretariat. After the discussion of the report but prior to its adoption, the Technical Committee will discuss the nature of the necessary follow-up measures (see Chapter IX, infra).

64. The final report is a GABAC report and no longer a report of the assessors. As such, the Technical Committee will largely decide on the wording of the report, in accordance with the requirements of the FATF standards and Methodology. The Technical Committee will carefully study the points of view of the assessors and the assessed country as well as consider the need to ensure consistency between reports, should it decide to reformulate the report.

II. PUBLICATION AND OTHER PROCEDURES FOLLOWING THE DISCUSSION BY THE TECHNICAL COMMITTEE

65. In the week following the report's discussion by the Technical Committee, the Permanent Secretariat will modify, under the supervision of the assessment team, all documents pursuant to the decisions of the Technical Committee and send the revised version of the report to the assessed country. In the two (2) weeks following receipt of the revised report, the assessed country will confirm the correctness of the MER and/or indicate any typographical or other error. Particular attention should be paid to preventing any confidential information appearing in any of the published documents (e.g. the mutual evaluation report, its executive summary and the follow-up reports).

66. As required by the Universal Procedures for AML/CFT Evaluations, the Permanent Secretariat will send the final version of the MER to the members and observers of the
GABAC as well as to other FSRBs; they will have two (2) weeks to provide written statements to the Permanent Secretariat with regard to any serious concerns about the report's quality and consistency. Where two or more delegations raise the same concern, the Permanent Secretariat will inform the assessed country, the assessment team and the FATF Secretariat of the concern within (1) week. The assessed country and the assessment team will have one (1) week to provide their observations to the Permanent Secretariat and the FATF Secretariat. On the basis of all received comments, the Permanent Secretariat and the FATF Secretariat will prepare a brief document on the points of view of the assessment team and the assessed country. The document, with the MER, will then be transmitted to the Evaluation and Compliance Group of the FATF so that the Evaluation and Compliance Group can decide whether the report contains significant quality and consistency deficiencies. If such is the case, the Evaluation and Compliance Group of the FATF will issue recommendations to the Plenary of the FATF regarding the appropriate measures that should be taken (e.g. demand the report’s reconsideration by the GABAC and/or state the changes required before publication). Where the FATF Plenary adopts and issues such recommendations, the Permanent Secretariat must present them to the Technical Committee for their consideration and implementation, and to the Plenary for the purpose of keeping it informed. In the event that the Technical Committee does not implement the recommendations of the FATF Plenary or the recommendations are not formally approved by the GABAC Plenary, the FATF Plenary will again examine the issue and decide on any additional action it deems necessary.

67. All MERs and their executive summaries will be published on the websites of both the GABAC and the FATF. This will allow an important part of the work of the GABAC to be highlighted in a timely manner. The MER and the executive summary should only be published once all concerns regarding their quality and consistency have been resolved. In all other cases, the MER and the executive summary must be published within six (6) weeks of their adoption by the Technical Committee.

VI. EVALUATION OF NEW MEMBERS

68. Where a potential new member undergoes a mutual evaluation by the GABAC to ascertain whether the potential member fulfils the membership criteria, the procedures stipulated in Chapters I to V will apply. If the membership criteria are fulfilled and the country is admitted as a member of the GABAC but deficiencies are identified in the country’s AML/CFT system, the Plenary will apply the GABAC follow-up policy (Chapter IX).

VII. JOINT FATF EVALUATIONS

69. Where a GABAC member becomes an FATF member, the FATF policy on joint mutual evaluations will be applicable. This policy requires FATF members to be also FSRB members for the purpose of undergoing an evaluation that is jointly arranged by the FATF and the relevant FSRB. The FATF is generally the main organiser and will employ three (3) assessors while the participating FSRB sends 1 to 2 assessors. Consequently, the secretariats of the FATF and the GABAC will participate in the evaluations. The MER discussion must take place in a plenary session of the FATF and in light of the additional measures adopted for the joint evaluations, the opinion of the FATF will take precedence. The MER adopted by the FATF plenary will be officially submitted by the Chairperson of the GABAC Technical Committee to the Plenary immediately after the FATF plenary at which the MER was discussed. However, the FATF may decide that the MER of a GABAC Member State, which
is also a direct member of the FATF, should be examined in a plenary session of the GABAC Technical Committee.

70. The joint-evaluation process (including the FATF procedures for the preparation of the provisional MER and executive summary) should be the same as the process for other FATF evaluations; however, the GABAC and its members may directly participate by being members of the assessment team, and offer comments and contributions, like other delegations, during the plenary session of the FATF. The GABAC will allow the reciprocal participation of FATF members in the mutual evaluation discussions. On this basis, the following measures should be applied to joint evaluations:

- The GABAC representative will have the opportunity to speak in the FATF plenary during the examination of the MER;

- If the MER must be examined by the plenary of the GABAC Technical Committee, all FATF assessors who are members of the assessment team may attend the plenary session examining the joint-evaluation report. The same approach will apply to the IFI evaluations of those FATF members that are also GABAC members;

- In the exceptional case where a report has been accepted by the FATF but major problems with the text have been subsequently identified by the GABAC, the GABAC Permanent Secretariat will inform the FATF Secretariat of these problems which should be examined during the next plenary session of the FATF;

- It will also be necessary to consider a publication date if the MER has not been examined by the GABAC, for the purpose of coming to a mutual agreement on such a date.

VIII. IFI-LED EVALUATIONS AND THEIR COORDINATION WITH THE FSAP PROCESS

A. IFI-LED EVALUATIONS

71. The GABAC is responsible for the mutual evaluation of each of its members and their monitoring, without exception. This principle may be departed from on a case-by-case basis and at the discretion of the GABAC Plenary in agreement with the country.

72. The IFIs (IMF and World Bank) will periodically inform the GABAC of their intention to evaluate the AML/CFT systems of a limited number of GABAC members, in accordance with the schedule of the Financial Sector Assessment Programme. During its Plenary, the GABAC will study this information and indicate the GABAC members that will be evaluated by an IFI. Only those members wishing to be evaluated by an IFI should be chosen. The number of evaluations to be organised every year by the IFIs should be limited in order to provide the assessors of the GABAC with the opportunity to participate in mutual evaluations and increase their competence in AML/CFT.

73. If an IFI organises the evaluation of the AML/CFT system of a GABAC member as part of the mutual evaluation process, the following procedures will be applicable:

   a) The IFI sends the Permanent Secretariat a draft Detailed Assessment Report (DAR) and Report on the Observance of Standards and Codes (ROSC) of the
assessed GABAC member, for its subsequent communication to the GABAC
delegations within the time frame stated in the mutual evaluation procedure
established by the GABAC.

b) The deadline for the finalisation of the DAR and ROSC depends on the schedule
of the discussions under Article IV of the Statutes of the IMF and the Board of
the World Bank. Normally, the DAR and ROSC drafts are disclosed to the
GABAC prior to the discussions of the Board of the World Bank. However, in
certain exceptional cases, the IFIs will have to complete the DAR and ROSC in
a short turnaround time, without their review by the Technical Committee. In
such cases, the IFIs, with the GABAC, should look into adopting these reports as
GABAC mutual evaluation reports. If there is no agreement on this point, the
GABAC will decide on the possibility of accepting the given assessment as a
mutual evaluation.

c) The IFI assessors are invited to the Technical Committee to present the DAR
and ROSC and answer any questions as part of the mutual evaluation process.

d) In the case of DAR and ROSC drafts, the assessor appointed by the IFIs must
consider the points of view expressed by GABAC members and modify the
drafts as appropriate. Nevertheless, the assessors of the IFIs are ultimately
responsible for the content of the DAR and ROSC of the IFIs.

e) Important policy issues on the analysis, ratings or recommendations posed
during discussions of an IFI report may be reviewed by the GABAC.

f) The DAR and ROSC should be treated as if the GABAC had organised the
assessment. They are then adopted as an MER or executive summary of the
GABAC without amendments.

g) The Technical Committee adopts the IFI assessment of a GABAC member and
considers it equivalent to a mutual evaluation.

74. As part of the review of its mutual evaluation process and procedures, the GABAC may
review the above-described process to ensure its effective and efficient operation.

75. If the IFIs assess a GABAC member, the ROSC prepared by an IFI must contain, in
addition to any other text normally included in the ROSC, the following phrase: "The views
expressed in this document are those of the assessment team and have been discussed (and
adopted) by the GABAC as part of the discussion of the report on (name of country); such
opinions do not necessarily reflect the views of the government of (name of country) or those
of the Boards of the IMF or World Bank. The document is based on the information available
at the time it was completed on (state date)."

B. COORDINATION

76. The basic products of the evaluation process are the MER and the executive summary
(which are virtually identical to the DAR and ROSC). The ROSC is included in the IMF's
Financial System Stability Assessments (FSSAs), which may be published. GABAC members
may opt to participate in the FSAP process of the IMF/World Bank; the result of this process
is a distinct Financial System Stability Assessment (FSSA/IMF) that does not have external
participation, or an FSAP/World Bank. With regard to work on AML/CFT systems, the FSSA
reports contain two parts: an overall view of the financial sector's problems (a half-page
summary of the principal outcomes on the AML/CFT system) and the ROSC. If the members
have decided to participate in the FSAP process in combination with a GABAC mutual
evaluation, they must come to an agreement as soon as possible with the GABAC Permanent
Secretariat and IMF staff in relation to the timetable of the FSAP and mutual evaluation.
For ROSCs, the process is as follows:

- The draft ROSC is approved by the country and assessors and is then sent to the IMF for a "pro forma review". The IMF examines the MER and ROSC, then verifies if the summary conforms to the content of the MER. No modification to the factual results or the substance of the MER's conclusions is allowed; the IMF reviews the consistency between the MER and executive summary. Then, at least one week before the Technical Committee, the IMF submits its observations which the assessment team/country are free to accept or reject. After the Technical Committee, the ROSC is finalised and sent to the IMF. As a general rule, the ROSC (with tables and observations by the authorities) should not contain more than 15 pages.

- To avoid duplicated work and ensure consistency, the text of the ROSC is the same as the executive summary. Changes arising from the pro forma review of an ROSC should be the addition of:

  "This Report on the Observation of Standards and Codes for the FATF Recommendations on Combating Money Laundering and the Financing of Terrorism and Proliferation was prepared by the Task Force on Money Laundering in Central Africa. The report provides a summary of the AML/CFT measures in place in [name of country] as at [date], the level of compliance with the FATF Recommendations, the effectiveness level of the AML/CFT system, and contains recommendations on how the latter could be strengthened.

  The views expressed in this document have been approved by the GABAC and [name of country]; such views do not necessarily reflect the views of the Councils of the IMF or World Bank."

- Tables 1 "Summary of the effectiveness level obtained for each Immediate Outcome" and 2 "Compliance with the FATF Recommendations" are attached.

- If necessary, the comments of the assessed country are attached to the end of the document.

For the FSSA or the FSAP, the IMF/World Bank requires a document on the "principal outcomes" which summarises the ROSC in no more than 300 words. This text on the principal outcomes will also be used as an introduction to the summary/ROSC. The GABAC Permanent Secretariat will prepare this document only for the requirements of the FSSA/FSAP; it is not open for discussion within the GABAC. The principal outcomes must be approved by the assessed country, if possible, before its disclosure to the IMF/World Bank. If an agreement on this document is not possible, the IFIs must be notified along with the comments of the country concerned.

IX. FOLLOW-UP OF MUTUAL EVALUATIONS

The follow-up process intends to: (i) encourage GABAC Member States to implement the FATF standards; (ii) provide regular monitoring of the countries as well as update the information on their compliance with FATF standards and the effectiveness of their AML/CFT systems; (iii) apply sufficient peer pressure; and (iv) better align the GABAC and FSAP assessment cycles.
A. FOLLOW-UP PROCESS

80. Following the discussion and adoption of the MER, each country is placed under the follow-up process of the GABAC. This follow-up is the traditional response of the GABAC to an MER that highlights deficiencies (in technical compliance and/or effectiveness) in the AML/CFT system of the assessed country. The GABAC follow-up process can be either regular, or enhanced.

81. The follow-up reports prepared by the country must be sent to the GABAC Permanent Secretariat at least two (2) months before the Technical Committee meeting. The reports will contain the country’s action plan and describe the implemented actions and adopted measures (since the MER for the first follow-up report or since the preceding report for later follow-up reports) aimed at rectifying the technical compliance deficiencies and improving the effectiveness of the AML/CFT system.

82. The Permanent Secretariat will perform an analysis of the country’s reports. It will prepare a short memo regarding the progress made and in progress, which will also contain a recommendation for the next steps in the follow-up process. The memo should be sent to the country concerned four weeks prior to the Technical Committee meeting; the country will have two weeks to make any observations on the memo. The memo from the Permanent Secretariat and the follow-up report by the country will be distributed to the members and observers of the GABAC at least two weeks prior to the plenary of the Technical Committee.

83. The follow-up reports will be examined by the WGEC which will make a recommendation, based on the progress made, to the Technical Committee in relation to the subsequent steps for the follow-up process. The Technical Committee will itself examine the country’s report, the Permanent Secretariat’s memo and the WGEC recommendations. It may decide to either (i) keep the country under the regular follow-up process, or (ii) place it under the enhanced follow-up process. In the latter case, the Technical Committee may decide to impose additional measures on the country concerned (see paragraph 92, infra). Lastly, the Technical Committee may decide to return the country to the regular follow-up process (see paragraph 93, infra).

i. Regular follow-up

84. The regular follow-up process reflects the FATF approach used for members with some significant deficiencies in their AML/CFT system. This is the default mechanism for ensuring a sustained, continuous monitoring system. It is the minimum to be applied to all members.

85. Subject to paragraph 89 below, following the adoption of the country’s MER, said country will have to report to the plenary of the Technical Committee two (2) years after the adoption of the MER and supply information on the measures that have been taken or will be taken to address the priority actions and recommendations and the deficiencies identified in the MER. Significant progress should be made by this time.

86. The country will provide the Permanent Secretariat with an action plan and a follow-up report stating the measures undertaken since the MER. The report should include relevant changes to the laws, regulations, relevant data and information on effectiveness, and other contextual and institutional information. All these factors will be analysed by the Permanent Secretariat and it will prepare a summary report. This analysis is a document review.
However, difficulties relating to effectiveness must be, insofar as possible, taken into account. The following substantive issues must be studied:

a) Important changes to the country's AML/CFT system which leads to a drop in technical compliance or effectiveness;

b) Insufficient progress made by the country in relation to the priority actions stated in the MER;

c) The country's continuance or otherwise in the regular follow-up process.

87. During the preparation of the report and summary that are to be submitted to the Technical Committee plenary, the Permanent Secretariat may consult with the assessors who were involved at the beginning of the process if they are available. The analysis and summary document must be sent to the country for comments before it is sent to the delegations. The report should contain a recommendation on the next step in the follow-up process. The Technical Committee plenary will examine the report and the progress made by the country and will decide whether to maintain the country under the regular follow-up process or place it under the enhanced follow-up process.

88. Following the discussion of the follow-up report, irrespective of the stage of the regular follow-up process, the country will be placed under the enhanced follow-up process if it has not undertaken satisfactory measures to rectify the deficiencies identified in the MER or has not implemented an adequate number of priority actions within an appropriate period.

ii. Enhanced follow-up

89. The enhanced follow-up process is consistent with the FATF approach used for countries with significant deficiencies in their AML/CFT system and requiring a severer follow-up process.

90. The Technical Committee plenary may decide to place a country under an enhanced follow-up process. This entails the preparation by the country of more reports than would be required under a regular follow-up. The country under an enhanced follow-up will submit their reports to the Technical Committee plenary every year. In deciding whether to place a country under the enhanced follow-up process, the Technical Committee plenary must consider both the level of technical compliance and the level of effectiveness obtained by the country. After the discussion of the MER, a country will be immediately placed under the enhanced follow-up process if one of the following occurs:

a) It obtained eight (8) or more Non-compliant/Partially-compliant (NC/PC) ratings for technical compliance;

b) It is rated NC/PC on one or more of Recommendations 3, 5, 6, 10, 11 and 20;

c) It has a low or moderate level of effectiveness for seven (7) or more of the eleven (11) Immediate Outcomes;

d) It has a low level of effectiveness for four (4) or more of the eleven (11) Immediate Outcomes.

91. A country placed under enhanced follow-up must comply with the following schedule:
i. **Within the year** following the adoption of the MER – the country should prepare, adopt and send to the GABAC Permanent Secretariat an action plan for rectifying the deficiencies on technical compliance and implementing the priority actions and recommendations of the MER. The action plan must be clear, complete and realistic. The country shall abide by the following deadlines insofar as possible:

ii. **Within two (2) years of the adoption of the MER** – the country should implement its action plan. At this stage, the country is expected to have rectified the technical compliance deficiencies, especially those identified for Recommendations 3, 5, 10, 11 and 20;

iii. **Within three (3) years of the adoption of the MER** – the country should continue implementing the action plan and adjust it if necessary. At this stage, the country is expected to have rectified the majority, if not all, of the technical compliance deficiencies. It should then concentrate on implementing the other recommendations of the MER. If it wishes, it may request a new rating on its technical compliance;

iv. **Within four (4) years of the adoption of the MER** – the country should complete the implementation of the MER recommendations;

v. **Within five (5) years of the adoption of the MER** – the country should conclude its action plan. The follow-up assessment will then be arranged.

92. In addition to the annual reports, the Technical Committee may decide to apply the additional measures below to countries placed under the enhanced follow-up mechanism, especially in the absence of any satisfactory progress:

a) A letter by the GABAC Chairperson to the competent minister(s) of the country concerned in order to bring attention to the lack of compliance with the FATF standards and the failure to respect the country’s obligations as a member of the GABAC;

b) Arrange a high-level mission to the assessed country in order to reinforce this message. This mission would be to meet the ministers and senior officials of the country concerned;

c) Inform the FATF’s International Cooperation Review Group (ICRG) of the country's situation and publish a formal GABAC declaration highlighting the lack of cooperation on the part of that country with a recommendation to the international community to take all appropriate measures (in accordance with FATF Recommendation 19);

d) Suspend the participation of the country until the MER recommendations have been implemented;

c) Terminate the membership of the country.

93. The country may enter the regular follow-up process at any time in the following situations:
a) The Technical Committee plenary considers that the country no longer falls within the criteria described in paragraph 90; in such a case, the country may request the Technical Committee for a new rating on said criteria;

b) The Technical Committee plenary is convinced that significant progress has been made in relation to the priorities identified in the MER or that satisfactory measures have been taken, even if the country still falls within the criteria on paragraph 90. The Technical Committee will decide, at that moment, on a schedule for the next regular follow-up report or the next follow-up assessment of the country.

B. FOLLOW-UP ASSESSMENT

94. Apart from the follow-up process, every GABAC Member State is subject to a follow-up assessment five (5) years after the adoption of its MER. The follow-up assessment is intended to provide a complete update on the country’s AML/CFT system. It also serves as an update that is part of a country’s FSAP.

95. In the follow-up assessment, the emphasis is placed on the progress made by the country (i) in its implementation of priority actions and recommendations listed in its MER and (ii) in relation to other fields where significant deficiencies were identified. The follow-up assessment also examines (i) the fields in which the FATF standards have changed since the MER, (ii) other components of the country’s AML/CFT system which have been significantly changed since the MER, and (iii) the areas shown to have high ML/TF risks by either the MER or during the follow-up process.

96. The follow-up assessment is performed by a small team of one (1) to three (3) experts supported by the Permanent Secretariat. It includes the arrangement of a short on-site visit (2-3 days), which is necessary for assessing any improvements in effectiveness and other areas. If available, the experts who were on the original assessment team should be employed. The number of experts and their required expertise (in law, finance or law enforcement) will depend on the field of the follow-up assessment. The team will prepare a progress report and, where appropriate, propose new technical compliance and effectiveness ratings. Like the MERs, these reports will be discussed by the WGEC and then the Technical Committee will decide on their adoption (see Chapter V, supra). The Technical Committee will also decide on the follow-up process that the country concerned will have to undergo: (i) continuance in the follow-up process (see paragraph 80, supra); (ii) adoption of additional measures (see paragraph 92, supra); (iii) re-entry to the regular follow-up process (see paragraph 93, supra); or (iv) reduced follow-up process (see paragraph 97, infra).

97. The reduced follow-up process is a biennial monitoring of a country which can be applied if it fulfills the following conditions:

a) The country meets the conditions listed in paragraph 93, supra; and,

b) The country obtains a "significant or high level of effectiveness" in seven (7) of the eleven (11) Immediate Outcomes; and,

c) The country is not rated as having a "low level of effectiveness" in four (4) of the eleven (11) Immediate Outcomes.
C. NEW TECHNICAL COMPLIANCE RATING

98. As part of the follow-up process, a country can request new ratings on its technical compliance before the fifth-year follow-up assessment. The country should furnish an update on its technical compliance (see Appendices 3 and 3A) at least six (6) weeks before the Technical Committee meeting.

99. A small group of one to three experts, supported by the Permanent Secretariat, will be formed to analyse the application for a new rating, in particular the technical compliance update. The team of experts will prepare a report containing proposed ratings. If available, the experts who were on the original assessment team should be employed. The number of experts and their required expertise (in law, finance or law enforcement) will depend on the field of the follow-up assessment.

100. Like the MERs, the report will be discussed by the WGEC and the Technical Committee will decide on their adoption. The draft report will be distributed to the members and observers of the WGEC and Technical Committee at least four (4) weeks before the Technical Committee plenary. The members and observers will provide their comments within two (2) weeks (see Chapter V, supra).

D. PUBLICATION OF THE REPORTS

101. The follow-up assessment reports and the reduced (or biennial) follow-up reports, as well as the reports prepared for the request of new technical compliance ratings, will be published on the website of the GABAC Permanent Secretariat.
Appendix 1 – Sample schedule for the mutual evaluation process

<table>
<thead>
<tr>
<th>Date</th>
<th>Assessment team</th>
<th>Assessed country</th>
<th>External reviewers</th>
</tr>
</thead>
<tbody>
<tr>
<td>9 months before the on-site visit</td>
<td>The GABAC Permanent Secretariat organises the mutual-evaluation preparatory seminar for the assessed country. See §9. At the end of the seminar, the Questionnaire on Technical Compliance Updates is provided to the assessed country.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 6 months before the on-site visit | • Start of document review on technical compliance. See §§12 et seq.  
• Members of the assessment team. The Permanent Secretary informs the assessed country of the members of the assessment team once all members have confirmed their participation. See §§16 et seq.  
• Email dispatch on international cooperation. See §§28 et seq.  
• Commencement of work on issues that may require increased scrutiny during on-site visit. See §§30 et seq. |                                                                                  | • Return of completed Questionnaire along with information and documents on ML/TF risks and context. See §§12 et seq.  
• Appointment of the point of contact for the mutual evaluation. See §24. |                                             |
| 4 months before the on-site visit | • Discussion of issues likely requiring increased scrutiny during the on-site visit. Request for supplementary information. See §31.  
• Non-disclosure agreement (assessment team and external reviewers). See § 36 |                                                                                  | • Submission of information on effectiveness. See §15. |                                             |
| 3 months before the on-site visit | • Submission of the Initial draft of the Technical Compliance Annex (without ratings or recommendation) to the assessed country. See §26. |                                                                                  | • Preparation of the on-site visit with the Permanent Secretariat. See §33. |                                             |

6 Those on the GABAC qualified assessors panel may also participate in order to improve their knowledge and expertise on the standards and methodology.
<table>
<thead>
<tr>
<th>Date</th>
<th>Assessment team</th>
<th>Assessed country</th>
<th>External reviewers</th>
</tr>
</thead>
</table>
| 2 months before the on-site visit | • Draft guideline memo sent to reviewers and the assessed country. See §31.  
• Submission of the preliminary effectiveness analysis. See §33. | • Comments on the initial draft of the Technical Compliance Annex. See §26.  
• Draft timetable for the on-site visit and logistical arrangements. See §33. | • Inspection of the draft guideline memo. See §31. |
| 1 month before the on-site visit  | • Finalisation of the guideline memo, and its communication to the assessed country. See §31. |                                           |                                                  |
| 3 weeks before the on-site visit   | • Revised draft Technical Compliance Annex sent to the assessed country. See §32.  
• Preparation of technical compliance text for the MER; outline of preliminary conclusions/key issues on effectiveness to be discussed during the on-site visit. If possible, a preliminary MER draft is prepared. |                                           |                                                  |
<p>| 1 week before the on-site visit    |                                                                                   |                                           |                                                  |
| 6 weeks after the on-site visit    | • Supply of the initial draft MER to the assessed country                        |                                           |                                                  |</p>
<table>
<thead>
<tr>
<th>Date</th>
<th>Assessment team</th>
<th>Assessed country</th>
<th>External reviewers</th>
</tr>
</thead>
<tbody>
<tr>
<td>visit</td>
<td>for comments. See §44.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10 weeks after the on-site</td>
<td>• Inspection of the country's comments and revision of the draft. Second draft MER and draft executive summary sent to the country and reviewers. See §45.</td>
<td>Comments on the initial draft MER. See §44.</td>
<td></td>
</tr>
<tr>
<td>visit</td>
<td></td>
<td></td>
<td>Comments on the second draft MER. See §49.</td>
</tr>
<tr>
<td>17 weeks after the on-site</td>
<td></td>
<td></td>
<td>Comments on the second draft MER. See §48.</td>
</tr>
<tr>
<td>visit</td>
<td>FACE-TO-FACE MEETING. See §§51 et seq.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>20 weeks after the on-site</td>
<td>• Revised draft MER and draft executive summary sent to the members and observers of the Technical Committee (with the country's and reviewers' comments as well as the response of the assessment team). See §54.</td>
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<tr>
<td>visit (and at least 8 weeks</td>
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<td>before the Technical</td>
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<tr>
<td>Committee meeting</td>
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<tr>
<td>At least 5 weeks before the</td>
<td>• Receipt of comments on revised draft MER and draft executive summary. See §54.</td>
<td>Comments on the revised draft MER and draft executive summary. See §54.</td>
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<tr>
<td>Technical Committee meeting</td>
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<tr>
<td>At least 3 weeks before the</td>
<td>• Analysis of the received comments.</td>
<td></td>
<td>Preparation with the WGEC on the list of issues to be discussed by the</td>
</tr>
<tr>
<td>Technical Committee meeting</td>
<td>• Preparation with the WGEC and the assessed country on the list of priority issues to be discussed by the</td>
<td></td>
<td>WGEC. See §§55 and 56.</td>
</tr>
<tr>
<td>At least 2 weeks before the</td>
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<tr>
<td>Technical Committee meeting</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Date</td>
<td>Assessment team</td>
<td>Assessed country</td>
<td>External reviewers</td>
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<td>-----------------------</td>
<td>---------------------------------------------------------------------------------</td>
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<tr>
<td></td>
<td>WGEC. See §§55 and 56.</td>
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<tr>
<td></td>
<td>• Collection of received comments and the list of priority issues to be discussed</td>
<td></td>
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<tr>
<td></td>
<td>by the WGEC are sent to the members and observers of the Technical Committee.</td>
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<tr>
<td>Technical Committee</td>
<td>Working Group on Evaluations and Compliance:</td>
<td></td>
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<tr>
<td>meeting</td>
<td>• Discussion of the priority issues;</td>
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<tr>
<td></td>
<td>• Revision and finalisation of the list of priority issues for discussion by the</td>
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<td></td>
<td>Technical Committee.</td>
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<td></td>
<td>• Discussion of the MER and executive summary, in particular the list of priority</td>
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<td></td>
<td>issues;</td>
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<tr>
<td></td>
<td>• Adoption of the MER and executive summary;</td>
<td></td>
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<tr>
<td></td>
<td>• Discussion and adoption of the appropriate follow-up process.</td>
<td></td>
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<tr>
<td></td>
<td>GABAC Plenary:</td>
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<td></td>
<td>• Notification by the Permanent Secretariat of the Technical Committee’s adoption of the</td>
<td></td>
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<tr>
<td>1 week after the</td>
<td>• In accordance with the decision of the Technical Committee, revision of all</td>
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<tr>
<td>Technical Committee</td>
<td>documents, which are sent to the assessed country. See §65.</td>
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<tr>
<td>meeting</td>
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<tr>
<td>3 weeks after the</td>
<td>• Confirmation that the MER and executive summary are correct. Where appropriate,</td>
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<tr>
<td>Technical Committee</td>
<td>indication of any typographical or other mistake. See §65.</td>
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<tr>
<td>meeting</td>
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<tr>
<td>4 weeks after the</td>
<td>• The report and executive summary are sent to the</td>
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</tr>
<tr>
<td>Date</td>
<td>Assessment team</td>
<td>Assessed country</td>
<td>External reviewers</td>
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<tr>
<td>-------------------------------------------</td>
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</tr>
<tr>
<td>Technical Committee meeting</td>
<td>members and observers of the Technical Committee. See §66.</td>
<td></td>
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</tr>
<tr>
<td>6 weeks after the Technical Committee meeting</td>
<td>• Publication of the MER and executive summary on the GABAC and FATF websites, unless two or more delegations raise serious concerns about the MER and executive summary. See §67.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
APPENDIX 2 – AUTHORITIES AND BUSINESSES TYPICALLY INVOLVED IN THE ON-SITE VISIT

Ministries:
- Ministry of Finance
- Ministry of Justice, including the authorities responsible for international cooperation
- Ministry of the Interior/Security
- Ministry of Foreign Affairs
- Ministry responsible for the law relating to legal persons, legal arrangements and non-profit organisations
- Other bodies or committees to coordinate AML/CFT actions, including the assessment of national ML/TF risks

Criminal justice and operational agencies:
- Financial Intelligence Unit
- Law enforcement agencies, in particular the police and other relevant investigative authorities
- Prosecution authorities, including specialised confiscation agencies
- Customs services, border agencies, and where relevant, trade promotion and investment agencies
- If relevant, specialised anti-drug or anti-corruption agencies, tax authorities, intelligence or security services
- Task forces or commissions on ML/TF or organised crime

Financial sector bodies:
- Ministries/public treasuries/agencies responsible for licensing, registering or otherwise authorising financial institutions
- Supervisors of financial institutions, including the supervisors for banking and other credit institutions, insurance, and securities and investment
- Supervisors or authorities responsible for monitoring and ensuring AML/CFT compliance by other types of financial institutions, in particular bureaux de change and money remittance businesses
- Exchanges for securities, futures and other traded instruments
- Central bank
- The relevant financial sector associations, and a representative sample of financial institutions (including senior executives, compliance officers and internal auditors)
- A representative sample of external auditors

Designated non-financial businesses and professions and other matters:
- Supervisory body for casinos and other gambling businesses
- Supervisor or other authority or self-regulatory body responsible for monitoring AML/CFT compliance by other designated non-financial businesses and professions
- Registry for companies and other legal persons, and for legal arrangements if applicable
- Bodies or mechanisms that have oversight of non-profit organisations, for example tax authorities
- A representative sample of professionals involved in non-financial businesses and professions (managers or persons in charge of AML/CFT matters in casinos, real estate agencies, precious metals/stones businesses as well as lawyers, notaries, accountants and any person providing trust and company services)
- Any other agencies or bodies that may be relevant (e.g. reputable academics relating to AML/CFT and civil society)

In order to efficiently use the time available for the on-site visit, it is suggested that the meetings with financial and non-financial sector associations also have financial institutions and designated non-financial businesses and professions present.
APPENDIX 3 – QUESTIONNAIRE ON TECHNICAL COMPLIANCE UPDATES

CONTEXT AND KEY DOCUMENTS

The country should list the main laws and regulations of its AML/CFT system, and briefly describe their scopes. The text of these laws should be distributed to the assessors. To ensure references are consistent, each document should be allocated a unique number or name. Those numbers must be enumerated here.

The country should list the principal competent authorities for AML/CFT policies and actions and summarise their respective responsibilities in AML/CFT issues.

The country can also briefly note any important changes to its AML/CFT system which occurred since its last evaluation or since its exit of the follow-up process. This includes new laws, regulations, and enforceable means on AML/CFT issues and the new competent authorities, or any other significant reallocation of responsibilities among the competent authorities.

1. [Example – "The principal law relevant to AML/CFT are:
   - Money Laundering Act 1963/XX of [date] (document L1) -- establishes a criminal offence of money laundering
   - Proceeds of Crime Act 2007/XX of [date] -- sets a legal framework for confiscation of the proceeds of crime
   - National Security Act 2005/XX of [date] -- establishes a criminal offence of terrorist financing and a legal framework for implementing targeted financial sanctions
   - Financial Sector Act 1999/XX of [date] -- provides the legal basis for financial sector regulation and supervision and sets out the basic AML/CFT obligations on financial institutions]

2. [Optional: Example – "Since the last evaluation, Country X has passed the 'Law on Suspicious Transaction Reporting 2009/XX of [date]' and established an FIU. Responsibility for investigating suspicious transactions has been transferred from the Ministry of the Interior to the FIU."

RISK AND CONTEXT

The country should provide the assessors with the available documents on the ML/TF risks in the country. It should list all documents furnished and briefly describe their scope. The country should also indicate the important considerations relating to the risks and context that it wishes to bring to the attention of the assessors. This should not duplicate the information contained in the documents provided. If the country wishes to demonstrate specific contextual factors, it must provide the documentation on this topic.

The country should describe the size and structure of its financial sector and DNFBP by using the tables in the annex.
TECHNICAL COMPLIANCE

The country should provide information on its technical compliance with each criterion used in the FATF Methodology.

For each criterion, the country should, as a minimum, note the applicable reference (instrument or article name, or article number). The country should always refer to the particular clause of its laws, enforceable means, or other relevant mechanisms for each criterion. If necessary, the country can also briefly describe the elements of its laws, enforceable means, or other mechanisms that implement the criterion (e.g., an outline of the procedures followed, or an explanation of the interaction between two laws). The country can also indicate whether the law or enforceable means have been amended since the last MER or follow-up report.

The text of all laws, enforceable means and other relevant documents must be provided separately (but as soon as possible).

The country should provide brief factual information only — there is no need for lengthy details or interpretations. There is no need to set out each criterion in full. The information could be provided as follows:

**Recommendation 1**

**Criterion 1.1**

[Example — "Country X has conducted separate risk assessments on Money Laundering (see document R1) and on Terrorist Financing (see document R2 for public version). These risk assessments are both used as the basis for the National Strategic Plan on AML/CFT (see document R3) which handles ML and TF risks."]

**Criterion 1.2**

[Example — "The Minister for Finance has overall responsibility for AML/CFT. The National Strategic Plan on AML/CFT (see document R3) assigns responsibility for ML risk assessment and TF risk assessment to the National Police Authority (page 54) and the Interior Ministry (page 55) respectively. Actions are coordinated through the National AML/CFT Coordinating Committee (see terms of reference on page 52)."

**Criterion 1.3**

[Example — "The ML/TF risk assessments must be updated annually (see document R3, page 54-55)."

**Criterion 1.4**

[Example — "The ML risk assessment is a public document (document R1). The TF risk assessment is confidential but it is available to all selected staff of all relevant competent authorities. A public version of the TF risk assessment describes the key conclusions for financial institutions and designated non-financial businesses and professions (document R2)."]

Etc.
Appendix 3A – AML/CFT preventive measures for financial institutions and designated non-financial businesses and professions

<table>
<thead>
<tr>
<th>Type of entity*</th>
<th>No. licensed / regulated / registered</th>
<th>AML/CFT laws⁷ / enforceable means for preventive measures</th>
<th>Data in force or law updated</th>
<th>Other information (e.g. substantive changes, etc.)⁸</th>
</tr>
</thead>
<tbody>
<tr>
<td>Banks</td>
<td></td>
<td></td>
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<tr>
<td>Life insurers</td>
<td></td>
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<tr>
<td>Securities</td>
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<tr>
<td>Money or value transfer services</td>
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<tr>
<td>Casinos</td>
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<tr>
<td>Lawyers</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Notaries</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Accountants</td>
<td></td>
<td></td>
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<tr>
<td>Precious metals/stones dealers</td>
<td></td>
<td></td>
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<tr>
<td>Trust and company service providers</td>
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<tr>
<td>Others</td>
<td></td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

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* Additional rows may be added for other types of financial institutions and designated non-financial businesses and professions. Countries may also choose to have more granular and specific classification of the types of financial institutions and designated non-financial businesses and professions.

⁷ Countries must indicate the provisions of the AML/CFT laws that set out the customer due diligence, record keeping and suspicious transaction reporting obligations.

⁸ Where there have been changes since the last update, countries should state the specific provisions of the laws and enforceable means and of the other preventive obligations (e.g. politically exposed persons, wire transfers, internal controls, foreign branches and subsidiaries, etc.).
### Legal persons and arrangements (R.8, R.24 and R.25)

<table>
<thead>
<tr>
<th>Type of legal person / arrangement&lt;sup&gt;10&lt;/sup&gt;</th>
<th>No. registered (if applicable)</th>
<th>Applicable laws / regulations / obligations</th>
<th>Date in force or law updated</th>
<th>Other information (e.g., substantive changes, etc.)&lt;sup&gt;11&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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<td></td>
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</tbody>
</table>

<sup>10</sup> Additional rows may be added for other types of financial institutions and designated non-financial businesses and professions. Countries may also choose to have more granular and specific classification of the types of legal persons or arrangements.

<sup>11</sup> Countries must indicate the specific provisions in the applicable laws, regulations and obligations, as well as the provisions on the obligation to hold requisite information under R.24 (e.g., basic and beneficial ownership information) and R.25 (e.g., settors, trustees, protectors, the (class of) beneficiaries and, where applicable, any other natural person exercising control over the legal arrangement).