CARIBBEAN FINANCIAL ACTION TASK FORCE



CFATF ANNUAL REPORT 2020 - 2021

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CFATF Profile

The Caribbean Financial Action Task Force (CFATF) is an organisation of twenty-four (24) States of the Caribbean Basin, Central and South America, which have agreed to implement common countermeasures to address money laundering (ML), terrorist financing (TF) and proliferation financing (PF). It was established as a result of meetings convened in Aruba in May 1990 and Jamaica in November 1992 (<u>Kingston Declaration</u>).

The main objective of the CFATF is to achieve effective implementation of, and compliance with, the <u>FATF</u> <u>Recommendations</u> to prevent and eliminate ML/FT/PF.

The CFATF Membership comprise the following:

- 1. Antigua and Barbuda
- 2. Anguilla
- 3. Aruba
- 4. Bahamas, The
- 5. Barbados
- 6. Belize
- 7. Bermuda
- 8. Cayman Islands
- 9. Curaçao
- 10. Dominica
- 11. Grenada
- 12. Guyana
- 13. Haiti
- 14. Jamaica
- 15. Montserrat
- 16. St. Kitts and Nevis
- 17. St. Lucia
- 18. St. Maarten
- 19. St. Vincent and the Grenadines
- 20. Suriname
- 21. Turks and Caicos Islands
- 22. Trinidad and Tobago
- 23. Venezuela
- 24. Virgin Islands

The Co-operating and Supporting Nations (COSUNs) are countries or territories that are

not Members or Observers of the CFATF and who have expressed their support for the objectives of the CFATF and have been approved by the Council of Ministers.

COSUNs are committed to the mutual evaluation process for implementing the FATF Recommendations and make contributions to the work and/or resources of the CFATF as are permitted by their respective national laws and policies.

COSUN countries include:

- 1. Canada
- 2. France
- 3. Mexico
- 4. Kingdom of the Netherlands
- 5. Spain
- 6. United Kingdom and
- 7. The United States of America

These nations recognise the relationship between the work and objectives of both the FATF and the CFATF.

The CFATF Secretariat undertakes the following activities on behalf of the CFATF Membership:

- An ongoing programme of the Mutual Evaluation of Members.
- Co-ordination of, and participation in, training and technical assistance programmes.
- Bi-annual plenary meetings for technical representatives.
- Annual Ministerial Meeting.
- Represent the CFATF interests at FATF Plenary meetings and before the Global Network.

Additionally, since February 1996, the CFATF has been conducting ML typology exercises. Some have been undertaken in collaboration with the FATF and other FATF Style Regional Bodies (FSRBs) with a view to increasing awareness of the attendant risks



to the Region. These exercises allow for the sharing of information collated by various bodies involved in combating ML/TF.

The CFATF Secretariat also works closely with many international organisations and entities, some of which include:

- CARICOM/CARIFORUM
- CARICOM IMPACS
- The Caribbean Development Bank (CDB)
- The World Bank (WB)
- The International Monetary Fund (IMF)
- The Eastern Caribbean Central Bank (ECCB)
- The Inter-American Development Bank (IDB)
- Organization of American States (OAS) and
- The United Nations Office on Drugs and Crime (UNODC).
- Regional Security System Asset Recovery Unit (RSS-ARU)

Several organisations and two countries are Observers to the CFATF. A full list is contained at <u>Annex 3</u>.

Mr. Carl Bethel held the position of the CFATF Chairmanship for the period November 2020 – September 2021. The Honourable Ryan Pinder, Attorney General and Minister of Legal Affairs, The Bahamas held the position of CFATF Chairmanship from September 2021 to December 2021. The Deputy Chair of the CFATF was Mrs. Cheryl-Ann Lister, Acting Financial Secretary, Ministry of Finance, Bermuda. Lt. Col. Edward Croft, Director of the Office of Drug and Money Laundering Control Policy of Antigua and Barbuda held the position of Immediate Past Chair, which ensures the tripartite governance of the CFATF.

The Executive Director (ED) of the CFATF is Ms. Dawne Spicer.

For more information, please visit our website at: <u>https://www.cfatf-gafic.org/</u>



CFATF Mission, Vision and Values

VALUES

Leadership Effectiveness Integrity Cohesiveness

MISSION

To develop and implement effective anti-money laundering, counter-terrorist financing and counter-proliferation of weapons of mass destruction financing systems and to contribute to the setting of global standards.

VISION

To be an efficient and responsive organisation that plays a leading role, within the region and the global community, in the prevention and suppression of money laundering, terrorism financing and financing the proliferation of weapons of mass destruction through the effective implementation of the international standards.



Chairman's Remarks



Chairman The Honourable Ryan Pinder, Attorney General and Minister of Legal Affairs, The Bahamas

It is with great pleasure that I present the Annual Report of the CFATF for the period December 2020 to December 2021 under the Chairmanship of The Bahamas.

The COVID-19 pandemic continues to present unique challenges for our Member jurisdictions and their AML/CFT/CPF systems. We have witnessed the emergence of new obstacles and reconfigurations of existing ones. Yet, this period also heralded the advent and continuation of opportunities to address our challenges and move forward.

In 2020, the CFATF's 4th Round of Mutual Evaluations (MEVALs) was severely impacted as no on-site visits were possible due to travel restrictions and other measures that countries adopted in response to the COVID-19 pandemic. The **MEVAL** Programme has successfully finalized and published ten (10) Mutual Evaluation Reports (MERs) within the period of this report, with one (1) that will soon be finalized, but there are still thirteen (13) Members to be evaluated. These remaining evaluations must occur in the shortest possible time so that the CFATF can start the 5th Round of MEVALs in a timely manner. Recognising the current circumstances, our Ministers approved an amendment to the

CFATF Mutual Evaluation Schedule that would see the final MEVAL on-site visit occur in the third quarter of 2024 and last MER will be presented in May 2025. The CFATF remains fully committed to adopting all measures for the advancement and timely conclusion of its 4th Round of Mutual Evaluations.

In moving forward with our Mutual Evaluation Programme, the CFATF has had to adjust to the variances of the pandemic to achieve its goals. This has resulted in the development and use of hybrid on-site evaluation procedures in 2021. Based on these procedures, at least 50% of the Assessment Team must be physically present on-site with the others in virtual attendance. St. Kitts and Nevis was the first jurisdiction where this procedure was used, followed by Grenada and then Aruba. Each of these evaluations were well executed due to the commitment, professionalism and expertise of the respective Assessment Teams, Mission and Co-Mission Leads and the CFATF Secretariat staff.

The review and enhancement of the IT functionality of the CFATF Secretariat continues to play an important role in the core functions of the CFATF Secretariat. The IT



Unit provided logistical support for preonsite training and hybrid on-site assessments of Grenada and Aruba. New methods for communication, collaboration and workflow management were developed as well as the IT Work Plan was updated. This sets a solid platform for further growth and success of the organisation into the future. I recognise the invaluable support and innovativeness of the IT Unit to the Secretariat's work.

Over the past year, the Chairmanship of The Bahamas has engaged in multiple activities, with the aim of fulfilling the mandate of the CFATF, forging strong relationships with our stakeholders, and boosting the public profile of the CFATF.

In November 2020, as incoming Chairman, The Bahamas had the distinct privilege to preside over CFATF's first Virtual Plenary. The CFATF's LI's Plenary and Working Groups Meetings discussed the Mutual Evaluation of St. Lucia. Fruitful dialogue was also held on other matters such as the Supervision Project, upcoming projects in Working Groups and the ICRG procedures. The MER of St. Lucia was published under the Bahamian Chairmanship in February 2021.

The European Commission (EU) listing of CFATF members remains a long-standing issue that negatively impacts our Members. The CFATF Secretariat has engaged in meetings held by the Organisation of African, Caribbean and Pacific States (OACPS) who has been focusing on the EU listing of countries on AML/CFT and tax matters. On June 23rd, 2021, The Bahamas as Chair represented the CFATF at the Organisation of African, Caribbean and Pacific States' (OACPS) webinar on the European Union's (EU) list of non-cooperative jurisdictions for tax purposes and that of high-risk third countries. The CFATF has also collaborated with the CARICOM Secretariat regarding this issue.

While physical meetings were limited, the virtual platforms facilitated and, in some cases, expanded the CFATF's collaborative activities with regional and international organizations. The **CFATF** delivered training, presentations, actively participated in or was invited as observers in more than forty (40) events under the Chairmanship of The Bahamas. These included high-level Standing Committee CARICOM meetings, several banking, fintech, compliance and counter-terrorism conferences as well as meetings on combatting modern slavery, human trafficking, and illicit financial flows. As Chairman, The Bahamas sought to increase awareness of CFATF's mandate and work. In an interview with Global Financial Integrity (GFI) on March 8th, 2021, as part of their Report on Financial Crime in Latin America and the Caribbean, the CFATF had the opportunity to elaborate on the 4th Round of MEVALs, the challenges in the context of COVID-19 and present recommendations to address these challenges. This, among the other calls for participation, shows the recognition of the role of the CFATF to address AML/CFT, increase compliance with the FATF Standards and encourage cooperation and collaboration between stakeholders.

Training remains an important part of CFATF's capacity building for Members and staff. In July 2021, a Joint Assessors' training was possible where fifteen (15) Members and one Secretariat staff was trained. Moreover, the CFATF ensured that two (2) Secretariat technical staff members received FATF Assessor Training in March/April 2021. Refresher training for the Aruba Assessment Team was conducted on Mar 22nd, 2021, where four (4) assessors trained by Secretariat staff. Technical assistance and training remain a priority for



the CFATF, evident in the number and quality of these events the CFATF membership were able to participate in. Over 400 participants attended the RUSI training on "Countering on Proliferation Financing" from March 24th to 25th, 2021 while beneficiary and non-beneficiary member jurisdictions benefitted from UNODC's "Combatting Cash Smuggling" webinars. Internal training for Secretariat staff was a major part of The Bahamas' Work Programme for 2021. I am pleased to state that there were six (6) internal training sessions held to assist staff in having a more comprehensive understanding of FATF Standards. All of these activities were significant in the fulfilment of the Chairman's Work Programme.

The 11th EDF Project was granted fourteen (14) month extension via an addendum to the Grant Agreement in January 2022. This extension allows Guyana and Belize to benefit from the funding of their 4th Round MEVALs since the timeframe is now in keeping with the extended MEVAL schedule. As a central part of the CFATF operations, the 11th EDF provided funding for the MEVALs of St. Kitts and Nevis and Grenada. Moreover. they have been assiduously working on CFATF's E-Learning Platform, which should be launched in 2022.

Under the Chairmanship of The Bahamas, these important advances were attained in the execution of the Work Programme for 2020 to 2021 with tangible success in many areas. The Bahamas further advocated the work being undertaken by the CFATF by virtually attending the FATF Plenary meetings. It is important to note that the FATF Plenary in October 2021 agreed to provide 'mentoring' and 'direct participation' assistance to higher priority FSRBs. Thus, the CFATF will receive assistance to ensure that the 4th Round of MEVALs is completed according to the revised Schedule.

Regarding staffing, the CFATF continues to have a highly professional and dedicated staff who have ensured that the important work of this organisation continues.

Despite the difficulties we all face from the pandemic and other challenges, I urge members to continue to actively participate in the MEVAL process and other work of the CFATF as this is critical to fulfilling our mandate as an FSRB and Member-led organisation. Members should be fully appraised of and engaged in the issues discussed at Plenary Meetings, Heads of FIU, CFATF Risk Trends and Methods (CRTMG) Working Group, CFATF International Cooperation Review Group (CFATF ICRG), and the Working Group on FATF Issues (WGFI). Participation at the Global Network level is also strongly encouraged through involvement in FATF Plenary and working group meetings.

In addition to our Members, I wish to thank our Cooperating and Supporting Nations (COSUNs), and Observers along with the FATF Secretariat for their ongoing support and investments of human and financial resources, technical assistance, and guidance, all of which has been tremendously invaluable during the COVID-19 pandemic in assisting our jurisdictions in building stronger AML/CFT/CPF capacity.

The Government and people of The Bahamas thank you all for this opportunity to serve as Chairman of the CFATF and pledge our continued support to the CFATF. The Bahamas wishes all the best to my successor, Mrs. Cheryl-Ann Lister, Acting Financial Secretary, Ministry of Finance, Bermuda, and trust that under her leadership, the CFATF will continue to successfully overcome every obstacle and positively forge ahead.



May God Bless you All.

Ryan Pinder, Chairman of the CFATF September 2021- December 2021

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Foreword by the Executive Director



Dawne J. Spicer

The COVID-19 pandemic continues to negatively affect the lives, livelihoods and security within the entire Caribbean region and especially among the small developing economies which make up the CFATF Membership. We recognise that the toll of the pandemic on human, financial, and other critical resources is significant and that this has necessitated that we innovate, in a cost effective way to better serve our Members in their ongoing quest to improve their AML/CFT/CPF frameworks and complete their on-site mutual evaluation (MEVAL) assessments. It is in this context that collaboration, cooperation and engagement have become important maxims that have driven the continued work of the CFATF over the past year to ensure our Members' needs were met during this unprecedented time.

To facilitate the progression of the CFATF's MEVAL programme, the Supplementary Procedures for Hybrid On-site Visits and supporting protocols were adopted in February 2021. This has allowed the Secretariat to complete three (3) hybrid onsite visits (St. Kitts and Nevis, Grenada and Aruba) as well as adopt the Mutual Evaluation Report (MER) of St. Kitts and Nevis. These on-sites required a high degree of teamwork among the Assessors who were physically and virtually present, cooperation with the jurisdictions being assessed, the Secretariat's IT Unit, 11th EDF Programme staff and general assistance from other staff. It was therefore no small feat that each of these on-sites were successfully completed, and I thank all the Assessors, jurisdictions, Mission and Co-Mission Leaders, and the CFATF Secretariat's IT Unit and staff for ensuring this process was accomplished.

In furtherance of our business continuity goals, which included the resumption of MEVALs, Plenary meetings were also held virtually. In November 2020, the CFATF held its first virtual Working Group and Plenary Meetings. This event was particularly auspicious as the May 2020 Plenary Meeting was cancelled due to the COVID-19 pandemic and so it was a moment of virtual normalcy that saw all our Members come together on screens. The mood was joyful and welcoming, with all happy to see their counterparts as for many, it was the first time in a year. In addition to the successful adoption of the MER of St. Kitts and Nevis, which was facilitated by the CFATF WGFI and the diligent work of its Co-Chairs, (Jamaica and Trinidad and Tobago). I am pleased to note that our virtual Plenaries during November 2020 to November 2021 resulted in the distinguished work of the CFATF Risk, Trends and Methods Group (CRTMG) led by its Co-Chairs (Trinidad and Tobago and Jamaica) with a Project Update on "CFATF Report of Regional Money Laundering and Terrorist Financing Cases." the adoption of the "Financial Flows from Human Trafficking" and the "Vulnerabilities in the Concealment of Beneficial Ownership Information." adopted in November 2021. Each of these projects represents concerted and collective efforts among project team members and the CFATF Secretariat to provide high-quality typologies that raise awareness of ML/TF/PF risks within the region and the global network.

The Heads of FIUs led by its Chair (The Bahamas) kept abreast of the operational successes and challenges faced by Member FIUs as a result of the pandemic and encouraged measures that deepened regional in international cooperation and as usual had presentations that were topical and engaging for Members. I also extol the CFATF ICRG whose rigorous work led by its Co-Chairs (Belize and the Virgin Islands) directly ensures that our Members are compliant with the FATF Standards and are effectively implementing AML/CFT/CPF their frameworks.

New types of illicit activities and different manifestations of existing crimes that emerged because of the COVID-19 pandemic were shared with CFATF Members at various fora. Notably, criminals have significantly exploited the crisis created by the pandemic with regard to modern slavery and human trafficking. The CFATF's work on human trafficking and my role as a former commissioner on the Liechtenstein Initiative led to collaborations and strengthening of relationships with regional and international organizations on this significant issue. The CFATF remains committed to partnering with organizations, agencies and other stakeholders that address emerging and current ML/TF/PF issues that affect our Members and the global network and will continue to focus on virtual assets, virtual asset service providers and risk assessments for proliferation financing which will be a feature of the next round of mutual evaluations.

Training and technical assistance continued to be a prime function and through collaboration with the FATF Secretariat, the IMF, UNODC, IDB and other donor organisations such as RUSI, we were able to provide a wide range of training to our Members. The Secretariat's expert technical, research and administrative staff were also instrumental in providing training, guidance and articles on AML/CFT/CPF matters.

On behalf of the Executive and staff of the Secretariat, I wish to thank The Bahamas for all the guidance, support and high level of engagement provided during their tenure as Chairman of the CFATF. My sincere thanks also go to the Council of Ministers who have positively responded to the challenges being faced by the CFATF and ensured that the organisation continues to grow from strength to strength. The ongoing sterling work being done by the Steering Group sub-committees; the Budget and Audit Committee (BAC), the Human Resources Committee (HRC) and the Planning Committee (PLC) is also to be highly commended as they provide the dayto-day support and guidance to me and the Secretariat. To our COSUNs, Observers and Plenary delegates, thank you and I entreat you to keep engaged with the work of the CFATF and to fully participate in the MEVAL Process. Last, but importantly is my staff; my colleagues, my teammates whom I immensely thank for their ongoing commitment to provide a high-quality service to Members under what has been at times challenging circumstances.

The CFATF Secretariat looks forward to working with all Members in 2022 and beyond. Together, we can usher in increased resilience against global financial crimes and in so doing increase our level of AML/CFT/CPF compliance.

Thank you all for your support.

Dawne J. Spicer Executive Director



June 7, 2022



Execution of the Chair's Work Programme

Photo: Chairman of the CFATF, the Honourable Ryan Pinder, pictured in the third row, photo 5, and participants at the LIII Plenary and Working Groups meetings held virtually during the period November 18th to December 3rd, 2021.

The implementation of the Chairman's Work Programme was conducted through five pillars, as follows:

- 1. Continued enhancement of the CFATF's Mutual Evaluation Programme, including the follow-up process.
- 2. Maintaining CFATF's Financial Stability.
- 3. Increasing CFATF Membership participation in the work of the organisation and the Global Network.
- 4. Ensuring continued good governance of the operations of the CFATF.
- 5. Advocacy on AML/CFT/CPF matters affecting Members.

Continued Enhancement of the CFATF's Mutual Evaluation Programme

Three on-site evaluations were carded for 2020 but could not be conducted due to travel bans and quarantines associated with

measures to impede the spread of the COVID-19 virus. The hybrid procedures for on-site evaluations were approved in February 2021. This allowed the hybrid onsite evaluation for St. Kitts and Nevis, Grenada and Aruba to occur in March, June and August 2021 respectively. Amendments to the CFATF Schedule of the Fourth Round of Mutual Evaluations were also approved by the Council of Ministers allowing the final MEVAL on-site evaluation to occur in the third quarter of 2024 and the presentation of the last two MERs in May of 2025. The onsite evaluation of Venezuela, which was originally scheduled for November 2021 was deferred to January 17th to 28th, 2022. Venezuela's MER will be presented at a specially convened Plenary in September 2022.

Amendments to the CFATF Procedures for the Fourth Round of AML/CFT Mutual Evaluations (The CFATF Procedures) were adopted as necessary to ensure alignment with the Universal Procedures and are intended to strengthen the mutual evaluation process with the aim of better-quality Mutual Evaluation Reports (MERs). Changes to the

Caribbean Financial Action Task Force

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CFATF ICRG procedures were made and approved via Round Robin in April 2021. Internal quality and consistency (Q&C) reviews by the Secretariat's technical staff on Drafts 1 and 2 of MERs continue to ensure better-quality MERs are published, and this is evidenced by the fact that the MERs have been consistently passing the post-Plenary global Q&C review.

Despite the physical limitations imposed by the COVID-19 pandemic, the Secretariat's staff receives ongoing training related to reviewing technical issues that arise as deficiencies in MERs, understanding the various steps in the MER and the types of information that countries need to provide as well as the types of analysis that should be conducted by assessors. Staff received seven (7) internal training sessions in 2021 on key aspects of the FATF recommendations, the Immediate Outcomes and **MEVAL** Procedures. The staff training ensures that a high level of guidance can be given to assessed countries and assessors and has been ongoing throughout the Chairman's term.

Staff development during the Chairman's term also included assessor training for three (3) staff members. The Staff Training and Development Policy was implemented in October 2021 to allow external on-the-job training for one member of staff. In addition, a refresher training session for Aruba's assessment team took place on March 22nd, 2021. Four (4) assessors were trained by two delivered Secretariat staff who (2)presentations while two (2) members of the FATF Secretariat attended to provide advice and support.

The continued development of the Assessors' Mentorship Programme (AMP) was evident with the development of the first Module. Module 1 focuses on Recommendations 24 and 25 as well as Immediate Outcome 5, legal persons and arrangements. An oral report was made at the LII May 2021 Plenary Meeting by Legal Advisor, Mr. Hector Sevilla. The

Module was presented to the AMP Working Group on December 21st, 2021, to finalize the material for the mentees.

Maintaining CFATF's Financial Stability.

The CFATF has collaborated with partnering entities to fund and deliver technical assistance and training. Pre-assessment training for Venezuela's Mutual Evaluation was funded by Spain in March 2021 and the UNODC delivered 'Combatting Cash Smuggling' Webinars for nine (9) CFATF beneficiary countries between January and March 2021. A new Voluntary Contribution Agreement (VCA) with UK will provide funding for an Advisor post (currently Financial Advisor) will be extended until 2025. There has also been an extension of VCA for the position of Supervision Advisor for an additional three (3) years, from 2022 to 2025. The additional resources will greatly assist the CFATF in completing its MEVAL Fourth Round.

Due to the pandemic, the 11th EDF Project's activities were postponed by fourteen (14) months. To adjust for this postponement, an application for a fourteen (14) month 'Non-Cost' Extension was submitted to the EU's Delegation to Barbados on 15th January 2021. In November 2021, an Addendum to the Financing Agreement between the EU's Delegation Office to Barbados and the CARIFORUM Directorate was signed. This addendum effected a 14 month 'Non-Cost' Extension to the program's implementation period. A corresponding addendum to the CFATF's 11th EDF Grant Agreement was finalized in January 2022. The 11th EDF Project also funded the hybrid Mutual Evaluation Missions for St Kitts and Nevis and Grenada in March and June 2021 respectively as well as Suriname's Preassessment training in June 2021.

Increasing CFATF Membership participation in the work of the organisation and the Global Network.

Members continue to support the CFATF's work as co-chairs within the four (4) Working Groups (WGs) and during Plenary. Representatives from Anguilla, Antigua and Barbuda, the Cayman Islands, Turks and Caicos Islands and Jamaica participated in the WGFI sub-working group for the MER of St. Kitts and Nevis. The CFATF Risks Trends and Methods Group (CRTMG) has also been supported by members in its projects on "ML/FT/PF Risks through the use of Virtual Assets and Virtual Assets Service Providers and its implications in the Caribbean Region" and on the "Survey of Factors Related to Beneficial Ownership in CFATF Jurisdictions." Furthermore, a "Draft Concept for the Recognising/incentivizing member participation in RTMG/CRTMG Projects" was put forward as a mechanism to increase membership participation in CRTMG projects and those in the wider global network.

Ensuring continued good governance of the operations of the CFATF.

The implementation of the Staff Training and Development Policy was aimed at ensuring that staff receive training that will allow them to successfully achieve the CFATFs strategic and operational objectives. A Staff Retention Policy is also being developed to minimise staff turnover. There is also an onoging review of the Organisational structure to ensue that there is improved governance and organisational efficiency.

Advocacy on AML/CFT/CPF matters affecting Member.

The CFATF Secretariat continues to advocate at the regional and international levels as well as to provide guidance or relevant expertise in matters that affect Members. On June 23rd, 2021, the Chair of the CFATF presented at the Organisation of African, Caribbean and Pacific States' (OACPS) webinar on the European Union's (EU) list of non-cooperative jurisdictions for tax European Commission listing regarding anti-money laundering and countering the financing of terrorism. The CFATF Secretariat continues to monitor the situation and has attended subsequent meetings. The Secretariat is also collaborating with the CARICOM Secretariat in this regard.

Another issue that the CFATF Secretariat has provided guidance to its members on was the Anti-Money U.S. Laundering Act (USAMLA 2020). For CFATF Members, provisions within the Act may significantly impact banks correspondent banking relationships in the U.S., or with U.S. branches or agencies. In addition, there are revised beneficial ownership requirements. An article was published in the "CFATF Insights" Newsletter, Volume 3, Issue 2 (2021) and a paper was later circulated on December 16th, 2021.

Through its "What's Happening?" section on the website, the CFATF Secretariat raises awareness of the development of emerging AML/CFT/CPF issues to Members. Six (6) articles were posted including "RF Holdings to accept Digital Currency across Regional Network", "Financial Investigation Division (FID) focus on Assets after Investigation into Lottery Scam" and "The Office of the Public Prosecutor in Curação administers Sanctions against Banks". Continued hosting "CFATF Research Corner" on the website also assists the Secretariat to achieve the same goal. For 2021, twenty (20) articles were published on various topics such as "The Importance of National Risk Assessment to the Mutual Evaluation Process", "Applying KYC to Predicate Offences" Detecting and "Characteristics of a Good Asset Recovery System".

Regarding developments on virtual assets (VAs) and Virtual Asset Service Providers



(VASPs), the CFATF Secretariat published two (2) monthly articles, "AML/CFT 101-How can Virtual Assets be used for the commission of Financial Crime" and "AML/CFT 101 - Virtual Assets - Regulatory safeguards being developed in the Caribbean". The CFATF also delivered a

CFATF Members benefitted from Technical Assistance Trainings in collaboration with regional and international organizations. Among these were the Royal United Services Institute (RUSI) training on "Countering on Proliferation Financing" on March $24^{th} - 25^{th}$, 2021, UNODC-CFATF Regional webinar on "Combatting Cash Smuggling" on March $10^{th} - 11^{th}$, 2021 and the OECD Tax Crime Academy Secretariat's "Managing Financial Investigations (Intermediate) Programme on September $13^{th} - 24^{th}$, 2021.

CFATF Membership and Observers

El Salvador has withdrawn as a CFATF Member with effect from January 2022. The Chair thanked El Salvador for their contribution to the CFATF during their eighteen (18) year membership in the CFATF. The Council of Ministers approved the OAS-DTOC as an Observer to the CFATF and OAS-CICAD has been withdrawn as an Observer in its October 2021 meeting.

Image of the CFATF

Representations by the Chair and the Secretariat in training programs, workshops and conferences have positively enhanced the June 7, 2022

presentation on "Virtual Assets and Virtual Assets Service Providers – FATF Standards and Regulatory Safeguards", which was organized by FIU and Financial Services Commission (FSC) of Belize 19th August 2021.

image of the CFATF during the Chairman's term. The image of the CFATF is also being addressed through the efforts to increase the quality and consistency of CFATF MERs. Amendments to the CFATF Procedures for the Fourth Round of Mutual Evaluations were made at the first Virtual Plenary held in December 2020 with the aim of producing better quality Mutual Evaluation Reports by addressing issues such as assessor qualifications, translation of documents, the re-circulation of the MER to reviewers where the MER is substantially changed following the face-to-face meeting, development of the Key Issues Document and matters pertaining to the TC re-rating process. The changes were based on amendments made to the Universal Procedures.

Regarding the Fourth Round of Mutual Evaluations of the ten (10) published MERs, all but one country has been placed in follow-up. The Enhanced level of effectiveness continues to present a challenge to many of our Members, there has however been noticeable improvements in the level of technical compliance. In its 3rd Follow-Up Report for Technical Compliance Re-Ratings, the Cayman Islands is now Compliant/Largely Compliant with all 40 FATF Recommendations.





CFATF Members continue to receive support through the Supervision Project: Strengthening Supervisory Systems (The Project), funded by the COSUNs, namely the Governments of the United Kingdom of Great Britain and Northern Ireland and Canada (the Donors). The Project's initial two-year term has been extended for a further four-year period until May 2025 and continues to focus on Immediate Outcome 3 (IO3) – Supervision.

The Project:

- 1. Provides technical assistance to Members with the FATF Recommendations specific to IO3.
- 2. Reviews the AML/CFT supervisory approach and identifies areas that require attention.
- 3. Considers the existing action plans and/or offers guidance to help with implementing the recommended actions in a Mutual Evaluation Report.
- 4. Develops and delivers training for AML/CFT supervisory authorities based on identified needs relative to an effective supervision regime, and allows the Supervision Advisor to participate in conferences, workshops and other training events that promote effective AML/CFT supervision by CFATF Members.

Member Engagement

 In 2021, in the area of technical assistance, nine (9) supervisors from two (2) Members began active engagement, with eight (8) supervisors from three (3) Members continuing to receive support since 2020. As a result, supervisors have been able to perform gap analyses and develop plans to addresses the areas which require strengthening. Similarly, the review and feedback on the AML/CFT supervisory approaches of three (3) supervisors from one (1) Member commenced in 2021 and fourteen (14) supervisors from four Members are ongoing. Altogether, seventeen (17) supervisors from five Members continue to make concerted efforts to strengthen their AML/CFT supervisory systems.

- For the year in review, 204 persons from eighteen (18) Supervisors representing six (6) Members participated in the capacity building exercise. This brings the total number of persons trained since the start of the Project to 303 from thirty (30) supervisors representing ten (10) Members.
- 3. As the pandemic continues, in April 2021, forty-one (41) supervisors from nineteen (19) CFATF Members participated in the second survey to understand their response to COVID-19. Based on the results of the survey, supervisors demonstrated the ability to adapt and resume or improve their ability to perform their supervisory functions with more than 80% functionality in key supervisory functions. Supervisors also overcame the limitations posed on restrictions on physical movement by utilising innovative measures and financial technology, with at least 51% of the responders promoting financial inclusion. Each member received a report on the findings.
- 4. Since May 2021, the Project began providing desk-based assistance to the CFATF's Mutual Evaluation Programme. By December 2021, the Supervision Advisor, provided support in the form of quality and consistency reviews of the draft MERs and technical assessment of the FATF Recommendations to four (4) Members.

- 5. In November 2021, the Supervision Advisor delivered a presentation on the topic, "Understanding Risk to Promote Inclusion", as part of the World Bank's Technical Assistance Programme offered to the Eastern Caribbean Central Bank Members. The event was the first AML/CFT **Risk-Based** Supervision Banking Dialogue Sector and Collaboration Workshop aimed at strengthening the dialogue and cooperation between the private and public sectors, clarifying the regulatory expectations and the guidance needs of the private sector.
- 6. The Supervision Advisor continues with the work plan to ensure supervisors receive the required support necessary, to build and strengthen their AML/CFT supervisory systems.

The Way Forward

The work continues as Members have articulated their appreciation for the support provided by the CFATF and the COSUNs.



Human and Financial Resources

Human Resource Overview

At the close of the Plenary year, December 2021, the current staff at the CFATF Secretariat totalled twenty-six (26) and comprised: the Executive Director, Ms. Dawne Spicer; two (2) Deputy Executive Directors, Ms. Ana Folgar and Mr. Loxly Ricketts, the Director of Finance & Administration, Ms. Magdalene Walcott; three (3) Legal Advisors, Mrs. Sunita Ramsumair, Mr. Héctor Sevilla and Ms. Camille Renie; three (3) Law Enforcement Advisors, Mr. Jefferson Clarke, Mr. Pedro Harry and Mr. Kerry Lucio; four (4) Financial Advisors, Mr. Roger Hernandez, Ms. Nikima Prince, Ms. Avelon Perry and Jackson-Frederick; Knalidi Ms. one Supervision Advisor; two (2) Research Officers, Mrs. Risha Pragg-Jaggernauth and Ms. Brionne Antoine; two (2) Administrative Officers, Ms. Ellisha George (MEVAL) and Hope (Finance Ms. Iyaana and Administration); two Translators, Mrs. Michele Le Blanc-Morales and Ms. Ayana Jack; one Accounting Assistant, Ms. Allysha Gibson; one (1) Information Technology Officer Mrs. Alysia Jugmohunsingh and one (1) ICT Support Officer Mr. Noellynton A. Serapio Jr, the 11th EDF team comprising Project Manager. Mr Andrew Frection.

The CFATF Secretariat performs technical and administrative functions under the direction of the Executive Director, Deputy Executive Directors and Director Finance and Administration. The Secretariat provides support to the member jurisdictions of the CFATF. Key activities include:

• Organising CFATF meetings such as Plenary and working groups meetings, Council of Ministers meeting, Steering Group and other meetings as needed.

- Addressing the needs of the Chairman, the Steering Group and CFATF delegations inclusive of technical guidance and training.
- Supporting CFATF Working Group Co-Chairs and preparing and producing policy papers to be discussed in working groups and/or the Plenary.
- Co-ordinating and participating in mutual evaluation missions and drafting the related assessment reports and subsequent follow-up reports.

The CFATF Secretariat also liaises on an ongoing basis with the numerous CFATF partners, undertakes a representational role at professional events and provides information to the public and the media.

Financial Overview

Management of the organisation's financial resources continues to be key to ensuring that the goals and objectives of the organisation are met. The Secretariat's operational and administrative expenses are budgeted and approved annually by the Council of Ministers and membership annual contributions are set based on these expenditure levels. COSUNs, Observers and the donor community are also engaged and provide funding either on a project basis or for specific types of activities.

Donor Funded Projects

The donor community supports and funds several activities. During the period under review, opportunities for funding activities were minimal due to the ongoing impact of COVID-19. Many activities were held virtually and/or incurred minimal expenses if any. See below for a list of activities which required funding:

Activity	Donor Country/ Organisation	Type of relationship
EVENTS	-	
Preassessment Training for Venezuela	Spain	COSUN
ONGOING PROJECTS		
Supervision Advisor Project	United Kingdom & Canada	COSUNs
Short-term Advisor Project	United Kingdom	COSUN
11 th EDF Project – Implementation of the Mutual Evaluation Programme ¹	European Union (through the Financing agreement with CARIFORUM under the 11 th EDF)	Observer Organisation

The purpose of the Supervision Advisor project is to provide technical assistance which will include onsite engagement with the CFATF member country supervisors (training, mentoring, policy work) aimed at supporting the CFATF members to meet the FATF effectiveness measures relating to AML/CTF supervision. The initial Voluntary Contribution Agreement (VCA) spanned a two-year period, originally due to end in 2021. During 2021, the VCA was amended, and the project extended for a further four (4) years, now due to end in 2025.

The purpose of the Short-term Advisor project is to provide additional human resources to support the CFATF's Mutual Evaluation programme. This VCA has also been extended to 2025.



¹ See pages $\underline{23}$ for further information

COSUNs/ Donor Support

The COSUNs have made very valuable contributions to the CFATF over the years by their critical role in the growth and development of the CFATF as a FATF Style Regional Body (FSRB), contributing both human and financial resources to all CFATF endeavours.

CFATF Member countries have been encouraged to provide detailed matrices on their Technical Assistance and Training needs. Based on these submissions, discussions would continue with the COSUNS, Observers (IMF, WB, CDB, UNODC, CARICOM IMPACS, IDB, EU) and other partners in the donor community for the delivery of relevant assistance to Members in support of the Fourth Round of Mutual Evaluations using available funds and those to be provided within the framework for delivery and reporting as agreed by the Parties.

The Donors' Forum was held during the May 2021 Plenary. A Report on the technical

assistance and training needs of the CFATF members was presented. Technical assistance and training matrices from Members were used to determine training that can be sourced or developed.

Seventeen (17) member countries of the CFATF submitted their technical assistance and training needs matrix during the period covered by this report.

The United Nations Office on Drugs and Crime (UNODC) provided details on the "Combating Trade Based Money Laundering in Central America and the Caribbean" which encompassed workshops and webinars for beneficiary countries.

The EU, through the 11th EDF also provides valuable technical assistance and training to the CFATF Members. *See pages 24 for further information.*



11th EDF – EU/CARIFORUM Assists CFATF Implementation of the Mutual Evaluation Programme



The EU and the CFATF signed a Grant Agreement in October 2018 to enhance the Region's capacity to comply with standards relating to AML/CFT. This is being undertaken via the implementation of the Mutual Evaluation Programme which evaluates compliance in the financial and related sectors in CFATF member countries, to ensure that international standards are adhered to.

One of the main actions under the 11th EDF is assisting countries in improving their levels of compliance with the FATF 40 Recommendations.

The Project undertakes a series of workshops and seminars to build technical capacity, carry out public education and awareness activities, and develop an Information Communication Technology platform called Vision 2022 which will allow CFATF Members to access resource databases. It should be noted that some of these milestones have been affected by the ongoing pandemic.

During the reporting period January 2021 to October 2021, the 11th EDF Office conducted:

- 2 Mutual Evaluations
 - \circ 1 Hybrid Mutual Evaluation Mission for St Kitts and Nevis was executed over the period $15^{\text{th}} 25^{\text{th}}$ March 2021.
 - \circ 1 Hybrid Mutual Evaluation Mission for Grenada was executed over the period $14^{th} 25^{th}$ June 2021.
- 1 Pre-Assessment Training
 - 1 Virtual Pre-Assessment Training for Suriname was conducted over the period 28th -30th June 2021 (237 persons trained).

The CFATF 11th EDF E-Learning Platform

The CFATF's E-Learning Platform is comprised of three distinct deliverables. The first component, a Video conferencing service (Subscription) for conducting live-streaming training was installed in February 2021. The second and third components, an Integrative Learning Management System (Subscription) and a Video on Demand platform for hosting videos/content (Subscription) was installed at the end of October 2021. These two components allow the CFATF to deliver self-paced and guided module learning, registration, testing and certification for participants. This will be launched in 2022.



The CFATF 11th EDF's Application for Non-Cost Extension to the implementation period

Due to the Global COVID 19 Pandemic (11th March 2020) the project's activities were postponed by 14 months. To adjust for this postponement, an application for a 14 month 'Non-Cost' Extension was submitted to the EU's Delegation to Barbados on 15th January 2021. In November 2021 an Addendum to the Financing Agreement between the EU's Delegation Office to Barbados and the CARIFORUM Directorate was signed. This addendum effected a 14 month 'Non-Cost' Extension to the program's implementation period. A corresponding addendum to the CFATF's 11th EDF Grant Agreement is expected to be signed by December 2021. On January 12th, 2022, the 14-month extension of the 11th EDF Programme was finalized.

Summary of 11th EDF Events January 2021 to October 2021

(1)	Hybrid On-site	15 th – 25 th March 2021	
	Mutual Evaluation	Mission led by Mr. Roger Hernandez, Financial Advisor and Co-	
	Mission for St. Kitts Mission Leader, Ms. Nikima Prince, Financial Advisor.		
	and Nevis		
	Hybrid On-site	14 th – 25 th June 2021	
	Mutual Evaluation	Mission led by Mrs. Sunita Ramsumair, Legal Advisor and Co-	
	Mission for Grenada	on for Grenada Mission Leader, Mr. Kerry Lucio, Law Enforcement Advisor.	
	Virtual Pre-	28 th – 30 th June 2021	
	Assessment Training Training conducted by Law Enforcement Advisor, Mr. Jeffer		
	for Suriname Clarke and Financial Advisor, Ms. Avelon Perry.		





CFATF Chairmanship November 2020 to September 2021 – Mr. Carl Bethel, Q.C.

The Chairmanship of the CFATF was held by Mr. Carl Wiltshire Bethel, Q.C., from December 2020 to September 2021, who represented The Bahamas as their Attorney General at that time. Mr. Bethel was also the Deputy Chairman of the CFATF (2019-2020) prior to assuming the Chair on behalf of The Bahamas. The Bahamas previously served as CFATF Chair from 2002 to 2003 and 2013 to 2014. Under his tenure, three hybrid on-site missions were successfully completed: St. Kitts and Nevis, Grenada and Aruba. Under the Chairmanship of Mr. Bethel, the Supplementary Procedures were approved by the Steering Group, which enabled the conduct of hybrid on-sites for CFATF Mutual Evaluations. Subsequently, the Mutual Evaluation Report of St. Kitts and Nevis was adopted at the CFATF LIII Plenary in December 2021.

During the Chairmanship of Mr. Bethel, the CFATF conducted activities in several key areas, including;

1. Continued advocacy at regional and international fora regarding European Commission listing of CFATF Members. Mr. Bethel presented at the Organisation of African, Caribbean and Pacific States' (OACPS) webinar on the European Union's (EU) list of noncooperative jurisdictions for tax purposes and that of high-risk third countries, regarding anti-money laundering and countering the financing of terrorism on June 23rd, 2021.

- Monitoring the development of emerging AML/CFT/CPF issues and providing feedback to Members, such as the U.S. Anti-Money Laundering Act (USAMLA) 2020 published in "CFATF Insights" Volume 3, Issue 2 (2021).
- 3. Ongoing internal training of the Secretariat staff such as internal "Tech Talk" and "Advisor's Guidance to the Legal Assessor of the Aruba Evaluation Team" (July 6th, 2021)

The CFATF Secretariat extends its gratitude to Mr. Bethel for his leadership, guidance and service to the continued success of CFATF's work and the continued enhancement of its Members AML/CFT/CPF systems.

CFATE

Hybrid On-sites for CFATF Members

The Assessment Teams met with the national authorities in each of the jurisdictions to assess their effectiveness, which entailed assessing the implementation of the FATF Recommendations, identifying the extent to which the Immediate Outcomes were being achieved, and the extent to which the legal and institutional frameworks produced the expected results. Additionally, the on-site visits provided opportunities to clarify remaining technical compliance issues and obtain additional information. During the on-site visits, national authorities and private sector representatives were also able to demonstrate the levels to which their AML/CFT regimes were reflective of the characteristics of an effective system.

Hybrid On-site for St. Kitts and Nevis' Mutual Evaluation

The hybrid on-site for St. Kitts and Nevis was conducted from March 15th to March 26th, 2021. This was the first hybrid on-site conducted after the approval of the Supplementary Procedures for Hybrid Onsite Visits. The Mission Leader, Mr. Roger Hernandez, Financial Advisor was physically present in St Kitts and Nevis and the Co-Mission Leader, Ms. Nikima Prince, Financial Advisor, was virtually present at the proceedings from the CFATF Secretariat. The Assessment Team also included the following members:

1. Ms. Kara Duff-Yehuda - Legal Advisor, Guyana Geology and Mines Commission (Guyana)

- 2. Mr. Junior Nisbett- Law Enforcement Financial Investigator (Trinidad and Tobago)
- 3. Ms. Sharlene Jones National Risk Assessment (NRA) Coordinator, Belize Financial Intelligence Unit (Belize) and
- 4. Mr. Lesley Pearson Senior Manager of Risk Analytics & Examinations of the Securities Commission of The Bahamas (The Bahamas).





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Photo: Mission Leader, Mr. Roger Hernandez, team members Junior Nisbett and Sharlene Jones on location in St. Kitts Nevis, Co-Mission Leader, Ms. Nikima Prince and other members of the Assessment team Ms. Kara Duff and Ms. Lesley Pearson during the hybrid onsite.



Photo: Officials of St. Kitts and Nevis during the hybrid on-site meeting.

Hybrid On-site Visit for Grenada's Mutual Evaluation

The hybrid on-site of Grenada was conducted during the period June 14th to June 25th, 2021. Members of the Assessment Team attended either physically in Grenada or virtually from their respective countries.

The members of Assessment Team who attended virtually were:

- 1. Mission Leader Ms. Sunita Ramsumair, Legal Advisor, CFATF Secretariat;
- 2. Legal Assessor Mrs. Vyana Sharma, Head, Anti-Terrorism Unit, Ministry of the Attorney General & Legal Affairs (Trinidad and Tobago); and

3. Financial Assessor Ms. Nikitia Francis, Financial Compliance Examiner, Office of the National Drug and Money Laundering Control Policy (Antigua and Barbuda).

The members of assessment team who attended physically were:

- 1. Co-Mission Leader Mr. Kerry Lucio, Law Enforcement Advisor, CFATF Secretariat;
- 2. Law Enforcement Assessor Mr. Horace Edwards, Director, Financial Intelligence Unit, Money Laundering Reporting Authority (Anguilla); and



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3. Financial Assessor Ms. Caritza Schoot Financial Insurance Examiner, Institutional Investors General Supervision Department, Centrale Bank van Curaçao en Sint Maarten (Curacao).



Photo: Co-Mission Leader, Mr. Lucio and Members of the Assessment team during the hybrid onsite.



Photo: Mission Leader, Ms. Sunita Ramsumair (top right), Co-Mission Leader, Mr. Kerry Lucio (bottom left, right) and Members of the Assessment team during the hybrid onsite.



Hybrid Onsite Visit for Aruba's Mutual Evaluation

The hybrid onsite for Aruba took place from August 30th to September 10th, 2021, following approval of the Supplementary Procedures by the Steering Group. Members of the Assessment Team attending either physically in Aruba or virtually from their respective jurisdictions. The members of Assessment Team who attended physically were:

- 1. Mission Leader Mr. Pedro Harry, Law Enforcement Advisor at the CFATF Secretariat.
- 2. Law Enforcement Assessor Mr. Floyd Theodore. Financial Investigator, Financial Intelligence Unit (Dominica);
- 3. Legal Assessor Ms. Kozel Creese. Senior Crown Counsel (Ag.),

Attorney General's Chambers (Saint Lucia);

- Financial Assessor Ms. Dana Munnings-Gray. Manager, Supervision Department, Securities Commission of The Bahamas (The Bahamas); and
- 5. Financial Assessor Ms. Amy Callwood. Compliance Examiner, Financial Investigation Agency. (Virgin Islands (British).

The member of assessment team who attended virtually was:

1. Co-Mission Leader- Ms. Camille Renie, Legal Advisor at the CFATF Secretariat.

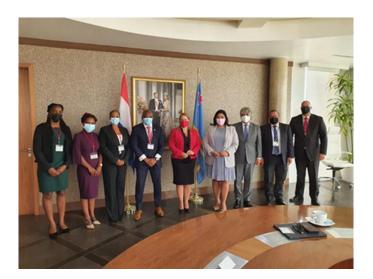


Photo: Members of the Aruba Assessment Team (from left to right) - Ms. Amy Callwood-McIntosh (Financial Assessor - BVI), Ms. Kozel Creese (Legal Assessor - St. Lucia), Ms. Dana Munnings-Gray (Financial Assessor - The Bahamas) and Mr. Pedro Harry (Mission Lead). Missing is Mr. Floyd Theodore (Law Enforcement Assessor-Dominica)

Also included are officials from Aruba (from left to right): Mrs. Evelyna Wever-Croes - Honourable Prime Minister and Minister of General Affairs, Integrity, Energy, Innovation, and Government Organization, Mrs. Xiomara Maduro - Honourable Minister of Finance, Economic Affairs and Culture, Mr. George Croes -Director of the Department of Legislation and Legal Affairs, Mr. Jarzinho (Gino) Giel - Senior Legal Advisor





at the Department of Legislation and Legal Affairs and Mr. Marcel `t Mannetje - Senior Legislative Drafter at the Department of Legislation and Legal Affairs.

Pre-Assessment Training for Suriname

The virtual Pre-Assessment Training for Suriname was held from June 28th to 30th, 2021. This was facilitated by Mr. Jefferson Clarke, Law Enforcement Advisor and Ms. Avelon Perry, Financial Advisor from the CFATF Secretariat. Over 80 participants from the public sector attended the training during the first two days while more than 150 private sector attendees representing financial and DNFBP entities were trained in a half-day session. Participants were guided through the Mutual Evaluation process, key principles and concepts of the 4th Round of Mutual Evaluations and preparatory considerations relating to their upcoming 4th Round Mutual Evaluation in 2022.

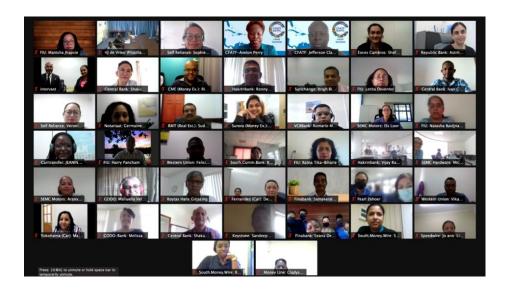


Photo: Pre-Assessment Training for Suriname - Private Sector Entities.





Pre-Onsite Training for Venezuela's MEVAL

Photo: Deputy Executive Director, Ms. Ana Folgar and Legal Advisor, Mr. Hector Sevilla with members of the Assessment Team during training.

The pre-onsite training for Venezuela's Assessment Team was held virtually from September 27th to October 1st, 2021. The training was delivered by Mission Leader, Mr. Hector Sevilla, Legal Advisor of the CFATF Secretariat and Co-Mission Leader, Ms. Ana Folgar, Deputy Executive Director. The Mission and Co-Mission Leaders were assisted by Ms. Knalidi Jackson-Frederick, Financial Advisor. The training focused on the following areas:

The training was enriched by the intense participation of the Assessment Team who engaged in fluent discussions on the application of the FATF Methodology, review of information provided by Venezuela, and preparation for the onsite visit interviews. The members of the Assessment Team are Ms. Irene Sánchez, Deputy Assistant Director-General of 1. The Scoping Note;

- 2. The Technical Compliance Annex;
- 3. The Immediate Outcomes;
- 4. Institutions to be interviewed;
- 5. Identification of Lead Assessor for each interview;
- 6. Preparation of Preliminary Questions and
- 7. The way forward.

Inspection Control Capital and of Movements, Secretariat of the Treasury. Ministry of Economy and Digital Transformation of Spain (Financial Expert); Mr. Mauro Ortega, Chief Coordinator, Financial Investigation Unit (FIU), El (Financial Expert); William Salvador Lightbourne, Inspector in charge of the RTCIPF (Police) National Crime Intelligence

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Bureau, Turks and Caicos Islands (Law Enforcement Expert); Mr. Sergey Levoshin, Representative of the Ministry of Internal Affairs of Russia in the region of Peru and the Dominican Republic, Russia (Law Enforcement Expert) and Mr. Bayardo Orozco, Director of Supervision and Compliance, Financial Investigation Unit (FIU), Nicaragua (Legal Expert).

Training and Events 2020-2021

During the reporting period, the CFATF continued to engage in training and technical Assistance and capacity building for Members. A number of Assessor and assessed country training workshops were also conducted as the quality of the mutual evaluation process relies on the participation of relevant and experienced experts from the Membership in each assessment team. To ensure a consistently high quality of all mutual evaluations, the CFATF organises training sessions on a bi-annual basis. Only trained assessors with relevant AML/CFT experience are asked to participate as assessors for mutual evaluations.

During Assessor Training, potential assessors learn how to critically analyse the country's risk and context and assess the reasonableness of its NRA to determine whether the country has sufficiently understood the ML and TF risks and whether it has taken commensurate mitigating action. Trainee assessors also learn more about the

information they should request during a mutual evaluation to determine whether the country has implemented the required legal, regulatory and operational framework. Most importantly, they learn to identify the evidence needed to demonstrate that a country's efforts are effective in tackling ML, TF and PF. The aim of the mutual evaluation is not only to identify where a country's strengths and weaknesses lie but to also provide the assessed country with clear and targeted recommendations that will help it to strengthen its measures swiftly and effectively. Consequently, the training gives potential assessors the necessary tools to successfully undertake a mutual evaluation mission.

Assessor and assessed country training and other AML/ CFT Trainings and workshops delivered and attended for the period are included in the table below. Please note that this excludes 11th EDF activities.

TRAINING AND EVENTS	DATES	LOCATION
CARICOM IMPACS virtual workshop - "Asset Recovery In- Practice"	11 th ,13 th , 15 th and 16 th October 2020	Virtual
Asset Recovery Workshop	26 th - 30 th October 2020	Virtual
Supervision Project - Training - Belize	9 th , 12 th -13 th November 2020	Virtual
Supervision Project - Training - Trinidad & Tobago	1 st – 3 rd December 2020	Virtual
Conference on "Corruption, Compliance and Cybercrime in the Caribbean"	7 th - 8 th December 2020	Virtual
OECD International Academy for Tax Crime Investigations - Compliance with FATF Recommendations	17 th February 2021	Virtual



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TRAINING AND EVENTS	DATES	LOCATION
Webinar – The Mutual Evaluation Process	1st -3 rd March 2021	Virtual
Internal CFATF Tech Talks - FATF's 4th Round ICRG Procedures	12 th March 2021	Virtual
Webinar - FATF ICRG process	12 th March 2021	Virtual
Webinar - Outcomes of the FATF Working Meetings held in February 2021	19 th March 2021	Virtual
Workshop - Fridays with Fintelekt	19 th March 2021	Virtual
Refresher Training Aruba's Assessment Team	22 nd March 2021	Virtual
Webinar offered by the Royal United Services Institute for Defence and Security Studies (RUSI) – Counter Proliferation Financing	24 th - 25 th March 2021	Virtual
FIBA's 3rd Annual Caribbean Roundtable Conference	25 th March 2021	Virtual
Workshops for small international financial centres - Virtual sessions organised by the Ministry of Foreign Affairs of Malta	19 th – 23 rd April 2021	Virtual
ComplianceAid Conference	22 nd April 2021	Virtual
OAS AML Workshop	3 rd May 2021	Virtual
Advisor's Guidance to the Central Bank of Aruba – Immediate Outcome 4	28 th May, 2021	Virtual
Pre-Mutual Evaluation High Level Engagement with Assessed Countries	3 rd June, 2021	Virtual
Maintaining an Effective AML/CFT/PF Framework While Adjusting to Regulatory Reform.	17 th June 2021	Virtual (St. Lucia)
Training Event - Changes in The Global Regulatory Framework & The Impact to The Caribbean	24 th June 2021	Virtual
Pre-Assessment Training - Suriname	28 th – 30 th June 2021	Virtual
Egmont Group Plenary Meetings - FIUs	July 2021	Virtual
Advisor's Guidance to the Legal Assessor of the Aruba Evaluation Team - Recommendations 6 and 7	20 th July, 2021	Virtual
Egmont Group Americas Region Workshop - Improving the quality of STRs/SARs	August 2021	Virtual
FATF Standards and Regulatory Safeguards - Virtual Assets and Virtual Asset Service Providers	19 th August 2021	Virtual (Belize)
Internal CFATF Tech Talks - CFATF Mutual Evaluation Process	20 th August 2021	Virtual
Internal CFATF Tech Talks - IO. 1 and related Recommendations	27 th August 2021	Virtual
Internal CFATF Tech Talks - Immediate Outcomes 6, 7 and 8 and related Recommendations	10 th September 2021	Virtual
ARIN CARIB Steering Group Meeting	23 rd September 2021	Virtual
Pre-onsite Training - Venezuela	27 th September - October 1 st 2021	Virtual



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TRAINING AND EVENTS	DATES	LOCATION
OECD Latin America Academy for Tax and Financial Crime	18 th – 29 th October 2021	Virtual
Investigation Virtual intermediate programme on "Managing		
Financial Investigations"		
RSS Heads of FIU Meeting	2 nd November 2021	Virtual
Webinar - VA and VASP by GAFILAT	11 th November 2021	Virtual
CFATF-focused Standards Training	$8^{\text{th}} - 12^{\text{th}}$ November 2021	Virtual

Collaboration with Regional Bodies and Organizations

UNODC Compendium on PPP to Prevent and Counter Trafficking in Persons (TIP)

In December 2020, the CFATF Secretariat took part in the Regional Expert Group Meetings (REGMs) discussions of the UNODC's "Public-Private Partnerships (PPP): Fostering Engagement with the Private Sector on the Implementation of the UN Convention against Transnational Organized Crime (UNTOC) and its Trafficking in Persons Protocol" also called the "PPP Project". Mr Kerry Lucio, Law Enforcement Advisor with the CFATF involved in panel Secretariat. was discussions on public-private partnerships as it relates to supply chain, technology sector

and financial institutions to prevent and counter TIP. The result of the REGMs hosted by the UNODC was a "Compendium of Promising Practices on Public-Private Partnerships to Prevent and Counter Trafficking in Persons". In addition, the CFATF highlighted its involvement and work in PPPs, Caribbean's Initiative's Financial Inclusion Task Force (FITF) and the Global Coalition to Fight Financial Crime – Effectiveness Expert Working Group



Inter-American Development Bank Fourth Technical Dialogue in Trafficking in Persons



Photo: CFATF Executive Director Ms. Dawne Spicer makes a presentation at the IDB Fourth Technical Dialogue in Trafficking in Persons. Photo credit: IDB

The CFATF participated in the Fourth Technical Dialogue in Trafficking in Persons hosted virtually by the Inter-American Development Bank (IDB) on September 28th, 2021. Specifically, the CFATF contributed to the panel discussion on "The Trafficking in Persons, Organized Crime, and other Associated Crimes", which concentrated, inter alia on CFATF's role and work in combatting this crime and the main findings of the CFATF Financial Flows from Human Trafficking Report. The Executive Director's contribution to the panel discussion expounded on several areas in the context of human trafficking. These included the extent and impact of trafficking in person in the Caribbean region, the importance of efficient cooperation and coordination among FIUs and other competent authorities as well as mechanisms to improve coordination and cooperation between these entities. The main findings and lessons for the Caribbean region emerging from the CFATF Financial Flows from Human Trafficking Report were also described.

Regional Security System-Asset Recovery Unit (RSS-ARU) Terrorism and Terrorist Financing Course

The RSS-ARU held its Terrorist and Terrorism Financing course from February 1st to 26th 2021. The course was geared for police, financial intelligence units, and military and border security personnel from SS Member States, with the objective of providing an understanding of terrorism and terrorist financing policies, best practices as well as to provide training to RSS personnel to conduct relevant investigations. Mr. Jefferson Clarke, Law Enforcement Advisor at the CFATF, conducted a session on the FATF Recommendations and the regional experience on February 8th, 2021, which was well-received by the participants.

Regional Security System-Asset Recovery Unit (RSS-ARU) Heads of FIU Meeting

The RSS-ARU's Heads of FIU meeting was held on November 2nd, 2021. The meeting was attended by Directors and staff of the FIUs that are Member countries. Opening remarks for the meeting were delivered by former Executive Director of the RSS, Commodore Errington R. Shurland, Director of the ONDCP, Lt. Col Edward Croft and Director of the RSS-ARU, Mr. Grenville Williams.

The CFATF, represented by Mr. Pedro Harry, Law Enforcement Advisor, presented on Public Private Partnerships (PPP) and its

importance to FIUs. This entailed an overview of PPP, consideration for establishing PPP, opportunities, barriers and challenges. value of PPP to the FATF/evaluation process, value to FIUs as well as lessons learned and success stories. Several other agencies such as, Interpol, RSS-ARU, Trinidad and Tobago Police Service, Financial Intelligence Division of Jamaica, and the Financial Intelligence Agency of St. Lucia made presentations at the meeting.

CFATF Technical Assistance and Training - Egmont Group

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Financial Advisor at the CFATF Secretariat, Ms. Nikima Prince delivered a presentation on the technical assistance and training provided to CFATF Members at the Egmont Technical Assistance and Training Working Group (TATWG) on February 9th, 2021. The presentation was based on the training provided by the CFATF, such as joint Assessors' training, Supervisory training (risk-based supervision for AML/CFT compliance) and the CFATF Asset Recovery Virtual Workshop. The presentation also highlighted training conducted with collaborative partners, CFATF Plenary outcomes and Working Group meetings, specifically CFATF Heads of FIU meeting outcomes at both the May and November Plenary meetings.

CARICOM Standing Committee Meetings

The CFATF took part in two CARICOM Standing Committee meetings in 2021. The first was the 26th Meeting of the CARICOM Standing Committee Commissioners of Police and Military Chiefs, which occurred virtually on February 18th, 2021. The objectives were building regional member state capacity and measures to improve overall citizen security in the context of the COVID-19 pandemic. The CFATF Secretariat, represented by Mr. Jefferson Clarke, Law Enforcement Advisor, presented an oral update on the CFATF's work regarding the mutual evaluation programme, COVID-related crimes in the Caribbean region and an overview of the Report on the impact of COVID-19 on the operation of FIUs. Mr. Clarke was also present at the virtual 33rd Meeting of the CARICOM Standing Committee of Intelligence Heads and FIUs.

Virtual Training on AML Law in Suriname

The Department against Transnational Organized Crime of the Organization of American States (DTOC/ OAS), the Embassy of the United States in Suriname, and the Centre for Democracy and Justice (CDR) conducted "Virtual training on interpretation and application of current AML law from a fiscal perspective in Suriname" from May 3rd to 6th, 2021. Former Attorney General of Suriname, Hon. Mr. Roy Baidjnath Panday also collaborated on this initiative. The purpose of the training was to increase the knowledge of AML law among and fiscal authorities other related professionals. Emphasis was placed on highlighting the gaps in the existing AML legal framework from a fiscal perspective

and assisting in determining the way forward to comply with the FATF recommendations. Attendees included tax authorities, custom authorities, prosecutors, financial intelligence analysts, accountants, and financial and non-financial service providers

The first session on "Money Laundering and Tax Legal Frameworks" was opened by Ms. Dawne Spicer, Executive Director, CFATF Secretariat. Ms. Spicer spoke on the universal tax legal framework and the related FATF recommendations. Participants had the opportunity to engage in robust discussion of the topic in a follow-up 'Question and Answer' session.

Caribbean Group of Banking Supervisors XXXVIII Annual Conference

The Caribbean Group of Central Bank Governors XXXVIII Conference was held virtually from June 1st to 2nd, 2021. The theme of the meeting was "Pivoting Effectively in the Changing Financial Environment: A Regulator's Perspective." Executive Director of the CFATF, Ms. Dawne Spicer presented on "FATF

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Recommendations for Regulators During and Post COVID-19". The presentation focused

on COVID-19 related threats and vulnerabilities, emerging ML/TF risks as well as the impact of the pandemic on

supervisory entities and their functions. Ms. Spicer also discussed some recommended responses to both present COVID-19 ML/TF

risks and moving forward. In closing, the Executive Director highlighted that the pandemic can also present positive opportunities for regulators, such as increased international cooperation, building capacity and improved domestic cooperation between regulators and with other competent authorities.

Third (Virtual) Meeting of National Authorities on Transnational Organised Crime



Photo: Blurb by CFATF Executive Director Ms. Dawne Spicer. Photo credit: OAS DTOC

The Organization of American States (OAS) held the Third Meeting of National Authorities on Transnational Organised Crime (RANDOT III) virtually on June 23rd and 24th 2021. The theme of this meeting was "Bolstering Global and Hemispheric Efforts to Address Transnational Organized Crime". The objectives of this meeting were to 1) promote dialogue and exchange of best practices and 2) promote cooperation and technical assistance among Member States. Several regional and international organizations representing law enforcement, anti-money laundering, public safety and other related bodies participated in the meeting.

The CFATF, represented by the Executive Director, Ms. Dawne Spicer, had the

privilege of presenting on "Emerging Threats and Opportunities in relation to Transnational Organised Crime: a CFATF Perspective." Ms. Spicer elaborated on emerging transnational crime trends that were identified, especially during the COVID-19 pandemic based on recent reports as well as work by the CFATF, such as the "The COVID-19 Pandemic Impact on the operations of CFATF FIUs, ML/TF Trends identified and Policy Responses. 2nd Publication," October 2020. She also noted several mechanisms and methods criminals have utilized to exploit new and existing opportunities for transnational crime.

Stronger policy responses and opportunities for building greater resilience to the threats within the Caribbean region were highlighted

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by the Executive Director. These included improved collaboration and cooperation between different stakeholders and countries, monitoring areas of vulnerability that illicit actors may use and promoting awareness of the emerging threat trends.

Counter Terrorism Conference Trinidad and Tobago

Four members of the CFATF Secretariat attended a virtual high-level counter terrorism conference held by the Ministry of National Security of Trinidad and Tobago on June 23rd, 2021. The theme of the conference was "Challenges and Opportunities to Countering Terrorism and Violent Extremism in the Caribbean in the Post-COVID 19 Era" and consisted of several presentations by law enforcement, officials from the Office of the Attorney General and

Ministry of Affairs, Legal the Commonwealth Secretariat and officials from the Ministry of National Security of Trinidad and Tobago. The members of the Secretariat who attended were Mr. Jefferson Clarke, Law Enforcement Advisor: Ms. Knalidi Jackson-Frederick, Financial Advisor; Mrs. Risha Pragg-Jaggernauth, Research Officer and Ms. Brionne Antoine, Research Officer.

Caribbean Association of Banks CEO and Director's Forum

The Caribbean Association of Banks held its "CEO and Director's Forum" from June 24th to 25th, 2021. The theme of this virtual event was "Looking Beyond the Pandemic" and participants included senior bankers, C-suite executives, and directors. Legal Advisor from the CFATF Secretariat, Ms. Camille Renie presented on "Changes in the Global Regulatory Framework and the Impact on the Caribbean." The presentation focused on the basis for regulatory frameworks namely, importance of the risk-based approach and

amendments made to the FATF Recommendations since 2012. Ms. Renie expanded on two significant changes to the FATF Recommendations, virtual assets/virtual asset service providers and proliferation financing assessments. The discussion also highlighted the impact of the COVID-19 pandemic and other global developments on the Caribbean region as well as the opportunities that have arisen from the challenges.

World Bank and CARIFORUM Training on Beneficial Ownership

The CFATF Secretariat took part in the World Bank and CARIFORUM regional training on "Risk Assessment of Legal Persons, Legal Arrangements, and Beneficial Ownership-related Risks which was held online on September 22nd and 23rd, 2021. The objective of the training was to enable governments, in the Caribbean region to build their expertise in the assessment of the risks posed by different types of legal persons and corporate vehicles that can be

incorporated, both domestically and abroad. Deputy Executive Director at the CFATF Secretariat, Mr. Loxly Ricketts presented on "Global Standards on Identification and Transparency of Beneficial Ownership of Legal Persons and Arrangements". The training assisted participants to develop an understanding of the requirements under FATF Recommendations; explore tools and resources to help prepare governments to map the legal persons and arrangements that

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can be incorporated in their jurisdictions and abroad and discuss the features and characteristics of the Legal Persons and Arrangement risk assessment module so that participants can better understand how it works and connects to overall National Risk Assessments.

CARICOM IMPACS Regional Asset Recovery In-Practice Workshop

The Caribbean Community (CARICOM) Implementation Agency for Crime and Security (IMPACS) held a virtual Regional Asset Recovery In-Practice Workshop from October 7th to 16th, 2021. The main goal of the workshop was to build on the Regional Asset Recovery Forum and Strategy Workshop delivered in July-August 2020. The workshop consisted of practical exercises based on various aspects of investigation, such as evidence gathering, confiscation and realizing the property. The CFATF participated as an observer in this Workshop and was represented by Mr. Jefferson Clarke, Law Enforcement Advisor at the CFATF Secretariat.

Jamaica Bankers' Association (JBA) 10th Annual Anti-Money Laundering (AML) and Counter Financing of Terrorism (CFT) Virtual Conference.

The Jamaica Bankers Association (JBA) in collaboration with the Jamaica Institute of Financial Services (JIFS) held the 10th Annual Anti-Money Laundering (AML)/Counter-Financing of Terrorism (CFT) Conference virtually on October 12th and 13th, 2021. The theme of the Conference was "Let's Get Radical – Navigating the New Normal". The CFATF Secretariat was invited to address Board of Directors, CEOs of Member Institutions and Compliance Committee Members in a session on "Governance in the New Normal." The Executive Director, Ms. Dawne Spicer delivered the session which was well received by the audience.

Group of Experts on Money Laundering Control (GELAVEX) LI Meeting





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The Group of Experts on Money Laundering Control (GELAVEX) held its LI meeting on November 15th to 17th, 2021. The meeting was held virtually under the Chairmanship of Paraguay and the CFATF Secretariat was represented at the meeting as an Observer by Law Enforcement Advisor, Mr. Pedro Harry. The objective of the meeting was to follow up on the approved Work Plan and recommendations agreed upon by delegates at the XLIX meeting that was held on November 10th, 2020. Presentations and opening remarks were delivered by persons in the expertise of financial investigations,

international cooperation and asset recovery and other high-level officials including Mr. Gastón Schulmeister, Director, OAS Department against Transnational Organized Crime (DTOC), Mr. Carlos Adolfo Arregui Romero, Minister Executive Secretary of the Anti-Money Laundering Secretariat and Chair Pro - Tempore (outgoing) and Head of the Financial Intelligence Unit of Mexico and Chair Pro Tempore (incoming) of the Group of Experts for Money Laundering Control (GELAVEX).

Anguilla FinTech and Compliance Conference

The Anguilla Financial Services Commission held its annual Fintech and Compliance Conference from December 1st to 2nd, 2021 under the theme "Adding Value: Unity, Strength and Endurance: Anguilla's AML/CFT Framework." The Participants included competent authorities and the private sector, and students. Deputy Executive Director, CFATF Secretariat, Mr. Loxly Ricketts, made a presentation titled "FATF:

Revisiting Recommendations". Mr. Ricketts provided an overview of the FATF and current Work Plan for 2021 to 2022, including changes being made to Recommendation 24, ongoing engagement with stakeholders in relation to Virtual Asset Services Providers and Recommendation 15, as well as challenges to achieving compliance and effective AML/CFT systems in the Caribbean region and the global network.

Caribbean Development Bank Conference on Corruption, Compliance and Cybercrime

The Caribbean Development Bank (CDB) hosted its annual conference on corruption, compliance and cybercrime, also known as the "3Cs Conference" virtually on December 7th and 8th, 2021. The theme was "Ending Poverty and Driving Growth: Promoting Good Governance by Curbing Corruption, Money Laundering and Cybercrime in the Caribbean" which sought to examine the impact of corruption, anti-money laundering/terrorist financing compliance, and cybercrime on economic development in

the Caribbean region. The CFATF represented Secretariat. by Executive Director Ms. Dawne Spicer, participated in discussions; "Re-thinking two panel AML/CFT Compliance: Lessons for the Caribbean" on December 7th and "The Role of the Private Sector in Curbing Corruption, Money Laundering and Cybercrime" on December 8th,2021.

Collaboration with International Bodies and Organizations

High-level meeting of the General Assembly on the appraisal of the United Nations Global Plan of Action to Combat Trafficking in Persons

The High-Level Meeting of the General Assembly on the appraisal of the United Nations Global Plan of Action to Combat Trafficking in Persons occurred virtually on November 22nd and 23rd, 2021. The CFATF participated in a side event panel discussion on "Financial Inclusion: A Way to Prevent Human Trafficking and Modern Slavery." The Executive Director, Ms. Dawne Spicer, discussed, inter alia, the relationship between financial inclusion and human trafficking

(HT), the Caribbean experience, financial inclusion measures for victims, the effects of the pandemic and financial interventions that can be used to reduce the risk of HT among vulnerable groups. Ms. Spicer served as one of the Commissioners in the Liechtenstein Initiative for a Financial Sector Commission on Modern Slavery and Human Trafficking which published a 'Blueprint for Mobilizing Finance against Slavery and Trafficking' Report in 2019.

United Nations (UN) High-Level Political Forum on Modern Slavery and Human Trafficking

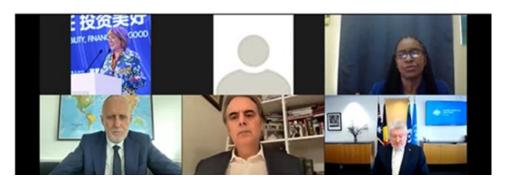


Photo: CFATF Executive Director Ms. Dawne Spicer at UN High-Level Political Forum panel discussion. **Photo credit**: UNU Centre for Policy Research.

On July 13th, 2021, the United Nations University Centre for Policy Research held its UN High-Level Political Forum under the theme "sustainable and resilient recovery from the COVID-19 pandemic that promotes the economic, social and environmental dimensions of sustainable development". This side-event examined the important role

of the financial sector in addressing modern slavery and human trafficking, with emphasis on recovery from the COVID-19 pandemic. Finance Against Slavery and Trafficking (FAST) is a project based at United Nations University Centre for Policy Research, of which Executive Director Dawne Spicer was a commissioner. Along with Ms. Spicer,

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various speakers engaged in a panel discussion related to the role of sustainable

finance to deal with human trafficking and modern slavery.

Africa, Caribbean, Pacific - European Union-Joint Parliamentary Assembly (ACP-EU-JPA) Conference on Illicit Financial Flows

The ACP-EU-JPA Conference on Curbing Illicit Financial Flows and mitigating the socio-economic impacts of the COVID-19 pandemic in ACP countries took place on July 1st, 2021. This online event had multiple keynote speakers from civil society, international organizations, tax and finance specialists and justice officials. They covered topics related to fighting corruption, tax evasion and improving the effectiveness of AML/CFT regimes in ACP jurisdictions. Development, Finance and Trade Committee. Executive Director, Ms. Dawne Spicer was part of the second panel discussion on "How can the anti-money laundering and counterterrorist financing (AML/CFT) regimes in ACP countries be rendered more effective?" along with Mr. Juan Fernando López Aguilar, Chair of the Committee on Civil Liberties, Justice and Home Affairs and Mr. Soobeersingh Dhunoo (ACP): Member of the Economic Development, Finance and Trade Committee.

Global Financial Integrity Report on Financial Crime

Global Financial Integrity's published a report on 'Financial Crime in Latin America and the Caribbean' in October 2021. GFI embarked on a project in 2020-2021 to conduct an analysis of financial crimes trends across 33 countries in Latin America and the Caribbean. The project focused on four main financial crimes: money laundering (ML), terrorism financing (TF), trade-based money laundering (TBML) and corruption. As part of this project, the CFATF was selected to participate. In an interview on March 8th, 2021, former Chairman Mr. Carl Bethel, Q.C., highlighted the CFATF's role, the challenges faced by Members, particularly in the context of COVID-19 and offered recommendations. It was also noted that through collaboration with organisations such as the UNODC and CARICOM IMPACS, Members have received valuable training on TBML. On October 15th, 2022, CFATF Chairman Ryan Pinder delivered the

keynote address for the presentation of the GFI's report. Chairman Pinder noted that regionally, there are laws to address money laundering, terrorist financing, trade-based money laundering, corruption, human trafficking and smuggling, and mineral trafficking. There is also a high level of ratification of relevant treaties to address these crimes. These constitute strong legal frameworks that countries should continue to effectively implement for domestic purposes and international cooperation throughout Latin America and the Caribbean and beyond. He further stated that the GFI Report was an excellent guide on the challenges faced by Caribbean and Latin American countries as well as how to address them. In addition, it allows jurisdictions to learn from each other's best practices and areas for improvement.



UNODC Anti-Money Laundering Day

Photo: CFATF Executive Director Ms. Dawne Spicer at the UNODC AML Day Webinar. **Photo credit**: UNODC.

The UNODC held its 'Anti-Money Laundering Day' on October 29th, 2021. The focus of this event was "Take action against money laundering". The campaign was supported by more than 300 institutions in Latin America and the Caribbean on social media. The campaign concluded with two (2) webinars on beneficial ownership and virtual assets. The webinars were a joint effort between the Latin American Financial Action Task Force (GAFILAT) and the CFATF. Other speakers at this event were Ms. Christina Rolle, Executive Director of the Bahamas Security Commission and Kenneth Joaquin, Registrar of Companies in Bermuda.

Royal United Services Institute for Defence and Security Studies (RUSI) Training

The CFATF participated in two (2) RUSI-led training workshops. The first was on 'Counter Proliferation Financing' on March 24th and 25th 2021. The sessions covered topics such as international counter-proliferation financing obligations, proliferation financing typologies and counter-proliferation financing frameworks. In the second instance, the workshop focused

on the 'FATF Standards and Unintended Consequences', which was held on the 8^{th} , 15^{th} and 22^{nd} of July 2021. The webinar series sought to assess the FATF's work on this issue to-date, identify current challenges and a look ahead to future ways in which its standards might be manipulated.

Global Coalition to Fight Financial Crime (GCFFC) Effective Working Group

The GCFFC is a group of organisations from law enforcement, policing, private and nonfor-profits sectors that collaborate to increase the effective of financial crime efforts. There are five (5) five committees/working groups within the organisation dedicated to assessing, examining and providing expert opinion for key stakeholders and policy

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makers, across a range of focus areas and regions. The CFATF is part of the Effectiveness Expert Working Group and is represented by the Executive Director Ms. Dawne Spicer. The work of this group is ongoing, and the next meeting is expected to be convened on February 17th, 2022.

CFATF-focussed Virtual Standards Training Course

Photo: Participants in the CFATF-focussed Virtual Standards Training Course. Photo credit: FATF.

The CFATF-focussed Virtual Standards Training Course took place virtually during November 8th to 12th, 2021. Participants were trained on the FATF Methodology Immediate Outcomes and engaged in a number of exercises and discussions. There were 38 attendees representing 16 CFATF member jurisdictions, namely Aruba, The Bahamas, Barbados, Belize, Bermuda, Cayman Islands, Curaçao, Dominica, Guyana, Jamaica, Montserrat, St. Lucia, St. Vincent and the Grenadines, Suriname, Trinidad and Tobago and the Virgin Islands.



Revised CFATF Mutual Evaluation Schedule

The FATF has been conducting a Strategic Review² since June 2019 to discuss a wide range of issues concerning the Fifth Round Mutual Evaluation process, FATF ICRG, FATF Recommendations and other matters. During the discussions, the FATF Ad Hoc Group for the Strategic Review (AGSR), it was originally decided that the FATF will present its first Fifth Round MER at the October 2024 Plenary and that all FSRBs will have to complete their Fourth Round of MEVALs by that time and present their first Fifth Round MER to a Plenary before the end of 2025. This decision resulted in Roadmaps being developed for FSRBs that were not scheduled to complete their Fourth Round of MEVALs by that deadline. The CFATF is one such FSRB and has been classified by the FATF as a higher priority FSRB. A Roadmap has been prepared to ensure that all measures are being taken to advance the Fourth Round of Mutual Evaluations to a timely conclusion. Accordingly, as indicated during the December 2021 Plenary, a proposal for the amendment of the Fourth Round MEVAL schedule was presented to the Council of Ministers (COM) in October 2021. The COM approved the conduct of two (2) MEVALs in 2022, four (4) in 2023 and three (3) in 2024 with the last two (2) MERs to be presented for approval at the May 2025 Plenary. The MEVAL of the Virgin Islands will be undertaken by the IMF.

The currently approved MEVAL Schedule shows the last MEVAL on-site for the third quarter of 2024 and the presentation of that MER in 2025. The final decision by the FATF on the timing of the Fifth Round of MEVALs is that FSRBs must present their first Fifth Round MER before the end of 2026. Consequently, the amended MEVAL schedule allows the CFATF to meet the completion deadline.

Islands delegation) and Dr. Cassandra Nottage, (The Bahamas delegation) supporting as a Working Group.

² The Executive Director and Legal Advisor Camille Renie represent the CFATF at these meetings with Ms. Elisabeth Lees, (Cayman

Overview of the Mutual Evaluation Programme and the Plenary Process

An effective Mutual Evaluation Programme is the primary objective of the CFATF's work as it is one of the mechanisms to ensure that each Member State fulfils their obligation undertaken as a signatory of the CFATF Memorandum of Understanding (MOU).

Each mutual evaluation is an in-depth assessment that will take into account the country's unique risk and context and determine whether the country has the technical requirements of each of the 40 FATF Recommendations. At the same time, the assessment team will look at whether, in practice, the assessed country's legal, regulatory and operational framework is delivering the expected results, in other words, measure its effectiveness, so that it can protect their financial systems and the broader economy from the threats of money laundering and the financing of terrorism and proliferation.

Thus, the assessment results in two sets of ratings, one on the 40 Recommendations that

indicate how well the assessed country has met the technical compliance requirements and the other 11 ratings that correspond to the level of effectiveness of its efforts to protect the financial system from the threats of ML/TF/PF through implementation.

The CFATF is currently conducting a Fourth Round of Mutual Evaluations for its based the Members on FATF Recommendations (2012), and the Methodology for Assessing Compliance with the FATF Recommendations and the Effectiveness of AML/CFT Systems (2013), as amended from time to time. The CFATF Procedures for the Fourth Round of Mutual Evaluations informs the conduct of the mutual evaluation and follow-up processes.

(See <u>Annex 1</u> for a detailed illustration of the Mutual Evaluation Process and <u>Annex</u> <u>2</u> for a detailed illustration of the Follow-up Process.)



Plenary Meetings

The principal responsibility of the CFATF Plenary is oversight of the Mutual Evaluation Programme. The CFATF Plenary discusses the assessment team's findings, including the proposed ratings and recommended priority actions, and approves the report as final. Subsequently, the report undergoes a post-Plenary Q and C review. This review is mandatory for all mutual evaluations. The review ensures a consistently high standard for all assessments conducted in the FATF Global Network. If the review reveals inconsistencies, then the report is referred back to the relevant assessing body and the FATF EGC. Where there are no inconsistencies, the report is cleared for publication.

The CFATF Plenary meets at least twice annually and is the ultimate decision-making body on all technical issues relating to MERs, FURs and adoption of the revised FATF Recommendations.

During the period November 2020-December 2021, the CFATF conducted three (3) plenary meetings.

- 1. The CFATF LI **first** *Virtual* Plenary and Working Groups Meetings were held during the period 20th November 2020 to December 11th, 2020, where the Mutual Evaluation Report of St. Lucia was adopted.
- The CFATF LII Virtual Plenary and Working Groups Meetings were held virtually during the week of 12th -27th May 2021.
- The CFATF LIII Virtual Plenary and Working Groups Meetings were held virtually during the week of 12th – 18th November to 3rd December 2021 where the Mutual Evaluation Report of St. Kitts and Nevis was adopted.



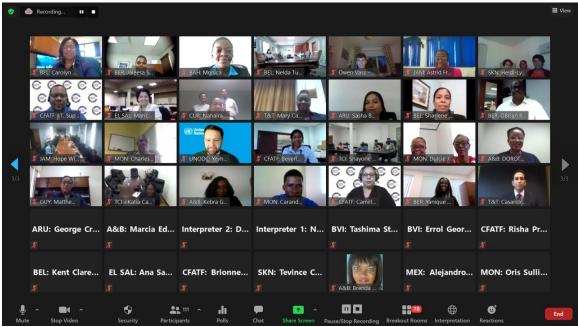


CFATF LI December 2020 First Virtual Plenary Highlights

Photo: Lt. Col. Edward Croft, Director of the Office of Drug and Money Laundering Control Policy of Antigua and Barbuda and Chairman of the CFATF for the period November 2019-December 2020 (from left third column and third photo down) and participants at the LI Plenary and Working Groups meetings held in virtually during the period 9th -11th December 2020.



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Photos: Participants at the CFATF LI Plenary and Working Groups meetings held virtually during the period 9th -11th December 2020.

Port-of-Spain, Trinidad and Tobago, (Virtually) December 2020 – Outgoing CFATF Chairman, **Lt. Col. Edward Croft,** Director of the ONDCP of Antigua and Barbuda chaired the CFATF LI Plenary and Working Groups meetings which commenced virtually on 20th November 2020 and concluded on 11th December 2020.

This represented the final Plenary over which Lt. Col. Edward Croft presided as he passed the baton to the Honourable Carl Wilshire Bethel, Q.C. Attorney General and Minister of Legal Affairs of The Bahamas who will hold the position of CFATF Chairman for the period November 2020 to November 2021. The Deputy Chairmanship was held by Bermuda.

The main issues dealt with by this Plenary were:

- Mutual Evaluations
 - Discussion of the Mutual Evaluation Report (MER) of St. Lucia: The CFATF LI Plenary discussed the MER of

on the basis of the FATF Methodology, and which set out the level of effectiveness of the country's AML/CFT system and their level of compliance with the FATF Recommendations. Plenarv approved the MER following discussions at both the CFATF Working Group on FATF Issues (WGFI) meeting and at Plenary. The MER was then prepared for the post-Plenary and Consistency Quality (O&C) process and was published on January 27th, 2021.

St. Lucia which was prepared



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- Adoption of Amendments to the CFATF Procedures for the Fourth Round of AML/CFT Mutual Evaluations.
- Amendments to the **CFATF Procedures for the Fourth Round** of AML/CFT Mutual Evaluations ("The CFATF Procedures) were adopted as necessary to ensure alignment with the Universal Procedures and are intended to strengthen the mutual evaluation process with the aim of better-quality Mutual Evaluation Reports (MERs). changes to the CFATF The Procedures were focused on (i) enhancements to allow for clarity and better flow; (ii) processes; (ii) timelines; (iv) reliance on MER precedents; and (v) formalizing practices.

• CFATF International Co-operation Review Group (ICRG) Matters

- Discussion and adoption of Jamaica's 3rd Follow Up Report (FUR)
- Approval of Sint Maarten's exit from the Third Round of Mutual Evaluations
- Follow-up Process for Barbados and Cayman Islands' FURs with reratings
- Other Working Group Meetings held virtually:
 - <u>CFATF Heads of FIU Forum</u> (20th November 2020)

Members continue to adjust to the changing risk environment within their respective jurisdictions. The CFATF conducted a virtual

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'Heads of FIU' meeting on November 20th, 2020, which allowed Members to share experiences the regarding adjustment of their supervision and monitoring of entities as their detection of evolving trends. Some CFATF Members have indicated that they are experiencing similar changes in criminal behaviour as reported by other regions (increase in fraud and cyber-criminality), however some Members have been able to harness the use of new technologies. The **CFATF** Secretariat published the second instalment of a document entitled, "The Coronavirus (COVID 19) Pandemic Impact on the operations of the CFATF FIUs, ML/TF trends identified and policy responses"- 2^{nd} publication on October 8th, 2020.

- <u>CFATF Risk Trends and</u> <u>Methods Group (CRTMG)</u> (26th November 2020)

In November 2020, the CFATF completed a compilation of cases based on regional money laundering and terrorist financing investigations. The report categorises these cases, some of which show money flows across corridors: fraud involving politically exposed persons; and COVID-19 related fraud. Click here to access.

- <u>CFATF Working Group on</u> <u>FATF Issues (WGFI) (30th</u> <u>November - 1st December</u> <u>2020)</u>
- Other Updates Received

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- Supervision Project funded by the Government of the United Kingdom of Great Britain and Northern Ireland ("the UK") and the Government of Canada ("Canada")
- 11th European Development Fund Implementation of the Mutual Evaluation Programme Project
- Updates from the Group of Co-operating and Supporting Nations (COSUNs) and Observer Organisations

• **CFATF Governance**

For	the	period	Dece	ember
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Chairmanship of the CFATF is held by The Bahamas represented in the first instance by the Honourable Wilshire Carl Bethel, Q.C. (December 2020 to September 2021) Attorney General and Minister of Legal Affairs and subsequently by the Honourable Ryan Pinder, (September 2021-December 2021) Attorney General and Minister of Legal Affairs. The Deputy Chairmanship is held by Bermuda, through Mrs. Cheryl-Ann Lister. The position of Immediate Past Chair is held by Antigua and Barbuda, represented by Lt. Col. Edward Croft, Director of the ONDCP, which ensures the tripartite governance of the CFATF.





CFATF LII May 2021 Virtual Plenary Highlights

Photo: The Honourable Carl Wilshire Bethel, Q.C. Attorney General and Minister of Legal Affairs of the Bahamas and Chairman of the CFATF for the period December 2020-September 2021 (first row, sixth photo from left), Executive Director of the CFATF, Ms Dawne Spicer, (third row, fourth photo from left) and other participants at the LII Plenary and Working Groups meetings held in virtually during the period 12th -27th May 2021.

Port-of-Spain, Trinidad and Tobago, (Virtually) May 2021 –CFATF Chairman, the Honourable Carl Wilshire Bethel, Q.C. Attorney General and Minister of Legal Affairs chaired the CFATF LII Plenary and Working Groups meetings held virtually during the period 12th -27th May 2021. He was ably assisted by the Deputy Chairman of the CFATF for the period November 2020-November 2021, Mrs. Cheryl-Ann Lister, Acting Financial Secretary, Ministry of Finance of Bermuda.

1. The main issues dealt with by this Plenary were:

Amendments to the CFATF Procedures for the Fourth Round of AML/CFT Mutual Evaluations ("The CFATF Procedures) were adopted as necessary to ensure

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alignment with the Universal Procedures and are intended to strengthen the mutual evaluation process with the aim of better-quality Mutual Evaluation Reports (MERs). to the CFATF Amendments Procedures were made to (i) allow for consistency with the Universal Procedures; (ii) adopt some of the changes made to the FATF MEVAL Procedures; (iii) increase the pool of qualified volunteer experts; and (iv) clarify the composition of the Assessment Team.

- 2. CFATF International Cooperation Review Group (ICRG) Matters (May 21st, 2021)
- Status Report on the FATF ICRG Process: Ten (10) CFATF members



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have been assessed in the 4th Round of AML/CFT Mutual Evaluations and nine (9) have met the FATF ICRG referral criteria. Seven (7) members remain subject to FATF ICRG monitoring as Trinidad and Tobago and The Bahamas were removed and are now being monitored by the CFATF ICRG.

- Trinidad and Tobago Follow-Up Status - Fourth Round Mutual Evaluations: Trinidad and Tobago presented its 4th Follow Up Report (FUR) at this Plenary which provided an update on their strategy to address the issues identified in the country's MER as well as the initial compliance enhancing steps taken to date.
- Update on the 4th Round Followup Process for other jurisdictions reporting in the November 2021 Plenary, namely, Jamaica, the Bahamas, Barbados, Antigua and Barbuda, Cayman Islands, Haiti, Turks and Caicos, and St Lucia.
- Actions taken by the CFATF Members on the FATF Public Statements issued in October 2020, December 2020 and February 2021. The delegations from the following ten (10) jurisdictions provided information in response to the Secretariat's call for providing inputs on the actions taken on the FATF Public Statements: Aruba, Belize, Cayman Islands, Curacao, El Salvador, Guyana, Montserrat, St. Kitts and Nevis, The Bahamas and the Virgin Islands

3. Other Working Group Meetings held virtually

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WGFI (May 19th, 2021)

- Amendments to the CFATF 4th Round Evaluation Mutual Procedures were proposed based on the holistic review conducted by FATF of the Mutual Evaluation Procedures of the FATF and FATF Style Regional Bodies (FSRBs) to determine their compliance with the Consolidated Processes and Procedures for Mutual Evaluations and Follow-Up (Universal Procedures).
- Proposal to develop a consolidated Terms of Reference for the WGFI.

<u>CFATF Heads of FIU Forum (May 12th, 2021)</u>

- The "oral presentations • by Members" agenda item was replaced by a paper prepared by the Secretariat "CFATF Members' FIUs November 2020 - May 2021 Updates" which detailed the sixmonth update by FIUs, it was disseminated and is available on the CFATF website. The paper focused on areas such as (i) FIUs status of operation relative to the COVID-19 pandemic. (ii) ML/TF trends identified by FIUs, (iii) STRs receipt, analysis and dissemination, (iv) FIUs role in mutual evaluation and risk assessments and (v) national coordination and cooperation.
- Delegates were informed that Guidance on TF Risk associated with illegal firearms and the investigation and prosecution of the offence was published by the FATF.
- Presentations were delivered by the CFATF Secretariat, Financial Intelligence Unit of Trinidad and Tobago (FIUTT), ECOFEL, and

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The Bahamas FIU on Strategic Analysis.

<u>CFATF Risk Trends and Methods Group</u> (CRTMG) Matters (May 7th, 2021)

- The CRTMG discussed a Co-Chairs' proposal aimed at increasing the members' participation in work of the CRTMG by recognizing/incentivizing member participation in FATF RTMG/CRTMG Projects.
- Project Update on the "Vulnerabilities in the Concealment of Beneficial Ownership Information." This project is co-led by Bermuda, Curaçao and Jamaica. The co-leads, project team and Secretariat held discussions on May 19th, 2021, and May 27th, 2021, to advance the data collection phase of the project.

4. Other Updates

Supervision Project

• An oral report on the activities of the Supervision Project was provided by Supervision Advisorthe Strengthening Supervisory Systems (the Project) for the 24-month period June 2019 to May 2021 and the way forward. A brief overview of the Project's rationale and the types of support offered to all CFATF Members, set the stage for the successes of the Project despite the setbacks experienced by the COVID-19 pandemic.

11th EDF Project

- Mutual Evaluations 1 Hybrid MEVAL Onsite Mission for St Kitts and Nevis was completed on 26th March 2021. 1 Hybrid MEVAL Onsite for Grenada was executed between 14th -26th June 2021.
- Pre-Assessment Training Virtual Pre- Assessment Training for Suriname was executed between 28th -30th June 2021.

5. CFATF Governance

For period December the 2020/September 2021, the Chairmanship of the CFATF is held by The Bahamas represented by the Honourable Carl Wilshire Bethel, **Q.C.** Attorney General and Minister of Legal Affairs of The Bahamas and subsequently by the Honourable Ryan Pinder, (September 2021-December 2021) Attorney General and Minister of Legal Affairs of The Bahamas. The Deputy Chairmanship is held by **Bermuda** represented by Mrs. Cheryl-Ann Lister, Acting Financial Secretary, Ministry of Finance of Bermuda. The position of Immediate Past Chair is held by Antigua and Barbuda, represented by Lt. Col. Edward Croft, Director of the Office of Drug and Money Laundering Control Policy, Antigua and Barbuda which ensures the tripartite governance of the CFATF.



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CFATF LIII December 2021 Virtual Plenary Highlights

Photo: Chairman of the CFATF, the Honourable Ryan Pinder, pictured in the third row, photo 5 from the left, and participants at the LIII Plenary and Working Groups meetings held in virtually during the period November 18th to December 3rd, 2021.

Port-of-Spain, Trinidad and Tobago, (Virtually) December 2021 – Outgoing CFATF Chairman, the Honourable Ryan Pinder, Attorney General of The Bahamas chaired the CFATF LIII Plenary and Working Groups meetings held virtually during period November 18th - December 3rd, 2021. The Honourable Ryan Pinder presided and passed the baton to the Mrs. Cheryl-Ann Lister, Acting Financial Secretary, Ministry of Finance, Bermuda, who will hold the position of CFATF Chairman for the period December 2021 to December 2022. The Deputy Chairmanship was passed to the Cayman Islands represented by the Honourable Samuel Bulgin, Q,C, Attorney General of the Cayman Islands.

1. The main issues dealt with by this Plenary were:

- Discussion of the Mutual Evaluation Report (MER) of St. Kitts and Nevis: The CFATF LIII Plenary discussed the MER of St. Kitts and Nevis. Six (6) Key Issues were discussed, as detailed under the WGFI meeting below. The MER was prepared on the basis of the FATF Fourth Round Methodology.
- The MER was prepared for the post-Plenary Quality and Consistency (Q&C) process and was published on January 27th, 2022.



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- Discussion of the Follow-up Reports (FURs) for the mutual evaluations of:
- i. The Bahamas 4th FUR for re-ratings.
- ii. The Republic of Haiti 2nd FUR for information only
- iii. Jamaica 4th FUR for information only.
- iv. Barbados 3rd FUR for information only.
- v. Turks and Caicos Islands 2nd FUR for information only.
- vi. St. Lucia 1st FUR for information only.
 - 2. CFATF International Cooperation Review Group (ICRG) (November 24th and 26th 2021)

Discussion of the 4th Enhanced Follow-up Report of The Bahamas:

The Bahamas sought technical compliance (TC) re-ratings on twelve (12) Recommendations was re-assessed on Recommendations 2, 7, 8, and 15 based on changes to the FATF Standards. Plenary approved the re-ratings in the FUR as follows:

- i. Upgrade the rating from **PC to C** for R. 12, 21 and 33. 2.
- ii. Upgrade the rating from **PC to LC** for **R**. 2, 10, 11, 14, 17, 18 and 19.
- iii. Upgrade the rating of **NC to LC** for R.6 4.
- iv. Upgrade the rating from **NC to PC** for R. 8.
- v. Maintain the rating of LC for R.5.
- vi. Maintain the rating of PC for R.1, 7, 22, 23 and 24.
- vii. Downgrade the rating of **C to PC** for R.15.

3. Other Working Group Meetings held virtually

WGFI (November 22nd and 23rd, 2021)

Discussion of Key Issues in relation to the Mutual Evaluation of St. Kitts and Nevis. Six (6) Key Issues were presented related to IO5, IO1, IO3, IO9, R.10 and R.38; however, two (2) were not proposed for Plenary's discussion and decision. These Key Issues are related to IO5 and IO9. The conclusions reached in the discussions and the proposed revisions regarding IO5 and IO9 were for information of the Plenary and summarized in the document "Key Issues of St. Kitts and Nevis" Mutual Evaluation Report for Plenary" which was circulated to all Plenary delegations.

Changes to the Schedule of the Fourth Round of Mutual Evaluations: The amended CFATF MEVAL Schedule includes two (2) MEVALs in 2022 (Suriname and Dominica), four (4) MEVALs in 2023 (St. Vincent and the Grenadines, Anguilla, Guyana and Belize) and three (3) MEVALs in 2024 (Montserrat, Curaçao and Sint Maarten). The MEVAL of Virgin Islands will be led by the IMF.

<u>CFATF Heads of FIUs' Forum (November</u> 24th, 2021).

The "CFATF Members' FIUs May 2021- November 2021 Updates" were prepared and posted on the CFATF secure website. The report was prepared based on submissions from CFATF Member Countries and focused on areas such as. (i) FIUs status of operation relative to the COVID-19 pandemic, (ii) Emerging and existing ML/TF trends, (iii) STRs receipt, analysis and dissemination, (iv) Strategic analysis, (v) FIUs role in the mutual evaluation and risk assessments, (vi)

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national and international cooperation and coordination, (vii) ML investigations and prosecutions, (viii) seizures and confiscation and (ix) challenges.

<u>CFATF Risk Trends and Methods Group</u> (<u>CRTMG</u>) (November 24th, 2021).

- The ML/FT/PF Risks through the use of Virtual Assets and Virtual Assets Service Providers and its implications in the Caribbean Region ("the VASPs Project") started December 2021 and will be executed over a one-year period, ending in November 2022. The Co-Leads for the VASPs project are The Bahamas and Trinidad and Tobago. The other project team members are Antigua and Barbuda, Dominica, Cayman Islands, Montserrat and Suriname.
- The Vulnerabilities in the Concealment of Beneficial Ownership Information ("the BO project") was adopted by Plenary subject to further proof reading and it was approved for publication as a public document on the CFATF website.

4. Other Updates

The Supervision Project

• The Supervision Project, which was extended for an additional period of four (4) years (June 2021 – May 2025), continues to provide support to Members, with an additional element of providing desk-based assistance to the CFATF's Mutual

Evaluation (MEVAL) Programme.

11th EDF Project

- The 11th EDF undertook the costs for two Mutual Evaluations between January and October 2021. The first was the hybrid Mutual Evaluation Mission for St Kitts and Nevis which took place from March 15th to 26th, 2021 and the second was the hybrid Mutual Evaluation Mission for Grenada which occurred from June 14th to 25th 2021. One virtual Pre-Assessment Training for Suriname was conducted from June 28th to 30th 2021 (237 persons trained).
- The 11th EDF Project was granted a 14-month 'Non-Cost' Extension. An addendum to the CFATF's 11th EDF Grant Agreement came into effect on January 12th, 2022.

5. CFATF Governance

For the period December 2021 to December 2022 the Chairmanship of the CFATF is held by **Bermuda** represented by **Mrs. Cheryl-Ann Lister**, Acting Financial Secretary, Ministry of Finance, Bermuda. The Deputy Chairmanship is held by the **Cayman Islands** represented by the **Honourable Samuel Bulgin**, Q.C., Attorney General of the Cayman Islands. The position of Immediate Past Chair is held by The Bahamas, represented by the **Honourable Ryan Pinder**, Attorney General and Minister of Legal Affairs of The Bahamas which ensures the tripartite governance of the CFATF.



Council of Ministers Meeting

The Council of Ministers (COM) Meeting during the reporting period November 2020-December 2021 was held virtually in October, 2021. The COM supported the nomination of Cayman Islands as Deputy Chair for the period 2021/2022.

Highlights of this meeting:

- Revision of the 4th Round MEVAL schedule so that all evaluations will be completed by May 2025 instead of May 2026.
- The Incoming Chair's Work Programme 2021/2022 was approved.

- Recruitment of one additional Advisor to bolster the Secretariat's resources for completing the 4th Round of MEVALs.
- Approval of the budget for 2022 with Members' contribution set at US\$63,671, which represents a discount of US\$4,689. (The contribution for 2022 was US\$68,360, which was the amount approved by the COM for 2020. However, a COVID-19 discount was given for 2021 and another was approved for 2022).
- OAS-DTOC was approved as an Observer to the CFATF and OAS-CICAD has been withdrawn as an Observer.



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CFATF Charitable Donations

The Covid-19 pandemic brought significant challenges worldwide. During this time, economic hardships were and continues to be faced by many persons who lost their sources of income and livelihood. In an effort to assist where possible, the staff of the CFATF Secretariat voluntarily contributed to the purchase of five (5) hampers containing basic food items which were purchased on October 6th, 2021, at \$200 each. The Manager of the supermarket provided a complimentary bag of snacks for each hamper upon learning that the hampers were for charitable purposes.



Photo: Hampers distributed by CFATF Staff



Looking Ahead

Our successes during the 2020/2021 period would not have been possible without the collective efforts of all Members and I pledge to support Bermuda and Mrs. Cheryl-Ann Lister, Acting Financial Secretary, Ministry of Finance, the incoming Chair of the CFATF and the Cayman Islands as the Incoming Deputy Chair. I remain committed to providing support to ensure the continued building of a strong and respected CFATF. I

Ryan Pinder

Chairman of the CFATF September 2021- December 2021

Caribbean Financial Action Task Force March 24, 2022 also wish to recognise the hard work and dedicated staff at the Secretariat who all contribute to the efficient functioning of the organisation and the effective representation of the Region's interests in various fora across the globe, to the benefit of all Members and our regional and international partners.



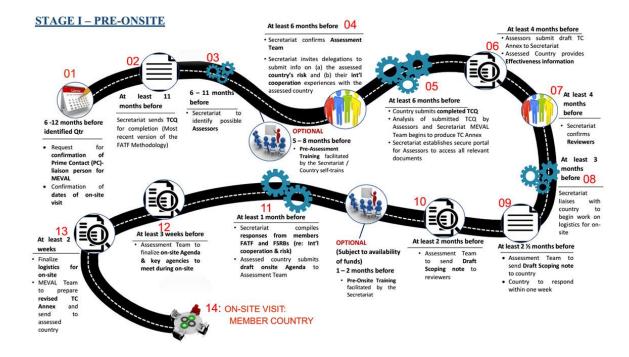
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Annex 1- The Mutual Evaluation Process (Flowchart)

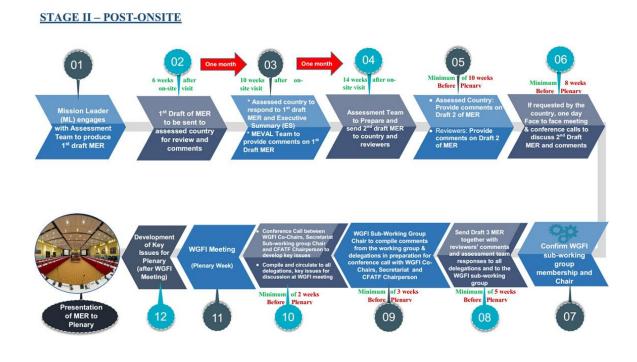
The flowcharts below highlight the processes and are divided as follows:

- I. Stage I: The Pre-Onsite Process
- II. Stage II: The Post-Onsite Process

I. Stage I: The Pre-Onsite Process³



³An updated version of the Pre-Onsite Process will be published in May 2022.



II. Stage II: The Post-Onsite Process



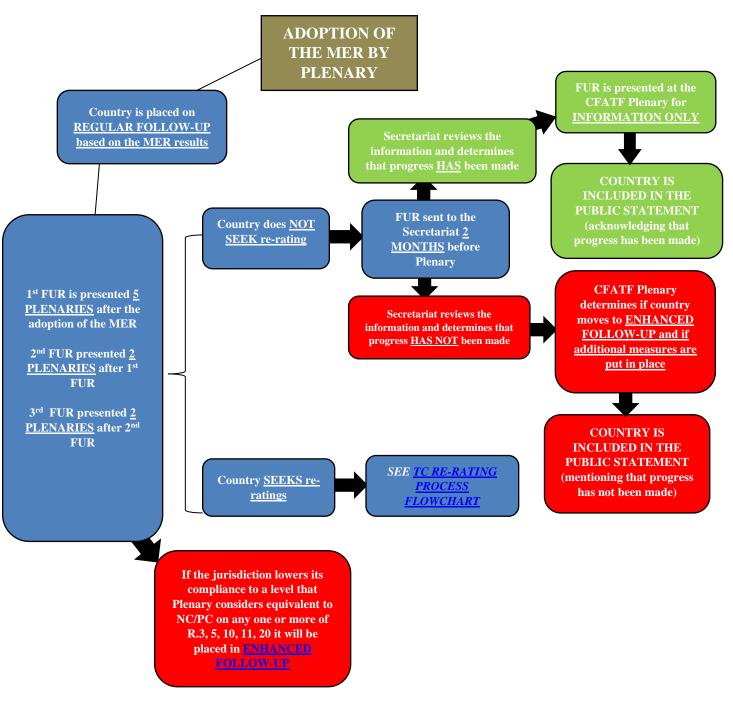
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Annex 2 - CFATF Follow-up Process Flowchart

The Regular Follow-up process

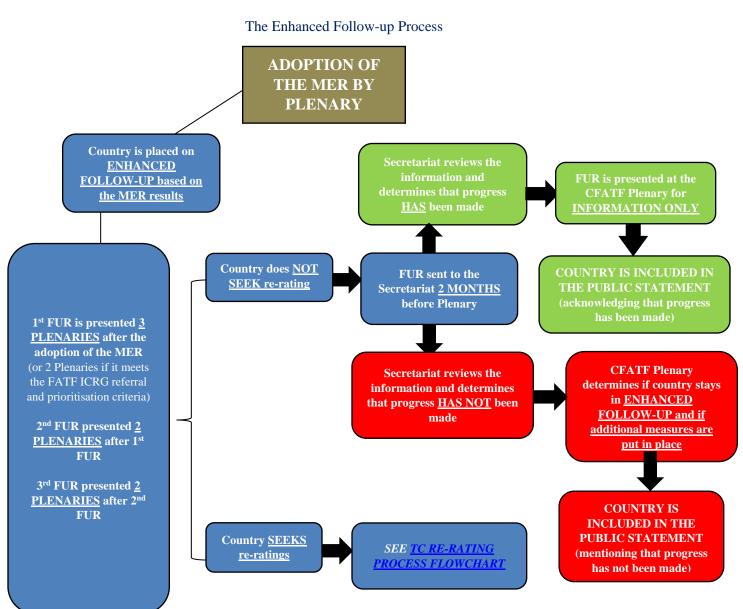


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TC Re-rating Process Flowchart



7 months before FUR is due at the CFATF Plenary, country indicates the Secretariat the decision and Recommendations that will be considered for re-rating

6 months before FUR is due at the CFATF Plenary, country provides the Analytical Tool (Annex E, with the necessary attachments) for each recommendation (also those who have been revised after the on-site visit) and the Group of Experts will start reviewing the information with support from the Secretariat Country will also provide the TC Matrix with the update on the other recommendations and the information on effectiveness for the Secretariat to review

PRE-PLENARY REVIEW: The Group of Experts will submit their analysis at least five (5) weeks before the Plenary meeting for comments to all Members, COSUNs and Observers, who have two (2) weeks to comment on the draft. Depending on the comments received, the follow-up report may be first discussed at the CFATF ICRG meeting before Plenary.

Where there are major disagreements between the Group of experts and the assessed country on the findings contained in the follow-up report (e.g., reratings) and/or major issues raised through the <u>PRE-PLENARY REVIEW</u> process, the Group of Experts and the CFATF Secretariat will compile a short list of the most significant issues, and will circulate this to all Members, COSUNs and Observers at least two (2) weeks prior to the CFATF ICRG and/or plenary discussion.

CFATF PLENARY

After adoption by the Plenary but prior to publication, final follow-up reports with TC re-ratings will be circulated to all assessment bodies¹ for consideration in the Global Quality and Consistency Review process for two (2) weeks. Follow-up reports where no issues are raised through the pre-plenary review process or during the CFATF ICRG/plenary discussion are not subject to this expost review process



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Annex 3 - CFATF Observers

- Asia Pacific Group Secretariat
- Association of Caribbean Commissioners of Police
- Caribbean Customs Law Enforcement Council
- Caribbean Development Bank
- CARIFORUM
- Caribbean Regional Technical Assistance Centre
- CARICOM Secretariat
- CARICOM IMPACS
- Central American Bank for Economic Integration (CABEI)
- Commonwealth Secretariat
- Eastern Caribbean Central Bank
- Eastern and Southern Africa Anti Money Laundering Group
- EGMONT Group
- European Commission
- European Union
- Germany⁴
- Guatemala
- Federal Republic of Germany
- Financial Action Task Force
- Financial Action Task Force of Latin America
- Group of International Finance Centre Supervisors
- Inter-American Development Bank
- International Monetary Fund
- Interpol
- MONEYVAL
- Organization of the American States-DTOC
- Organization of Eastern Caribbean States Secretariat
- United Nations Office of Drugs Control and Crime Prevention
- Regional Security System- Asset Recovery Unit (RSS-ARU)
- The World Bank Group
- World Customs Organization





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Glossary of terms and acronyms

AML/CFT	Anti-Money Laundering/Countering the	
	Financing of Terrorism	
ARIN-CARIB	Asset Recovery Inter-Agency Network for the	
	Caribbean	
BAC	Budget and Audit Committee	
CARICOM	Caribbean Community	
CARICOM IMPACS	CARICOM Implementing Agency for Crime	
	and Security	
CARIFORUM	Caribbean Forum	
CDB	Caribbean Development Bank	
CFATF	Caribbean Financial Action Task Force	
CFATF WGFI	CFATF Working Group on FATF Issues	
CICAD	Inter-American Drug Abuse Control	
	Commission	
CIFAD	Centre for Anti-Drug Training	
COSUNs	Cooperating and Supporting Nations	
CRTMG	CFATF Risks Trends and Methods Group	
CRWG	CFATF Review Working Group	
CVE	Countering Violent Extremism	
ECCB	The Eastern Caribbean Central Bank	
EDF	European Development Fund	
FATF	Financial Action Task Force	
FATF TREIN	FATF Training and Research Institute	
FIUs	Financial Intelligence Units	
FUR	Follow-Up Report	
FFUR	First Follow-Up Report	
GABAC	Groupe d'Action contre le blanchiment	
	d'Argent en Afrique Centrale	



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HRC	Human Resources Committee
ICRG	International Co-operation Review Group
ICS	Innovation for Citizen services
IFD	Institutions for Development
IMF	International Monetary Fund
MER	Mutual Evaluation Report
MEVAL	Mutual Evaluation
ML	Money Laundering
MOU	Memorandum of Understanding
NAMLC	National Anti-Money Laundering Committee
NCCT	Non-Cooperative Countries and Territories
NRA	National Risk Assessment
OAS	Organization of American States
ONDCP	Office of the National Drug and Money
	Laundering Control Policy
PF	Proliferation Financing
PLC	Planning Committee
POPR	Post-Observation Period Report
SCOPING NOTE	Document that identifies areas of lower and
	higher risk that need reduced or increased
	focus for the onsite visit.
SUB-WGFI	Sub Working Group on FATF Issues
TC ANNEX	Technical Compliance Annex
TCI	Turks and Caicos Islands
TCQ	Technical Compliance Questionnaire
TF	Terrorist Financing
WB	World Bank

