



Understanding the CFATF Quality and Consistency Review Process

CFATF Secretariat Research Desk

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Role of Pre-Plenary Reviewers

- ✓ Ensuring MERs are of an acceptable level of quality and consistency.
- ✓ Reviewing and providing input on Scoping Note, Executive Summary and Draft MER.
 - Commenting on assessors' proposals for the scope of the on-site.
 - Reflecting a correct interpretation of the FATF Standards and application of the Methodology.
 - Checking whether the description and analysis supports the conclusions (including ratings), and sensible recommended actions for improvement are made.
 - Highlighting potential inconsistencies with earlier decisions adopted by the FATF/CFATF on technical compliance and effectiveness issues.
 - Checking that the substance of the report is generally coherent and comprehensible.

Source: Procedures for the Fourth Round of AML/CFT Mutual Evaluations, May 29, 2014 (amended)



Selection of Pre-Plenary Reviewers

- ✓ **Reviewers taken from a pool of qualified volunteer experts.**
 - Consists of Members from CFATF, FATF and FSRB delegations, FSRB Secretariat members, and the International Financial Institutions (IFIs).
- ✓ **Selected Reviewers will be from countries other than the country that is being assessed.**
- ✓ **For each assessment, there will be:**
 - At least two (2) reviewers from the CFATF;
 - One (1) reviewer from the COSUNs, another FSRB or from the IFIs, and
 - The FATF Secretariat.

Source: Procedures for the Fourth Round of AML/CFT Mutual Evaluations, May 29, 2014 (amended)



Important Pre-Plenary Review Procedures

- ✓ **Reviewers are provided with a copy of the comments by the assessed country on the 1st draft MER to review:**
 - The Scoping Note.
 - Quality, coherence and internal consistency of the 2nd draft MER.
 - Consistency with the FATF Standards and FATF precedent.
- ✓ **Transparency**
 - The Reviewers' comments are disclosed to the Assessment Team and assessed country.
- ✓ **Power of the Reviewers**
 - The Reviewers do not have any decision-making powers or powers to change the MER.
 - The Assessment Team provides short responses to the Reviewers regarding the changes it has made to the draft MER based on their comments.

Source: Procedures for the Fourth Round of AML/CFT Mutual Evaluations, May 29, 2014 (amended)



Quality and Consistency Pre-Plenary Review Process

Second Draft MER

- Assessment Team prepares 2nd Draft MER for country and Reviewers 14 weeks after on-site visit.
- Reviewers have 3 weeks to provide comments.



Pre-Plenary Draft MER and Executive Summary

- Reviewers' and assessed country comments on 3rd draft MER and Assessment Team response circulated to delegations and the sub-working group of the CFATF WGFI to identify any issues



First Draft MER and Executive Summary

- Sent to assessed country for review and comments 6 weeks after on-site visit.
- Response by assessed country to 1st Draft and comments by Assessment Team 10 weeks post on-site visit.



Quality & Consistency Review





Post Plenary Quality and Consistency Process

- ✓ **Purpose:**
 - Prevents the publication of reports with significant quality and consistency problems.
 - Maintenance of the FATF brand.
- ✓ Following the adoption by Plenary, the MER and Executive Summary will be provided to the FATF, other FSRBs and IFIs for consideration in the Global Quality and Consistency Review process.
- ✓ Publication on the CFATF website occurs after the global review process is complete.
- ✓ An **ex-post review** may occur in exceptional circumstances where there are significant concerns with the quality and consistency of a MER remain following adoption of the MER by the Plenary.



Importance of Participating in Review Process

Essential to the execution of CFATF work

- Reviewers provide expertise and analysis that is an essential part of Membership contribution to CFATF work.

Peer Review Process

- CFATF members are required to fully participate in all stages of the process of the Mutual Evaluation process in different capacities, such as Assessors and Reviewers.

Ensuring the delivery of high quality and timely MERs to the global network

- As an FSRB, CFATF is expected to maintain the high quality and consistency of the FATF brand. The expertise of the Reviewers represent one of the key initial steps in achieving this.



THANK YOU!

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