



Meeting between FATF Secretariat and Global NPO Coalition on FATF post June Plenary

08.07.2022

1. The Secretariat emphasized opportunities to **engage with the NPO sector** in the coming time, including on:
 - a. Digital transformation in the fight against financial crime – so on the potential use of new technologies and the data protection ramifications of these
 - b. The Beneficial Ownership framework
 - c. The Unintended Consequences workstream
 - d. Virtual Assets and Service Providers
2. The Secretariat outlined the [priorities of the new FATF President](#), T. Raja Kumar, for the Singaporean Presidency (July 2022–June 2024). These are in line with the [recent Ministerial Declaration](#) and include:
 - a. Strengthening asset recovery (including through international cooperation, and with a focus on the victims of crime)
 - b. Countering illicit finance of cyber-enabled crime (online fraud, ransomware)
 - c. Increasing the effectiveness of global AML/CFT measures
 - d. Reinforcing partnerships with FATF-Style Regional Bodies (FSRBs) – strengthening the global network
3. In this context, the **following meetings** are foreseen with the Global NPO Coalition:
 - a. Meeting with the new President and the new Executive Secretary
 - b. Meetings with the various working groups (especially those tasked with the Unintended Consequences workstream)
 - c. FATF/Interpol roundtable on asset recovery
 - d. Private Sector Consultative Forum in spring 2023
4. On a question from a Coalition member on **asset recovery**, the Secretariat mentioned the following initiatives and networks: CARIN (<https://www.carin.network/>) – an informal, inter-agency network of law enforcement and judicial practitioners in the field of asset tracing, freezing, seizure and confiscation. And the regional networks, known as ARINs.
5. On the current situation of the problematic NPO law in **Nicaragua**, the GAFILAT contact at the Secretariat said that GAFILAT was in the process of establishing a procedure to deal with such egregious cases, and that this will be discussed in the upcoming Plenary. A Coalition representative said that a 100 more CSOs were added to the list of 700 CSOs already dissolved by the government. Therefore, a lot of hope rests with the discussions at GAFILAT to establish a procedure for dealing with situations like this.
6. On the [Unintended Consequences workstream](#), different working groups have been set up and tasked with coming up with adequate mitigation measures, with amendments being foreseen, as necessary, to the FATF Standards, to the methodology and to the procedures. Additional training development is also on the cards. First on the list is Recommendation 8:
 - a. The **Best Practices Paper on Recommendation 8 will be updated**
 - b. **Recommendation 8 will then potentially be revised** to provide further guidance and clarification on the risk-based approach



This work will be led by a small project team. There will be a period of research (6 months) and then a process of revision (6 months) – this timeline depends on the scope of the revision. **The Global NPO Coalition will be consulted throughout the process,** along with other stakeholders.

7. **Libya** – The Global NPO Coalition has flagged the problematic Central Bank regulation in Libya to the FATF Secretariat earlier. The Norwegian Refugee Council reiterated the ongoing issues, including the fact that 3 million euros of their assets meant for humanitarian assistance in the country are currently frozen by the Central Bank. The Secretariat recommended that they can only engage within the Mutual Evaluation cycle, and recommended engagement with MENAFATF on the issue, and directly with the Central Bank of Libya.
8. The **training** manager at the FATF Secretariat outlined that training was provided on the FATF Standards to jurisdictions and on FATF processes to the assessors. These were either delivered online or in person at the training centre in Busan, South Korea. The February 2022 plenary approved the development of the following e-learning courses:
 - a. Risk Assessment
 - b. Terrorism financing and targeted financial sanctions
 - c. Beneficial Ownership
 - d. Financial Inclusion
 - e. Misuse of NPOs

The FATF is hiring an e-learning design specialist. And is hoping to have these courses ready before the start of the 5th Round of Mutual Evaluations. They have received funding to develop these courses, and will be looking to partners like the Global NPO Coalition for input and to illustrate the courses and bring them to life. Start date to develop these is likely to be September 1.

9. **Beneficial Ownership**: Recommendation 24 has been revised and the **guidance document** for the Recommendation now being developed. There is an online consultation on this later this month (comments can also be provided in writing). Recommendation 25 on legal arrangements is also being revised – the white paper is now [out for consultation](#).
10. There was an update from **Zimbabwe**, where the problematic NPO law is still being discussed in Parliament, and further repressive provisions have been added.