

18. Terrorism [246]

Commitment:

“We stress the urgent need for full implementation of existing standards, including Financial Action Task Force (FATF) Special Recommendations VIII and IX, and ask our experts to take steps to share information, evaluate threats, assess new trends and promote implementation and review these efforts next year.”

G8 Leaders Statement on Counter-Terrorism

Assessment:

Compliance Score

Country	Lack of Compliance	Work in Progress	Full Compliance
	-1	0	+1
Canada		0	
France	-1		
Germany	-1		
Italy			+1
Japan	-1		
Russia	-1		
United Kingdom	-1		
United States			+1
European Union			+1
Average Score	-0.22		

Background:

The Financial Action Task Force (FATF) was established at the 1989 G7 Summit in Paris, France in response to mounting concern over international money laundering.¹³²⁰ Originally composed of only the G7, the European Commission, and eight other states, the FATF has since grown to include 34 members and 27 regional and international partner organizations from around the world.¹³²¹

Following the 11 September 2001 terrorist attacks, an extraordinary Plenary on the Financing of Terrorism was held in Washington, DC and the decision was made to expand the FATF’s mission to include combating terrorist financing. During the Plenary, the FATF issued Eight Special Recommendations on terrorist financing.¹³²² In October 2004, a Ninth Special Recommendation was added with the objective of ensuring that terrorists could not finance their activities through the physical cross-border

¹³²⁰ Mission, Financial Action Task Force (Paris). Date of Access: 30 December 2008. http://www.fatf-gafi.org/pages/0,3417,en_32250379_32236846_1_1_1_1_1,00.html.

¹³²¹ Members and Observers, Financial Action Task Force (Paris). Date of Access: 18 December 2008. http://www.fatf-gafi.org/pages/0,3417,en_32250379_32236869_1_1_1_1_1,00.html.

¹³²² Terrorist Financing, Financial Action Task Force (Paris). Date of Access: 17 December 2008. http://www.fatf-gafi.org/pages/0,3417,en_32250379_32236947_1_1_1_1_1,00.html.

transportation of illicit and untraceable cash.¹³²³ Together, the Nine Special Recommendations have become the international standard for detecting, preventing, and suppressing the financing of terrorism.

The FATF has received regular support from the G8. At the 2006 St Petersburg Summit, G8 members affirmed their broad commitment to “collaborative work with our international partners to combat the terrorist threat, including enhancing efforts to counter the financing of terrorism based on agreed standards.”¹³²⁴ In 2007, the G8 specifically expressed its support for the FATF, promising in the Heiligendamm Statement on Counter-Terrorism to implement and promote all 40 of the FATF’s Recommendations on Money Laundering and the 9 Special Recommendations on Terror Finance.¹³²⁵

The commitment announced at the 2008 Hokkaido-Toyako Summit focuses G8 support on two Special Recommendations, reproduced below:

VIII. Non-Profit Organizations: Countries should review the adequacy of laws protecting non-profits from being misused or exploited by terrorist organizations as conduits for financing terrorism;

IX. Cash Couriers: Countries should have measures in place to detect the physical cross-border transportation of currency or bearer negotiable instruments as well as competent authorities with the legal authority to stop or restrain them. Countries should ensure that effective, proportionate and dissuasive sanctions are available to deal with persons who make false declarations, including the confiscation of such currency or instruments.¹³²⁶

The FATF has published guidelines for assessing country compliance with each of its recommendations.¹³²⁷ Actions that must be taken to comply with Special Recommendation VIII include: reviewing domestic laws related to the NPO sector; promoting transparency and accountability in NPO management; ensuring measures are in place to sanction violations; coordinating information gathering; and maintaining communication with international partners.¹³²⁸

¹³²³ Interpretative Note to Special Recommendation IX: Cash Couriers, Financial Action Task Force (Paris). Date of Access: 17 December 2008. http://www.fatf-gafi.org/document/53/0,3343,en_32250379_32236947_34261877_1_1_1_1,00.html#INSRIX.

¹³²⁴ G8 Summit Declaration on Counter-Terrorism, G8 Information Centre (Toronto) 16 July 2006. Date of Access: 17 December 2008. <http://www.g8.utoronto.ca/summit/2006stpetersburg/counterterrorism.html>.

¹³²⁵ G8 Summit Statement on Counter-Terrorism: Security in the Era of Globalization, G8 Information Centre (Toronto) 8 June 2007. Date of Access: 17 December 2008. <http://www.g8.utoronto.ca/summit/2007heiligendamm/g8-2007-ct.pdf>.

¹³²⁶ Nine Special Recommendations on Terrorist Financing, Financial Action Task Force (Paris) 22 October 2004. Date of Access: 28 December 2008. http://www.fatf-gafi.org/document/9/0,3343,en_32250379_32236920_34032073_1_1_1_1,00.html.

¹³²⁷ Methodology for Assessing Compliance with the FATF 40 Recommendations and the FATF 9 Special Recommendations, Financial Action Task Force (Paris) 27 February 2004. Date of Access: 13 December 2008. <http://www.fatf-gafi.org/dataoecd/16/54/40339628.pdf>.

¹³²⁸ Methodology for Assessing Compliance with the FATF 40 Recommendations and the FATF 9 Special Recommendations, Financial Action Task Force (Paris) 27 February 2004. Date of Access: 13 December 2008. <http://www.fatf-gafi.org/dataoecd/16/54/40339628.pdf>.

To meet the FATF’s essential compliance criteria for Special Recommendation IX, countries must have: a declaration or disclosure system for incoming and outgoing currency; competent authorities to question, and if necessary, restrain cash carriers; mechanisms to retain and share information among customs and immigration officials as well as other financial intelligence units; and cooperative working relationships with international authorities.¹³²⁹

Commitment Features:

The commitment calls for full implementation, so both Special Recommendations must be addressed. Compliance is assessed based on the FATF’s own essential criteria, outlined above. Members are understood to have committed to make some incremental progress on each Special Recommendation, regardless of how much has been done in the past, unless they have been deemed compliant by an FATF Mutual Evaluation.

The Recommendations call for new or revised legislation, policy changes, or enforcement mechanisms, not just renewed enforcement. For example, a policy that increases the chance of intercepting cash couriers could be considered compliance, while a number of high-profile cash seizures not accompanied by a policy change cannot, by themselves, be considered compliance.

Scoring:

-1	Member makes no effort to address any of the essential criteria laid out by the FATF for Special Recommendations VIII and IX, and has not previously been deemed compliant by the FATF.
0	Member introduces new legislation OR changes policy OR introduces a new enforcement mechanism to comply with at least one of the essential criteria laid out by the FATF for either Special Recommendation VIII or Special Recommendation IX. Alternatively, the member has previously been deemed compliant by the FATF with EITHER Special Recommendation VIII or Special Recommendation IX.
+1	Member is already deemed compliant by the FATF OR introduces new legislation OR changes policy OR introduces a new enforcement mechanism to comply with at least one of the essential criteria laid out by the FATF for BOTH Special Recommendations VIII and IX.

Lead Analyst: Miranda Lin

¹³²⁹ Methodology for Assessing Compliance with the FATF 40 Recommendations and the FATF 9 Special Recommendations, Financial Action Task Force (Paris) 27 February 2004. Date of Access: 13 December 2008. <http://www.fatf-gafi.org/dataoccd/16/54/40339628.pdf>.

Canada: 0

Canada has partially complied with its commitment to work towards full implementation of FATF Special Recommendations VIII and IX. Canada is in full compliance with Special Recommendation IX, but despite strong action in the past, in this compliance cycle Canada has not taken action to improve its compliance with Special Recommendation VIII.

In a February 2008 Mutual Evaluation, the FATF judged Canada to be compliant with Special Recommendation IX, on the transportation of cash.¹³³⁰ The Canada Border Services Agency has reported several cases of currency confiscation at the Canadian border since the Hokkaido-Toyako Summit.¹³³¹

In the past, Canada has demonstrated some compliance with FATF Special Recommendation VIII, which calls on governments to protect non-profit organizations from being misused or exploited by terrorist groups.¹³³² According to the FATF methodology, NPOs should be protected from terrorist financing through effective oversight and sanctions against violating parties. Possible sanctions include having the organization de-registered and de-certified as well as freezing its accounts and removing board trustees.¹³³³

The FATF's last evaluation found Canada to be largely compliant with this recommendation, but not yet fully compliant.¹³³⁴ It noted that "the existing co-ordination mechanisms between competent authorities, especially between the CRA and the parties responsible for listing and freezing applications is insufficient to fully address the risk in some segments of the NPO sector."¹³³⁵ Since the Hokkaido-Toyako Summit, the Canada Revenue Agency has revoked the charitable status of six non-profit organizations.¹³³⁶ In this compliance cycle, however, the Canadian government has made no progress in reviewing its laws protecting non-profits from terrorist financing as required by Special Recommendation VIII. Canada has not made any changes to its laws or policies to enhance the protection of NPOs from terrorist exploitation.

¹³³⁰ Third Mutual Evaluation on Anti-Money Laundering and Combating the Financing of Terrorism: Canada, Financial Action Task Force, 29 February 2009. Date of Access: 6 June 2009. <http://www.fatf-gafi.org/dataoecd/28/33/40196937.pdf>.

¹³³¹ 2008 News Releases, Canada Revenue Agency (Ottawa) 12 December 2008. Date of Access: 9 December 2008. <http://www.cra-arc.gc.ca/nwsrm/rlss/2008/menu-eng.html>.

¹³³² Financial Action Task Force on Money Laundering, Financial Action Task Force (Paris) 27 February 2004. Date of Access: 8 December 2008. <http://www.fatf-gafi.org/dataoecd/45/15/34864111.pdf>.

¹³³³ Financial Action Task Force on Money Laundering, Financial Action Task Force (Paris) 27 February 2004. Date of Access: 8 December 2008. <http://www.fatf-gafi.org/dataoecd/45/15/34864111.pdf>.

¹³³⁴ Third Mutual Evaluation on Anti-Money Laundering and Combating the Financing of Terrorism: Canada, Financial Action Task Force, 29 February 2009. Date of Access: 6 June 2009. <http://www.fatf-gafi.org/dataoecd/28/33/40196937.pdf>.

¹³³⁵ Third Mutual Evaluation on Anti-Money Laundering and Combating the Financing of Terrorism: Canada, Financial Action Task Force, 29 February 2009. Date of Access: 6 June 2009. <http://www.fatf-gafi.org/dataoecd/28/33/40196937.pdf>.

¹³³⁶ 2008 News Releases, Canada Revenue Agency (Ottawa) 12 December 2008. Date of Access: 9 December 2008. <http://www.cra-arc.gc.ca/nwsrm/rlss/2008/menu-eng.html>.

Thus, Canada has been awarded a score of 0. While Canada had some success addressing the essential criteria of Special Recommendations VIII and IX prior to the Hokkaido-Toyako Summit, it has not made further any further progress in this compliance cycle.

Analysts: Liliane Vicente and Natalie Antonowicz

France: -1

France has failed to comply with its commitment to work towards full implementation of FATF Special Recommendations VIII and IX. Though it has taken some action on terrorist financing, France has still not specifically addressed the role of non-profit organizations or cash couriers.

On 11 July 2008, the French National Assembly introduced a new bill aimed at expanding anti-money laundering and anti-terrorist financing mechanisms to protect the financial system, but the proposed legislation made no mention of non-profit organizations (NPOs) or cash couriers.¹³³⁷ The French government's attempts to establish bilateral security agreements with countries like Tajikistan,¹³³⁸ Slovenia,¹³³⁹ and Croatia¹³⁴⁰ have provided greater cross-border cooperation, but have again failed to achieve any progress on the NPO or currency issues.

On 15 November 2008, France signed the G20 Declaration on Financial Markets and the World Economy, promising to reform the financial system and strengthen accountability as well as confirming its commitment to the FATF in general.¹³⁴¹ However, the declaration was mainly a statement of common principles for reform and not an action plan on terrorism financing.

The French government's inertia prompted the European Commission to refer France to the European Court of Justice on 29 January 2009 for "non-implementation of the third

¹³³⁷ Projet De Loi Modifié par le Sénat de Modernisation de L'économie, Assemblée Nationale (Paris) 11 July 2008. Date of Access: 8 December 2008. <http://www.assemblee-nationale.fr/13/projets/pl1050.asp>

¹³³⁸ Projet de Loi Autorisant la Ratification de L'Accord de Partenariat et de Coopération Entre les Communautés Européennes et Leurs États Membres, d'une part, et la République du Tadjikistan, d'autre part, Assemblée Nationale (Paris) 3 September 2008. Date of Access: 10 December 2008. <http://www.assemblee-nationale.fr/13/ta/ta0199.asp>.

¹³³⁹ Projet De Loi Autorisant L'Approbation de L'Accord de Coopération en Matière de Sécurité Intérieure Entre le Gouvernement de la République Française et le Gouvernement de la République de Slovénie, Assemblée Nationale (Paris) 10 September 2008. Date of Access: 8 December 2008. <http://www.assemblee-nationale.fr/13/projets/pl1104.asp>.

¹³⁴⁰ Projet De Loi Autorisant L'Approbation de L'Accord Entre le Gouvernement de la République française et le Gouvernement de la République de Croatie Relatif à la Coopération en Matière de Sécurité Intérieure, Assemblée Nationale (Paris) 10 September 2008. Date of Access: 8 December 2008. <http://www.assemblee-nationale.fr/13/projets/pl1103.asp>.

¹³⁴¹ Declaration of the Summit on Financial Markets and the World Economy, Group of Twenty (Washington) 15 November 2008. Date of Access: 11 December 2008. <http://www.g20.utoronto.ca/2008-leaders-declaration-081115.html>.

Anti-Money Laundering Directive” – the directive that incorporates FATF guidelines into EU law.¹³⁴²

Since then, France has sought to build further cooperative bilateral arrangements with other European countries. On 18 March 2009, the French National Assembly ratified a Stabilization and Association Agreement with Montenegro, which held provisions for increased cooperation in the fight against money laundering and terrorism.¹³⁴³ Also on 18 March 2009, France and Monaco announced the expansion of their 2001 monetary convention to include safeguards against money laundering.¹³⁴⁴ These actions do not directly address the Special Recommendations in question, however.

At the G20 Leaders Summit in London on 2 April 2009, France joined the rest of the members in affirming continued support for the FATF and requesting that a progress report be presented at the next Finance Ministers meeting in November 2009.¹³⁴⁵ Later that month, on 24 April 2009, the G7 Finance Ministers issued a statement in which the Financial Stability Board (FSB), OECD, and FATF were again urged to “intensify their work.”¹³⁴⁶

Despite developing these cooperative international partnerships and making general statements in support of the FATF, France has not addressed the specific issues identified in FATF Special Recommendations VIII and IX. Thus, it has thus been awarded a score of -1.

Analyst: Erin Haines

Germany: -1

Germany has failed to comply with its commitment to implement the FATF Special Recommendations VIII and IX.

A 2003 review by the Ministry of Justice found that Germany had in place legislation that fulfilled much of the FATF criteria, including measures to block or freeze assets suspected of belonging to terrorist organizations and mechanisms for increasing

¹³⁴²Anti-Money Laundering: Commission Takes Action to Ensure that France, Poland and Spain Implement EU Laws, European Commission (Brussels) 29 January 2009. Date of Access: 5 May 2009. <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/09/159&format=HTML&aged=0&language=EN&guiLanguage=en>.

¹³⁴³Autorisant La Ratification de l'Accord de Stabilisation et d'Association entre les Communautés Européennes et Leurs États membres, d'une part, et la République du Monténégro, d'autre part, La Commission des Affaires Étrangères (Paris) 18 March 2009. Date of Access: 3 May 2009. <http://www.assemblee-nationale.fr/13/rapports/r1524.asp>.

¹³⁴⁴Autorisant l'approbation de l'accord sous forme d'échange de lettres relatives à la garantie des investisseurs entre le Gouvernement de la République française et le Gouvernement de Son Altesse Sérénissime le Prince de Monaco, La Commission des Affaires Étrangères (Paris) 18 March 2009. Date of Access: 3 May 2009. <http://www.assemblee-nationale.fr/13/rapports/r1527.asp>.

¹³⁴⁵London Summit Leaders' Statement, Group of Twenty (London) 2 April 2009. Date of Access: 5 May 2009. <http://www.g20.utoronto.ca/2009/2009-london-plan-090402.pdf>.

¹³⁴⁶Statement of the G7 Finance Ministers and Central Bank Governors, Group of Seven (Washington) 24 April 2009. Date of Access: 5 May 2009. <http://www.g8.utoronto.ca/finance/fin090424.htm>.

transparency and oversight in financial transactions.¹³⁴⁷ In July 2004, the FATF released a report on the Republic of Germany's observance of international standards and codes. At the time, the FATF concluded Germany had made some progress towards the Special Recommendations, but also suggested a number of changes that could be made to improve compliance.¹³⁴⁸

At the international level, Germany has regularly endorsed the FATF. On 15 November 2008, in the G20 Declaration on Financial Markets and the World Economy, Germany was among the countries lauding the FATF for its "important work against money laundering and terrorist financing."¹³⁴⁹ On 22 February 2009, in advance of the G20 Summit in London, German Chancellor Angela Merkel called on the FATF, OECD, and FSB to prepare new proposals for leaders to consider on how to increase information sharing between supervisory bodies and how to sanction uncooperative jurisdictions.¹³⁵⁰

On 2 April 2009, Germany affirmed its continued support for the work of the FATF in the London G20 Summit Leaders' Statement, and on 24 April 2009, Germany issued another joint statement at the G7 Finance Ministers meeting that urged the OECD, FSB, and FATF to "intensify their work."¹³⁵¹

Despite these public statements, Germany has not introduced or amended any legislation that specifically relates to non-profit organizations and cash couriers. Thus, Germany has been awarded a score of -1 for failing to progress further on implementing Special Recommendations VIII and IX.

Analyst: Erin Haines

Italy: +1

Italy has fully complied with its commitment to implement the FATF Special Recommendations VIII and IX.

¹³⁴⁷ International Cooperation in the Fight against International Terrorism and Implementation of the Relevant Instruments of the Council of Europe, Council of Europe – 25th Conference of European Ministers of Justice (Sofia) 9-10 October 2003. Date of Access: 19 December 2008.

[http://www.coe.int/T/E/Legal_Affairs/Legal_co-operation/Conferences_and_high-level_meetings/European_Ministers_of_Justice/MJU-25\(2003\)5E-Germany.pdf](http://www.coe.int/T/E/Legal_Affairs/Legal_co-operation/Conferences_and_high-level_meetings/European_Ministers_of_Justice/MJU-25(2003)5E-Germany.pdf).

¹³⁴⁸ Republic of Germany: Report on Observance of Standards and Codes FATF Recommendations for Anti-Money Laundering and Combating the Financing of Terrorism, Financial Action Task Force (Paris) July 2004. Date of Access: 19 December 2008. <https://www.imf.org/external/pubs/ft/scr/2004/cr04213.pdf>.

¹³⁴⁹ Declaration of the Summit on Financial Markets and the World Economy, Group of Twenty (Washington) 15 November 2008. Date of Access: 11 December 2008. <http://www.g20.utoronto.ca/2008-leaders-declaration-081115.html>.

¹³⁵⁰ Summary of the Presidency of the G20, Office of the Federal Chancellor (Berlin) 22 February 2009. Date of Access: 5 May 2009. http://www.bundesregierung.de/nn_774/Content/DE/Pressemitteilungen/BPA/2009/02/2009-02-22-zusammenfassung-g20-vorbereitung.html.

¹³⁵¹ London Summit Leaders' Statement, Group of Twenty (London) 2 April 2009. Date of Access: 5 May 2009. <http://www.g20.utoronto.ca/2009/2009-london-plan-090402.pdf>. Statement of the G7 Finance Ministers and Central Bank Governors, Group of Seven (Washington), 24 April 2009. Date of Access: 5 May 2009. <http://www.g8.utoronto.ca/finance/fin090424.htm>.

A 2005 Mutual Evaluation by the FATF found Italy to be compliant with BOTH Special Recommendations VIII and IX.¹³⁵² The extent of Italy's progress was revealed on 27 February 2009, when the FATF released its Follow-Up Report to Italy's Third Mutual Evaluation from October 2005.¹³⁵³ It concluded that Italy had "made significant progress" in fulfilling the general obligations of the 40+9 Recommendation, thus allowing Italy to be removed from the regular follow-up process and to instead report biannually about its anti-money laundering and combating the financing of terrorism activities.¹³⁵⁴

The Italian government has worked to strengthen the overall integrity of its financial institutions and prevent them from being exploited by terrorist organizations. Since 1999, the Bank of Italy has worked with the Italian Banking Association and the SIA-SSB Group, a developer of financial surveillance technology, to create an improved financial monitoring mechanism known as the Centralized System to Identify Limited Amount of Credit Risks.¹³⁵⁵

On 16 July 2008, SIA-SSB-owned software firm RA Computer signed a five-year agreement with Florida-based WorldCompliance.¹³⁵⁶ The agreement should lead to new products for Italy's banks, electronic fund transfer services, financial intermediaries, and investment management firms to combat money laundering and terrorism financing.¹³⁵⁷ WorldCompliance also granted Italy access to its compliance database of over 1.2 million profiles, which could help identify potential security threats in the NPO sector.¹³⁵⁸ This will strengthen compliance with Special Recommendation VIII.

On 23 April 2009, the Italian Council of Ministers implemented Directive 2005/60/EC, a measure designed to prevent terrorist financing and warn against activities that threaten international peace and security.¹³⁵⁹ Under the directive, Italy's financial intelligence

¹³⁵²

¹³⁵³ Third Mutual Evaluation of Italy – Follow-Up Report, Financial Action Task Force (Paris) 27 February 2009. Date of Access: 10 May 2009. http://www.fatf-gafi.org/document/9/0,3343,en_32250379_32236920_42257865_1_1_1_1,00.html.

¹³⁵⁴ Third Mutual Evaluation of Italy – Follow-Up Report, Financial Action Task Force (Paris) 27 February 2009. Date of Access: 10 May 2009. http://www.fatf-afi.org/document/9/0,3343,en_32250379_32236920_42257865_1_1_1_1,00.html.

¹³⁵⁵ Limited Amount Risks Service, SIA-SSB Group (Milan). Date of Access: 19 December 2008. <http://www.siassb.eu/Engine/RAServePG.php/P/258110010102/L/1>.

¹³⁵⁶ RA Computer Signs an Agreement with American Firm WorldCompliance for New Anti-Money Laundering and Anti-Terrorism Solutions, SIA SSB: Press Room (Milan) 16 July 2008. Date of Access: 10 December 2008. <http://www.siassb.eu/Engine/RAServePG.php/P/301510010600/L/1/M/251910010606>.

¹³⁵⁷ RA Computer Signs an Agreement with American Firm WorldCompliance for New Anti-Money Laundering and Anti-Terrorism Solutions, SIA SSB: Press Room (Milan) 16 July 2008. Date of Access: 10 December 2008. <http://www.siassb.eu/Engine/RAServePG.php/P/301510010600/L/1/M/251910010606>.

¹³⁵⁸ RA Computer Signs an Agreement with American Firm WorldCompliance for New Anti-Money Laundering and Anti-Terrorism Solutions, SIA SSB: Press Room (Milan) 16 July 2008. Date of Access: 10 December 2008. <http://www.siassb.eu/Engine/RAServePG.php/P/301510010600/L/1/M/251910010606>.

¹³⁵⁹ Decreto Legislativo: Modifiche ed integrazioni al DLG 22 giugno 2007, n. 109, recante attuazione della direttiva 2005/60/CE, concernente misure per prevenire, contrastare e reprimere il finanziamento al

unit, L'Unità di Informazione Finanziaria (UIF), would become the primary national supervisory body tasked with gathering information and developing models to fight money laundering and the financing of terrorism.¹³⁶⁰

Italy has reached out to other countries in hopes of developing strong counter-terrorism partnerships and information sharing networks. On 4 November 2008, Italian and Turkish Foreign Ministers Franco Frattini and Ali Babacan participated in the fifth annual Italian-Turkish Dialogue Forum.¹³⁶¹ A press release co-authored by the two ministers stated that “the success in combating terrorism is directly proportional to collaboration between states.”¹³⁶²

On 4 December 2008, Italy met with American representatives in an attempt to increase cooperation in fighting transnational organized crime, drug trafficking, terrorism, and illegal immigration.¹³⁶³ The American delegation was comprised of the FBI, the Immigration and Custom Enforcement Sector of the Department of Justice, the Drug Enforcement Administration, and the United States Secret Service.¹³⁶⁴ The Italian delegation was made up of the Ministry of Public Safety, the Ministry of Finance, and the Ministry of Justice.¹³⁶⁵ The two delegations concluded that a greater exchange of

terrorismo e l'attività di Paesi che minacciano la pace e la sicurezza internazionale, Council of Ministers (Rome) 23 April 2009. Date of Access: 24 April 2009

<http://www.governo.it/Governo/Provvedimenti/dettaglio.asp?d=44639>.

¹³⁶⁰ Attuazione della direttiva 2005/60/CE concernente la prevenzione dell'utilizzo del sistema finanziario a scopo di riciclaggio dei proventi di attività criminose e di finanziamento del terrorismo nonché della direttiva 2006/70/CE che ne reca misure di esecuzione, Italian Parliament (Rome) 21 November 2007. Date of Access: 17 February 2009 <http://www.parlamento.it/leggi/deleghe/07231dl.htm>

¹³⁶¹ Article by Foreign Ministers Franco Frattini and Ali Babacan: “Italy and Turkey, A Common Front for Peace and Development,” Ministry of Foreign Affairs (Rome) 4 November 2008. Date of Access: 18 December 2008.

http://www.esteri.it/MAE/EN/Stampa/Sala_Stampa/Interviste/2008/11/20081104_ArticoloFrattini_AliBabacan.

¹³⁶² Article by Foreign Ministers Franco Frattini and Ali Babacan: “Italy and Turkey, A Common Front for Peace and Development,” Ministry of Foreign Affairs (Rome) 4 November 2008. Date of Access: 18 December 2008.

http://www.esteri.it/MAE/EN/Stampa/Sala_Stampa/Interviste/2008/11/20081104_ArticoloFrattini_AliBabacan.

¹³⁶³ Sicurezza. Cooperazione tra organismi investigativi italo-statunitensi, conclusa a Roma la riunione del Comitato bilaterale, Ministero Dell'Interno (Rome) 4 December 2008. Date of Access: 8 December 2008. http://www.interno.it/mininterno/export/sites/default/it/sezioni/sala_stampa/notizie/sicurezza/0672_2008_12_04_riunione_comitato_bilaterale_Italia_Usa.html_516981391.html.

¹³⁶⁴ Sicurezza. Cooperazione tra organismi investigativi italo-statunitensi, conclusa a Roma la riunione del Comitato bilaterale, Ministero Dell'Interno (Rome) 4 December 2008. Date of Access: 8 December 2008. http://www.interno.it/mininterno/export/sites/default/it/sezioni/sala_stampa/notizie/sicurezza/0672_2008_12_04_riunione_comitato_bilaterale_Italia_Usa.html_516981391.html.

¹³⁶⁵ Sicurezza. Cooperazione tra organismi investigativi italo-statunitensi, conclusa a Roma la riunione del Comitato bilaterale, Ministero Dell'Interno (Rome) 4 December 2008. Date of Access: 8 December 2008. http://www.interno.it/mininterno/export/sites/default/it/sezioni/sala_stampa/notizie/sicurezza/0672_2008_12_04_riunione_comitato_bilaterale_Italia_Usa.html_516981391.html.

relevant information between the United States and Italy would be crucial to bolstering their combined fight against terrorism and corruption.¹³⁶⁶

On 10 February 2009, the Minister of the Interior, Roberto Maroni, met with Britain's Home Secretary Jacqui Smith to discuss their common priorities, including the fight against "international terrorism, illegal immigration, urban unrest, organized crime, and child abuse."¹³⁶⁷ Maroni stressed the significance of "bilateral and multilateral agreements" between countries in general and encouraged greater cooperation between Italy and the United Kingdom in particular.¹³⁶⁸ Similar cooperative agreements were established on 19 March 2009 and 24 April 2009 with the government of San Marino and the Council of Europe, respectively, with both parties in each meeting agreeing to collaborate on preventing and punishing money laundering.^{1369,1370}

Thus, Italy has been awarded a score of +1. In the past, it has been found fully compliant with both Special Recommendations, and it continues to take action in these and related areas.

Analyst: Luca Sarcanin and Nikolaeva Ekaterina

Japan: -1

Japan has received a score of -1 for not complying with FATF Special Recommendations VIII and IX. While Japan has implemented some programs in previous years to prevent and terrorist attacks and continues to monitor economic transactions carefully, no new initiatives have been put in place since the 2008 Hokkaido-Toyako Summit.

An October 2008 FATF Mutual Evaluation found Japan to be partially compliant with Special Recommendation VIII, and not compliant with Special Recommendation IX.¹³⁷¹

¹³⁶⁶ Sicurezza. Cooperazione tra organismi investigativi italo-statunitensi, conclusa a Roma la riunione del Comitato bilaterale, Ministero Dell'Interno (Rome) 4 December 2008. Date of Access: 8 December 2008. http://www.interno.it/mininterno/export/sites/default/it/sezioni/sala_stampa/notizie/sicurezza/0672_2008_12_04_riunione_comitato_bilaterale_Italia_Usa.html_516981391.html.

¹³⁶⁷ Sicurezza. G8, Maroni: "Le nostre priorità saranno la sicurezza urbana, l'immigrazione, la lotta al terrorismo internazionale, alla criminalità organizzata, all'abuso sui minori e in particolare alla pedopornografia online," Ministero Dell'Interno (Rome) 10 February 2009. Date of Access: 8 May 2009. http://www.interno.it/mininterno/export/sites/default/it/sezioni/sala_stampa/notizie/sicurezza/0540_2009_02_10_Londra.html_1966336524.html.

¹³⁶⁸ Sicurezza. G8, Maroni: "Le nostre priorità saranno la sicurezza urbana, l'immigrazione, la lotta al terrorismo internazionale, alla criminalità organizzata, all'abuso sui minori e in particolare alla pedopornografia online," Ministero Dell'Interno (Rome) 10 February 2009. Date of Access: 8 May 2009. http://www.interno.it/mininterno/export/sites/default/it/sezioni/sala_stampa/notizie/sicurezza/0540_2009_02_10_Londra.html_1966336524.html.

¹³⁶⁹ Italy-San Marino: Talks on the Prevention and Elimination of Money Laundering and other Criminal Activities, Ministry of Foreign Affairs (Rome) 19 March 2009. Date of Access: 10 May 2009. http://diplomacymonitor.com/stu/dma1_nsf/uh/ccA1D59715778FF8178525757F004375BD.

¹³⁷⁰ Incontro tra il Ministro Frattini e il Segretario Generale del Consiglio d'Europa, Ministry of Foreign Affairs (Rome) 24 April 2009. Date of Access: 24 April 2009. http://www.esteri.it/MAE/IT/Sala_Stampa/ArchivioNotizie/Comunicati/2009/04/20090424_FrattiniDavis

¹³⁷¹ Mutual Evaluation of Japan: Executive Summary, Financial Action Task Force, 17 October 2008. Date of Access: 14 June 2009. <http://www.fatf-gafi.org/dataoecd/8/48/41654127.pdf>.

The report outlined a wide variety of measures needed for compliance, but Japan has not taken further action in this compliance cycle.

Japan first made terrorist funding illegal in 2002, enacting the Law on Punishment of the Financing of Offences of Public Intimidation, which enabled officials to freeze terrorist assets.¹³⁷² In July 2004, Japan established the Headquarters for Promotion of Measures against Transnational Organized Crime, a branch within the Cabinet that was reorganized in August 2004 to also handle international terrorism issues.¹³⁷³ In December 2004, the Headquarters created an “Action Plan for the Prevention of Terrorism” and stated its intention “to fully implement FATF Recommendations.”¹³⁷⁴ To do so, nine government agencies were mandated to prepare a bill aimed at applying the FATF Recommendations.¹³⁷⁵ Though the bill is still in progress, the agencies are supposed to work towards the implementation of FATF Special Recommendations VIII and IX.

Japan has been awarded a score of -1 since it has taken no further actions to enforce FATF Recommendations VIII and IX since the Hokkaido-Toyako Summit. However, it must be noted that Japan has demonstrated resolution in implementing FATF Recommendations in previous years and continues to support the resulting agencies and bills.

Analyst: Lucy Isabel Leiderman

Russia: -1

Russia has not yet complied with its commitment to work towards full implementation of the FATF’s Special Recommendations VIII and IX. While Russia has made some progress in combating terrorism in general, its actions have not directly addressed FATF Special Recommendations VIII and IX.

A June 2008 FATF Mutual Evaluation found Russia partially compliant with Special Recommendation VIII, and not compliant with Special Recommendation IX.¹³⁷⁶ The evaluation found the Russian government’s implementation of Special Recommendations VIII and IX to be particularly lacking. The report noted: “Russia should review and update all its supervisory laws and practices. None of the supervisory authorities in Russia currently possesses an adequate level of (sanctioning) powers, and criminal

¹³⁷² Third Mutual Evaluation Report on Anti-Money Laundering and Combating the Financing of Terrorism – Japan, Financial Action Task Force (Paris) 17 October 2008. Date of Access: 10 December 2008. <http://www.fatf-gafi.org/dataoecd/6/45/42395799.doc>.

¹³⁷³ Third Mutual Evaluation Report on Anti-Money Laundering and Combating the Financing of Terrorism – Japan, Financial Action Task Force (Paris) 17 October 2008. Date of Access: 10 December 2008. <http://www.fatf-gafi.org/dataoecd/6/45/42395799.doc>.

¹³⁷⁴ Third Mutual Evaluation Report on Anti-Money Laundering and Combating the Financing of Terrorism – Japan, Financial Action Task Force (Paris) 17 October 2008. Date of Access: 10 December 2008. <http://www.fatf-gafi.org/dataoecd/6/45/42395799.doc>.

¹³⁷⁵ Third Mutual Evaluation Report on Anti-Money Laundering and Combating the Financing of Terrorism – Japan, Financial Action Task Force (Paris) 17 October 2008. Date of Access: 10 December 2008. <http://www.fatf-gafi.org/dataoecd/6/45/42395799.doc>.

¹³⁷⁶ Mutual Evaluation of the Russian Federation, Financial Action Task Force (Paris) 2 July 2008. Date of Access: 16 December 2008. http://www.fatfgafi.org/document/1/0,3343,en_32250379_32235720_40945665_1_1_1_1,00.html.

ownership of financial institutions is not specifically prohibited.”¹³⁷⁷ Soon after the completion of the FATF Mutual Evaluation, Russia took action. In particular, in November 2008, measures to upgrade Russian systems to combat money laundering and terrorism financing were initiated. Currently the plan is nearing implementation.¹³⁷⁸

A number of legislative initiatives should be noted, though they do not directly address these FATF recommendations. A law improving the process of politically exposed persons’ identification and obliging to attach information about sender when remitting money or when the financial controller has suspicions of money laundering and terrorism financing has been adopted.¹³⁷⁹

According to the Ministry of Foreign Affairs a new federal law on preventing currency trafficking bypassing the declaration system is in final stage of interdepartmental negotiation.¹³⁸⁰ As the details of the law are not yet publicly available, it cannot be assessed in this report.

On 28 April 2009, the Association of Russian Banks (ARB) together with Russian Federal Service on financial monitoring hosted a conference on money laundering and terrorism financing during the financial crisis. At the conference, the President of the ARB, G. Tusonyan, declared that an ARB committee on money laundering and terrorism financing is in the process of working out policies for banks to counteract money laundering and terrorism financing.¹³⁸¹ It is unclear whether any of these policies will directly address either Special Recommendation, however.

On 8 September 2008, Russia participated in a UN meeting on the formation of a global partnership between governments and private businesses.¹³⁸² Though still in a conceptual phase, the initiative could eventually produce mechanisms to prevent the use of unofficial banking institutions for financing crime and terrorism.¹³⁸³

¹³⁷⁷ Mutual Evaluation of the Russian Federation, Financial Action Task Force (Paris) 2 July 2008. Date of Access: 16 December 2008.

http://www.fatfgafi.org/document/1/0_3343.en_32250379_32235720_40945665_1_1_1_1.00.html.

¹³⁷⁸ Press Release, Federal Financial Monitoring Service (Moscow) 04 February 2009. Date of Access: 25 June 2009. http://www.kfm.ru/news_04022009_382.html

¹³⁷⁹ The 10th Plenary Session and Session of Work Groups of EAG, EAG (Saint Petersburg) 08 June 2009. Date of Access: 25 June 2009. http://www.eurasiangroup.org/ru/calendar_18.html

¹³⁸⁰ A. Pospelov, deputy director of the Department for foreign policy planning of the Ministry of Foreign Affairs of the Russian Federation. 25 June 2009.

¹³⁸¹ Association of Russian Banks. 28 April 2009. Date of access: 29 June 2009. http://www.arb.ru/site/action/list_news.php?id=2903

¹³⁸² Moscow Satisfied with UN Session on Anti-Terrorism Partnership between Governments and Businesses, G8 Live (Toronto) 8 September 2008. Date of Access: 19 December 2008. <http://g8live.org/2008/09/08/moscow-satisfied-with-un-session-on-antiterrorism-partnership-between-governments-businesses>.

¹³⁸³ Moscow Satisfied with UN Session on Anti-Terrorism Partnership between Governments and Businesses, G8 Live (Toronto) 8 September 2008. Date of Access: 19 December 2008. <http://g8live.org/2008/09/08/moscow-satisfied-with-un-session-on-antiterrorism-partnership-between-governments-businesses>.

Thus, Russia has been awarded a score of -1. While progress is expected in the near future, no progress has been made in addressing the essential criteria for these Special Recommendations.

Analyst: Tatyana Lanshina

United Kingdom: -1

Russia has failed to comply with its commitment to work towards full implementation of the FATF's Special Recommendations VIII and IX.

A June 2007 FATF Mutual Evaluation found the UK to be largely compliant with both Special Recommendations VIII and IX. The report noted some concerns about tracking cross-border money transfers within the EU, the supervision of charities in Northern Ireland.¹³⁸⁴ It specifically criticized the UK's cash declaration system.¹³⁸⁵ The UK has not addressed this criticism in the current compliance cycle.

In late December 2008, the House of Lords European Union committee announced that a sub-committee on home affairs would begin investigating what role the EU and its members can play in preventing terrorism financing.¹³⁸⁶ Between 4 March and 13 May 2009, the committee heard oral evidence on money laundering and the financing of terrorism.¹³⁸⁷ It is unclear what action might emerge from these hearings.

Thus, the United Kingdom has been awarded a score of -1.

Analyst: Lucy Isabel Leiderman

United States: +1

The United States fully complied with its commitment to work towards full implementation of FATF Special Recommendations VIII and IX. Prior to undertaking this G8 commitment, the United States had already the FATF essential criteria.

A June 2006 FATF Mutual Evaluation found that the United States was compliant with both Special Recommendation VIII and Special Recommendation IX.¹³⁸⁸ Thus, the United States is already in full compliance with this commitment.

¹³⁸⁴ Third Mutual Evaluation Report, Anti Money Laundering and Combating the Financing of Terrorism, The United Kingdom of Great Britain and Northern Ireland, Financial Action Task Force, 29 June 2007. Date of Access: 22 January 2009. <http://www.fatf-gafi.org/dataoecd/55/29/39064399.pdf>.

¹³⁸⁵ Third Mutual Evaluation Report, Anti Money Laundering and Combating the Financing of Terrorism, The United Kingdom of Great Britain and Northern Ireland, Financial Action Task Force, 29 June 2007. Date of Access: 22 January 2009. <http://www.fatf-gafi.org/dataoecd/55/29/39064399.pdf>.

¹³⁸⁶ Lords investigate terrorist financing, politics.co.uk 20 December 2008. Date of Access: 31 December 2008. [http://www.politics.co.uk/news/opinion-former-index/policing-and-crime/lords-investigate-terrorist-financing-\\$1255935.htm](http://www.politics.co.uk/news/opinion-former-index/policing-and-crime/lords-investigate-terrorist-financing-$1255935.htm).

¹³⁸⁷ European Union, House of Lords, UK Parliament. Date of Access: 14 June 2009. <http://www.publications.parliament.uk/pa/ld/ldeucom.htm>.

¹³⁸⁸ Summary of the third mutual evaluation report on anti-money laundering and combating the financing of terrorism, Financial Action Task Force, 23 June 2006. Date of Access: 14 June 2009. <http://www.fatf-gafi.org/dataoecd/44/12/37101706.pdf>.

The US Department of the Treasury offers guidance to non-profit organizations through private sector outreach, target investigations, coordinated oversight, and international engagement.¹³⁸⁹ Specifically, the Treasury investigates links between terrorist organizations and charities and advises the private sector on how to avoid being inadvertently exploited by terrorist groups, using its own material alongside text from the FATF itself.¹³⁹⁰

During this compliance cycle, the United States has used the appropriate authorities to stop and restrain suspicious and undeclared currency at border crossings.¹³⁹¹ At Arizona ports of entry alone, US Customs officers were able to seize USD1.6 million worth of undeclared currency.¹³⁹²

At the November 2008 G20 Summit, countries agreed that “the Financial Action Task Force should continue its important work against money laundering and terrorist financing,” and that they “support the efforts of the World Bank – UN Stolen Asset Recovery (StAR) Initiative.”¹³⁹³

Thus, the United States has been awarded a score of +1.

Analyst: Liliane Vicente and Natalie Antonowicz

European Union: +1

The European Union has fully complied with its commitment to work towards implementation of the FATF’s Special Recommendations VIII and IX. Not only has it made efforts to insulate non-profit organizations from financial abuse and to maintain the integrity of international transactions within the European Union, but it has likewise addressed the vulnerability of cash couriers.

On 2 October 2008, the European Commission launched the Financial Transparency System (FTS) website.¹³⁹⁴ The FTS allows users to retrieve data on all grants received

¹³⁸⁹ Terrorism and Financial Intelligence: Goals, US Department of the Treasury (Washington). Date of Access: 12 December 2008. <http://www.treas.gov/offices/enforcement/goals.shtml>.

¹³⁹⁰ Key Issues: Protecting Charitable Organizations, US Department of the Treasury (Washington). Date of Access: 31 December 2008. <http://www.treas.gov/offices/enforcement/key-issues/protecting/index.shtml>.

¹³⁹¹ 2008 Fiscal Year in Review, US Customs and Border Protection (Washington). Date Accessed: 12 December 2008.

http://www.cbp.gov/xp/cgov/newsroom/news_releases/archives/2008_news_releases/2008_fiscal/.

¹³⁹² CBP Announces Fiscal Year 2008 Achievements for Arizona Ports of Entry, US Customs and Border Protection (Washington) 7 November 2008. Date of Access: 18 December 2008.

http://www.cbp.gov/xp/cgov/newsroom/news_releases/archives/2008_news_releases/2008_fiscal/11072008_3.xml.

¹³⁹³ Declaration of the Summit on Financial Markets and the World Economy, Group of Twenty (Washington) 15 November 2008. <http://www.g20.utoronto.ca/2008-leaders-declaration-081115.html>.

¹³⁹⁴ Who Gets EU Cash? New Website Gives Details of Beneficiaries, European Union (Brussels) 2 October 2008. Date of Access: 9 December 2008.

<http://europa.eu/rapid/pressReleasesAction.do?reference=IP/08/1444&format=HTML&aged=0&language=EN&guiLanguage=en>.

and all contracts signed by EU beneficiaries including NPOs.¹³⁹⁵ The website reveals the names of the beneficiaries and their locations as well as the total amount of funding received, the department granting the funding, and the year in which the amount was booked in the accounts.¹³⁹⁶ The FTS, however, is still in a “test phase” and does not yet display all of the relevant information.¹³⁹⁷

On 12 February 2009, the European Commission invited various civil society organizations to a conference at which they were encouraged to comment on a study conducted by the European Center for Non-Profit Law (ECNL) that examined specific initiatives aimed at “improving transparency and accountability of non-profit organizations” to counter terrorism.¹³⁹⁸ Organizations that either could not attend the meeting or had more to say afterwards were also invited to send detailed comments to the European Commission (EC) up to 15 March 2009.¹³⁹⁹ A report will be published outlining all of the findings as well as the EC's own conclusions.¹⁴⁰⁰

The European Union has also taken significant steps to address international fraud, including cases that involve NPO abuse. On 24 September 2008, the European Anti-Fraud Office (OLAF) and the European Union Judicial Cooperation Body (EUROJUST) signed a Practical Agreement to strengthen the cooperation between the two bodies and encourage a greater exchange of information.¹⁴⁰¹

On 20 November 2008, the European Commission released a communication on the Confiscation and Recovery of Criminal Proceeds, where it outlined ten steps member states could follow in order to counter organized crime.¹⁴⁰² The report advocated the effective functioning of Asset Recovery Offices throughout the EU, as well as greater

¹³⁹⁵ Financial Transparency System, European Commission (Brussels) 1 October 2008. Date of Access: 9 December 2008. http://ec.europa.eu/grants/search/find_en.htm.

¹³⁹⁶ Financial Transparency System, European Commission (Brussels) 1 October 2008. Date of Access: 9 December 2008. http://ec.europa.eu/grants/search/find_en.htm.

¹³⁹⁷ Financial Transparency System, European Commission (Brussels) 1 October 2008. Date of Access: 9 December 2008. http://ec.europa.eu/grants/search/find_en.htm.

¹³⁹⁸ EUCSCG Contribution on NPO Transparency and Counter-Terrorism, EU Civil Society Contact Group (Brussels). Date of Access: 8 May 2009.

http://www.act4europe.org/code/EN/actions.asp?id_events=142.

¹³⁹⁹ EUCSCG Contribution on NPO Transparency and Counter-Terrorism, EU Civil Society Contact Group (Brussels). Date of Access: 8 May 2009.

http://www.act4europe.org/code/EN/actions.asp?id_events=142.

¹⁴⁰⁰ EUCSCG Contribution on NPO Transparency and Counter-Terrorism, EU Civil Society Contact Group (Brussels). Date of Access: 8 May 2009.

http://www.act4europe.org/code/EN/actions.asp?id_events=142.

¹⁴⁰¹ EUROJUST and OLAF Strengthen Their Cooperation in Combating Financial Crime, European Anti-Fraud Office (Brussels) 24 September 2008. Date of Access: 9 December 2008.

http://ec.europa.eu/anti_fraud/press_room/pr/2008/10_en.html.

¹⁴⁰² Ensuring That Crime “Does Not Pay”: Commission Proposes Ten Strategic Priorities On Confiscation and Recovery of Criminal Proceeds, European Union (Brussels) 20 November 2008. Date of Access: 9 December 2008.

<http://europa.eu/rapid/pressReleasesAction.do?reference=IP/08/1748&format=HTML&aged=0&language=EN&guiLanguage=en>.

exchange of cross-border information.¹⁴⁰³ In addition, the Communication emphasized the importance of obtaining accurate data on freezing, confiscating, and recovering assets – a recommendation similarly made by FATF essential criteria VIII.3.2.¹⁴⁰⁴

Furthermore, in accordance with FATF Special Recommendation IX, Europol has specifically addressed the problem of cash couriers. On 27-30 April 2009, it participated in the Second International Conference on Illicit Cash Couriers organized by Interpol and the World Customs Organization (WCO).¹⁴⁰⁵ One hundred delegates – representing sixty countries and seven international and regional organizations – were able to share their experiences and best practices as well as to discuss various real constraints and obstacles.¹⁴⁰⁶ On 15-16 April 2009, the European Commission hosted the High Level Expert Meeting on Property Crime, inviting delegates from Eurojust, Interpol, the Regional Cooperation Council, eighteen European countries, and various corporations to examine recent “attacks on cash-couriers, bank robberies, aggravated burglaries, and itinerant organized crime groups.”¹⁴⁰⁷

The Council of Europe’s MONEYVAL Committee has also actively targeted money laundering schemes that help finance terrorism. Along with the FATF, MONEYVAL hosted the Joint Experts Meeting on Typologies from 24-26 November 2008.¹⁴⁰⁸ The conference brought together more than 150 experts from over 50 countries in an attempt to examine trends in money laundering within the securities industry.¹⁴⁰⁹ Furthermore, on 2 December 2008, MONEYVAL released the “Typologies Report on Money Laundering and Counterfeiting,” which sought to explain how terrorists might finance

¹⁴⁰³ Ensuring That Crime “Does Not Pay”: Commission Proposes Ten Strategic Priorities On Confiscation and Recovery of Criminal Proceeds, European Union (Brussels) 20 November 2008. Date of Access: 9 December 2008. <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/08/1748&format=HTML&aged=0&language=EN&guiLanguage=en>.

¹⁴⁰⁴ Ensuring That Crime “Does Not Pay”: Commission Proposes Ten Strategic Priorities On Confiscation and Recovery of Criminal Proceeds, European Union (Brussels) 20 November 2008. Date of Access: 9 December 2008. <http://europa.eu/rapid/pressReleasesAction.do?reference=IP/08/1748&format=HTML&aged=0&language=EN&guiLanguage=en>.

¹⁴⁰⁵ INTERPOL Holds Second International Conference on Illicit Cash Couriers, INTERPOL (Brussels) 7 May 2009. Date of Access: 8 May 2009. <http://www.interpol.int/Public/news/2009/IllicitCashCouriersConf20090507.asp>.

¹⁴⁰⁶ INTERPOL Holds Second International Conference on Illicit Cash Couriers, INTERPOL (Brussels) 7 May 2009. Date of Access: 8 May 2009. <http://www.interpol.int/Public/news/2009/IllicitCashCouriersConf20090507.asp>.

¹⁴⁰⁷ Focus on Organized Robberies and Burglaries, European Police Office (Brussels) 10 May 2009. Date of Access: 8 May 2009. <http://www.europol.europa.eu/index.asp?page=news&news=pr090423.htm>.

¹⁴⁰⁸ Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL), Council of Europe (Brussels) 26 November 2008. Date of Access: 9 December 2008. <http://www.coe.int/t/dghl/monitoring/moneyval>.

¹⁴⁰⁹ Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL), Council of Europe (Brussels) 26 November 2008. Date of Access: 9 December 2008. <http://www.coe.int/t/dghl/monitoring/moneyval>.

their projects through selling counterfeit products.¹⁴¹⁰ Finally, from 8-12 December 2008, MONEYVAL hosted its 28th Plenary Meeting, which included a keynote address from FATF President Antonio Gustavo Rodrigues as well as a special session dedicated to discussing strategies for implementing the FATF Recommendations.¹⁴¹¹

On 28-29 January 2009, the Council of Europe, along with the United Nations Office on Drugs and Crime (UNODC) and the Organization for Security and Cooperation in Europe (OSCE), arranged a Workshop on Enhancing International Legal Co-operation. The seminar focused on the evaluation of legal and technical instruments meant to encourage international anti-terrorist cooperation as well as to enforce extradition in terrorist-related criminal cases.¹⁴¹² On 16-17 April 2009, the Council of Europe co-hosted another event in Madrid with the Inter-American Committee against Terrorism in an attempt to buttress national, bilateral, subregional, regional, and international cooperation on cyber security.¹⁴¹³

Thus, the European Union has been awarded a score of +1 for encouraging greater NPO transparency and for taking measures against the illegal cross-border transportation of negotiable instruments.

Analyst: Luca Sarcanin

¹⁴¹⁰ MONEYVAL: Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism – Typology Research, Council of Europe (Brussels) 2 December 2008. Date of Access: 9 December 2008.

[http://www.coe.int/t/dghl/monitoring/moneyval/typologies/MONEYVAL\(2008\)22RRepTyp_counterfeiting.pdf](http://www.coe.int/t/dghl/monitoring/moneyval/typologies/MONEYVAL(2008)22RRepTyp_counterfeiting.pdf)

¹⁴¹¹ Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism (MONEYVAL), Council of Europe (Brussels) 12 December 2008. Date of Access: 12 December 2008. <http://www.coe.int/t/dghl/monitoring/moneyval>.

¹⁴¹² Workshop on Enhancing International Legal Cooperation Related to Terrorism Including the Drafting of Requests for Extradition and Mutual Legal Assistance, Council of Europe (Brussels) 6 May 2009. Date of Access: 8 May 2009. http://www.coe.int/t/e/legal_affairs/legal_co-operation/fight_against_terrorism/.

¹⁴¹³ OAS/CICTE Conference on Terrorism and Cyber Security, Council of Europe (Brussels) 6 May 2009. Date of Access: 8 May 2009. http://www.coe.int/t/e/legal_affairs/legal_co-operation/fight_against_terrorism/.