



EU AML / CFT GLOBAL FACILITY

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In the 21st century, financial crimes have become increasingly sophisticated and transnational. Money laundering and terrorist financing threaten the stability and security of nations worldwide. Despite considerable progress in recent years, **many countries still have low awareness of anti-money laundering and countering the financing of terrorism (AML/CFT) issues**, weak or inadequate legal and institutional frameworks, and insufficient cooperation and exchange of information between key actors and institutions.

In 2017, the European Commission established the EU Global Facility on AML/CFT to support countries worldwide in strengthening their policy, legislative

The fight against money laundering and countering the financing of terrorism is a high priority for the European Commission.

This is illustrated not least by the fact that it presented an ambitious anti-money laundering (AML/CFT) package in 2021. This package consists of legislative proposals for a Regulation establishing a new EU AML/CFT Authority, a Regulation on AML/CFT, a sixth AML Directive and a revision of the Regulation on Transfers of Funds. The new EU AML/CFT Authority will be the centrepiece of the new integrated AML/CFT supervisory system.

The Commission is an active member of the Financial Action Task Force (FATF), the global AML/CFT standard setter, which leads

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Forewords

and regulatory frameworks and building their analytical and institutional capacity, in line with EU directives on AML/CFT, UN Security Council resolutions and FATF recommendations. Guided by the multiplier effect of coordination and cooperation, the EU GF engages with all actors of the financial investigation and penal chain in creating a safer, more secure global financial landscape, including public bodies, civil society actors, media, and the private sector at national, regional and international levels.

With the EU Global Facility currently **operating on 5 continents**, with the ability to deliver in **6 languages** thanks to a **network of 130+ experts from 40 nationalities**, the results have been remarkable. As of 2023, more than 100 countries have been involved in regional activities delivered by the project while **30+ countries have been engaged in bilateral technical assistance**, with some being subsequently “delisted” by the FATF.

However, our work continues to be more important than ever. We envision a future where AML/CFT frameworks will be deployed to face more efficiently the weaknesses used by financial criminals to launder money. As terrorist groups and organised criminals constantly update their modalities, our ambition is to remain one step ahead, leveraging cutting-edge tools and intelligence-sharing to stop illicit financial flows for terrorists and terrorist organisations.

Peter Wagner

Head of Service – Service for Foreign Policy Instruments (FPI)

to the fight against money laundering and terrorism financing globally. As peer pressure remains a key driver for change, mutual evaluations and follow up processes conducted by the FATF help raise global compliance with international standards.

The Commission actively contributes to the work of the FATF and remains committed to implementing FATF standards and to promoting compliance globally, as well as to supporting efforts to address new and emerging risks at global level. **The EU Global Facility is instrumental to this goal**, as it has funded trainings delivered by the FATF to build expertise on the FATF Standards and has cooperated closely with FATF-Style Regional Bodies by co-sponsoring regional conferences on key themes of relevance in the field of AML/CFT, such as beneficial ownership and virtual assets, in line with the current priorities of the FATF.

The EU Global Facility provides **a constructive link between rulemaking and concrete implementation on the ground**. It enhances local understanding, provides targeted trainings, and develops tailor-made programmes for the project partners. The EU Global Facility is a reliable partner for countries. This is demonstrated not least by the fact that the number of activities has continuously increased in recent years (from 43 in 2020 to 162 activities in 2023).

John Berrigan

Director – General for Financial Stability (DG FISMA)

How to Request Technical Assistance

The EU Global Facility on AML/CFT is a demand-driven project: it responds to requests for technical assistance after they are formulated by countries.

To receive technical assistance, countries can submit requests for support to the EU Delegation in their country and/or to the European Commission, Services FPI. The Commission will then assess requests, prioritise them and pass them onto the project. Once received, the request will be examined by the EU GF, who will coordinate with local authorities to propose technical assistance activities tailored to the specificities and circumstances of the country.

If you are interested, contact your local EU Delegation ([full contact list is available here](#)).

Where we worked

January – March 2024



The Netherlands

Participation in workshop on Balancing Privacy, Data Protection, & Corporate Transparency

Ukraine

Presentation of the NPO Risk Assessment methodology to authorities
Workshop on 'BOR discrepancy and verification'
Legal review of Virtual Assets legislation

Belgium

3rd meeting of the AML/CFT Moot Court Concept Working Group
Working meeting with the European Business Register Association

Georgia

Participation in the Global Forum on Good Governance

Panama

Four e-sessions on Virtual Assets risk assessment

Spain

Outreach/Coordination with EL PACCTO, COPOLAD, EU ACT

Turkiye

E-session on Proliferation RA

Costa Rica

Scoping mission
Series of 9 sessions on risk assessment of ML/TF in the notarial sector (see p.8)

Indonesia

E-workshop on FATF Rec 8 on Not Profit Sector
First onsite training of NPOs on Rec 8
First e-Focus Group Dialogue on Rec 8

Kenya

Regional workshop (ESAAMLG) on 'Intelligence into Evidence'

Seychelles

Support to NPO RA
Launch of the Judicial Manual (see p.7)

Angola

3 e-sessions on BO

Malawi

NPO RA workshop
Training of Local Data Collectors (Rec 8)
1st onsite BO training

Trinidad & Tobago

Support to NPO RA drafting process
Legal review of Gaming legal framework
Support to Virtual Assets national RA

Zambia

Study visit of delegations of Botswana and Malawi
Support for NPO RA development

Madagascar

1st onsite training on BO (see p.8)

Paraguay

5 e-sessions on investigation/prosecution and confiscation

Mauritius

Participation in Central Bank Conference on AML/CFT

Argentina

Strategic approach – sessions to support partners on FATF Evaluation process
Two e-mentoring on FATF Recommendation 8
One e-mentoring on BO
One e-mentoring on Virtual Assets
Completion of the NPO Risk Assessment

South Africa

Regional FATF Standards Training Course (ESAAMLG) (see p.5-6)
Workshop on BO Guidance
Completion of NPO RA and preparations for public presentation

Botswana

E-training of local data collectors (Rec 8)
Launch of NPO RA

Mozambique

Strategic approach: e-training on FATF methodology
Training on Statistics and IOs 6/7
BO outreach and training
4 e-training on Gaming (IO3)

FATF Standards Course

Strengthening Financial Integrity: African Nations Embark on Specialised FATF Training with EU Support

From 29 January–2 February 2024, over 40 officials from 21 countries, including 18 from the [Eastern and Southern Africa Anti-Money Laundering Group \(ESAAMLG\)](#) jurisdictions, engaged in a comprehensive Financial Action Task Force (FATF) Standards Training Course. Facilitated by the EU Global Facility on AML/CFT, the weeklong training was delivered by experienced trainers from the FATF Training Institute and the ESAAMLG Secretariat.

The event marked a significant step in the global fight against financial crimes, with participants coming from **Angola, Botswana, Eritrea, Eswatini, Kenya, Lesotho, Madagascar, Malawi, Mauritius, Mozambique, Namibia, Rwanda, South Africa, South Sudan, Tanzania, Uganda, Zambia, and Zimbabwe.** The presence of the **ESAAMLG and GABAC Secretariats, along with three attendees from Finland, Germany, and Jersey,** underscored the collaborative spirit of the training. Together, they exchanged best practices and insights, fostering a unified approach to countering financial crimes.

The course centered around a number of anti-money laundering and counter-terrorist financing –proliferation financing topics, ranging from risk assessment, domestic coordination and information sharing, beneficial ownership, financial intelligence, asset recovery and prosecution, among many others.

“The FATF Standards Training Course covers all aspects of financial investigation and the criminal process”, explained Head of the [FATF Training Institute](#), Joël Godard. “Through training programmes like these, the FATF is helping countries in the African region build their capacity to combat ML/TF/PF effectively, deprive criminals of their ill-gotten gains, and improve global asset recovery.”

This marks the 2nd collaboration between the EU Global Facility and the FATF Training Institute, following a first key event for French-speaking nations in Vienna in July 2023. These two successful instances pave the way for the expansion of this collaborative model to the Caribbean and Latin American regions later this year.

The FATF Standards Training Course, which has been delivered to more than 950 officials globally, plays a crucial role in deepening the understanding of FATF Standards, thereby enhancing the ability of jurisdictions to meet these benchmarks since its inception in 2021.



“ International training like this are crucial as they allow for flexibility in approaches and offer insights into what can be applied within our jurisdiction. Networking helps us understand how challenges faced by other countries might align with our own, and provide solutions for the training gaps we've identified.

Haja L. Razanamanana
Head of Madagascar's FIU Training Centre

The region faces unique challenges in tackling money laundering and related crimes (illegal logging, human trafficking etc). Through these regional platforms, our partner countries can gain a better understanding of the practices they can implement and disseminate back home, in a way that is tailored to their jurisdiction and needs.

David Hotte
Team Leader of the EU AML/CFT Global Facility



“ Angola views this training as part of a long-term strategy to create a conducive environment for AML/CFT efforts. Being here as a representative from the Ministry of Justice reflects the importance of legal and judicial considerations in these efforts and the need for comprehensive capacity building across different sectors, including legal reforms and supervision.

José Campos K. Do Nascimento
National Director of Justice Policy
Ministry of Justice and Human Rights of Angola



Representatives from 21 countries, including 18 ESAAMLG jurisdictions gathered in Cape Town, South Africa for the weeklong training course. © 2024/EU Global Facility

AML/CFT Judicial Manual unveiled in the Seychelles

On Tuesday 26 March 2024, Seychelles presented a groundbreaking judicial manual on financial investigations, marking a decisive step in the country's fight against money laundering. This leading-edge manual was developed with support from the EU Global Facility over the past year.



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'The unveiling of this judicial manual marks a pivotal moment in our ongoing work in combatting money laundering in Seychelles. A work that is the first of its kind in this sphere, this manual is the result of the collaborative effort of the Seychelles with the EU Global Facility on Anti-Money Laundering and Counter-Terrorist Financing,' said Chief Justice His Lordship Rony Govinden.

Speaking on the occasion of the official unveiling of the judicial manual held in Victoria on Tuesday 26 March 2026, he added: *'this new manual represents our dedication to ensuring justice is served and proceeds of crime are seized, safeguarding our financial integrity and security as a nation. It is a direct response to the enactment of the AML/CFT Act, which made it evident that a brand new, comprehensive resource was essential to guide our Judiciary in navigating these complex investigations and in effectively prosecuting these crimes.'*

The result of a yearlong collaborative process, the judicial manual on financial investigations aims to **provide practical support to judges, prosecutors, law enforcement agencies, Financial Intelligence Unit staff and all penal chain institutions working on financial investigations related to AML/CFT cases.**

'The introduction of such a manual represents a pivotal advancement in equipping key institutions with the necessary knowledge to combat money laundering effectively in the Seychelles. This is a significant development for the island, and I am privileged to contribute to this crucial initiative,' stated Director of FIU Richard Rampal.

The manual, which was developed with the **support of EU Global Facility experts from France, the Netherlands, Moldova and Poland**, also seeks to ensure seamless coordination among all stakeholders involved in the fight against financial crimes, resulting in a more effective AML/CFT system.



'Work on this manual was not just only drafting a document to be kept on a shelf; it has been about equipping our partners from Seychelles with the knowledge and tangible tools they need to effectively combat financial crimes,' noted EU Global Facility Team Leader David Hotte in his opening speech.

The elaboration of this manual comes after the one successfully developed by another partner state, Jordan, with the support of the EU Global Facility in 2023.

New partner countries

Madagascar: launch of the technical assistance

In 2023, Madagascar formulated a request for technical assistance to the EU Global Facility. After a scoping mission carried out by our Team Leader David Hotte, the project designed a workplan aimed at answering the needs of the country on anti-money laundering and counter-terrorist financing.

On 29 January–1 February 2024, our experts from Belgium and Luxembourg delivered its very first activity, focused on the topic of Beneficial Ownership. Joining hands with the SAMIFIN, the EU Global Facility organised a scoping visit and training on the implementation of Madagascar's Beneficial Ownership (BO) framework.

During the four-day working visit, our team of experts held sessions aimed at:

- Assessing the state of play of reforms, ongoing initiatives, and the stakeholders involved in BO.
- Identifying the specific needs in this critical area.
- Facilitating peer-to-peer exchanges on the implementation of a Beneficial Ownership Registry.
- Defining the next steps where the EU Global Facility can provide support.



Background: In the latest follow-up Mutual Evaluation Report relating to the implementation of AML/CFT standards (2023), Madagascar was found to have made "significant overall progress in resolving the technical compliance shortcomings identified in its 2018 Mutual Evaluation Report". Seven Recommendations were re-rated in this report, and Madagascar was deemed **Compliant for 6 and Largely Compliant for 11 of the FATF 40 Recommendations**.

Costa Rica: supporting the notaries' sector

Responding to a request for support from the Costa Rican authorities, the EU Global Facility has been delivering a series of 14 online sessions targeted at the Notary Sector.

Tailored to the teams operating under the National Directorate of Notaries, these e-training are part of a comprehensive technical assistance programme, which includes the **creation of an AML/CFT Risk Assessment in the notary sector and specialised training sessions**. This technical support aligns with the Central American country's commitment to meeting FATF standards as per their Action Plan.

Focused on FATF Immediate Outcomes 1 (National coordination / risk assessment) and IO 3 & 4 : Supervision of non-financial sectors – Notary sector, the training aimed to reach different goals:

- To identify the National Directorate of Notaries of Costa Rica as the competent authority in charge of coordinating and implementing the RA;
- To define the metric and both qualitative and quantitative techniques to be used;
- To determine the risk rating that will be assigned to the notarial sector.

Congratulations to all participants for their dynamic involvement in this initial part of the course and warm thanks to our specialised experts from the AML Office of the Spanish Notaries. This training also received constant support from the Costa Rican authorities.

The collaboration isn't over: a comprehensive programme of 12 months is coming up.

Long Read



Facing the challenge of the metaverse: the fundamentals of anti-money laundering still apply

If you imagine a nightmare for anti-money laundering practitioners and investigators it might look something like this: A network of virtual worlds where people from around the world can use pseudonyms and avatars to connect with each other and exchange digital assets.

Leading tech companies are heavily investing to make the virtual worlds of the metaverse mainstream. They predict it will radically change how we do business. As Mark Zuckerberg, CEO of Meta, famously asserted: *'Metaverse isn't a thing a company builds. It's the next chapter of the Internet overall.'*

This complex digital landscape – **the Web 3.0 metaverse** – already functions as a component of the existing Internet. It was conceived from the outset to have decentralised control and ownership, based on blockchain technology.

As it develops, it presents a novel set of challenges for money laundering efforts. Regulators, lawmakers, law enforcement agencies, and partners across the private and non-profit sectors, will need to rapidly understand the complex challenges presented by the metaverse.

Deep fakes and the metaverse

Users of the metaverse will be able to meet virtually and conduct transactions, free from the threat of interception and entirely anonymously. **This level of privacy is a step-change beyond 'end-to-end' encryption and challenges the foundations of anti-money laundering supervision.**

The architects and pioneers shaping this new reality are driven by innovation and profit. But apart from

a few exceptions, legislations and regulators are years behind the reality of the Web 3.0 metaverse. Even if mainstream adoption takes some time, this space will draw in those who see the value in staying most hidden from official view.

Artificial intelligence (AI) is playing a significant role in this. *"AI is entwined with the development of the metaverse,"* explains Liam Ennis, Key Expert on Law Enforcement for the EU Global Facility for Anti-Money Laundering and Countering Financing of Terrorism (EUGF). *"You can't discuss the metaverse without addressing that, and money laundering in the metaverse is no exception."*

“Criminals can meet and transactions can take place in complete privacy [...]

In a virtual, digitally connected world, AI offers previously unparalleled scope to facilitate identity fraud via deepfakes and information scraping at scale, **challenging the very basis of Know Your Customer.** *"AI provides the key to unlock the virtual meeting rooms and transactions that can take place in the metaverse. This key may result from a stolen identity or an entirely falsely created one; either way it will mean criminal parties can meet and transactions can take place in complete privacy,"* says Liam Ennis.

These techniques for obscuring ownership and identity will be available to those who finance

terrorist groups too. Whether the group is part of a loose alliance, or is formed as a highly organised, corporate structure, **the metaverse offers a readily accessible virtual sanctuary and trading place for designated armed groups.**

Back to the fundamentals

Fortunately, financial authorities do not have to start from a blank slate. Some countries are already establishing a high level of competence in terms of legislating, regulating, and successfully investigating digital crimes involving the metaverse. Financial authorities in the US are leading the way, with new regulations to prevent Convertible Virtual Currency mixing, and following earlier moves by FinCEN to demand DeFi services comply with AML obligations.

The UAE's new licencing regime for Virtual Asset Service Providers (VASPs) is backed up in law by oversight provisions, including for Suspicious Transaction Reports. The UAE's new licencing rules explicitly map out how the country expects VASPs to operate in line with FATF guidance on Virtual Assets.

The metaverse will force authorities to strengthen all the basics of AML; Know Your Customer, Suspicious Transaction Reporting, mapping typologies, information sharing, registers, and more.

But **regulation in this area is only as good as its weakest link**, and some international partners are finding it a challenge to keep pace with technology and the new risks it brings. So how will suspicious transactions and assets be identified, tracked, and matched to participants' real-world identities?

Supervision and enforcement through the metaverse require

the ability to source and sift data, spot patterns, and share information rapidly. The volume of anti-money laundering data that needs to be analysed and shared is set to become a tidal wave. **Everyone will be challenged to play their part better and faster.**

To apply resources effectively, law enforcement will need to get to grips with understanding these new threats and vulnerabilities. In particular, the challenge will be to identify typologies that criminals and terrorists will use in the metaverse. These in turn can help inform the application of AI by Fintech and others to identify suspicious transactions and mitigate risks.

This is a daunting prospect for many, which is why the EU Global Facility is supporting partners and working collaboratively to anticipate the challenges that the metaverse will present. This in turn will facilitate the sharing of technical expertise in financial investigations in the metaverse.



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Those tools include advanced data analytics using AI. Even in the absence of traditional transaction records, these can identify patterns indicating money laundering which would be missed by human analysts. The EU Global Facility's Strategy on Cryptocurrencies also describes how blockchain technology itself presents opportunities to apply traditional investigative methods in novel ways.

Blockchain underpins thousands of cryptocurrencies and authenticates the ownership of everything in a metaverse world. It normalises pseudonymous transactions and obscures, at least in part, the individuals behind transactions. At the same time, as blockchain records are immutable they allow investigative agencies some ability to monitor the source and destination of crypto-assets.

“ The metaverse will force authorities to strengthen all the basics of AML; Know Your Customer, Suspicious Transaction Reporting, mapping typologies, information sharing, registers, and more.

Indeed, in the shadowy world of the metaverse **it may be that going back to traditional policing techniques, such as the use of informants and undercover law enforcement**, will play a more significant role than previously seen in anti-money laundering investigations.

Responsible authorities must also establish collaborative platforms and forums with users, developers and operators. These include channels for efficient data-sharing and automated reporting, and spaces for both sides to identify emerging risks and typologies together. Communicating and educating can even contribute to the 'designing out' of some risks through early consultation.

To implement FATF recommendations effectively, countries will have to adapt as the technology develops, just as they have already had to respond to the advent of crypto-currencies. The virtual environment will not be set in stone, and will continue to evolve rapidly, often faster than legislation.

This puts the onus on countries to proactively engage with tech companies as they develop the metaverse, and to feel empowered to innovate and adapt in response. There are many unknowns, but sharing knowledge and lessons globally, and adopting the pragmatic shifts seen in response to earlier technological shifts can help to contribute to the safe evolution of the metaverse.

[Read the piece, and more in-depth articles, on our blog](#)





Coming Up

A number of activities is on the agenda of the EU Global Facility for the next few months. Take a peak at a few of them below.

Trinidad & Tobago

Following the successful collaboration between the FATF Training Institute and the EU GF, a third FATF Standards Training course will be organised for the Caribbean countries in July 2024.

Belgium:

The third meeting of the EU Global Facility's Senior Advisory Group will take place in the project's headquarters in Brussels at the end of May.

Angola:

A delegation from the project will attend the ESAAMLG Plenary in April to discuss support in the implementation of the ESAAMLG Toolkit for assessing risk of LP/LA developed with the EU Global Facility. A working visit is also scheduled for the mapping exercise on FATF Recommendation 8

Indonesia

Technical assistance to the new partner country will continue, as the project will organise the second 'Focus Guided Dialogue' on Recommendation 8 with the authorities and regulators.

MOOT Court

A group of experts from Iceland, Italy, France, Georgia, Romania and the US will gather in Siracusa, Italy, for the 4th working meeting of the AML/CFT MOOT Court, organised as part of our collaboration with The Siracusa International Institute for Criminal Justice and Human Rights (SII).

Legal Innovation and AML/CFT

Following the launch of a publication on 'Legal Approaches and Evidentiary Challenges in ML Prosecutions and Confiscation proceedings', we will co-organise a regional conference with GAFILAT, the SII and Brazilian authorities in Rio de Janeiro in April 2024.

Regional conferences

Preparations for several regional and global conferences with various stakeholders are currently underway. Scheduled to take place in various parts of the globe, they will cover topics such as Gaming, Virtual Assets, Intelligence into Evidence, Art Trafficking and AML/CFT investigations as well as Judicial Cooperation in AML/CFT cases.



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