



Concerns regarding the Banque du Trésor (BDT) Decree in Burkina Faso and its compatibility with FATF Recommendations

Update #1 March 2026

Following the submission sent in January, the Coalition is providing an update on the current implementation and impact of the recent decree in Burkina Faso requiring non-profit organisations (NPOs), including international humanitarian non-governmental organisations (NGOs), to transfer all funds and manage their accounts exclusively through the Banque du Trésor (BDT) administrative structure attached to the Treasury.

While the NGO sector fully supports accountability and transparency, the decree as currently designed and implemented risks substantially impeding humanitarian activities.

Under existing national legislation, all registered NGOs are already required to submit annual audits, funding plans projections for the 3 years ahead and maintain registered bank accounts that are included in those audits. Organisations are currently undergoing the national external review and certification of their 2025 accounts under SYCEBNL (*Système Comptable des Entités à But Non Lucratif*) standards, as well as preparing the annual report to DGCOOP (*Direction Générale de la Coopération*), due on 30 April 2026.

Since the decree was issued in November, organisations have been scrambling to meet the 5th March 2026 deadline. We have developed below a snapshot of the experience of approx. 40 humanitarian organisations. Out of the 40 organisations consulted, the majority have either opened BDT accounts or are in the process of doing so. Those who have not opened accounts are still awaiting final internal approval.

1. Confirmation of public treasury management rules

The contractual arrangement with the BDT stipulates that organisations are subject to public treasury management rules. In practice, the decree appears to bring NGO funds under public financial management frameworks that are designed for state entities, not independent non-state actors. Furthermore, as the BDT does not appear to have a legal identity distinct from the public treasury, it is unclear whether the usual banking safeguards and regulatory protections applicable to licensed financial institutions would apply. This raises concerns regarding the absence of standard prudential oversight, depositor protections, and banking regulations typically governing NGO access to financial services.

2. Operational functionality

Organisations report significant delays in opening accounts. Even once opened, accounts remain inactive for up to two weeks. Many organisations are still awaiting their IBAN and RIB details. Cheque books have not been delivered, and staff report waiting up to three hours at the bank to obtain necessary documentation or initiate transfers.

3. Payments and liquidity

Extensive delays have been reported in processing salary and supplier payments, alongside serious difficulties in withdrawing cash. For the limited number of international transfers that have been



successful, organisations report delays of approximately 12 days. Every transaction above 10 M XOF (approx. 18,000 USD) is subject to additional scrutiny and may be blocked until authorities are satisfied with the verifications. Other transfers have failed or been blocked without clear explanation. While an e-banking facility technically exists, it is not currently functional in practice.

4. Anticipated impact on humanitarian action

If organisations are required to bank exclusively with the BDT under the current conditions, they anticipate severe delays in humanitarian service delivery, suspension of supplier contracts, and disruptions to staff payments, with direct consequences for affected populations. Given the difficult access situation and reliance on convoys to deliver supplies to hard-to-reach areas, delayed payments can compound into significantly longer delays in the actual delivery of goods and services. This not only undermines timely assistance for vulnerable populations but also poses serious challenges with donors regarding the ability to execute projects within contractual timeframes.

Humanitarian needs in Burkina Faso

Around **4.4 million people** in Burkina Faso require humanitarian assistance, with needs described as extreme and worsening particularly in hard-to-reach and conflict-affected areas where several sectors are close to breaking point. Humanitarian response is currently concentrated on the most urgent, life-saving priorities, including food, water, and shelter.

To put this in perspective, 4.4 million people is equivalent to the entire population of greater Dakar and roughly double the population of Paris. Approximately **half of those in need are internally displaced**, creating acute and sustained requirements for shelter, protection, civil documentation, and access to basic services. Acute food insecurity affects an estimated **2.5–3 million people**, alongside high levels of child malnutrition. Access to healthcare, water and sanitation, and education remains severely constrained.

Engagement with the authorities

Organisations confirmed they have been engaging with relevant ministries on the potential impact and to request for flexibility and transitional arrangements. Government focal points have outlined the BDT decree is in response to a limited number of NGOs registering. However, we respectfully question whether this modality will, in practice, incentivise those organisations who have not yet registered to comply with the national registration requirement.

We respectfully request that the FATF Secretariat and regional FATF body, GIABA engage with the authorities in Burkina Faso to ensure alignment with FATF standards and to mitigate negative catastrophic consequences on humanitarian services

Specifically, we request consideration of the following:

- **Overturning or substantially revising the decree** to align with FATF Recommendation 8 and the mandated risk-based approach.
- **Removing exclusivity**, allowing NGOs to maintain secondary accounts with regulated commercial banks.
- **Extending the implementation period by at least six months** and issue an official communique confirming the delay in enforcement of the decree. Unofficial or inconsistent



enforcement creates legal uncertainty and risks placing organisations in non-compliance with national requirements.

- **Issuing a formal compliance analysis by the FATF Secretariat and/or GIABA** assessing the compatibility of the BDT decree with FATF standards.

In addition to the broader concerns regarding the impact on humanitarian action through non-compliance with FATF standards, we have highlighted the **absence of international precedent** for such a decree. The Coalition is concerned that, if the decree is implemented and not clearly identified as inconsistent with international standards including the FATF Recommendations, it may encourage replication by other states as a mechanism to restrict humanitarian and civil society operations.