



ANNUAL REPORT 2022



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Acronyms

AAP	Annual Action Plan
AG	Attorney General
AML/CFT	Anti-Money Laundering / Countering the Financing of Terrorism
AMLID	Anti-Money Laundering International Database
APG	Asia/Pacific Group on Combating Money Laundering
ARS	Alternative Remittance Systems
ASEAN	Association of South East Nations
BNI	Bearer Negotiable Instrument
BOFI	Banks and Other Financial Institutions
BSA	Bank Secrecy Act
CBN	Central Bank of Nigeria
CDD	Customer Due Diligence
CE	Council of Europe
CFATF	Caribbean Financial Action Task Force
CFT	Countering the Financing of Terrorism
CMO	Capital Market Operations
CND	Commission on Narcotic Drugs
CTC	Counter-Terrorism Committee
CTRS	Currency Transaction Reports
DEA	Drug Enforcement Administration
DNFBP	Designated Non-Financial Business or Profession
DWT	Domestic Wire Transfer
EAG	The Eurasia Group on Combating Money Laundering and Financing of Terrorism
EBRD	European Bank for Reconstruction and Development
ECB	European Central Bank
ECOWAS	Economic Community of West Africa States
ECG	Evaluation and Compliance Group
EDD	Enhanced Due Diligence
EFCC	Economic and Financial Commission
ERM	Exchange Rate Mechanism
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit
FSAP	Financial Sector Assessment Program
FSRB	FATF Style Regional Body
FUR	Follow-Up Report

GABAC	Action Group against Money Laundering in Central Africa
GAFISUD	The Financial Action Task Force on Money Laundering in South America
GIABA	Inter-Governmental Action Group against Money Laundering in West Africa
GIFCS	Group of International Finance Center Supervisors (formerly OGBS – Offshore Group of Banking Supervisors)
GMC	GIABA Ministerial Committee
GPML	The Global Program against Money Laundering
HIDTA	High Drug Trafficking
HIFCA	High Financial Criminal Cases
IAPS	Institution Action Plans
IDA	International Development Association
IFC	International Finance Cooperation
IMF	International Monetary Fund
IMOLIN	International Money Laundering Information Network
IN	Interpretative Note
IOSCO	International Organization of Securities Commissions
IRS	Internal Revenue Service
KYC	Know Your Customer
LC	Largely Compliant
LCC	Low Capacity Country
LEA	Law Enforcement Agency
MENAFATF	Middle East and North Africa Financial Action Task Force
MER	Mutual Evaluation Report
ML	Money Laundering
MLA	Mutual Legal Assistance
MLRO	Money Laundering Reporting Officer
MIC	Middle Income Countries
MSBs	Money Service Businesses
MVTS	Money or Value Transfer Service(s)
NBFI	Non-Banking Financial Institution
NC	Non-Compliant
NCBC	Non-Conviction Based Confiscation
NPO	Non-Profit Organization
NSC	National Securities Commission
Palermo Convention	The United Nations Convention against Transnational Organized Crime 2000
PC	Partially Compliant
PEP	Politically Exposed Person

PMLA	Prevention of Money Laundering Act
PMLL	Prevention of Money Laundering Law
PPP	Public Private Partnership
PWMD	Proliferation of Weapons of Mass Destruction
R.	Recommendation
RBA	Result Based Analysis
RBA	Risk-Based Approach
SALW	Small Arms and Light Weapons
SEC	Securities and Exchange Commission
SR.	Special Recommendation
SRB	Self-Regulatory Body
SRO	Surveillance and Regulation Organizations
STR	Suspicious Transaction Report
TANA	Technical Assistance Needs A
TCSP	Trust and Company Service Provider
Terrorist Financing Convention	The International Convention for the Suppression of the Financing of Terrorism 1999
TFO	Terrorist Financing Offence
UN	United Nations
UNCAC	United Nations Convention Against Corruption
UN-ECOSOC	United Nations Economic and Social Council
UNODC	United Nations Office on Drugs and Crime
Vienna Convention	The United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances 1988
WMD	Weapons of Mass Destruction
WAMU	West Africa Monetary Union
WIPO	World Intellectual Property Organization

FOREWORD

Dear esteemed Colleagues, Partners, and Stakeholders,

It is my great pleasure to present to you the Annual Report of the Intergovernmental Action Group Against Money Laundering in West Africa (GIABA) for the year 2022. This report serves as a comprehensive overview of our collective efforts and achievements in the regional fight against money laundering and terrorism & proliferation financing.

Over the past year, GIABA has continued to play a pivotal role as the specialized agency of the Economic Community of West African States (ECOWAS) in coordinating and strengthening the efforts of our member states in combating the menace of illicit financial activities. As we navigate the challenges posed by evolving global trends and emerging threats, we remain steadfast in our commitment to promoting integrity, stability, and sustainable development within our region.

The year 2022 marked another significant milestone in our journey as we celebrated 22 years of dedicated service to the ECOWAS community. This anniversary provided us with an opportunity to reflect on the progress made thus far, the lessons learned, and the path ahead. Throughout this period, we have witnessed remarkable advancements in our member states' capacities, legal frameworks, and institutional structures, all aimed at countering money laundering and terrorism & proliferation financing effectively.

In 2022, GIABA continued to provide technical assistance, capacity building, and policy guidance to our member states, empowering them to implement robust anti-money laundering and counter-terrorism financing measures. We conducted numerous workshops, and training programs to enhance the knowledge and skills of our stakeholders, including financial intelligence units, law enforcement agencies, and the private sector. These initiatives have fostered greater collaboration, information sharing, and coordinated action, strengthening our collective ability to detect, investigate, and prosecute financial crimes. The year 2022 witnessed our efforts towards concluding the and mutual evaluations of our member States.

Thus, as in the past, the 2022 Annual Report delves into the key activities and achievements of GIABA over the past year. It highlights our efforts in facilitating legislative reforms, conducting risk assessments, promoting international cooperation, and raising public awareness. The report also provides an analysis of emerging trends, challenges, and opportunities in the realm of money laundering and terrorism financing, which will inform our strategies and initiatives going forward.

However, we are cognizant that the fight against money laundering and terrorism financing remains a dynamic and evolving battle. Criminals and illicit networks adapt their methods, exploit technological advancements, and exploit vulnerabilities within our systems. As such, it is imperative that we continue to strengthen our collective response, foster innovation, and harness the potential of emerging technologies to stay ahead of these threats.

In conclusion, I would like to express my gratitude to our member States for their unwavering support, dedication, and commitment to the cause. I also extend my sincere appreciation to our international partners, donor agencies, private sector and civil society organizations for their

collaboration and invaluable contributions. It is through these collaborative efforts that we can create a more secure and prosperous West Africa.

As we embark on the journey outlined in this Annual Report, I invite you all to join hands with GIABA, to embrace our shared responsibility, and to redouble our efforts in combating money laundering and the financing terrorism & proliferation. Together, we can forge a future where our region stands resilient against financial crimes, upholds the rule of law, and safeguards the integrity of our economies.

Thank you.

Edwin W. Harris, Jr
Director General

THE VISION OF THE DIRECTOR GENERAL – MR. EDWIN W. HARRIS JR.

I have had the privilege to lead the development of the GIABA Strategic Plan 2023-2027 as my immediate priority, with the overarching objective of contributing to the achievement of the ECOWAS Vision 2050 of a « *A fully integrated Community of peoples, living in a peaceful and prosperous region, with strong institutions and respect for fundamental rights and freedoms, striving for inclusive and sustainable development* » Indeed, GIABA has a crucial role to play in the achievement of this vision as the regional institution mandated to coordinate the fight against money laundering, terrorism and proliferation financing. Hence GIABA's Vision 2050, is “*A West African region that is peaceful and prosperous as a result of the contribution of the regional alliance against money laundering, terrorist financing and arms proliferation and an efficient leadership of GIABA.*”



As we embark on the implementation of the GIABA Strategic Plan 2023-2027, I envision a future where GIABA continues to lead the regional fight against money laundering and terrorism financing, achieving even greater impact and effectiveness in our collective efforts. Over the next four years, my vision as the Director General is to lead GIABA towards the realisation of this vision through the following four key pillars as outlined in our Strategic Plan:

Pillar 1 - Risk understanding and compliance

In line with this pillar, my vision is for GIABA to become a centre of excellence in risk understanding and compliance within the ECOWAS region. We will strengthen our risk assessment methodologies, promote the adoption of risk-based approaches in AML/CFT compliance and supervision, and facilitate the development of robust compliance frameworks in member States. Through targeted technical assistance, capacity building programs, and knowledge sharing platforms, GIABA will empower our stakeholders to identify, understand, assess, and mitigate the risks associated with money laundering and terrorism financing as well as proliferation financing. The outcomes of these efforts will foster a culture of compliance and deterrence across the region.

Pillar 2 - Performance of the GIABA Secretariat

Under this pillar, my vision is for the GIABA Secretariat to further enhance its performance and efficiency in delivering its mandate. We will prioritize capacity building and professional development of our staff, ensuring they have the necessary skills and expertise to effectively support our member States. We will invest in modern technologies, systems, and processes to streamline our operations, improve data management, and enhance the quality and timeliness of our outputs. By fostering a culture of excellence, innovation, and accountability within the Secretariat, we will become a model organisation in the field of anti-money laundering and countering the financing of terrorism & proliferation financing (AML/CFT&PF).

Pillar 3 - International coordination and international cooperation

My vision under this pillar, is for GIABA to sustain its pivotal role in strengthening international coordination and cooperation in the fight against money laundering and terrorism and proliferation financing. We will actively engage with relevant regional and international organisations, financial institutions, and other stakeholders to promote information sharing, joint investigations, and mutual legal assistance. We will advocate for the harmonisation of implementation of AML/CFT&PF measures and the adoption of best practices at the global level. By positioning GIABA as a trusted partner in the international arena, we will contribute to the global efforts to combat financial crimes and ensure that our region's interests are well-represented.

Pillar 4 - Performance of AML/CFT/FP actors

In this pillar, my vision is to enhance the performance of AML/CFT&PF actors (public and private sectors) within the ECOWAS region. We will work closely with our member States to strengthen their legal and regulatory frameworks, enhance the capacity of their financial intelligence units, law enforcement agencies, and judiciary, and promote effective public-private partnerships. By fostering a culture of collaboration, information sharing, and coordination among these actors, we will enhance their ability to detect, investigate, and prosecute financial crimes. Through our technical assistance programs including training initiatives, and peer review mechanisms, we will support their continuous improvement and create an enabling environment for improved performance in the implementation of effective AML/CFT&PF regimes.

In pursuing this vision, we must remain steadfast in our commitment to upholding the highest standards of integrity, professionalism, respect for diversity and solidarity. We will leverage the power of partnerships, harness the potential of technology, and adapt to emerging trends and challenges in the AML/CFT&PF landscape. Together, we will make significant strides in safeguarding the integrity of our financial systems, protecting our economies, and ensuring the safety and well-being of our citizens.

I am honoured to lead GIABA during this transformative period, and I look forward to working closely with our member States, partners, and stakeholders to make this vision a reality.

CHAPTER 1 – GLOBAL AML/CFT DEVELOPMENT, GIABA'S PREPARATION FOR THE THIRD ROUND OF MUTUAL EVALUATIONS

Introduction

1. The Global AML/CFT Network led by the FATF is in process of completing the current round of mutual evaluations (fourth round for FATF members and second round for GIABA member States) using the revised FATF Standards of 2012 (revised from time to time) and the FATF Methodology of 2013 (also revised from time to time). The current cycle of mutual evaluations placed emphasis on effectiveness of the AML/CFT systems alongside technical compliance. Emerging ML/TF risks occasioned revisions to some of the FATF 40 Recommendations, thus leading to challenges in the deployment of the FATF Methodology. Nonetheless, several lessons have been learnt that would definitely improve the process of conducting the assessments in the next round.

2. In 2022, the issue of understanding of ML/TF risks associated with different economic sectors remained central in the implementation of robust AML/CFT measures. The Global AML/CFT continued to emphasize the application of risk-based approach to AML/CFT compliance. Several guidance and policy papers were developed to assist countries and their institutions particularly the accountable institutions in their AML/CFT compliance functions. Notably, guidance on risk-based approach for the real estate sector was produced in 2022. This is in addition to the existing Guidances on RBA for Legal Profession, Trust and Company Service Providers (TCSP), Accounting Profession, Casinos, Security sector, Life Insurance Sector, Virtual Assets and Virtual Assets Service Providers, Risk-Based Supervision, etc.

3. The German Presidency of the FATF completed its tenure in 2022 and handed over to Singapore. Also, at the GIABA level, Mr. Edwin W. Harris Jr of Republic of Liberia assumed leadership on the institution on August 1, 2022 upon completion of the statutory non-renewable four-year mandate of Mr. Kimelabalou Aba of Togolese Republic.

Global AML/CFT Development

4. The year 2022 witnessed several propositions and pronouncements by different international AML/CFT stakeholders on areas of intense focus if the fight against ML/TF is to be effective and remain on course. These areas of increase attention include: Asset Recovery, Corruption, Environmental Crime, Financial Inclusion and NPOs, Beneficial Ownership, Digitalization, and Virtual Assets.

5. Tracing, seizure and confiscation of criminal assets are major challenges in taking profit out of crime. The Global AML/CFT network through several collaborative fora including that between the FATF and Interpol reinforced the call to enhance operational cooperation at national, regional and international levels and to promote national policies that would increase effective information sharing among public authorities and with the private sector.

6. In 2022, there was a clarion call led by the FATF Ministers that grand and systemic corruption have deleterious effects on the economies and the society, thereby impede effective

implementation of the FATF Standards. The Global AML/CFT network recognized the need to strengthen the FATF Standards on Beneficial Ownership to prevent the use of shell companies and trusts to hide proceeds of corruption. Also, there were efforts to tackle the misuse of citizenship by investment schemes including the revisions to the FATF Recommendation 24 on transparency of Beneficial Ownership of Legal persons. This revision is to promote the application of risk-based approach and to strengthen global response to addressing concealment of Beneficial Ownership of Legal persons.

7. The FATF Report noted that Environmental Crime (such as illegal logging, illegal wildlife trade and waste trafficking) generates between US\$110 Billion and US\$281 Billion annually thus making it one of the most profitable criminal enterprises. The perpetration of this crime has far-reaching implications on the achievement of sustainable developments goals. Following the addition to the examples of environmental crime in the FATF Glossary in 2021, countries were required to criminalize the full range of environmental crime.

8. In 2022, the FATF completed a stockpile project for identifying and analyzing unintended consequences of the FATF Standards on the Non Profit Organizations (NPOs). Emphasis is on application of RBA with respect to the FATF Recommendation 8 to ensure that the activities and operations of legitimate NPOs are not disrupted.

9. The impact of technology on how work is being undertaken has accentuated the need to explore opportunities that it can offer to improve the implementation of AML/CFT measures. There is on-going work on the role of big data and advanced analytics in transforming the capabilities of operational agencies in detecting and investigating ML/TF cases an understanding ML/TF risks.

10. In 2022, the FATF produced a targeted update on the implementation of its Standards on virtual assets (VAs) and virtual assets service providers (VASPs) with a focus on the FATF's Travel Rule. The report enjoined countries to strengthen their understanding of ML/TF risks of VA and VASP Sector and to rapidly implement the requirements of the FATF Recommendation 15. Some of the emerging risks and market development highlighted in the report include Decentralized Finance (DeFi), Non-Fungible Tokens (NFTs) and Unhosted Wallets. The FATF Travel Rule requires VASPs and other financial institutions to share relevant originator and beneficiary information alongside virtual asset transactions, thereby assisting to prevent criminal and terrorist misuse. Countries are enjoined to accelerate implementation and enforcement to mitigate misuse of VAs. The private sector is encouraged to deploy available technological solutions that would facilitate Travel Rule Compliance by increasing interoperability between solutions and across jurisdictions.

Preparation for the Next Round of Mutual Evaluations

11. In line with approved calendar, the second round of mutual evaluations of the seventeen (17) GIABA member States that commenced in 2016 will be coming to a close with on-site visits to the remaining member States in 2023. The next round (third) of assessments of GIABA member States is expected to take off in late 2024 all things being equal. The new round of assessment will build on the lessons learnt in the about to be concluded second round especially with respect to assessing the effectiveness of the AML/CFT regimes of member States.

12. The GIABA Secretariat is poised to provide adequate guidance to member States through the following:

- Participation in all FATF and other FSRBs activities for the enhancement of mutual evaluation process
- Revision of the GIABA mutual evaluation process and procedure in line with the FATF Universal procedure
- Revision of the draft Handbook on Mutual Evaluations produced by the former Director of Evaluation and Compliance, Dr. Buno Nduka, to ensure that revisions to the FATF Methodology for assessing compliance are comprehensively incorporated to assist assessors
- Re-training of existing assessors and training of new assessors with emphasis on quality report writing
- Fast tracking the implementation of action plans by member States on the ICRG process to ensure timely exit from the program

CHAPTER 2 - MEMBER STATES' ASSESSMENT

Introduction

13. Assessment of the AML/CFT regimes of GIABA member States is a central aspect of GIABA's mandate. GIABA undertakes this assessment through mutual evaluation, a peer review mechanism for ascertaining levels of compliance with acceptable international AML/CFT Standards particularly the FATF 40 Recommendations on technical compliance and the eleven immediate outcomes (IOs) on or the effectiveness of their AML/CFT systems. The exercise provides an in-depth description and analysis of each country's regime for preventing the criminal abuse of its financial system.

14. The overarching factors in the assessment of each country are risks and context, taking into consideration a country's specific ML/TF risks, materiality (e.g. the size, integration and make-up of its financial sector) and other structural or contextual factors that may impact its implementation of AML/CFT measures. In particular, the main essence of assessing is to gain insight into how the entire AML/CFT system of a country works in terms of technical compliance and effectiveness.

15. The effectiveness of the AML/CFT system is the extent to which financial systems and economies mitigate the risks and threats of money laundering, and financing of terrorism and proliferation. It requires a judgement as to whether, or to what extent defined outcomes are being achieved in line with the FATF Standards.

16. A country's Technical Compliance (TC) with the FATF Recommendations is assessed to ensure that the country has appropriate laws, regulations and other enforceable means to prevent criminals and terrorists from misusing the financial system, and that the country detects and punishes those that do or attempt to misuse the financial system for such criminal purposes. After the analysis, an on-site visit is undertaken to assess the implementation of the laws and regulations and to determine the extent to which the country's actions achieve the outcomes expected of an effective system and recommend priority measures to improve the country's AML/CFT system.

17. The outcome of the mutual evaluation exercise is the adoption of a mutual evaluation report (MER) by the GIABA Plenary and endorsement by the GIABA Ministerial Committee (GMC). The MER identifies a country's strengths and areas for improvement, and recommended priority actions for the assessed country to enhance its AML/CFT measures. Countries are rated on technical compliance for each of the 40 Recommendations and effectiveness under 11 Immediate Outcomes (IOs) (the expected results).¹

18. In addition, based on the outcome of a country's Mutual evaluation, an assessed country is placed in a follow-up program (regular or enhanced) in line with the GIABA P&P of Mutual Evaluation. Also, the performance of a country could trigger escalation to the International Cooperation Review Group (ICRG) process of the FATF based on some defined criteria, to

¹ The Level of effectiveness of an assessed country based on the IOs is rated as Low Effectiveness (LE), Moderate Effectiveness (ME); Substantial Effectiveness (SE); or High Effectiveness(HE), while that of TC is rated as Compliant (C); Largely Compliant (LC); Partially Compliant (PC) or Non-Compliant(NC).

facilitate increased monitoring of the assessed country for swift resolution of identified strategic deficiencies in its AML/CFT regime.

MUTUAL EVALUATIONS

19. In 2022, GIABA discussed and adopted the mutual evaluation Reports (MERs) of Guinea Bissau, Togo and The Gambia. Thus, by the end of 2022, GIABA has published the MERs of 12 of its 17 member States, indicating that approximately 70% of GIABA member States have been evaluated. Also, in 2022, GIABA conducted two on-site visits: the on-site visit of Côte d'Ivoire in collaboration with IMF from 6 to 24 June, 2022 and the on-site visit of Liberia from 3 to 20 September, 2022, and all things being equal, MERs of Côte d'Ivoire and Liberia are scheduled for discussion and adoption at the GIABA Plenary in May 2023.

20. Each adopted MER provides an overview of the AML/CFT&PF situation in the country as at the time of the on-site visit. There is political commitment by all assessed GIABA member States to implement the findings and recommended actions as stated in the various MERs.

21. The summary of the adopted MERs in 2022 are presented as follows.

MER of the Republic of Guinea Bissau

22. The on-site visit to the Republic of Guinea Bissau was undertaken from 17 January 2021 to 5 February, 2021. The MER, which was adopted in February 2022, shows that Guinea Bissau requires fundamental improvements in the implementation of its AML/CFT system as the country recorded low effectiveness in all immediate outcomes. The MER noted the following strategic deficiencies in the AML/CFT regime of Guinea Bissau:

- Low understanding of its ML/TF risks.
- No national AML/CFT policy that addresses the risks identified except the adoption of a seven-year (2021-2027) National Integrated Plan.
- Non-operational AML/CFT national coordination mechanism (Inter-Ministerial Committee) due to several factors, including administrative and resource constraints.
- Lack of prioritization of ML investigations by the criminal investigative and prosecutorial authorities, especially the criminal police agencies and the Public Prosecutor's Office.
- Limited Confiscations and absence of operational institutional framework for managing confiscated assets (Asset Recovery Office and the Asset Management Office).
- Inadequate legal framework on TF and non-criminalization of the financing of individual terrorists and terrorist organizations for any purpose and the financing of foreign terrorist fighters
- Weak implementation of a risk-based approach to AML/CFT supervision of banks and non-existent in non-bank financial institutions and DNFBPs.
- Non designation of an AML/CFT oversight authority for the DNFBP sector
- Lack of sanctions regime that will improve measures to enhance transparency of legal persons, including timely update of basic information.

- Limited use of international cooperation mechanisms, which is inconsistent with the transnational nature of the most important proceed generating crimes in the country.

23. In terms of Technical Compliance, Guinea Bissau domesticated the UEMOA Uniform AML/CFT Act through the enactment of AML/CFT Law No. 3/2018 which strengthened the country's legal framework particularly as regards preventive measures, provisional freezing measures and targeted financial sanctions (TFS) related to the financing of terrorism and the proliferation of weapons of mass destruction. The country also established the Asset Recovery Office and the Asset Management Office, and other agencies that deal with ML/TF cases. Guinea Bissau needs to improve its technical compliance in relation to the criminalisation of the full range of ML predicates especially the financing of an individual terrorist and a terrorist organisation for any purpose, beneficial ownership of legal persons and the definition of PEPs.

24. To address the identified significant deficiencies, the MER recommended that the country should deepen its understanding ML/TF risks and address the identified risks, including the assessment of ML/TF risk of legal persons, maintenance of relevant national statistics to enable it to better understand the effectiveness of its AML/CFT regime. In addition, the MER recommended the strengthening of international cooperation, supervision of reporting entities for compliance with AML/CFT requirements, enhancement of the implementation of preventive measures, improvement in the transparency of beneficial ownership of legal persons and arrangements, increased use of financial intelligence to investigate ML and associated predicate offences, and TF, prioritisation of the investigation and prosecution of ML, increase in the confiscation of proceeds and instrumentalities of crime, and to ensure the effective implementation of Targeted Financial Sanctions relating to TF and PF.

25. In line with the GIABA P&P, Guinea Bissau was placed in the enhanced follow-up process and the country is expected to present its first follow-up report (FUR) to the Plenary in May 2023.

MER of the Togolese Republic

26. The on-site mutual evaluation of Togo was conducted from 25 January 2021 to 10 February, 2021. Togo is exposed to a high level of ML risk, resulting from several predicate offences of a transnational nature including scam, tax fraud, corruption, cybercrime, drug trafficking, human trafficking, migrants' smuggling, trafficking in wildlife and cross-border gold smuggling.

27. The MER adopted in May 2022 indicates that Togo demonstrated low effectiveness on all the IOs. Significant shortcomings that impacted on effectiveness include weak understanding of ML/TF risks by the competent authorities and reporting entities; weak national AML/CFT/PF coordination; low level of international cooperation, including the sharing of financial intelligence and other information for investigating ML, associated predicate offences, TF and assets tracing/recovery; poor implementation of risk-based approach to preventive measures by reporting entities, especially the reporting of suspicious transactions; lack of accurate and up-to-date basic information on legal persons low level use of financial intelligence and other relevant information by law enforcement and investigative authorities; limited level of ML/TF investigations and prosecutions; inadequate resources for LEAs for the identification, tracing and confiscation of the proceeds and instrumentalities of crime; low rate of convictions for ML/TF and predicate offences; ineffective the

implementation of TFS related to TF and lack of appropriate mechanism for the implementation of PF-related TFS; and lack of comprehensive statistics on relevant ML/TF cases.

28. With respect to technical compliance, actions taken by Togo to strengthen its AML/CFT include the enactment of a Penal Code and the Uniform AML/CFT Law n°2018-004, a Decree designating the authority responsible for coordinating the national response to ML/TF risks. These laws addressed matters related to seizures and confiscations, TFS (TF&PF), risk-based approach to compliance and supervision of reporting entities, national cooperation and coordination, and international cooperation. However, Togo needs to criminalise financing a terrorist individual or terrorist organisation for any purpose and the financing of travel by foreign terrorist fighters (FTF).

29. To resolve these deficiencies, the MERs recommend the following actions as a priority:

- Adoption of the national AML/CFT policy and strategy document followed by the allocation of substantial resources necessary for the implementation of AML/CFT risk mitigating measures as well as the operationalization of the National Coordinating Committee for AML/CFT activities;
- Wider dissemination of the findings of the NRA and sectoral assessments, followed by awareness-raising sessions for a better understanding of ML/TF risks by all actors;
- Adoption and implementation of a risk-based approach in the supervision and monitoring of reporting entities and ensuring that they implement the preventive measures required to mitigate the ML/TF risks to which they are exposed;
- Criminalizing the financing of a terrorist organization, a terrorist individual for any purposes, the movement of foreign terrorist fighters and addressing the strategic gaps identified in the implementation regime of TFS related to TF and PF;
- Guaranteeing financial autonomy and the confidentiality of information received and used by the FIU, through its own budget allocation, regular appointment of its members, and ensuring they take an oath of office together with its institutional correspondents;
- Strengthening the capacities of the competent authorities, particular the Law Enforcement authorities, tax and customs administrations in the detection, investigation and prosecution of ML/TF acts of a transnational nature. And this could be achieved through the effective use of international cooperation, especially in tracing and confiscating the proceeds of crime.

30. Togo is placed in the enhanced follow-up and to report to the GIABA Plenary in May 2023

MER of the Republic of The Gambia

31. The on-site mutual evaluation of the Federal Republic of The Gambia was conducted from 23 August to 3 September 2021 and the MER was adopted in May 2022. The main proceeds-generating predicate crimes in The Gambia include fraud, drug trafficking, theft/stealing/robbery, corruption & bribery. Key vulnerabilities that increase ML/TF risks in

the country and contribute to impeding efforts to prevent, investigate and prosecute ML/TF in The Gambia include:

- large informal and cash-based economy,
- under-resourced authorities,
- porous land borders,
- weak cash control measures at the borders,
- poor implementation of AML/CFT requirements by DNFBPs,
- weak or absence of AML/CFT supervision, especially in the NBFIs and DNFBPs, and
- the non- application of proportionate and dissuasive sanctions

32. In relation to effectiveness of the AML/CFT system, the MER concluded that The Gambia has implemented an AML/CFT system that is generally effective to a limited extent. In particular, the country achieved moderate results in relation to the confiscation of proceeds and instrumentalities of crime.

33. The Gambia requires fundamental improvements to strengthen its understanding of ML/TF risks, measures to address the identified risks, including the maintenance of relevant national statistics to enable it to better understand the effectiveness of its AML/CFT regime, international cooperation, enhance the supervision of reporting entities and implementation of preventive measures, enhance the transparency of beneficial ownership of legal persons and arrangements, enhance the investigation and prosecution of ML/TF, and to ensure the effective implementation of TFS.

34. In relation to Technical Compliance, The Gambia made significant progress with the enactment of the AML/CFT Act, 2012, establishment of the FIU as an operationally independent body, reduction in the threshold for ML predicate offences, designation of authorities responsible for the implementation of AML/CFT measures, provision of adequate measures for tracing and confiscating criminal proceeds and assets of corresponding value, strengthened preventive and international cooperation measures. Unfortunately, Guidelines issued by the FIU and/or CBG for FIs and DNFBPs to facilitate the implementation of AML/CFT obligations were not published in the Government Gazette to receive legal recognition under the laws of The Gambia. Consequently, the assessment did not consider the Guidelines as enforceable and did not take them into account in the conclusions on analyses of technical compliance. Also, The Gambia lacks needs to criminalise the smuggling of migrants, designate tax crimes as predicate offences of ML, and adopt measures to confiscate assets of corresponding value, TFS, risk-based approach to NPOs, PEPs, money or value transfer services (MVTs), new technologies, reliance on third parties, higher-risk countries, transparency of beneficial ownership of legal persons and arrangements, and the regulation and supervision of DNFBPs.

35. To address the technical shortcomings which impact the effectiveness of the AML/CFT system, The Gambia should:

- Designate tax crimes as ML predicate;

- Criminalise attempted ML, migrants smuggling, market manipulation and the financing of individual terrorists and foreign terrorist fighters;
- Empower the Companies Registry to obtain and maintain BO information;
- Undertake implementation of TFS against persons and entities involved in TF and the proliferation of weapons of mass destruction without delay, and
- Amend relevant sections of the AML/CFT Act, 2012 that require the FIU to apply to courts for orders to enforce compliance with the AML/CFT requirements to make the applications of sanctions easier for all practical purpose, and broaden the scope of administrative sanctions for breaches of AML/CFT obligations

36. In line with the GIABA Mutual Evaluation Process and Procedures, the Plenary placed The Gambia on the Enhanced Follow-Up process and the country is to submit its First Follow-Up Report in May 2023.

37. Summary of the Ratings on Effectiveness in the mutual evaluation reports adopted and published in 2022 is as follows.

Immediate Outcome (IO)	Member State		
	Guinea Bissau	The Gambia	Togo
IO.1-Risk, policy and coordination	LE	LE	LE
IO.2-International co-operation	LE	LE	LE
IO.3-Supervision	LE	LE	LE
IO.4-Preventive measures	LE	LE	LE
IO.5-Legal persons & arrangements	LE	LE	LE
IO.6-Financial intelligence	LE	LE	LE
IO.7-ML investigation & prosecution	LE	LE	LE
IO.8-Confiscation	LE	ME	LE
IO.9-TF investigation & prosecution	LE	LE	LE
IO.10-TF preventive measures & financial sanctions	LE	LE	LE
IO.11-PF financial sanctions	LE	LE	LE

LE = Low level of effectiveness (fundamental improvement needed)

ME= Moderate level of effectiveness (major improvement needed)

FOLLOW-UP PROCESS

38. GIABA closely monitors member States' progress in improving their compliance with the FATF Recommendations through the follow-up process. The follow-up process focuses on ensuring that assessed countries address their technical compliance deficiencies by submitting progress reports (follow-up reports (FURs).) Overall, the expectation is that countries would have addressed most, if not all, technical compliance deficiencies by the end of the third year from the adoption of their MERs.

39. To facilitate proper understanding of the follow-up process by member States, the GIABA Secretariat developed a flowchart that captures all actions including timelines. The flow chart is available on the GIABA's website and has been shared with Heads of Delegations to GIABA. The Secretariat also shared detailed timelines concerning the follow-up process with countries to facilitate engagement and adherence to the P&P.

Follow-up reports adopted/published

40. In 2022, at the three² GIABA TC/Plenary meetings, the following ten (10) follow-up reports were presented, discussed and adopted.

S/N	Member State	Follow-Up Cycle	Date of Discussion/Adoption
Follow-Up Reports With Re-Rating			
1	Ghana	5 th FUR	February 2022
2	Senegal	2 nd FUR	February 2022
3	Senegal	3 rd FUR	May/June 2022
4	Nigeria	1 st FUR	November 2022
Follow-Up Reports Without Re-Rating (For Information Only)			
5	Benin	1 st FUR	May/June 2022
6	Cabo Verde	3 rd FUR	May/June 2022
7	Burkina Faso	3 rd FUR	May/June 2022
8	Niger	1 st FUR	November 2022
9	Sierra Leone	2 nd FUR	November 2022
10	Mali	3 rd FUR	November 2022
11	Senegal	4 th FUR	November 2022

41. The FURs of Ghana and Senegal in which the countries received upgrades on their ratings for technical compliance with the FATF 40 Recommendations rated PC/NC have been published. Also, the Plenary adopted Nigeria's First Enhanced FUR in which the country received upgrades on its technical compliance with five of the FATF 40 Recommendations rated PC/NC. The FUR is undergoing quality and consistency review by the Global Network and will be published in January 2023. The FURs of Benin, Burkina Faso, Cabo Verde, Niger, Mali, and Sierra Leone were presented to the Plenary as information items only since they did not request for technical compliance re-ratings. Similarly, in its 4th FUR, Senegal did not request for technical. Summaries of progress made by the individual countries are provided below:

Follow-up reports with re-ratings

Second and Third FURs of the Republic of Senegal

42. Senegal's Second and Third FURs were considered and adopted by the February and May/June Plenary meetings, respectively. Senegal made progress in addressing the technical compliance deficiencies identified in the MER and was re-rated on 14 of the FATF Recommendations rated PC/NC. This progress was mainly achieved through legislative reforms.

43. **R.1-** Senegal completed the NRA process, disseminated the results of the assessment to all AML/CFT stakeholders, and developed a national AML/CFT strategy based on the risk identified. It also enacted Law 2018-03 requiring FIs and DNFBPs to (a) have policies and

² February 2022 (Accra, Ghana), May/June 2022 (Saly, Senegal) and November 2022 (Saly, 2022)

procedures to mitigate and manage risks; (b) assess and understand their ML/TF risks and the requirement for FIs and DNFBPs to apply enhanced due diligence measures in cases of higher risks. However, reporting entities are yet to implement a risk-based approach to compliance. **R.1 was upgraded from PC to LC.**

44. **R.2** - Senegal put in place a national information exchange mechanism and provides cooperation/coordination to ensure the compatibility of AML/CFT requirements with data protection and privacy rules. In addition, Senegal has adopted the NRA Action Plan and the National AML/CFT Strategy for 2019-2024 to address the gap identified in its MER. **R.2 was upgraded from LC to C.**

45. **R.4** – Senegal amended the Criminal Code and Law No. 2021-34 of 23 July 2021 to provide for legal basis to freeze, confiscate and prevent or void actions that prejudice the country's ability to freeze or seize or recover property that is subject to confiscation regarding TF offence. **R. 4 was upgraded from PC to C.**

46. **R.5** – Senegal enacted Law n ° 2021-33 of 23 July 2021, an amendment to the Penal Code, to criminalise the financing of an individual terrorist and terrorist organisations for any purpose, as well as the financing of foreign terrorist fighters. **R. 5 was re-rated from PC to C.**

47. **R.6** - Senegal designated the Minister of Finance and Economy as the competent authority for TFS; established designation procedures and mechanisms (listing) and undertook other measures. However, Senegal needs to adopt measures to freeze, without delay, the assets of persons/entities designated by the UN and protect the rights of bona fide third parties; adopt a national list in the framework of UNSCR 1373; and issue guidelines for FIs and DNFBPs to facilitate the implementation of their obligations under the freezing mechanism. **R.6 was upgraded from NC to PC.**

48. **R.7** – Based on AML/CFT Law 2018-03, Decree 2020-602 of 28 February 2020 and Enforcement Order No. 026070 of 24 November 2020, Senegal designated the competent authority for PF-TFS; and established procedures and mechanisms for designation (registration on the lists) and the implementation of TFS without delay. However, the frameworks did not cover the freezing of funds or other property of persons and entities acting on behalf of and at the direction of designated persons and entities; clear guidelines for FIs and DNFBPs on their obligations under freezing mechanisms; sanctions for non-compliance by FIs and DNFBPs with the obligations under R. 7; mechanism to provide guidance to FIs and DNFBPs that may hold funds or other assets as to their obligations in relation to delisting and unfreezing actions; conditions set out under UNSCR 2231 in the context of withdrawing of funds from frozen accounts under obligations arising prior to the freezing order. **R.7 was upgraded from NC to PC.**

49. **R.17** – Through AML/CFT Law 2018-03, Senegal set out the obligations incumbent on third party providers to include the identification of beneficial ownership and the understanding of the nature of the client's business. However, deficiencies were identified in relation to the list of countries where third parties are to be located when considering the available information on the level of risk associated with those countries. **R.17 was upgraded from PC to LC.**

50. **R.18** – With the enactment of AML/CFT Law 2018-03, FIs are required to put in place policies and procedures for information sharing within financial groups for AML/CFT

purposes; specify how branches and subsidiaries of financial groups should implement their home country AML/CFT measures. However, the country needs to address the gap related to sharing audit of, and/or AML/CFT functions, of customer, account, and transaction information with branches and subsidiaries when relevant and appropriate to risk management.

R. 18 was upgraded from PC to LC.

51. **R.24** - Senegal introduced obligations to update basic information on legal persons and their beneficial owners, established in the Trade and Personal Property Credit Register (RCCM) a beneficial owners register for legal persons in the extractive sector and for tax purposes for other legal persons; put in place proportionate, effective and dissuasive sanctions for non compliance with reporting requirements; and assessed the risks of ML related to the various categories of legal persons created in the country. However, there are no mechanisms in place to prevent the misuse of bearer shares, bearer share warrants or nominee shares and nominee directors and monitor the quality of the assistance they receive from other countries in response to requests for basic and beneficial ownership information of legal persons. **R.24 was upgraded from PC to LC.**

52. **R.25** – Through AML/CFT Law 2018-03, Senegal now requires professional trustees to maintain accurate and timely information collected from their clients, and communicate trust information to competent authorities, FIs and DNFBPs. The law provides for the powers of competent authorities to access information on legal arrangements in a timely manner. Nonetheless, the following deficiencies remain regarding the obligation to maintain information about the trustee, protector, beneficiary or class of beneficiary and other agents providing services to the trust; obligation for trustees to declare their status to reporting entities when establishing a business relationship; formal mechanism for exchanging available information on trusts or other legal arrangements at national level; sanctions against non-professional trustees for non-compliance with their obligations; sanctions for non-compliance with the obligation to make information on trusts available to the competent authorities in a timely manner. **R. 25 was re-rated from NC to LC.**

53. **R.28** – Based on AML/CFT Law 2018-03 and Decree No. 2019-1500 of 18 September 2019, Senegal designated supervisory authorities, defined their powers, and established supervision and monitoring mechanisms for the DNFBPs. However, deficiencies continue to exist in relation to measures to prevent criminals or their associates from holding a significant or controlling interest in casinos and other DNFBPs; obligation for supervisory and self-regulatory authorities to undertake risk-based supervision of DNFBPs. **R. 28 was re-rated from NC to PC.**

54. **R.31**- The AML/CFT Law allows investigative authorities to defer arrests and seizures, and request for information from the FIU. **R.31 was re-rated from PC to C.**

55. **R.36** - Senegal has adopted several laws that have enabled it, for example, to supplement the criminalisation of the financing of terrorism. However, as regards the implementation of the relevant provisions of the Palermo and Merida Conventions, minor shortcomings related to the status of politically exposed persons, and the transparency of legal persons remain. **R.36 was upgraded from PC to LC.**

56. **R.38** - Senegal established the National Office for the Recovery of Criminal Assets (ONRAC) and improved cooperation on confiscations and provisional measures. No factual evidence was provided regarding the use of the power to provide assistance to requests for co-

operation on non-conviction-based confiscation proceedings and related provisional measures. **R.38 was upgraded from PC to LC.**

57. The MER ratings and the re-ratings for TC after the discussion and adoption of the 2nd and 3rd FURs are presented below:

REC	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10	R11	R12	R13	R14	R15	R16	R17	R18	R19	R20
MER RATING	PC	LC	LC	PC	PC	NC	NC	PC	C	PC	LC	NC	NC	LC	PC	PC	PC	PC	NC	C
RE-RATING AFTER 2 ND	PC	LC	LC	PC	C	NC	PC	PC	C	PC	LC	PC	LC	LC	PC	PC	LC	LC	NC	C
RE-RATING AFTER 3 RD	LC	C	LC	C	C	PC	PC	PC	C	PC	LC	PC	LC	LC	PC	PC	LC	LC	NC	C

REC	R21	R22	R23	R24	R25	R26	R27	R28	R29	R30	R31	R32	R33	R34	R35	R36	R37	R38	R39	R40
MER RATING	C	PC	PC	PC	NC	PC	C	NC	LC	LC	PC	LC	PC	PC	PC	PC	C	PC	LC	LC
RE-RATING AFTER 2 ND	C ³	PC	PC	PC	PC	PC	C	PC	LC	LC	C	LC	PC	PC	LC	PC	C	PC	LC	LC
RE-RATING AFTER 3 RD	C	PC	PC	LC	PC	PC	C	PC	LC	LC	C	LC	PC	PC	LC	LC	C	LC	LC	LC

Fifth Follow-Up Report of Ghana

58. Since the adoption of its Fourth FUR in May 2021, Ghana has improved its technical compliance and received upgrades on three FATF Recommendations as follows:

59. **R. 8** -- Ghana’s progress included the conduct of a risk assessment of the NPO sector, issuance of National Policy and Directives on NPOs, implementation of some outreach activities, issuance and dissemination of Guidance Note on TF Redflags / Indicators for NPOs and demonstration of the investigative capabilities of LEAs to investigate NPOs suspected to be exploited or supporting terrorist or terrorist organisations. However, some deficiencies remain, including identification of the subset of NPOs at risk of TF abuse, application of a risk-based monitoring, encouragement of NPOs to conduct transactions via regulated financial channels, development and refinement of best practices to address TF risk,, domestic cooperation and information sharing between competent authorities. **R.8 was upgraded from NC to PC.**

60. **R.33** - Ghana enacted the Anti-Money Laundering Act, 2020 (AML Act) to require competent authorities to maintain comprehensive statistics on matters relevant to the

³ The FATF Standard changed after the on-site visit, hence Senegal needed to be reassessed to ensure that it still meets the requirements.

effectiveness and efficiency of its AML/CFT regime. Competent authorities demonstrated the maintenance of comprehensive statistics on all the requirements of R.33 to a large extent. **R.33 was upgraded from PC to LC.**

61. **R.35** – Ghana enacted legislation and issued policies, which combined with existing frameworks, provide a wide range of proportionate and dissuasive criminal and administrative sanctions, including custodial sentences, against natural and legal persons who fail to comply with the requirements of Recommendations 6 and 8 to 23.. **R.35 was upgraded from PC to C.**

62. The MER ratings and the re-ratings for TC after the discussion and adoption of the 5th FUR are presented below:

REC	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10	R11	R12	R13	R14	R15	R16	R17	R18	R19	R20
MER RATING	LC	LC	C	LC	LC	LC	LC	NC	C	LC	LC	C	C	C	C	PC	PC	LC	C	C
RE-RATING AFTER 5TH	LC	LC	C	LC	LC	LC	LC	PC	C	LC	C	C	C	C	PC ⁴	LC	LC	LC	C	C

REC	R21	R22	R23	R24	R25	R26	R27	R28	R29	R30	R31	R32	R33	R34	R35	R36	R37	R38	R39	R40
MER RATING	C	LC	LC	LC	PC	LC	LC	PC	C	C	C	LC	PC	LC	PC	C	LC	LC	PC	LC
RE-RATING AFTER 5TH	C	LC	LC	LC	PC	LC	LC	PC	C	C	C	LC	LC	LC	C	C	LC	LC	PC	LC

First Enhanced Follow-Up Report of the Federal Republic of Nigeria

63. The Plenary discussed the progress made by Nigeria since the adoption of its MER in August 2021. As noted below, the Plenary agreed to re-rate five (05) of the FATF 40 Recommendations to reflect Nigeria’s current levels of technical compliance.

64. **R.3** – On 12 May 2022, Nigeria enacted the Money Laundering (Prevention and Prohibition) Act, 2022, Act No. 14 (MLPPA), to address the deficiencies identified in relation to R.3. The MLPPA repealed the Money Laundering (Prohibition) Act, 2011 (§29 (1), MLPPA). The MLPPA is in force and effect, and applies throughout the Federation. The ML offence applies to all types of property, including virtual assets, regardless of value, that directly or indirectly represent the proceeds of crime. There are proportionate and dissuasive sanctions for natural persons convicted of the ML offence. **R. 3 was upgraded from PC to C.**

65. **R.7** - Nigeria adopted legal and institutional measures and mechanisms to implement PF-TFS without delay. The country implements PF-TFS related to PF pursuant to the TPPA and the Regulation for the Implementation of Targeted Financial Sanctions on Proliferation Financing (UNSCR 1718(2006) and successor resolutions on DPRK, and UNSCR 2231(2015) on Iran;) (PF.R) which entered into force and effect on 12 May, 2022. Designation of any person or entity by the UN Security Council or relevant Committee related to PF has immediate application in Nigeria and continues in effect until the expiration or revocation by the UN

⁴ Change in the FATF Standards resulted in a downgrade after re-assessment.

Security Council or its Committees (§60, TPPA). However, the following minor shortcomings were noted for the implementation of UNSCRs 1718 and 2231 – lack of framework or mechanism for communicating de-listings and unfreezing to FIs and other persons or entities, including DNFBPs; and addition of interests or other earnings due on account frozen pursuant to UNSCRs 1718 and 2231. **R.7 was upgraded from NC to LC.**

66. **R.11** –With the enactment of the MLPPA (2022), Nigeria addressed the shortcomings related to the results of any analysis undertaken, absence of requirement for some FIs to maintain transaction records sufficient to permit the reconstruction of individual transaction, specific timeframe for FIs to make records available to domestic competent authorities, and the scope of competent authorities that can request transaction records kept by FIs. Also, FIs are now required to keep all records obtained through CDD measures (for both domestic and international transactions) for at least five years and to make the same swiftly available to domestic competent authorities. **R.11 was upgraded from PC to C.**

67. **R.19**–By the provisions of the MLPPA (2022), Nigeria has taken measures to apply relevant enhanced due diligence (EDD) measures and countermeasures to business relationships and transactions with natural and legal persons from higher-risk countries, whether called for by the FATF or independently. However, examples of EDD measures do not exist for banks, traders in foreign exchange, primary mortgage banks, microfinance banks, development finance institutions, finance companies, money or value transfer service (MVTs) and CMOs. Notwithstanding the materiality of these sectors, the shortcoming is considered a minor deficiency as the legal requirement for FIs to apply EDD measures proportionate to the risks exists. **R.19 was upgraded from PC to LC.**

68. **R.20** - Nigeria addressed the gaps related to the obligation for FIs to file reports on suspicious transaction linked to the proceeds of criminal activity. The MLPPA maintained the existing provision for reporting attempted suspicious transactions which enabled Nigeria to achieve full compliance with R. 20. **R. 20 was upgraded from LC to C.**

69. The MER ratings and the re-ratings for TC after the discussion and adoption of the 1st FUR are presented below:

FATF REC	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10	R11	R12	R13	R14	R15	R16	R17	R18	R19	R20
MER RATING	PC	PC	PC	C	LC	PC	NC	NC	C	LC	PC	PC	C	C	PC	LC	LC	LC	PC	PC
RE-RATING AFTER 1 ST	PC	PC	C	C	LC	PC	LC	NC	C	LC	C	PC	C	C	PC	LC	LC	LC	LC	C

FATF REC	R21	R22	R23	R24	R25	R26	R27	R28	R29	R30	R31	R32	R33	R34	R35	R36	R37	R38	R39	R40
MER RATING	LC	PC	PC	PC	PC	LC	LC	PC	C	C	C	PC	PC	PC	LC	LC	LC	LC	LC	LC
RE-RATING AFTER 1 ST	LC	PC	PC	PC	PC	LC	LC	PC	C	C	C	PC	PC	PC	LC	LC	LC	LC	LC	LC

FURs without technical compliance re-rating

May Plenary

70. The first Enhanced FURs of Benin and Niger, and third FURs of, Cabo Verde and Burkina Faso (Third), were circulated for information only. The Information Papers summarised actions taken by each of the member States to improve their technical compliance with the FATF Recommendations and effectiveness of their AML/CFT regimes since the adoption of their respective MERs and previous FURs. The summary of the papers are presented below:

First Follow-Up Report of Benin

71. Benin commenced legislative reforms by drafting decrees aimed at addressing the shortcomings identified in relation to its technical compliance with the FATF Recommendations. The authorities sensitised stakeholders on the outcomes of the MER; collected proposals for measures to address the deficiencies in the country's AML/CFT system; organised capacity building for specific actors; developed an action plan for the implementation of the MER's recommended actions; initiated reforms of the FIU including increase in the number of its staff to improve its operational capacity.

Third Follow-Up Report of Burkina Faso

72. Burkina Faso adopted a decree requiring obliging companies in the extractive industry to declare their beneficial ownership information and constituted the Commission for the Administrative Freezing of Assets (CCGA) as the competent authority for the implementation of TF-TFS. The country also adopted and commenced the implementation of a national AML/CFT strategy together with an action plan and a monitoring and evaluation mechanism; developed guidelines for all DNFDs to facilitate the understanding and effective implementation of their AML/CFT/FP obligations; raised awareness of supervisory and regulatory body for NPOs regarding TF risk. The FIU recruited five additional staff to enhance operational efficiency, particularly to facilitate prompt dissemination of financial intelligence to prosecutors.

Third Follow-Up Report of Cabo Verde

73. Cabo Verde supervised banks and monitored casinos for AML/CFT compliance; trained and sensitised casinos on AML/CFT measures; identified unregistered real estate agents; prepared an Action Plan based on the findings of the NRA; issued Notice no. 6/2021, of January 25, 2022 to streamline the process and application of customer due diligence (CDD) (including through videoconference and access electronic versions of identity documents issued by public authorities), enhanced due diligence (EDD) and simplified measures by FIs based on the risks identified; and concluded five ML cases leading to three convictions and two acquittals.

FURs without re-rating presented as information items to the November Plenary

74. The FURs of Niger, Sierra Leone, Mali and Senegal without re-rating were presented to the Plenary for information only. The Information Notes highlighted the progress made by

the countries in addressing the deficiencies identified in their AML/CFT systems since the adoption of their MERs/FURs. Summaries of progress reported and next the steps in the follow-up process are provided below:

First Follow-Up Report of Niger

75. The FUR indicated that Niger adopted a National AML/CFT/PF Strategy, 2022-2024 by Decree No. 2022-48/PRN/MF of 10 June 2022 and an NRA-TF Action Plan through Ministerial Order N°000434/MF/CENTIF of 28 July, 2022. The National Committee in charge of coordinating AML/CFT/PF activities (CNCA-AML/CFT/P) monitors the implementation of the strategy and action plan through regular reporting by members on the status of implementation of activities during Committee meetings.

Second Follow-Up Report of Sierra Leone

76. Sierra Leone has taken measures to improve the transparency of legal persons (R.24) through the enactment of the Mines and Minerals Act while legislative reforms are ongoing to address the remaining technical compliance deficiencies relating to FATF Recommendations R.6-8, 10, 14-19, 22-25, 28, 32, 34, 37-39).

Third Follow-Up Report of Mali

77. Mali's progress in implementing the MER's recommended actions include the adoption of (a) Decree No. 2021-0681/PT-RM of 24th September 2021, which designates the supervisory authorities for the DNFBPs sector and empowers them to monitor and supervise the entities in the fight against money laundering, terrorist financing and proliferation financing (AML/CFT/PF); (b) Decree No. 2021-0682/PT-RM of 24th September 2021, designating the competent Authority for administrative freezing in AML/CFT/PF and mapping out the freezing procedure in the same context; (c) Decree 2021-0683/PT-RM establishing the National Commission for the Coordination of AML/CFT/PF Activities and replaced the former Committee; (d) Ministerial Order No. 2021-4718/MEFSG of 15th November 2021, which requires companies bidding for public contracts to provide the requisite beneficial ownership information of their respective structures; and (e) Decree No. 2022-0107/PT-RM of 22nd February 2022, establishing the Public Register of Beneficial Owners of Extractive Companies in Mali.

Fourth Follow-Up Report of Senegal

78. Senegal's FUR indicates that the modalities for identification, declaration, and data recording on beneficial ownership have been specified. A division of the Surveillance of Gambling Establishments has been created within the Directorate of Territorial Surveillance to act as supervisory authority of DNFBPs for AML/CFT matters. Suspicious transaction reports are now received via electronic means, and Guidelines on AML/CFT have been issued for the insurance companies. The national risk assessment has been updated. Fourteen (14) notary firms, seven life insurance companies, five gold dealers and 38 approved manual exchangers, thirteen decentralised financial systems (DFS) and three banks have been examined for AML/CFT purposes. Training and capacity-building programmes have been organised for relevant stakeholders (judges, prosecutors and investigators) in the criminal justice system. A

guide on seizures and confiscations has been designed and shared with relevant authorities, and some confiscation of proceeds of crime has been achieved.

Post MER/FUR adoption actions

79. Based on the results of their technical compliance and effectiveness, all the countries assessed in the second round are on the enhanced follow-up process and will submit their relevant follow-up reports to the Plenary one year after adoption of their respective MERs/FURs. Countries that intend to request re-rating for any of the FATF Recommendations rated NC/PC will submit their requests to the GIABA Secretariat not less than seven months before the date of the Plenary at which the FURs will be discussed. Those who do not require technical compliance re-rating will submit their reports two months to the May 2023 or November 2023 Plenary as directed by the Plenary.

Updates on Outstanding Mutual Evaluations

Completed On-site visits to Cote d'Ivoire and Liberia

80. The second mutual evaluation on-site visits to Cote d'Ivoire and Liberia took place in Abidjan from 7 to 24 June 2022 and Monrovia from 4 September 2022 to 16 September 2022, respectively.⁵ The processes are ongoing, and the reports are expected to be discussed and adopted by the May 2023 Plenary.

Upcoming Mutual Evaluation of Member States

81. In line with the revised Calendar for mutual evaluations, the on-site mutual evaluations São Tomé and Príncipe, Guinea and the Union of the Comoros Islands will take place in the Second Quarter of 2023. Pre-assessment trainings were organised for the countries to prepare the relevant authorities for the exercise.

Update on Union of the Comoros Preparations for the on-site Mutual Evaluation

82. At the May/June 2022 GIABA Plenary, update by Comoros indicated the accession to the Protocol against the Illicit Manufacturing of and Trafficking in Firearms, their Parts and Components and Ammunition, supplementing the United Nations Convention against Transnational Organised Crime on 4 June 2021. The country needs to adopt effective laws and procedures to freeze terrorist funds or other assets of persons designated by the relevant United Nations Sanctions Committee (the 1267/1989 Committee or 1988 Committee), and if appropriate, the actions initiated under the freezing mechanisms of other countries pursuant to UNSCR 1373 (2001). Also, the country constituted an inter-agency technical committee and appointed a coordinator responsible for the mutual evaluation process to ensure adequate coordination and clear channels of communication between the GIABA Secretariat and the country.

⁵ The International Monetary Fund conducted the on-site visit of Cote d'Ivoire while GIABA undertook that of Liberia.

Upcoming FURs of Member States

83. In 2023, GIABA is expected to adopt the following FURs: First FURs of The Gambia, Guinea Bissau and Togo; 2nd FURs of Benin, Niger and Nigeria; 3rd FURs of Mali and Sierra Leone; 4th FURs of Burkina Faso and Cabo Verde; 5th FUR of Senegal; and 6th FUR of Ghana.

High Risk and other Monitored Jurisdictions – The FATF ICRG Process

84. The Global AML/CFT Community through the FATF ensures that criminals are denied the opportunities to undertake their illicit activities. Consequently, “The FATF continually identifies and reviews jurisdictions with strategic AML/CFT deficiencies that present a risk to the international financial system and closely monitors their progress. The FATF’s International Co-operation Review Group (ICRG) oversees the process”. Thus, the FATF publicly identifies high-risk countries/jurisdictions (Dark Grey List) and countries/jurisdictions for increased monitoring (Grey List). The ICRG process is a pressure platform for ensuring that each country and/or jurisdiction in the FATF Global Network upholds its commitment to implement the FATF Standards so that there are no safe havens for criminals and terrorists to hide their activities and accruing proceeds of crimes.

85. At the end of each of its three plenary meetings (February, June and October) every year, the FATF issues two public statements showing a brief summary of the recent actions taken based on agreed action plan with each jurisdiction, as well as a list of the remaining strategic deficiencies in its AML/CFT system. The public statements provide information about the specific risks emanating from each of the jurisdictions (High-Risk or countries for increased monitoring) so that potential business partners, financial institutions and regulators can take the necessary precautions. This limits the possibility of unwitting involvement in criminal transactions and keeps illicit financial flows out of the financial system. The public identification is also a powerful and effective tool for generating the necessary political commitment to drive through the required reforms.

86. The entry criteria for the ICRG process include referral based on MER results.⁶ Currently, all assessed GIABA member States meet the entry criteria the ICRG process but are either under active monitoring or in the ICRG pool. To ensure that the ICRG does not focus on relatively small countries with potentially insignificant impact on the international financial system⁷, the FATF prioritizes the review of those countries/jurisdictions with more significant financial sector assets of about USD 5 Billion or more.

87. A country that meets the prioritisation criteria based on the outcomes of its mutual evaluation enters one-year observation period and submits a Post Observation Period Reports (POPR) to the relevant Regional Joint Group of the ICRG for review and recommendation to the ICRG for further consideration. Based on the findings of the Joint Group, the FATF will determine whether the country has or has not addressed each of its MER recommended action for the IOs rated low or moderate; and identify any indicators that the reforms or other efforts

⁶ After the discussion of the MER, a country with very poor compliance with the FATF standards will enter the ICRG pool if any one of the following applies: (a) it has 20 or more NC/PC ratings for technical compliance; or (b) it is rated NC/PC on 3 or more of the following Recommendations: R.3, 5, 6, 10, 11, and 20; (c) it has a low or moderate level of effectiveness for 9 or more of the 11 Immediate Outcomes, with a minimum of two low level ratings; (d) it has a low level of effectiveness for 6 or more of the 11 Immediate Outcomes.

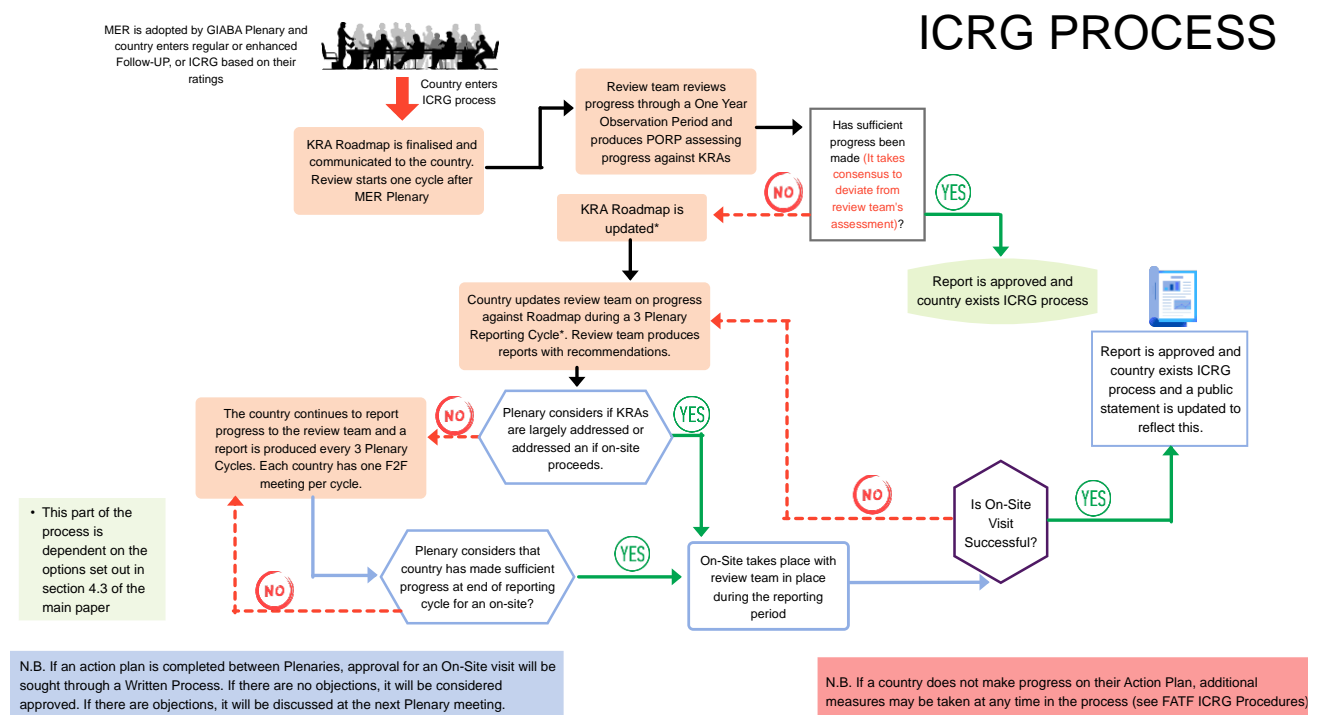
⁷ The FATF uses available broad money data as the standard determining financial sector assets, and this is measured twice: once at the beginning of the Observation Period and once at the end, to inform the ICRG’s decision on prioritisation. At the end of the Observation Period, and if a country is still in the pool, the FATF measures the on an on-going basis, as new data becomes available.

initiated or undertaken during the observation period have had a tangible and positive impact on the country's effectiveness on each IO rated low or moderate. The outcomes of this review determines whether the FATF will publicly identify and actively review the country based on an action plan noting the key strategic deficiencies and actions to be taken by the country to address them. The action plan will take into account the risk and context of the country and include the strategic deficiencies relevant for the country. It is important to state that the deficiencies that are included in the ICRG action plan are monitored exclusively under the ICRG process. This is to avoid duplication with the follow-up process.

88. Currently, Burkina Faso, Senegal and Mali are under increased monitoring and subject to individual action plans to address the strategic deficiencies in their AML/CFT systems. These countries have made high level political commitments and have been working with the FATF and GIABA in addressing their strategic deficiencies.

89. Benin and Nigeria were also adjudged to have met the prioritisation criteria⁸, and completed their observation periods in June and October 2022, respectively. The FATF scheduled Nigeria's Post Observation Period Report (POPR) for the February 2023 Plenary. Nigeria submitted its POPR to the Africa and Middle East Joint Group in November 2022 for review. The FATF postponed the POPR schedule for Benin to February 2023 Plenary to consider whether the country's ML/TF risk situation warrants review, with reference to specific higher ML or TF risks identified (e.g. a high terrorism and TF threat); indications that the country is a significant international or regional financial centre; information on the size of the financial system compared to its GDP; whether there is a large number of legal persons or arrangements relative to the size of its financial system.

90. The illustrative flow chart below demonstrates the ICRG process related to referral based on the results of an MER.



⁸ Benin's financial assets exceeded the threshold during the observation period.

CHAPTER 3 – RESEARCHES AND TYPOLOGIES

91. In the year 2022, GIABA completed three (3) research projects and published the reports on the GIABA website. These include: (i) a typologies report on money laundering and terrorist financing linked to corruption in West Africa; (ii) an assessment report on the challenges of investigating, prosecuting and adjudicating money laundering and terrorist financing cases in GIABA member States; and (iii) an assessment of the beneficial ownership information and asset recovery frameworks in GIABA member states.

92. A summary of the key findings and recommendations in these reports is presented below:

[Typologies Report of Money Laundering and Terrorist Financing linked to Corruption in West Africa, 2022](#)

93. Corruption is a major hindrance to the growth of West African economies. It alters the integrity of economic indicators and distorts development forecasts. The severity of this phenomenon is particularly acute in West Africa, where the predominance of cash transactions and the low rate of banking constitute obstacles to financial inclusion. In many countries, corruption, especially official government corruption, is a major source of illicit enrichment and money laundering (ML). It also tends to be one of the most critical impediments to promoting transparency, security, and integrity in the financial system. Worse still, corruption serves as a catalyst for many criminal activities including terrorism and its financing. Its negative effects on governance, human development and stability are well documented.

94. In view of the persistence of corruption in the region and its links with ML/TF, it was timely for GIABA to undertake a typologies study to assess the most common methods and techniques used to launder the proceeds of the various corrupt practices in West Africa and to finance terrorist activities. The overall objective of this study is to provide in-depth knowledge and understanding of the issue of corruption to AML/CFT actors, especially law enforcement agencies, investigative and prosecutorial authorities.

[Summary of Findings and Recommendations](#)

95. The data analysis and case studies reviewed in the report through a variety of available sources such as the FIU, central anti-corruption agencies, investigative and prosecutorial authorities, have provided a general overview of prevalent corrupt practices in West Africa, its magnitude and developmental impacts in the countries. It noted a high prevalence of embezzlement of public funds, which remains significant in public administration in the various countries of the sub-region. The study revealed that corruption is one of ML predicate offenses most damaging to security and development of West African countries, makes other illegal activities to flourish, such as money laundering, terrorist financing, tax fraud, forgery

and falsification of records, illicit financing of political parties, organized crime etc. All these criminal offenses in turn amplify the shock wave of corruption, with all its negative consequences on governance.

96. The Report further acknowledged that corrupt practices has potency to weaken a country's national defense system and exacerbate security tensions. In countries affected by armed conflicts, corrupt motives can impel rival factions to prolong armed conflict and use this as an opportunity to plunder natural resources, divert humanitarian aid or derive other benefits from the economy. According to the report, the various methods/techniques used by criminals to launder proceeds of corruption in the region include: non/under and anticipatory declaration of assets, use of offshore financial institutions, use of nominees to acquire assets, use of intermediaries as fronts, and use of legal arrangements. Through direct or indirect investments, the beneficiaries of the proceeds of corruption manage to launder illicit funds into formal activities, maintain their lifestyle and guarantee their impunity.

97. In general, PEPs are considered as the most impediments to the effective enforcement of corruption in the region. Their influence and constant interference in cases of corruption against them or their associates obfuscate evidence of corruption. The cash-based nature of economies in the region makes corruption opaque, as proceeds from the act are generally paid in cash, thus obscuring any traceability in the formal banking sector. In addition, investigative and prosecution authorities do not have the requisite capacity for conducting parallel financial investigations.

98. The report analyzed the inextricable linkage between corruption and money laundering and how corrupt activities are major sources of criminal proceeds in GIABA member States. The study did not allow establishment and documentation of the nexus between corruption and terrorist financing, however, it did give clear indications on the level of TF risks associated with the phenomenon. Thus, further studies will be required on how corruption facilitates terrorist financing in West Africa. Corruption fuels organized crimes and other predicate offenses of money laundering. It is therefore essential that competent authorities in member States fully understand and appreciate the methods and techniques used by corrupt individuals (private or public officials) to launder the proceeds of corruption.

99. The recommendations contained in the report include: the need for member States to carry out comprehensive revision of the extant AML/CFT legal and regulatory frameworks to provide specific protection for whistle-blowers; enhance the independence and autonomy of the anti-corruption agencies and judicial authorities. Implementation of enhanced due diligence (EDD) by financial institutions when on-boarding PEPs as customers, and ongoing monitoring are critical to curtail the siphoning of funds from government accounts to the private accounts of PEPs and their associates. Also, countries are enjoined to digitalize their public services operations and all payment systems to reduce human interactions as much as possible.

Assessment of the Beneficial Ownership Information and Asset Recovery Frameworks for AML/CFT purposes of GIABA member States

100. The outcomes of the second round of Mutual Evaluations of assessed GIABA member States and miscellaneous research studies conducted by the Secretariat revealed that jurisdictions find it challenging to achieve a high level of transparency of legal persons and arrangements that shield them from being misused for the purposes of money laundering and/or terrorist financing.

101. The exercise was designed to assess the national frameworks for the collection of beneficial ownership information of legal persons and arrangements in five GIABA member States: Cabo Verde, Cote d'Ivoire, Ghana, Nigeria and Senegal. The assessment lasted for Nineteen (19) months, from February 2019 to August, 2020. The parameters for the assessment include existence of company registry, comprehensiveness of information on beneficial owners and accuracy of such information. The study also assesses the level of ML/TF risks and vulnerabilities associated with legal persons and arrangements, asset recovery and management practices and the associated challenges competent authorities face during investigations, adjudication and confiscation. The assessment also examined the challenges that law enforcement agencies may experience in establishing the beneficial owner.

102. The findings of the exercise include: (a) lack of legal provisions to obtain information on trust and trust-like corporate vehicles; (b) lack of proportionate and dissuasive sanctions for false or non-disclosure of beneficial ownership information; (c) absence of asset or property register; (d) lack of resources and capacity to establish comprehensive databases for up-to-date BO information that is accessible to particularly LEAs, and (e) failure to collect comprehensive BO information during registration and customer onboarding of legal persons and arrangements by company registries and banks respectively. Finally, the report recommended actions for national, regional and international authorities to address the identified weaknesses.

103. The summary of findings and recommendations are indicated below:

Summary of Findings and Recommendations

104. In West Africa, as in most parts of the world, it is still possible to set up a company without providing any reliable and verifiable information on the beneficial owner(s), thereby making it possible for such company to move money, open subsidiaries and act as a shell company without providing any beneficial ownership information.

105. In general, member States are yet to establish functional asset recovery framework due to the existing culture of poor management of proceeds of crime and inability of confiscate the proceeds of crime despite securing convictions. The application of non-dissuasive and proportionate sanctions makes crime look attractive and profitable. Also, lack or inadequacy of BO information leads to poor investigation, prosecution and conviction, thereby resulting to non-confiscation of criminal assets.

106. A major recommendation is for countries to build on the GIABA assessment to conduct a national study or assessment of the transparency and beneficial ownership of Legal persons and legal arrangements and to develop a strategy and an action plan to address the deficiencies identified in the study or assessment. Countries that find it difficult to conduct such snap assessment could take the opportunity of conducting some other national or thematic/sectoral assessments, to cover these phenomena and then develop strategic action plan to deal with the issues.

107. In addition to the existing law enforcement and AML/CFT laws that touches on Legal persons and legal arrangements, the report recommended that countries should to develop separate stand-alone legal framework for BOI disclosure by legal persons and legal arrangements, and asset recovery and management, To operationalized the new legal

frameworks, countries should develop their corresponding policy framework and/or guidelines on how to implement both phenomena.

108. Specialize asset management agencies should be created by countries and where possible centralize the management of recovered assets, particularly for smaller economies. In countries with several agencies create to manage specific assets or proceeds of crime separately, adequate human resources should be made available and their expertise developed in the management of such assets.

109. Countries should designate lead agencies that will collect and manage a comprehensive and up to date beneficial ownership information register. The register should be digitalized to facilitate unrestricted remote access by competent authorities and availability to public including civil society and private sector players.

[An Assessment of the Challenges of Investigating, Prosecuting and Adjudicating ML and TF Cases in West Africa – Policy and Operational Options](#)

110. GIABA member countries are at different levels in their implementation of AML/CFT international standards. However, in general, countries in the region are characterized as low capacity countries. The porous nature of borders, the dominance of the informal economy, predominance of cash, the low penetration rate of banking in the economy and financial exclusion as well as the low level of digitalization of government services generally impede effective and efficient implementation of AML/CFT measures.

111. In the recent years, a number of actions have been taken by GIABA member States, ranging from legislative reforms to the establishment of new institutions, and capacity building of key players. Despite these important efforts, which are factors that promote good governance and economic development, enforcement actions are yet to produce the desired outcomes, especially with regard to investigations, prosecutions and adjudication of ML/TF offences. Thus, to address these lacunas in the implementation of robust AML/CFT regimes in member States, GIABA conducted this assessment.

112. One of the main objectives of this assessment was to examine the existing AML/CFT laws regarding enforcement practices in GIABA member States, identify gaps in relation to international standards and best practices, and proffer solutions to address the gaps. The study was initiated in a context where the overall adequacy of the countries' criminal justice response to AML/CFT was considered unsatisfactory, as evidenced by the performance in the first round of mutual evaluations conducted in the second round, against the increasingly complex criminal environment in the region. The study highlighted the efforts made by countries, identified strategic challenges to effective ML/TF enforcement, and key areas of interventions to build capacity for implementing effective AML/CFT systems based on dynamic and deterrent law enforcement. The summary of findings and recommendations is presented below.

Summary of findings and recommendations

On the Policy Issues

- i. Overall, the national AML/CFT regimes of member States are struggling to comply with the FATF standards. The existing frameworks are not tailored with the countries'

ML/TF risk profiles. As a result, ML and TF cases arising from the most prevalent predicate offences in the GIABA jurisdiction are not prosecuted as a matter of priority.

- ii. Integrity issues remain critical to the effective conduct of AML/CFT obligations by Law Enforcement Officers, Investigative and Prosecutorial Authorities. It is the fundamental condition to ensure effective, speedy, and unbiased criminal proceedings. Consequently, there is the need to deal with issue of integrity in a systematic manner.
- iii. The low political commitment, the negative growth in state discipline, ethical, deontological and social values constitute an obstacle to the detection, investigation, prosecution and adjudication of ML/TF cases.
- iv. Political interference affects the conduct of ML/TF investigations and prosecutions with integrity and independence, especially in cases involving politically exposed persons (PEPs).
- v. Most actors in the criminal justice system have inadequate understanding of national AML/CFT laws and related legal concepts. The autonomy of FIUs in the UEMOA sub-region is sufficiently guaranteed by the provisions the Community AML/CFT Directive of 2015.
- vi. Inter-agency collaboration is not coordinate organized or back by law, and, in some circumstances, data privacy laws impede access to information needed for investigations by law enforcement agencies.
- vii. The criminal policy of member States does not generally include clear and specific mechanisms for international cooperation and especially Mutual Legal Assistance in AML/CFT matters. The same is true for the recovery of criminal assets. Confiscation of proceeds of crime has not been established nor defined as a priority area by member countries.
- viii. Policy measures to guide the fight against ML/TF focus only on the predicate crimes to the exclusion of financial investigations and asset recovery. Specific measures are not provided as a matter of policy where it is mandatory to conduct parallel investigations, asset investigations and assets recovery. Also, AML/CFT policies do not provide for the protection of witnesses, whistleblowers and actors involved in AML/CFT as a matter of priority.
- ix. The existence of legislative and regulatory disparities in AML/CFT among ECOWAS member states is a challenge.

At Operational level

- i. The enforcement of ML/TF Cases under the special AML/CFT laws has the tendency of radically altering the conventional practices in the conduct of criminal proceedings. This situation is exacerbated by knowledge gaps and in some instances by systematic misgivings and hesitations of judges and prosecutors.

- ii. The low number of ML/TF cases prosecuted is not consistent with the ML/TF risk profile of member States. Where court decisions are made for confiscation, the lack of enforcement documents is an impediment to the recovery of confiscated assets.
- iii. Stakeholders in the criminal justice value chain in the region are not familiar with the range of existing international cooperation tools and instruments at their disposal. Consequently, the Egmont Group of FIUs, Interpol National Central Bureaus (NCBs), the Accra Initiative, the West Africa Network of Central Authorities and Prosecutors (WACAP), the Assets Recovery Inter-Agency Network for West Africa (ARINWA) etc. are not used to their full potential. Countries generally resort to diplomatic channels, which are generally inexpensive but time-consuming and inefficient.
- iv. The complexity of the modus operandi used by criminals across the region to launder funds or to finance terrorist activities is facilitated by the precariousness of civil status, addressing systems, cadastral matrices, and land transfer registers, etc. This situation complicates the collection of evidence in course of prosecution.
- v. New technology is not sufficiently leveraged upon in the search for and acquisition of evidence of ML/TF offences. Importantly, when investigating terrorism and/or terrorist financing cases, prosecutors are not involved at an early stage in determining what intelligence might be admissible as evidence, or what steps should be taken to make it admissible.
- vi. The actors in the criminal justice value chain, particularly, the judges and prosecutors, still rely on the traditional and classical approaches to criminal investigations, and therefore do not fully implement the scope of legal powers and possibilities offered by the AML/CFT legal framework.
- vii. In view of the transnational nature of ML/TF, Judges, prosecutors, and other legal experts also face technical challenges in translating financial intelligence into judicial language, which affects prosecution and adjudication of ML and TF cases in most countries.
- viii. Criminal justice actors do not have good understanding of the methods used by criminals to launder proceeds from organized crime or the financing of terrorism. There is also a lack of capacity and expertise to deploy special investigative techniques and conduct proactive financial and asset investigations. Similarly, investigators do not always have the culture of targeting ML and therefore do not systematically undertake parallel financial investigations.
- ix. Stolen asset recovery systems in place are not reflective of the international AML/CFT requirements. Member States lack the resources and capacity to set up a centralized online database on ML/TF crimes that is accessible to all relevant authorities. The rivalry among AML/CFT agencies or lack of cooperation among agencies exacerbates the critical resource gap and increases the weaknesses of the entire justice chain. Unavailability of softwares and modern tools (Fingerprint, Scanners, cameras, i-detectors, analytical tools and others) for gathering intelligence is a critical challenge.
- x. There are difficulties in obtaining information through Central Authority/ MLAT as procedure is very slow and cumbersome.

113. In view of these important issues, the Report formulated, among others, the following recommendations to Member States, GIABA and Technical and Financial Partners:

- (i) Strengthen AML/CFT legal and policy frameworks based on identified gaps in the mutual evaluation reports, as well as ensuring a broad dissemination of AML/CFT Laws and Regulations to ease their understanding and ownership by actors in the criminal justice value chain in member States.
- (ii) Improve use of traditional international cooperation mechanisms and promote the use of other forms of international cooperation instruments.
- (iii) Establish platforms for the timely exchange and sharing of information among actors within criminal justice value chain on lessons learnt from recorded prosecution, adjudication, and conviction of ML/TF cases.
- (iv) Promote the adoption by member States of coherent criminal policies adapted to AML/CFT requirements.
- (v) Strengthen the specialized judicial process of handling ML/TF offences through the creation of specialized judicial bodies and the provision of adequate resources.
- (vi) Establish mechanisms to strengthen the integrity of judicial proceedings and the protection of officials in charge of criminal investigation and prosecution.
- (vii) Streamline technical assistance to ensure that resources are allocated to AML/CFT activities, based on the country's priorities.
- (viii) Provide resources and capacity to entities involved in investigation, prosecution, and adjudication of ML/TF cases, particularly the Financial Intelligence Units, criminal investigation officers, judges and magistrates, bailiffs, anti-corruption agencies, agencies in charge of asset recovery and State judicial agencies.
- (ix) Promote the development and dissemination of a practical Manual for Judges and Prosecutors to the detection, investigation, prosecution, adjudication, freezing, seizure, confiscation, recovery and management of recovered assets.
- (x) Promote systematically and as a matter of urgency inter-agency cooperation in the fight against money laundering and terrorist financing.
- (xi) Prioritize the understanding by the actors of the criminal chain of ML/TF methods and techniques in the sub region.
- (xii) Establish a Regional Forum of Criminal Justice Value Chain to develop and strengthen information exchange on operational issues, training, and best practices in AML/CFT, including investigation, prosecution, adjudication, freezing, seizure, confiscation, recovery, and management of criminal assets.

114. In the year under review, GIABA organised the following workshops for either the validation or finalization of outcomes of two studies.

National Validation Workshops of the Country-Level Reports on the Assessment of Money Laundering, Terrorist Financing and Illicit Financing Flows resulting from Maritime Crime in the Gulf of Guinea, in Bissau, Abidjan, Accra, Lomé, Cotonou and Abuja, from 22nd September to 12th October 2022.

115. Within the framework of the European Union's Strategy for the Gulf of Guinea, a program called "Support for West African Integrated Maritime Security" (SWAIMS) has been established. It is designed not only to strengthen the capacity of security and non-security actors

in the preventive and repressive fight against maritime crime, but also and particularly to optimize the ECOWAS maritime economy.

116. One of the key components of this program is the conduct of a Research Study by GIABA on Illicit Financial Flows associated with the various forms of maritime crime in the countries of the Gulf of Guinea. The overall objective of this study is to understand the money laundering mechanisms through which financial proceeds derived from the various forms of maritime crime fuel the underground economy, as well as the magnitude and impact of such financial flows on the regional economies. The study was also designed to recommend concrete measures to disrupt the financial circuits of maritime crime and finally deprive criminals of the proceeds of their criminal activities.

117. To conduct this study, the GIABA Secretariat engaged the services of consultants at national levels in the six (6) targeted countries - **Benin, Cote d'Ivoire, Ghana, Guinea-Bissau, Nigeria and Togo**. The reports produced by the Consultants under the coordination and technical supervision of the GIABA Secretariat and SWAIMS Technical Assistance Team, **provided a precise view of the magnitude of maritime crime, the legal and institutional frameworks in their respective countries and the challenges encountered in the detection, investigation and prosecution of maritime crime cases. The reports also highlighted specific cases of money laundering associated with this phenomenon.** To discuss the preliminary findings of the research, which will serve as a basis for a consolidated regional report at the end of the project, in collaboration with the SWAIMS Technical Assistance Teams in Bissau, Abidjan, Accra, Lomé, Cotonou and Abuja **the GIABA Secretariat validation workshops** from 22nd September to 12th October 2022.

118. The national validation workshops were designed to bring together all public and private institutions/agencies involved in maritime security, financial intelligence units, law enforcement agencies, prosecutorial authorities as well as representatives of the relevant ministries. The workshops provided the desired platforms for the competent authorities to take ownership of the reports, as well as a window to trigger additional reflections from the relevant experts and professionals, thereby **enhancing the quality of the national reports that should serve as a basis for the preparation of a regional report.**

119. Highlights of the outcomes of the various workshops include the following:

- i. **In Guinea Bissau** – The national validation workshop for the Guinea Bissau's report was conducted from the 22nd to the 23rd September 2022 at the Dunia Hotel. The workshop was attended by about 42 participants who discussed the findings of the report. The discussions focused on the various forms of maritime crimes in Guinea Bissau such as: International maritime drug trafficking, maritime piracy and kidnapping of sailors, illegal, unreported and unregulated fishing, smuggling of migrants, smuggling of foreign currency by sea, illegal logging of tree transported by sea and illegal extraction of ore transported by sea. The flourishing of maritime crime in the country has been largely attributed to the weakening of the State authority, widespread corruption and the absence of clear political directions for the marine sector. In absolute terms, according to the Country Report, not less than F CFA 45 billion were generated by the commission of such crimes between 2006 and 2022, and only 0, 73% of this amount was either seized or confiscated.

The proceeds generated by the commission of these crimes are generally laundered through the real estate sector, the industrial fishing, shell companies, the informal currency exchange, etc.

The existing laws which sets the limits of maritime areas under the sovereignty or jurisdiction of the Republic of Guinea-Bissau, does not contain any provisions setting out a general framework for the exercise of police authority and powers at sea, and subsequent interaction with administrative and judicial authorities. However, the Bissau Guinean legislation provides for a Maritime Court, a specialized court with jurisdiction for the preparation, trial and subsequent terms of all disputes arising from maritime and related legal relations, as well as to decide on infringements of fisheries legislation and regulations and to enforce their decisions. Unfortunately, lack of resources and operational capacities of the relevant agencies to detect, investigate and prosecute maritime crimes, weak inter-agency coordination, as well as the systematic disregard of financial investigations for AML/CFT purposes, compromised the fight against transnational crimes in Guinea Bissau.

- ii. **In Côte d'Ivoire** – As a result of unavoidable circumstances associated with a strike by aviation staff in the country and other airports in the region, the national validation workshop of the Côte d'Ivoire's report was a one-day event held in September 27th, 2022 at the Radisson Blu Hotel, Abidjan. About 33 officials from various agencies and institutions participated in the workshop. Also in attendance were the European Union Delegation and the West Africa Regional Maritime Safety Center (CRESMAO). The focus of the workshop was the outcomes of the report of Côte d'Ivoire as it relate to the main vulnerabilities of the maritime environment to ML/TF & illicit financial flows. According to the report, from 2019 to 2022, various forms of maritime crime detected in the Ivoirian sea include **illegal transshipment, illegal, unreported and unregulated fishing, piracy, sea robbery and drug-trafficking**.

In Côte d'Ivoire, the critical agencies involved in the maritime security are **national navy** (militarized), the **maritime police** and **merchant navy**. These agencies are responsible for the defense of the country at sea, the administration of maritime activities, including the issuance of approvals or authorizations to operate in the sector, control and the exploitation of industrial and commercial activities, etc. of the maritime sector. They are all under the responsibility of a single ministry, the Ministry of Transport, with operational support from several other ministries, including the Ministry of Trade, the Ministry of the Economy, the Ministry of Digital Economy, and the Ministry of Justice..

The reported noted that lack of inter-ministerial cooperation and inter-agency collaboration weakens the detection of criminal activities on Sea. Also, another drawback is that national gendarmerie, national police, customs, the treasury and revenue authority, etc. are called upon unilaterally to take charge of some maritime cases without recourse to the navy, the original source of information about the crime. Furthermore, crimes related to money laundering and the financing of terrorism (ML/TF), are virtually absent from the legal framework of the structures and institutions operating in the marine space.

- iii. **In Ghana** – The national validation workshop for Ghana was held from 29th to 30th September 2022 at the Mensvic Hotel, Accra. The workshop was attended by 46

relevant national officials, European Union Delegation, SWAIMS Technical Assistance Team and SWAIMS Evaluation Team. The workshop brought to light the peculiarities of the Ghana marine sector. It was observed that the maritime security is increasingly coming to the fore within Ghana policy dialogue, however, very few linkages have been established between IFFs, money laundering and the range of criminalities occurring within Ghana's maritime domain.

Ghana has a complex mix of agencies with overlapping mandates in the area of maritime regulation and enforcement. This multiplicity of agencies rather providing complimentary efforts has led to a duplication of efforts, thus affecting easy access to viable sources of information and leading to inter-agency rivalry and poor coordination. Ghana's maritime institutional framework constitutes twenty (20) public agencies which function across twelve (12) different ministries in Ghana's primary blue economy sectors: shipping, oil and gas, and fisheries. The country recently endorsed National Integrated Maritime Strategy designed to address this conundrum by providing a framework through which the activities of the multiple institutions and agencies within Ghana's maritime security architecture can be more effectively coordinated.

The prevailing maritime crimes in Ghana include illegal bunkering and oil theft, illegal oil transshipments, Illegal Unreported and Unregulated (IUU) Fishing, and drug trafficking. The proceeds from these illegal activities are laundered through wire transfers, foreign bank accounts, shell companies, non-profit organizations (NPOs), expenditure on philanthropic projects, and investments in real estate and other landed properties.

- iv. **In Togo** – The national validation workshop of the Togo's report was held from the 3rd to 4th October 2022 at the Sarakawa Hotel, Lomé. The workshop was attended by about 45 national officials, and representatives of the European Union Delegation. It discussed the outcomes of the country report and highlighted critical factors that undermine the fight against maritime crime in Togo. Among the maritime incidents that Togo has experienced in its territorial waters, only one case that commenced in May 2019 as defined in the Togolese penal code resulted in conviction of the criminals on July 5, 2021 with prison sentences ranging from 12 to 20 years.

The workshop agreed that the proceeds from the prevailing maritime crimes in Togo, are laundered to a foreign destination with support from Togolese. The dominance of cash transactions and the preponderance of the informal sector blur the extent of financial flows associated with these crimes in the country. Nonetheless, the existing laws and regulations for maritime security are adequate and comprehensive. The report recommended the need for improved cooperation and coordination among relevant institutions and agencies especially with the financial intelligence unit to ensure detection, investigation, prosecution and conviction of maritime offenses.

- v. **In Benin** – The national validation workshop of the Benin report was held from the 6th to the 7th October 2022 at the Azalai Hotel, Cotonou. In attendance were 35 key national officials and representatives of the European Union Delegation, the SWAIMS Technical Assistance Team and the SWAIMS Project Evaluation Team. The legal framework for the fight against maritime crime in Benin aims to prohibit, prevent and repress all forms of crime such as maritime piracy, armed robbery at sea, IUU fishing,

marine pollution, drug trafficking, illegal immigration, and human trafficking, and to prosecute the perpetrators of these crimes and apply appropriate sanctions.

The findings in the report include non-existence of communication channel and collaboration framework between the financial intelligence unit and the maritime-sensitive agencies to create the operational conditions for suspicious transaction reports or parallel financial investigations by relevant maritime stakeholders. Also, the stakeholders in maritime sector are not familiar with AML/CFT requirements and their obligations.

- vi. **In Nigeria** – The national validation workshop of the Nigeria report was held from the 11th to the 12th October 2022 at the Reiz Continental Hotel, Abuja. The workshop was attended by about 45 officials from relevant national agencies and institutions, and the SWAIMS Technical Assistance Team. The meeting recognized that the maritime space of Nigeria is highly susceptible to criminal activities due to vulnerabilities that are continually exploited by criminal elements. The prevalent maritime crimes in Nigeria include: Piracy, Armed Robbery at Sea, kidnapping and hostage taking, Crude Oil Theft (COT), Illegal Oil Refining; Pipeline vandalism, Illegal Bunkering; Human Trafficking; Migrant Smuggling; Illicit traffic in narcotic drugs and psychotropic substances by sea, Illegal unregulated and unreported (IUU) Fishing. The facilitators of crime in the maritime space of Nigeria include (i) inadequate legal framework; (ii) collusion by security and Law Enforcement Agencies; (iii) white collar corruption; (iv) scale of oil and gas installations and infrastructure; and (v) low level of inter-agency cooperation.

Determining the flow of illicit proceeds associated with maritime crimes in Nigeria remains a herculean task. This is because proceeds from maritime crimes in Nigeria are largely obtained in cash through unregulated channels and rarely through formal financial institutions. Therefore, despite the huge amount of cash involved in maritime crime as illustrated in some case studies in the report, how they are deployed to resource the underground economy or fund terrorism cannot be documented. This is a major challenge to the Nigerian (NFIU) Financial Intelligence Unit to properly profile the criminals. The security and law enforcement agencies also find it difficult to follow the money trail during investigation and prosecution because once the cash is obtained during the commission of the maritime crime, they are easily dissipated into the economy leaving a cold trail. For several years in Nigeria, there was no successful conviction for piracy until the SPOMO Act⁹ came to effect in 2019. Nigeria is estimated to lose about 200,000 barrels of crude oil daily to oil theft. Over the years, the number of convictions for crude oil theft falls in comparison to the level of occurrences and arrests.

120. In each of the countries, the GIABA Secretariat leverage on the workshop to build capacity of the participants on the implementation of AML/CFT requirements to curb maritime crime in the country. At the national validation workshops, the stakeholders endorsed the outcomes of their country report and identified additional gaps in their national legal and regulatory systems and recommended areas of improvement for a more robust framework against maritime crimes.

⁹ Suppression of Piracy and other Maritime Offences Act, 2019

121. The workshops provided the participants a unique platform to share ideas and knowledge as well as network building for future collaboration and cooperation.

Regional Annual Typologies Exercise and Workshop on the Finalization of the Study on Money Laundering and Terrorist Financing Linked to Cybercrime in West Africa, October 24-29, 2022, Saly Portudal, Senegal

122. The annual typologies workshop was organized in Saly, Senegal, in October 2022. Participants include both the incoming and outgoing members of the RTMG / PRG, Country Researchers, Country Representatives and some Technical Partners such as Expertise France and OCWAR-C. The Workshop discussed and reviewed the preliminary findings of country-level reports on money laundering and terrorist financing linked to cybercrimes in GIABA member States.

123. The quality of the reports was commended. However, the workshop made the following observations/recommendations (i) country researchers to refine the case studies to ensure that financial aspects of the crimes committed in the cyberspace are properly flagged and analysed, (ii) recommendations in the reports to be re-focused and streamlined.

124. The workshop enable the participants to fully appreciated the magnitude of cybercrime in the region and the extent to which the informality of regional economies is key to the movement of funds generated and transferred within the cyber environment.

125. The last two days of the workshop were devoted to a sharing-session especially for the incoming members of the RTMG/PRG (Nov. 2022 – Nov. 2025) on step-by-step process from conception to publication of a typologies report. The GIABA Secretariat used the opportunity to present the PRG work process and what is required of RTMG members in the data gathering, analysis and quality control of country's submissions during typologies exercises.

Chapter 4 – Technical Assistance and Capacity Building Training

126. In 2022 the GIABA Secretariat entered into its cruising altitude, maintaining the deployment of both sole physical and hybrid approach (occasioned by SARS-COV2 Coronavirus pandemic) in the delivery of technical assistance and capacity-building training, workshops, fora, and awareness raising. The GIABA Secretariat also strengthened its resolve to collaborate with other stakeholder institutions in the AML/CFT/CPF network to further harness international expertise with specific related thematic topics in ensuring its member States are abreast with international global best practices.

127. The various technical assistance support and capacity building activities were derived based on recommended actions in the adopted mutual evaluation reports of member States, follow-up reports, typologies and research reports, outcomes of the FATF strategic documents, and several other international reports that highlighted high-risk areas that require the upgrading of stakeholders' understanding of the ever-changing nature of money laundering, terrorist financing, and proliferation financing. The fight against ML/TF/PF will continue as criminal and terrorist organizations continue to try their luck by infiltrating the global financial system and the aim of causing chaos in our peace, security, and way of life. Thus, it is very important to ensure that AML/CFT/CPF stakeholders are well equipped with requisite skills to prevent and disrupt the criminal networks and their nefarious activities.

128. In the context of the Effectiveness Improved Program (EIP), these activities focused on priorities of technical assistance aimed at strengthening member States' compliance frameworks consistent with the deficiencies identified in their mutual evaluation reports. Therefore, the technical assistance and capacity building training programs conducted in 2022 were specifically aimed at ensuring that substantial progress is made in the implementation of national and supranational AML/CFT/CPF measures. The activities were implemented at both regional and national levels as summarized below.

Regional Level

GIABA/SWAIMS Virtual Methodology Workshop on the Conduct of the Assessment Study on IFFs/ML/TF and Maritime Crime in the Gulf of Guinea, January 7, 2022

129. Under the 11th EDF, GIABA is responsible for implementing a major component of the SWAIMS project called "Strengthening Integrated Maritime Security in West Africa". This relates to the conduct of an assessment study on money laundering, terrorist financing, illicit financial flows and maritime crime in the Gulf of Guinea. In order to ensure that the consultants recruited for the study have a clear, adequate and common understanding of the requirements and expectations of this project, a concept-mapping workshop was organized virtually on **January 7, 2022**.

130. The purpose of this workshop, which brought together country researchers, the SWAIMS Technical Assistance Team, and members of the GIABA Risk, Trends and Methods Group (RTMG) and the Policy Review Group (PRG), was to provide researchers with feedbacks following their submission of inception reports. The peculiarities and complexities

of the issues around maritime crime and illicit financial flows were also extensively discussed during the meeting. The workshop also served as a collaborative platform between consultants on good practices in research and typologies. Focus was made on the need to identify case studies and money laundering/terrorist financing indicators and red flags.

Hybrid Regional Capacity Building Workshop on the Development of Regional Counter Proliferation Financing Operational Plan for GIABA, March 21 – 22, March 2022

131. In 2007, The FATF members commenced the implementation of measures to address threats related to proliferation financing and its interconnection with terrorism and its financing. However, countering proliferation financing (CPF) of weapons of mass destruction (WMD) remains a major challenge to GIABA member states as this phenomenon is novel to the region

132. Thus, considering the current security emergencies in the world, and the weakness in the responses by GIABA member states in the implementation of international requirements relating to CPF, the European Union, through its OCWAR-M project, proposed to support GIABA in the development of a regional CPF strategy and an operational implementation plan. Within this framework, a hybrid regional sharing session was organized from 21st to 22nd March 2022, as a prelude for the start-up of this project.

133. The objective of this sharing session was to bring together the CPF stakeholders in the member States around a college of experts to take stock of the situation, discuss the main policy and operational implications of CPF requirements, and chart a clear direction to take for a successful completion of this project.

134. The session was attended by officials from ministries of finance, security, justice and foreign affairs departments and FIUs in GIABA member States, as well as technical partners such as APG, UNODC, RUSI and 1540 Committee. It focused on the main requirements of international standards on CPF, particularly the interplay between FATF Recommendations 1, 2, 5, 7 and relevant UN standards (UNSCRs 1540, 2231, 2270, etc.). It also looked at the main threats and typologies, and the roles of the private sector. Various regulatory and coordination models were presented at the Workshop.

135. At the break-out sessions, the participants considered the different steps to take for successful CPF reforms and agreed to : (i) use ICRG pressure to effectively mobilise support from key leaders/political through constant engagement with political authorities on the implications of ICRG listing; (ii) use other stakeholders (such as Bankers Association) who have influence to engage with political leaders; (iii) create platforms for wider engagement on country obligations (for instance National Coordination Committees with Ministerial level representation and leadership at highest political level) with respect to CPF; (iv) highlight the specific roles of each stakeholders; (v) disseminate outcomes of national risk assessment to all relevant stakeholders in the implementation of CPF and highlight to political authorities the attendant negative implications of failure to comply with CPF obligations; (vi) exploit the use of media to raise awareness on CPF issues; and (vii) use the existing structures (for instance IMC) to set priorities for downstream stakeholders and ensure effective coordination mechanisms.

136. Within the second round of GIABA mutual evaluations which commenced in 2016, the contributions of member States to discussions of mutual evaluation reports (MERs) and follow-up reports (FURs) as well as provision of appropriate comments to draft MER circulated to global network have been minimal. The lack of active participation of GIABA member States is not in tandem with the mutuality principles of assessment. In addition, the lack of contributions by member States to discussions put undue pressure on observers and GIABA Secretariat staff to intervene in discussions. The inactive participation of GIABA member States has implications for decision-making and achievement of consensus on issues. One of the essential requirements of Pillar III of the EIP Action Plan is Engagement of GIABA members in discussions. Thus, to address this lacuna, it became very important that Heads of Delegation and their teams are trained on their role to facilitate member States' ownership of the process of discussion of various reports at GIABA meetings.



Participants in the 1st Edition of the training of heads of delegation at GIABA meetings

137. In view of the foregoing, and as a follow up to the bi-lateral meetings held with various Heads of Delegation, the GIABA Secretariat organized a 3-day training to improve the implementation of mutual evaluation process through effective contributions to discussions of reports. The main objectives were to:

- Improve skills of delegates in undertaking the FATF Standards and Methodology to enable them to contribute meaningfully to the discussions and adoption of quality MERs within the stipulated timelines;
- Explain to National Correspondents (Heads of Delegation and coordinators of mutual evaluations) on the need to provide assessment teams with relevant laws, data, statistics

and case studies that would demonstrate full compliance with the mandatory elements of the FATF Recommendations and the extent to which defined outcomes are achieved;

- Provide support for the Community Institutions of UEMOA and OHADA in resolving the Technical Compliance deficiencies identified in the relevant supranational AML/CFT legal frameworks to enable Member States, particularly countries under the ICRG process, to avoid sanctions for failing to make progress;
- Provide explanation on how to prioritize requests for Technical Compliance re-rating where changes have occurred in their legal frameworks after the adoption of their MERs/FURs;
- Engage member States to ensure that revision or enactment of AML/CFT laws does not reduce the level of compliance with FATF standards.

138. The training was delivered by GIABA Secretariat with the assistance of the FATF Secretariat and MENAFATF. The sessions will enable participants to discuss the challenges they are facing and proffer enduring solutions accordingly. The following topics were discussed through interactive plenary process and role play.

- Mutual Evaluation Process and Responsibilities of Plenary and Delegations
- Effective Meeting Management and Structuring Contributions to technical discussions
- Simulation (Role Play) on Meeting Management
- Nexus between technical compliance and Effectiveness of an AML/CFT system
- Provision of Comments to a mutual evaluation report
- Overview of Analytical tools for Follow-Up reports
- Key Issue Document – Role of member States
- Selection of assessors and composition of Delegation to GIABA meetings

139. The training brought together about forty (40) participants made up of Heads of Delegation/Heads of FIUs and one experienced assessor per country. Also in attendance was a senior official from the ESAAMLG Secretariat in line with the FAFT High-Level Principles.. The recommendations made (specifically for GIABA Member States, and both GIABA and FATF Secretariats)) include:

- GIABA Secretariat led by the Director General should undertake high-level advocacy missions during the pre-assessment training to engage with political authorities with a view to enlisting their support for the process.
- Emphasis should be placed on the need for a coordination mechanism that is adequately resourced and headed by a high-ranking coordinator with appropriate AML/CFT authority and relevant experience to ensure compliance.
- National mutual evaluation coordinating teams should involve knowledgeable people from wider stakeholder institutions (preferably those who participated in the pre-assessment training) and officials who have participated in on-site visits of other member States.

Regional Meeting of Chief Compliance Officers and Competent Authorities on Emerging Money Laundering & Terrorist Financing Issue, Abuja, Nigeria, July 18 - 21, 2022

140. The objectives of the programme were to: (i) raise awareness of participants on relevant recent changes to the FTAF standards; (ii) enhance the capacity of participants on current and emerging ML/TF issues; (iii) provide platform for sharing of experiences and good practices on AML/CFT issues; and (iv) promote cooperation, coordination and engagement amongst and between relevant competent authorities and private sector operators on how to effectively implement AML/CFT preventive measures. The meeting brought together One Hundred and fifty-seven (157) officials responsible for AML/CFT compliance from FIUs, supervisory/regulatory authorities and reporting institutions.

141. The 4th Annual Meeting of the Compliance Officers Forum of GIABA member States was also held on the side lines of the workshop activities. COFGMS was spearheaded by GIABA to strengthen coordination between GIABA Secretariat and the private sector and collaboration amongst reporting institutions in the implementation of preventive measures.

Regional Training Workshop on Investigative Journalism on Economic and Financial Crimes in West Africa, Assinie, Côte d'Ivoire, August 02 – 04, 2022.

142. The Workshop on investigating economic and financial crimes for journalists is an activity designed in 2009 to mobilize the media to be better equipped to understand AML/CFT/CPF issues and how to undertake economic and financial crimes investigation for journalism.

143. The Workshop organized in Assinie, Côte d'Ivoire, from August 2 to 4, 2022, trained forty-five (45) journalists from TV stations, Radio, newspapers, and Online platforms on reporting and analyzing an economic and financial fictional case.

IIJ/GIABA Regional Workshop on Mitigating Risks Associated with Abuse of DNFBPs for Terrorist Financing Purposes in West Africa, September 13-15, 2022, Abidjan – Côte d'Ivoire, September 13 - 15, 2022.

144. Understanding and addressing the vulnerabilities of the DNFBP sector, and preventing exploitation by terrorist groups, is crucial for a state's ability to effectively advance its national counter-terrorism strategies. To assist criminal justice practitioners and relevant stakeholders in addressing the terrorist funding vulnerability, the International Institute for Justice and the Rule of Law (hereafter IIJ) in collaboration with the GIABA Secretariat, with the funding by the German Government, organized a three-day capacity-building programme, tailored specifically to 11 countries in the West Africa and Sahel regions..

145. The workshop was attended by over seventy (70) criminal justice practitioners, law enforcement officials, financial analysts and DNFBP regulatory representatives from **Benin, Burkina Faso, Cameroon, Chad, Cote d'Ivoire, Mali, Mauritania, Niger, Nigeria, Senegal and Togo.**

146. The overarching objective of this important workshop was to strengthen the capacity of criminal justice practitioners and their private sector counterparts to understand, investigate, and prosecute terrorism financing cases involving the abuse of DNFBPs in West Africa and

the Sahel. The delivery of the workshop leveraged on the available regional experts with hands-on technical experience.

147. Participants and experts identified the challenges and emerging terrorism financing threats related to DNFBPs and discussed the importance of developing a comprehensive legal and regulatory framework to supervise the DNFBPs for compliance with FATF Recommendations. In addition, criminal justice practitioners who specialize in counterterrorism and criminal financial investigations shared best practices and cutting-edge techniques on detecting, investigating and prosecuting terrorist financing and related organized crimes where criminal assets and proceeds are channeled through real estate agencies, notaries, other legal professions, precious metals and gemstones trade, as well as the extractive mining industry. The workshop emphasized building successful public-private partnerships and formal and informal international cooperation by showcasing several case studies from the region and worldwide.

148. Practitioners also had several opportunities to apply the good practices and knowledge they gained in a series of breakout sessions, which included a hypothetical exercise drafted by subject matter experts. Finally, practitioners identified gaps in their national legal and regulatory systems related to DNFBPs and provided recommendations for developments. Subject to the availability of funds for this thematic area, the IIJ plans to continue its engagement with the Governments of the region and its regional partners to assist practitioners in achieving the priorities they identified at the workshop.

149. In view of the level and quality of support provided by GIABA to this event, the IIJ expressed serious interest in formalizing the partnership with GIABA to sustain and optimize the cooperation between the two organizations for the benefit of the region. The envisaged partnership **will enable GIABA to expand portfolio of its technical and financial traditional partners and donors in a context of limited resources.**

Regional GIABA-CRDF Global – Kharon – Canada Counter proliferation Finance Workshop - Identify and Prevent North Korea's Illicit Finance Activities in Africa, Dakar, Senegal, September 21 - 22, 2022

150. GIABA in collaboration with the CRDF Global, Kharon, and the Canadian Government, organized a Joint Counter proliferation Finance Workshop on Identifying and Preventing North Korea's Illicit Finance Activities in Africa.

151. The Workshop's primary objective was to sensitize competent national authorities on counter-proliferation financing and the global best practices to combat proliferation financing. The Workshop further provided participants with the UNSC's two-tier approach in combating WMD and associated proliferation financing. Specifically, the Workshop sought to improve the identification and reporting awareness of potential proliferation financing, improve the understanding of the PF, improve the implementation of UNSCR targeted financial sanctions, improve the level of cooperation and collaboration between the key agencies and the reporting institutions in the implementation of CPF and improve the working relationships and experience sharing amongst key agencies in the region.



Edwin W. HARRIS Jr. (middle), Director General of GIABA and Mr. Christian Bedford, CRDF Global representative and First Secretary to the Embassy of Canada to Senegal

152. Thirty-three (33) senior and mid-level intelligence officials from GIABA member States (customs, anti-corruption bodies, national security service, nuclear regulatory authorities, ministries of finance, justice, and commerce/trade and financial intelligence units (FIUs))) attended the program.

Virtual Sharing Session for Session for members of the Working Group on Evaluation and Compliance (ECG), October 25, 2022

153. A sharing session was organized by GIABA to facilitate exchange of experiences between the old and new ECG members, and in general, strengthen the capacities of ECG members to meet the relevant action items on the EIP Action Plan. In particular, it was to sensitize the members of the ECG on their roles and responsibilities, and also to facilitate experience sharing on good practices and working methodology, as well as on the challenges and proposed solutions.

Regional Sensitization Workshop for Civil Society Organizations on AML/CFT Requirements, Bissau, Guinea Bissau, October 31 – November 2, 2022

154. The Workshop was organized to sensitize Civil Society Organizations on the dangers and repercussions of ML/TF in the region, understand their roles in advocacy and sensitization; improve their knowledge of the FATF Standards, particularly, on Recommendation 8 and familiarize themselves with the GIABA mandate and activities.

155. Key highlights of the Workshop were the need for participants to strengthen collaboration and networking among themselves and to replicate the training for their peers in

their respective countries, and to champion the sensitization of the public about the consequences of money laundering and terrorist financing.



Her Excellency, Dr. Teresa Alexandrina DA SILVA, Minister of Justice and Human Rights (middle) of Guinea Bissau accompanied by the representative of the Director General of GIABA, experts and participants in the meeting.

156. The Workshop was attended by forty-five (45) delegates of civil society organizations from GIABA member States

Joint GIABA/OCWAR-M Regional Workshop on the Development of National Strategies and Action plan for Member States' Inter-Ministerial Committees/National Coordination Committees, October 31 – November 2nd, 2022, Saly Portudal, Senegal

157. A Regional Workshop on the roles and responsibilities of the IMCs/NCCs in the implementation of AML/CFT&PF measures was held at the Hotel Palm Beach, Saly, Senegal, from 31 October to 02 November 2022. The workshop was organized in partnership with OCWAR-M, a European Union AML/CFT Project that covers ECOWAS member countries and Mauritania, being implemented by EXPERTISE FRANCE.

158. The main objective of the workshop was to discuss on the roles and responsibilities of the IMCs/NCCs in countering money laundering, terrorist financing and proliferation in the light of the outcome of a study commissioned under the OCWAR-M project. The study looked at the relevance of the IMCs/NCCs, their effectiveness, the value addition they are making and their sustainability. The establishment of the IMCs/NCCs was initiated in 2006 by GIABA in line with the FATF Standards that require countries to put in place national mechanisms to coordinate AML/CFT efforts and facilitate inter-agency cooperation among competent authorities.



The Director General of GIABA, Mr Edwin W. HARRIS Jr. surrounded by the participants of the meeting

159. The three-day workshop was delivered through a mix of a roundtable thematic presentations, breakout sessions and plenary discussions. The workshop brought to the fore issues on legal and operational frameworks for national coordination and inter-agency cooperation in GIABA member States. The workshop recommended among others the need for political authorities should provide IMCs/NCCs with adequate resources to enable them to be fully operational.

[2nd Regional Training of Heads of Delegation to GIABA meetings, Saly-Portudal, Senegal, November 23 – 25, 2022](#)

160. Within the framework of the GIABA Effectiveness Improvement Process launched by the FATF in February 2021, and in furtherance to the maiden training in April, 2022, the GIABA Secretariat organized a second 3-day workshop from 23rd to 25th November 2022 for all Heads of Delegation and ECG members to GIABA meetings. Thee training aimed to enhance the understanding of Heads of Delegation, ECG members, and Technical Commission Chairman to the mutual evaluation processes and procedures, management of discussions, composition of delegations to GIABA Plenary meetings and their role in providing substantive comments on MERs and/or FURs.



The Director General, Mr Edwin W. HARRIS Jr. surrounded by the heads of delegation at the GIABA meetings

161. The training, which brought together about forty-five participants made up of Heads of Delegation/Heads of FIUs, ECG members or an experienced assessor per country, was successful and recommendations were made for GIABA Member States, GIABA Secretariat, and Supranational Authorities in the region.

[1st Regional Public-Private Sectors Consultative Forum: Cooperation and Coordination in the Implementation of AML/CFT Measures in GIABA Member States, Saly, Senegal, November 26, 2022](#)

162. GIABA organized its maiden edition of the Public-Private Sectors Consultative Forum under the theme: Cooperation and Coordination in the Implementation of AML/CFT Measures in GIABA Member States at the Palm Beach Hotel, Saly, Senegal, on November 26, 2022.

163. The programme was aimed at promoting the adoption and best practices of public-private partnership (PPP) amongst GIABA members. Specific objectives included providing a platform for: (a) sharing experiences on public-private partnership in the implementation of AML/CFT measures from other regions; (a) discussing benefits associated with partnership necessary to the next level of effectiveness, challenges of public-private sector cooperation and proffer solutions to facilitate the shared responsibility of effective implementation of AML/CFT measures in the region; and (d) galvanizing support for the development of public-private partnership (PPP) across member States to effectively address ML/TF and associate predicate offences.

164. The Forum was attended by Seventy (70) officials from the public and private sectors in GIABA member States and representatives from development partners.



The Director General, Mr Edwin W. HARRIS Jr and Mr Adrien DIOUF, Director General of Financial Stability and Financing of Economies at the BCEAO and the participants of the meeting

3rd GIABA-EGDC Regional Workshop on the Gender and Youth Dimensions of Transnational Organised Economic and Financial Crimes in West Africa, Abidjan, Côte d'Ivoire, from December 05 – 07, 2022.

165. The aim of the Workshop was to review, fine tune, finalize, and adopt the draft strategic action plan, which was the output from the 2nd GIABA-EGDC Regional Workshop held in Saly-Portudal, Senegal from December 17 to 19, 2018 into a comprehensive framework for mainstreaming gender and youth perspectives into the fight against transnational organized economic and financial crime and related issues in the ECOWAS region. Inter alia the specific objectives were to:

- Facilitate the sharing of knowledge, experiences and good practices on mainstreaming gender and youth issues in policies, strategies and programmes aimed at countering economic and financial crime and related issues.
- Build consensus on the way forward by critiquing, updating and finalizing the draft operational action plan on gender and youth-related issues and mechanisms that are relevant to the fight against economic and financial crime and related issues in the ECOWAS region.
- Adopt the regional action plan on mainstreaming gender and youth perspectives into the fight against economic and financial criminality in West Africa, including money laundering, radicalism, violent extremism and cyber fraud.

166. The Workshop was attended by forty-seven (47) participants drawn from relevant Government Ministries, Departments and Agencies (MDAs), Financial Intelligence Units (FIUs), Youth Groups, and Civil Society Organizations (CSOs) from ECOWAS member States. The action plan was harmonized and will be disseminated to the ECOWAS Commission for wider implementation.

Regional Joint GIABA-PNNL Counter Proliferation Financing Basic Instructor Training (BIT) Course for GIABA Member States, Dakar – Senegal, December 12 - 16, 2022.

167. The United States-Department of State's Office of Cooperative Threat Reduction, in cooperation with subject matter experts at the Pacific Northwest National Laboratory (PNNL), collaborated with the GIABA Secretariat in the delivery of a Basic Instructor Training.

168. The objective of the course was to train delegates on the proliferation threats facing individual countries in West Africa. Topics include an overview of proliferation finance threats and vulnerabilities, international legal requirements and standards, identification of sectors vulnerable to proliferation finance exploitation, and how to create an effective adult learning environment for teaching these topics.

169. Twenty (20) participants attended the training from the following key agencies: border control agencies, state intelligence services, financial intelligence units, law enforcement, and prosecution agencies, trade promotion and investment agencies, government policy departments, financial supervisors, competent authorities, and agencies or authorities involved in the implementation of relevant UNSCRs.



The Director General, Mr Edwin W. HARRIS Jr and Mrs Ellen Wynkoop, the PNNL representative and the participants of the meeting

Regional Stakeholders Workshop on the outcomes of the assessment report on the challenges of investigation, prosecuting and adjudicating Money Laundering and Terrorist Financing cases in West Africa, Lome, Togo, December 19-23, 2022.

170. A Regional Stakeholders Workshop on the Outcomes of the Assessment Report on the Challenges of Investigating, Prosecuting and Adjudicating Money Laundering and Terrorist

Financing Cases in West Africa was held in Lomé, Togo from 19th to 23rd of December 2022, in the Sarakawa Hotel Conference Room.

171. One of the main objectives of the workshop was to engage stakeholders at a regional level to discuss the findings and recommendations of the report and to discuss the best ways to mitigate the identified deficiencies and vulnerabilities in the criminal justice sector. About 72 participants from the financial intelligence units, law enforcement agencies, first instance courts, appeal courts, and other relevant institutions involved in detection, investigation, prosecution and adjudication of money laundering and terrorist financing cases in GIABA member States participated in the workshop.

172. The workshop was delivered through thematic presentations, breakout sessions and plenary sessions. The workshop noted the nexus between high-level political interference in the administration of justice which generally tends to complicate the possibilities of effectively conducting ML/TF investigations and prosecutions with integrity and independence, especially for cases involving politically exposed persons (PEPs). Also, the participants emphasized the importance of integrity in the effective implementation of AML/CFT obligations by Law Enforcement Officers, Investigative and Prosecutorial Authorities. Furthermore, the workshop enjoined member States to ensure the place of integrity in effective, speedy, and unbiased handling ML/TF cases. In addition, the workshop recommended the deployment of effective enforcement actions in dealing with ML/TF offences.

National Level

Training on AML/CFT through CBT E-Learning, Conakry, Guinea, January 31 - February 3, 2022

173. In 2019, the 31st GIABA Plenary in Conakry, Guinea approved the GIABA Secretariat's plan to conduct a series of training AML/CFT stakeholders in member states on basic AML/CFT knowledge through computer-based learning (CBT) platform. Consequently, UNODC established an online platform called "CBT E-Learning". Following the successful organisation of the sessions in Benin, Nigeria, and Sierra Leone in December 2021, a similar session was held for Guinea in Conakry from January 31 to February 3, 2022. About twenty-four (24) participants from various sectors (police, gendarmerie, judiciary, anti-corruption agencies, economic and financial brigades, FIU, anti-drug agencies, financial institutions and DNFBPs) took part in the training. Upon successful completion validation of the modules of training, the participants were issued certificates .

174. The objective of the training is to build the capacity of officials on ML and TF knowledge and AML skills in the Sub-region by training substantial number of law enforcement officers, regulatory staff, reporting entities (Banks, Non-Bank Financial Institutions, and Designated Non-Financial Businesses and Professionals (DNFBPs)).

E-learning/Computer Assisted Training (CAT) sessions conducted in Member States from March to April 2022.

175. The e-Training/Computer Assisted Training (CAT) is an AML/CFT stakeholder capacity building project designed by GIABA to build the capacity of officials by training a significant number of law enforcement officers, staff of the regulatory authorities as well as

reporting entities especially banks, other non-bank financial institutions and DNFBPs by imparting in them the notions of ML/TF as well as the requisite AML/CFT skills in the sub-region.

176. The training took place in Benin from 8th to 11th March 2022 and in Nigeria from 29th March to 1st April 2022.

177. The beneficiaries of this training came from law enforcement authorities (police, gendarmerie, customs, anti-corruption and anti-drug agencies), the judiciary and reporting entities (financial institutions and DNFBPs).

178. In Guinea, twenty-four (24) participants were trained. Among the three (3) target groups, the financial group completed up to 30% of the modules as against 39% for criminal law enforcement agencies and 54% for the judiciary. In Benin, twenty-three (23) participants were trained. Only 14% of the modules were completed for all three target groups. In Nigeria, twenty-seven (27) participants were trained. 59% of the modules were completed by bankers, as against 51% and 54% for the other two groups.

179. On the whole, the training sessions provided a platform to participants from various member States to acquire specialized knowledge on a wide range of ML/TF-related issues and other related offences as well as improvement in intelligence sharing and investigative methods for combating the said scourges.

National Workshop on the Prevention of ML/TF through Non-Profit Organizations (NPOs) for operators and managers of NPOs, Praia, Cabo Verde, April 11 – 13, 2022

180. The workshop served as a forum for participants to share experiences with a view to building consensus and enhancing cooperation/collaboration for effective implementation of FATF Recommendation 8 and Immediate Outcome 10 requirements relating to NPOs. Specifically, this was to: (i) raise awareness and develop a common understanding among stakeholders regarding effective and proportionate responses to TF risk across the NPO sector; (ii) discuss relevant FATF standards and share best practices for effective monitoring of the NPO sector; and (iii) strengthen cooperation/coordination between national authorities and operators in the NPO sector.



Dr. Joana Gomes Rosa Amado, Minister of Justice of Cabo Verde and participants at the meeting

181. Twenty-eight (28) of service-based NPOs participated in the workshop. At the end of the deliberations, the participants made the following observations: a) Need for Cabo Verde to provide additional training for NPOs to effectively implement the requirements of FATF Recommendation 8 and Immediate Outcome 10; b) The country should have increased cooperation/collaboration among AML/CFT stakeholders to further boost the implementation and effectiveness of AML/CFT efforts at domestic level; (c) need to strengthen cooperation/coordination between the NPO platform of self-regulatory bodies (SRBs) and national authorities; d) Need to adopt a risk-based approach in the design and implementation of CFT measures, particularly those relating to the supervisory practices of NPOs; e) Need for national authorities to collaborate more with NPOs to provide periodic training to the NPO sector and develop effective mechanisms for the timely dissemination of the UN Sanctions List.

National Sensitization Workshop on Enhancing AML/CFT Compliance by Real Estate Brokers in Nigeria, Abuja, Nigeria, April 25 – 27, 2022

182. The primary objective of the programme was to provide supervisors, self-regulatory bodies and real estate practitioners with requisite knowledge on the vulnerabilities, methods and/or channels used by criminals in the real estate sector to launder money. In Particular, the workshop aimed at: (a) enhancing the capacity of participants on the relevant FATF standards, (b) raising awareness of participants on current and emerging ML/TF risks; and (c) promoting cooperation, coordination and engagement amongst and between relevant competent authorities and real sector practitioners on how to effectively implement AML/CFT preventive measures in Nigeria. Overall, it was expected to further strengthen national AML/CFT efforts, and improve general compliance by Nigeria with relevant FATF Recommendations and Immediate Outcomes.

183. About forty (40) participants comprising real estate developers, real estate agents, members of self-regulatory bodies, and staff from the Economic and Financial Crimes Commission (EFCC), the FIU and the Special Control Unit against Money Laundering (SCUML) participated in this training.

Pre-Assessment Training Workshop for AML/CFT Stakeholders, Sao Tome and Principe, October 25 - 28, 2022

184. The pre-assessment workshop is designed to help the national authorities of Sao Tome and Principe to understand their roles and responsibilities in the mutual evaluation process and inform and sensitize national stakeholders of the importance of the peer review.

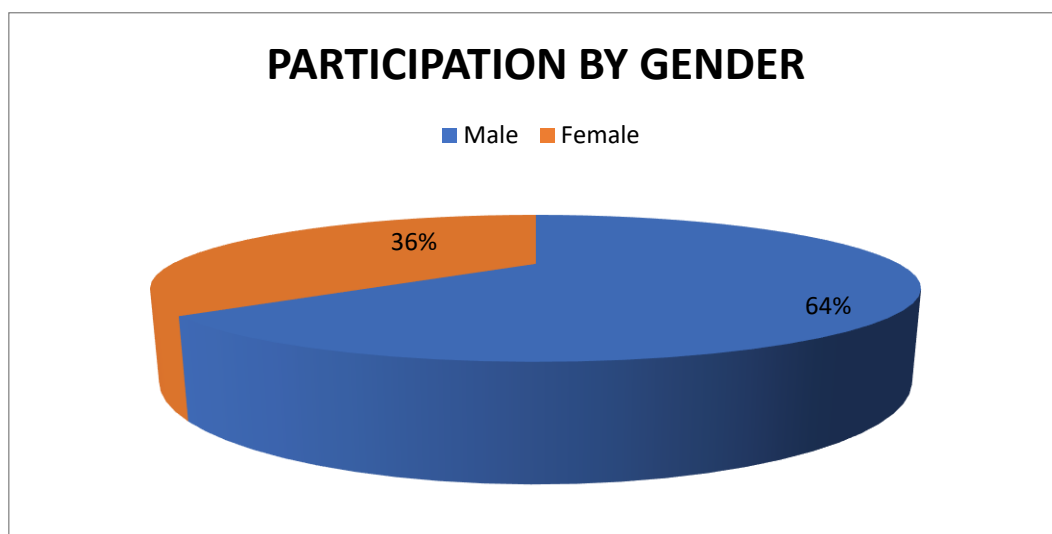
185. The training enabled GIABA to provide practical guidance to the country on how to complete the Technical Compliance Questionnaires. The training was attended by fifty (50) participants drawn from relevant AML/CFT stakeholders such as: FIU, Regulatory Agencies (Central Bank), Law Enforcement Agencies, Line Ministries (Finance, Justice and the Interior), Financial Institutions and Designated Non-Financial Business Professionals.

Conclusion

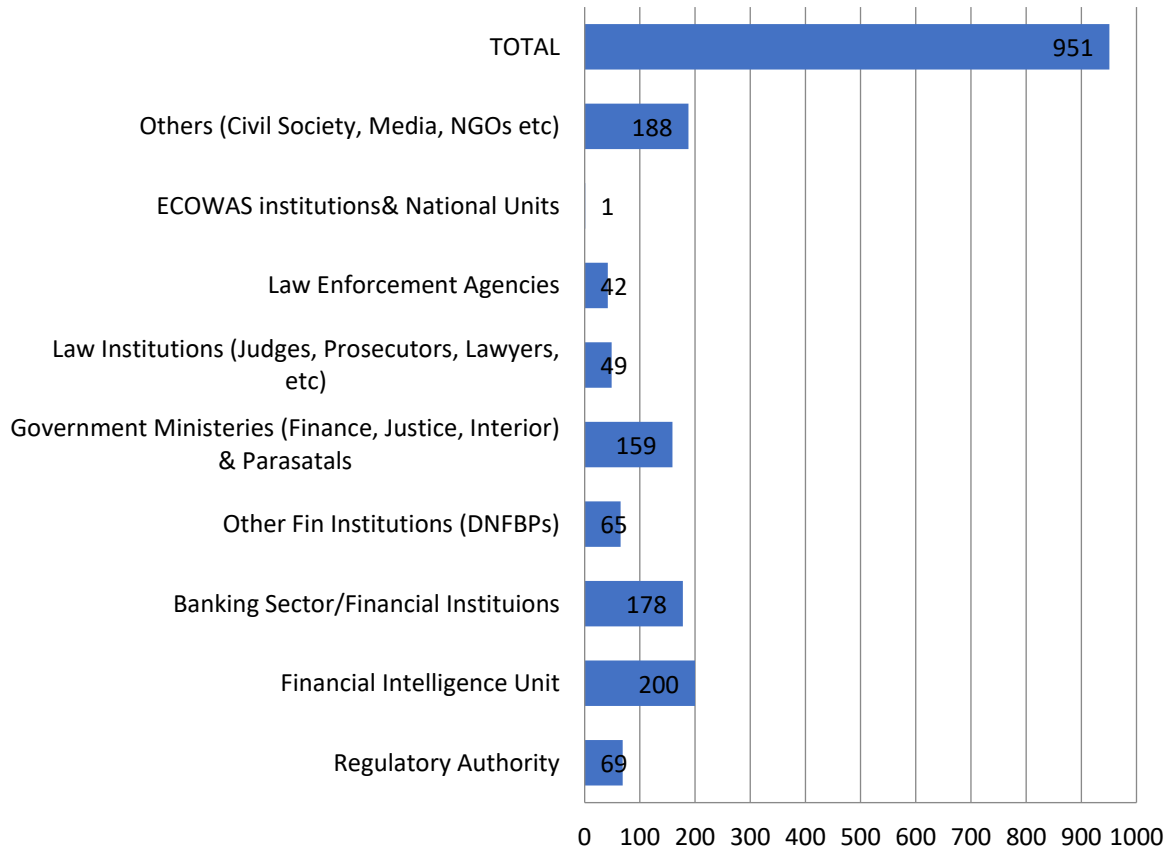
186. The year 2022 witnessed increase in momentum in the delivery of its technical assistance and capacity-building training and the Secretariat has developed a self-administering Technical Assistance Needs Assessment mechanism to enable member States to access and identify their TA and capacity building needs. During the Technical Assistance Forum organized at the 38th Technical Commission/Plenary Meeting from November 27 -30, 2022, the Secretariat presented the GIABA Technical Assistance Guidance and Technical Assistance Strategy documents, which provide the direction of its technical assistance provision for the upcoming year 2023.

187. Other developments include the online SharePoint Technical Assistance Portal which will enable member States, technical and financial partners, and the GIABA Secretariat to harmonize, collaborate, and coordinate the delivery of technical assistance and capacity building to member States.

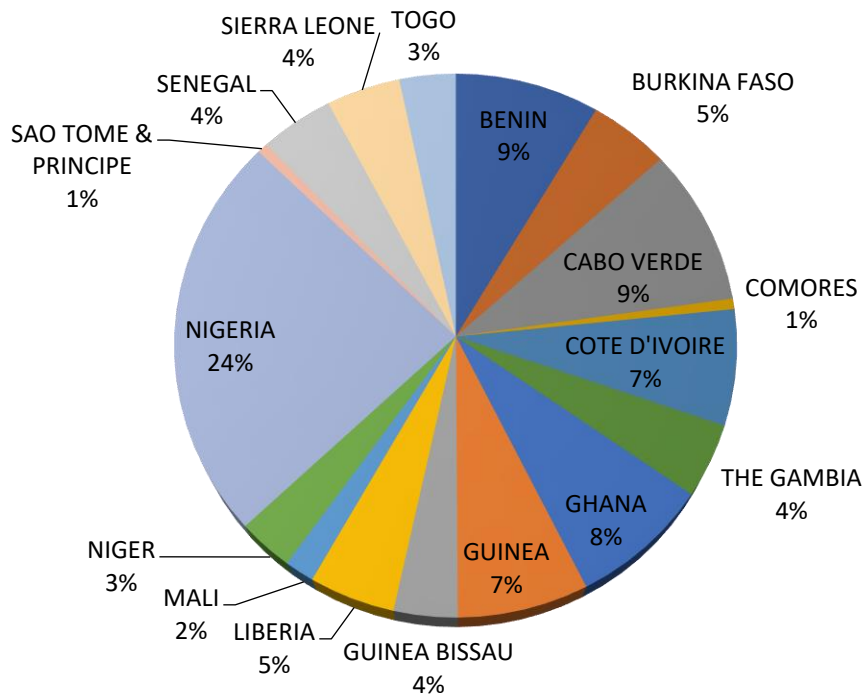
188. The total number of AML/CFT&PF stakeholders trained for 2022 is One thousand and Twenty-Five (1,025). The estimated graph breakdown by gender, sector and member States are presented below:



PARTICIPATION BY SECTOR



Participation by Country



CHAPTER 5 - COMMUNICATION, ADVOCACY AND STAKEHOLDERS' MOBILIZATIONS

Introduction:

189. Advocacy and Stakeholders Mobilization against ML/TF remained a major focus of GIABA Communication Strategic and a strategic programme area (SPA) in the GIABA 2016 – 2020 Strategic Plan. The overarching goal is the promotion of partnership with major AML/CFT actors (decision-makers, decision-implementers and decision-influencers). In 2022, GIABA accelerated its outreach activities, cutting across all strata of the society - women groups, the youths, non-governmental organizations, the media, and religious leaders. GIABA achieved this objective through the deployment of a basket of special purpose vehicle (SPV) events such as high-level advocacy missions; sensitization fora; open house fora; etc.

190. Massive awareness continues to expand through deeper engagement on new media (social media) platforms, deployment on the website, several press interviews amongst others. The unit also provides support to all the other directorates and units of the Institution. To support the activities of the operational directorates of GIABA, the following activities were undertaken by the Communication team of GIABA Secretariat.

Regional Training Workshop on Investigative Journalism on Economic and Financial Crimes held in Hybrid from 21st -23rd February 2022- Accra -Ghana

191. The Workshop on investigating economic and financial crimes for journalists is an activity designed in 2009 to mobilize the media to enhance their understanding of AML/CFT/CPF issues, and how to undertake economic and financial crimes investigation for journalism.

192. The Secretariat recognizes the media's vital role in curbing ML/TF/PF-related activities through their medium. Thus, building a solid alliance with the media will further increase the dissemination of successful investigation of economic and financial crime which will promote good governance and accountability of government.



Group photograph of participants and dignitaries at the Regional Training Workshop on Investigative Journalism on Economic and Financial Crimes held in Hybrid from 21st -23rd February 2022- Accra - Ghana

193. The Workshop organized in Accra, Ghana, from February 21 to 23, 2022, trained about fifty (50) journalists and representatives of the Ministry of Information of Ghana. The main theme of the workshop was "Investigative Journalism on Money Laundering and Financing of Terrorism (ML/FT) in West Africa" and was delivered through eleven (11) thematic and interactive sessions facilitated by eminent experts from the ECOWAS region and GIABA professionals.

13th Open House Forum for Youths on AML/CFT; Accra, Republic of Ghana; May 9th, 2022

194. The 13th Open House Forum for Youths on Anti-Money Laundering and Combating Financing of Terrorism (AML/CFT) was organized at the Ghana Institute of Management and Public Administration (GIMPA), Accra, Ghana on Monday 9th May 2022. The objective of the Open House Forum was to mobilize youths against organized crime, including money laundering (ML) and terrorist financing (TF), by targeting their attitudes, behaviours and beliefs, while providing them an opportunity to embark on advocacy by helping to disseminate anti- money laundering and counter financing of terrorism (AML/CFT) messages to their peers and political decision-makers, thereby becoming important policy advocates.



Group photograph of participants and dignitaries at the 13th Open House Forum for Youths on Anti-Money Laundering and Combating Financing of Terrorism (AML/CFT) held in Accra, Ghana on Monday 9th May 2022

195. The Open House was attended by sixty-four (64) participants drawn from the host university GIMPA, Pentecost University, University of Ghana, Legon and Wisconsin International University College. There were also participants from various Civil Society Organisations and AML/CFT stakeholders, including the Bank of Ghana, the National Insurance Commission, Ministry of National Security, Securities and Exchange Commission, Narcotics Control Commission, West African Monetary Institute and members of the press. Staff members of the Financial Intelligence Centre of Ghana also participated.

196. The key outcome of the Forum was the resolve of the students to use the lesson learned from the Forum to support national programs in fight against money laundering and terrorist financing, corruption and other predicate offenses. The participants also understand the concept of Money Laundering and the specific vulnerability of youths to ML/TF risks. They understand the risk factors and the required steps in collaboration with national authorities and other stakeholders to avoid falling into the pit.

National Sensitisation Seminars for Religious Leaders and Institutions on AML/CFT; Cotonou, Republic of Benin; May 11th -12th, 2022 and Monrovia, Liberia; August 09th - 10th, 2022

197. In pursuit of its efforts to ensure the participation of all stakeholders in the fight against money laundering and terrorist financing in West Africa, GIABA organized two National Sensitization Seminars for Religious Leaders and Institutions on Implementing Anti-Money Laundering and Combating Financing of Terrorism (AML/CFT) Measures at the Benin Royal

Hotel, Cotonou, the Republic of Benin from 11th to 12th May 2022 and Monrovia, Liberia; August 09th -10th, 2022.

198. The seminars were part of the process of developing partnerships with all critical stakeholders towards the achievement of GIABA's main objective of entrenching robust frameworks to combat corruption, religious extremism, and transnational organized crime across West Africa. The event therefore aims to share information with, stimulate the interest of, and foster viable partnerships with, National Religious Leaders in Benin in the fight against Money Laundering (ML) and the Financing of Terrorism (FT).

199. The promotion of strategic partnerships with all stakeholders remains a priority for GIABA within its regional strategic framework. In particular, faith-based organizations have an important role to play in the global fight against economic and financial crimes in particular money laundering and terrorist financing. The seminar is therefore, a platform to facilitate national partnership with, and promote collaborative efforts in the global crusade against these scourges.

200. The objective of the seminar was to raise the awareness level of religious leaders on their roles in the fight against Money Laundering (ML) and Terrorist Financing (TF). The sensitization seminar was also designed to help build a strong partnership between Supervisory Agencies with Faith-Based Organizations (FBOs), thereby ensuring,ting that FBOs are not abused for money laundering and terrorist financing (ML/TF) purposes, violent extremism, radicalization and terrorism.

201. The Sensitization Seminar for Benin was attended by forty-five (45) while that of Liberia was attended by fifty (50) delegates respectively. Participants were high-level persons from religious organizations drawn from both the Islamic and Christian faiths in Benin, the Financial Intelligence Unit of Benin, Non-Profit Organizations (NPOs), and the media. media The seminars was delivered through presentations, plenary discussions, and case studies during which several observations and recommendations were highlighted by participants.



Group photos of participants and dignitaries at the National Sensitisation Seminars for Religious Leaders and Institutions on AML/CFT; Cotonou, Republic of Benin; May 11th -12th, 2022



Group photos of participants and dignitaries at the National Sensitisation Seminar for Religious Leaders and Institutions on AML/CFT; Monrovia, Republic of Liberia; August 9th -10th, 2022

202. At the end of the seminars, participants resolved that religious leaders should continue to advocate and shun corruption and utilize methods beyond prayer, with the emphasis on hard work and genuine worship. Also, the participants recommended that religious leaders should preach piety and shun materialism, and admonish faithfuls to always act according to the tenets of the religious teachings. In addition, the umbrella bodies of faith-based organizations should continue to be empowered and assisted by government agencies, to adopt self-regulatory measures to be owned and monitored by them in order to avoid perceived governmental interference; and that religious leaders should form a committee that would assist members at the grassroots in sensitization and compliance with the laws against ML/TF.

Courtesy visit of the Head of the GIABA Abidjan Information Centre (AIC) to the President of Côte d'Ivoire FIU, 7th July 2022, Abidjan, Côte d'Ivoire

203. In line with the mandate of the Information Centre, the President of the Côte d'Ivoire FIU, Colonel Idrissa Touré, received a delegation of the Abidjan Information Centre (AIC) led by Ms. Regina Tiensbandé Bandé, Head of the AIC. This working visit is part of a series of meetings initiated by the AIC with various Côte d'Ivoire stakeholders for a better approach in the fight against money laundering and countering terrorist financing (AML/CFT). The discussions during the visit focused on issues related to cooperation and collaboration between the FIU and the AIC in the framework of mobilising and raising awareness of AML/CFT stakeholders in Cote d'Ivoire pursuant to GIABA's mission.

204. The AIC team was conveyed the GIABA DG's appreciation to the FIU-CI for their support and availability toto the Centre in carrying out its AML/CFT mission.



Photo of working visit of Mrs Regina S. Tiensbandé Bandé, Head of AIC with Colonel Idrissa Touré, President of Côte d'Ivoire FIU in the presence of members of the Unit, 7 July 2022, Abidjan, Côte d'Ivoire

LEADERSHIP CHANGE IN GIABA August 1st 2022, Dakar, Senegal

205. On August 1st, 2022 at the GIABA Secretariat in Dakar, Senegal, Mr. Kimelabalou ABA, handover the mantle of leadership of GIABA to Mr. Edwin W. HARRIS Jr, as the Director General for another four (4) years (2022 – 2026) In his valedictory speech, Mr. Kimelabalou ABA, the out going DG shared his assessment of his tenure (four years and five months) as the head of GIABA. He noted that almost all GIABA member States have carried out their national risk assessments and adopted strategies and action plans to combat money laundering and financing of terrorism (AML/CFT) based on the identified risks. Similarly, based on the established timeline, as at May 2022, about 11 MERs have been adopted Furthermore, during his tenure, about 4000 officials benefited from the several capacity building were conducted.. In. addition, some AML/CFT typology studies and research were completed and published during the period under review.

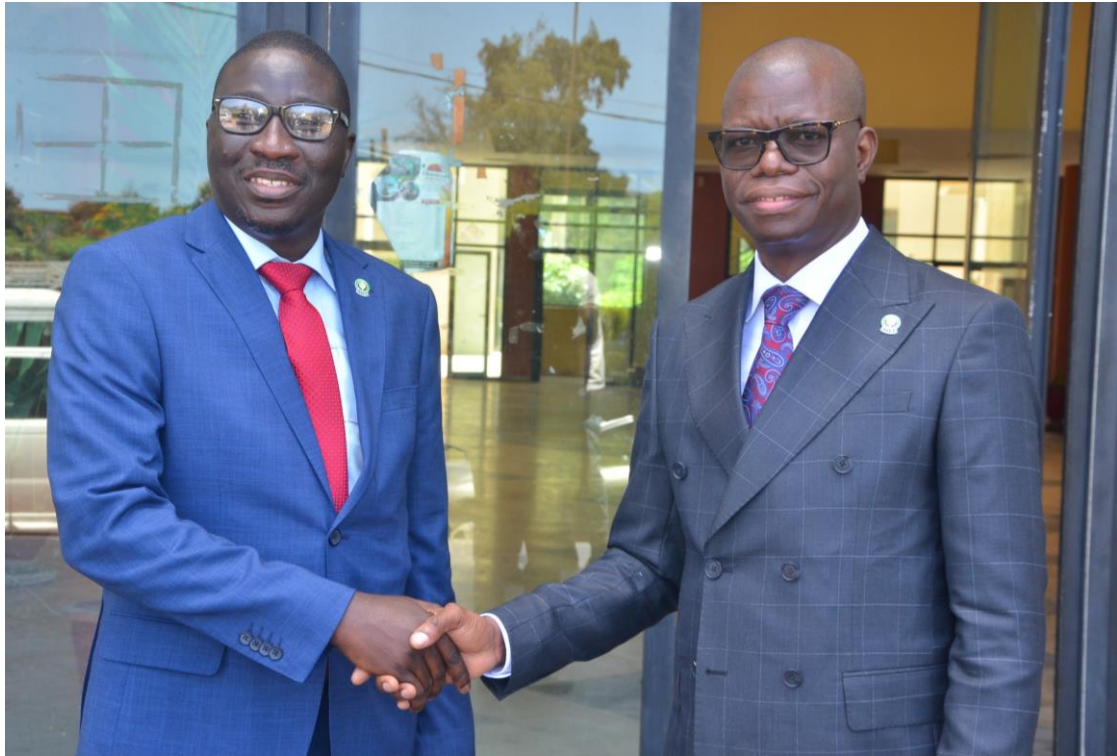


Photo of Mr. Edwin W. HARRIS, New Director General of GIABA with Judge Kimelabalou ABA, Former Director General of GIABA at the Handover Ceremony on August 1st 2022, Dakar, Senegal

206. Addressing his successor, Mr. Kimelabalou ABA urged him to focus on the challenges ahead, including the improvement of implementation of anti-money laundering (AML) and countering the financing of terrorism (CFT) measures in the region. In his response, the incoming Director General of GIABA, Mr. Edwin W. HARRIS Jr. expressed gratitude to Mr. ABA and affirmed that he would do his best in collaboration with all stakeholders including development partners to improve AML/CFT performance in member States. He also stressed the need for the GIABA team to work in synergy to achieve the mission of institution.

Regional Training Workshop on Investigative Journalism: Investigating Economic and Financial crimes for Journalists on Economic and Financial Crimes, 2nd – 4th August 2022, Assinie, Côte d'Ivoire

207. A Regional Training Workshop on Investigative Journalism on Economic and Financial Crimes was organised from 02nd to 04th August, 2022 in Assinie, Côte d'Ivoire. About thirty journalists from member countries of the Economic Community of West African States (ECOWAS) attended the training facilitated by experienced AML/CFT media experts, including GIABA staff through presentations. During the three-day workshop, several themes were developed in various sessions. These included understanding the role, mandate and mission of GIABA as a regional initiative; international AML/CFT standards; the theoretical framework of investigative journalism; conducting investigation based on a fictitious case of economic and financial crime; resources for investigative journalists, digital investigative tools; and handling sources in investigative journalism. Other topics include: Building trust and fostering cooperation (Regional AML/CFT Investigative Journalists Network; Ethics in investigative journalism; Drafting of reports, verification of information and Publishing an AML/CFT investigative story (Use of terminologies in investigative reporting: avoiding libel).



Group photo of participants and guests at the Regional Training Workshop on Investigative Journalism: Investigating Economic and Financial crimes for Journalists on Economic and Financial Crimes, 2nd – 4th August 2022, Assinie, Côte d'Ivoire

208. At the end of the meeting, the participants recommended that GIABA should continue to organize similar training programmes for the civil society and young people, and that a framework for cooperation and collaboration between investigative journalists and the regulatory/supervisory authorities, and law enforcement agencies in the AML/CFT field be established. They also urged GIABA to advocate for the adoption of a law on the freedom of Press in member states. Participants urged journalists to build trust with a network of relevant sources/experts on different topics to enable them to demonstrate professionalism in their publication; respect ethical standards in their professional relations; use verified official documents and government information in investigations; and to strive to trace the money laundering offence back to the predicate offence. In addition, participants stressed the need for journalists to work within a network that protects them from abuse; to improve on their knowledge of international AML/CFT Standards especially the FATF recommendations; to identify predicate offences in investigations of ML/FT cases; and to strengthen educational programmes on the conduct of investigative journalism and reporting on economic and financial crimes.

[The AIC visits the premises of Abidjan.net. 27th September 2022, Abidjan, Côte d'Ivoire](#)

209. With a view to bringing the Abidjan Information Centre (AIC) closer to the public, a series of meetings with various stakeholders in the fight against money laundering and the countering of terrorist financing (AML/CFT) was launched on 27th September 2022. The media being essential actors, AIC team held a meeting with the Heads of Abidjan.Net. The purpose of this meeting was to introduce AIC and its activities to the structure, and to seek possible partnerships with the Weblogy group, an important partner in terms of the group's diversified activities, including payment by electronic means and financial inclusion.

210. The Weblogy team was composed of one of the co-founders, Mr. Daniel, Ms. Danielle Gbizié of the Customer Service and Mr. Olivier WAR. The partnership from Abidjan.net

include occasional media coverage, deployment of innovative and inclusive products in the countries covered by the media and to promote at the regional level better understanding of AML/CFT issues.

Meeting of AIC with the Minister of Economy and Finance of the Republic of Côte d'Ivoire, Tuesday 27th September 2022, Abidjan, Côte d'Ivoire

211. The delegation of Abidjan Information Centre (AIC) held an official meeting with Mr Adama Coulibaly, Minister of Economy and Finance (MEF) of the Republic of Côte d'Ivoire. The meeting was an opportunity for The Minister seized the opportunity to present the concrete actions and measures taken by the State, notably through the adoption of laws in line with internationally acceptable AML/CFT Standards and the creation of relevant institutions. The new agencies include: the High Authority for Good Governance, The Criminal Asset Recovery and Management Agency (AGRAC), and the National Platform for the Prevention and Detection of Corruption and Related Offences (www.spacia.gouv.ci). The honourable Minister recalled that Côte d'Ivoire has been a member of the Inter-Agency Network for Asset Recovery in West Africa (ARINWA), and the host country of Secretariat and that the country is preparing to host the General Assembly in November 2022.



Photo of Mr Adama Coulibaly, Minister of Economy and Finance (MEF) and Ms Regina S. Tiensbandé Bandé, Head of the AIC

212. At the meeting, the AIC team reiterated GIABA's willingness to work in close collaboration and cooperation with the Ministry of Economy and Finance to achieve the common objectives set. The team seized the opportunity to convey the GIABA DG's follow up on the Headquarters Agreement between Côte d'Ivoire and GIABA which is central to effective implementation of AML/CFT measures in Cote d'Ivoire and the achievement of the Centre's missions in the country.

Courtesy visit of the team of the AIC in Abidjan to the Chairman of the 2022 AML/CFT/CPF and Policy Coordination Committee (CCLBCTF/PADM), 3rd October 2022

213. The AICA delegation paid a courtesy visit the Chair of the AML/CFT/CPFCPF Policy Coordination Committee on 3 October 2022, Abidjan, Côte d'Ivoire.

214. In his welcoming remarks, the Chair, Mr Olivier KOUADIO expressed appreciation to the visiting team, in particular for showing interest in the work of the AML/CFT Policy Coordination Committee. Both organisation agreed to use the opportunity of the visit strengthen their relationship in the fight against ML, TF and PF. between the AIC and the AML/CFT Coordination Committee. This visit was part of the advocacy process to strengthen GIABA's partnership with various stakeholders in the fight against money laundering and the financing of terrorism (AML/CFT).

Meeting GIABA Information Centre in Abidjan and High Authority for Good Governance, 10th October 2022, Abidjan, Côte d'Ivoire.

215. On Monday, October 10th, 2022, a meeting was held between GIABA Information Centre in Abidjan led by the ECOWAS Resident Representative in Côte d'Ivoire and Mr. Henri Augustin Aka, Secretary General of the High Authority for Good Governance (HABG). The representative of the President of the HABG reassert the commitment and involvement of the HABG in the implementation of AML/CFT measures in collaboration with the National Financial Intelligence Unit of Côte d'Ivoire (FIU-CI). Also, HABG recounted their roles the country's National Risk Assessment (NRA) as well as in the Mutual Evaluation of the country which started last May. The Secretary General of HABG re-affirmed their willingness to establish close links with the GIABA Information Centre in Abidjan through the signing of a partnership to join their efforts in AML/CFT. It is expected that the partnership between the two entities would help to identify the structural causes of corruption and related ML/TF offences and to propose to the competent authorities measures likely to eliminate them in all public and quasi-public sectors.

216. GIABA delegation presenting the missions, priority orientations, actions/interventions of GIABA for the benefit of member States including Côte d'Ivoire and of the Information Centre in Abidjan, and underscored the areas of partnership with the HABG under their respective missions. This partnership between the two entities will include, among others, the production of materials, the dissemination of good practices, the dissemination of information to target audiences; awareness raising, and training of stakeholders;...

217. The meeting resolved to continue the exchanges on the practical modalities for the implementation of the partnership agreement between the HABG and the GIABA Information Centre in Abidjan.

National Annual Public Lecture Series on AML/CFT Awareness, Praia, Cabo Verde, 13th October 2022

218. The academia is a critical stakeholder in spreading the knowledge of AML/CFT globally. West African region is challenged with depth of knowledge of the subject matter,

hence GIABA institutionalized the National Annual Lecture Series to spur the interest of academicians in the subject matter.



5th from Left to Right Standing front row is the Honourable Minister of Justice of the Republic of Cabo Verde, Dr. Joana Rosa and dignitaries in a group photos with participants at the National Annual Public Lecture Series on AML/CFT Awareness, Praia, Cabo Verde, 13th October 2022.

219. The 2022 annual Lecture series was organized at University of Cabo Verde (UNI-CV) in Praia, Cabo Verde on October 13. The objectives were to (i) acquaint and sensitize the academia in Cabo Verde of their roles in deepening the knowledge of AML/CFT in the region and promote economic development; (ii) increase awareness amongst the academia on the menace of ML/TF in West Africa; and (iii) stimulate institutional research and possibly to incorporate study on AML/CFT into the academic programs of different educational levels. The event was attended by about 100150 participants.

National 15th Edition of the Open House to Benefit Young People in the Fight Against Money Laundering and Terrorist Financing (ML/TF), Niamey, Niger October 18, 2022

220. The GIABA Open House Forum (OHF) is one of the activities designed to address the gaps in propagating the knowledge of AML/CFT among the young people. The Republic of Niger was selected to host the 2022 edition of OHF in view of the country strategic location within the Sahel region and vulnerable to terrorism. Specifically, the Sahel region has been prone to attacks of Boko Haram, Islamic State in West Africa Province (ISWAP) and other clandestine groups. Also, the continuous involvement of young people from both educated and uneducated youths has become a major source of serious concern. Therefore, as part of preventive measures, it is very important that GIABA continues to support the ECOWAS Community efforts by sensitizing young people to be part of the regional efforts to combat financial crimes, money laundering, terrorism and terrorist financing.



Group photo of participants from the universities, training institutes and schools in Niamey around S. E. M. Sekou Doro Adamou, Minister of Youth and Sport of Niger

221. About one hundred and fifty (150) participants from public and private universities, institutes and elite schools, police and gendarmerie schools, judicial training centre as well as university officials participated in the event. The objectives of the Open House were to mobilise and raise awareness among young people on the fight against money laundering and countering terrorist financing (ML/TF). It was also an opportunity to raise awareness about GIABA, its mission, mandate and activities; to make Niger's youth understand the challenges at the national, regional and international levels in implementing robust AML/CFT measures; and to encourage youth to be advocates by helping to convey AML/CFT messages to their peers and to policy makers. The Nigerien authority commended the initiative and urged young people to make voluntary commitment to the fight against money laundering and countering terrorist financing.

222. The themes covered at the forum include:

- Understanding the role, mandate and activities of GIABA as a regional organisation;
- Understanding AML/CFT and the role of youth in prevention and control;
- International AML/CFT measures: implications for West Africa.

223. Some of the recommendations contained in the communiqué by the Forum are as follows:

- The need to take into account the real estate sector in the fight against money laundering in Niger
- Increase in awareness raising activities raising activities Nigerien youth on the financing of terrorism and money laundering.
- The need to design series of training sessions accessible to the public on the theme of AML/CFT
- The need undertake awareness-raising for rural youths, and to putto put in place processes that would promote establishment of small businesses for young people in the rural areas
- Restoring confidence between Member States and operators in the informal sector
- The need to design policy on compulsory on compulsory formal education for young people.

Regional Sensitization Workshop for Civil Society Organizations On AML/CFT Requirements, Bissau, Guinea Bissau, October 31th – November 2nd, 2022

224. The Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) organized a Regional Sensitization Workshop on AML/CFT Requirements for Civil Society Organizations (CSOs), from 31st October to 2nd November 2022, in Bissau, Guinea Bissau. The objectives of the workshop were to sensitize Civil Society Organizations on the dangers and repercussions of ML/TF in the region; to strengthen the capacities of CSO stakeholders in the fight against ML/TF; to sensitize CSOs and enable them to conduct advocacy strong enough to influence the effective implementation of AML/CFT regimes at domestic and regional levels; to sensitize CSOs on the need to utilize relevant platforms for dissemination of information, publications and sharing of reliable intelligence on AML/CFT; and to map out an effective strategy designed to establish a solid network of CSOs committed to the AML/CFT cause in West Africa.



Group photo of participants and guests at the Regional Sensitization Workshop on AML/CFT Requirements for Civil Society Organizations (CSOs), from 31st October to 2nd November 2022, in Bissau, Guinea Bissau

225. The workshop was attended by forty-five (45) delegates of civil society organisations from GIABA Member States. At the end of the Workshop, more stakeholders were sensitized on AML/CFT and became more aware of GIABA’s mandates and activities. There was increased zeal among the participants to collaborate with GIABA and national authorities in all efforts at the national level to combat ML/TF and their predicate offenses. While a new crop of CSOs were recruited into the existing regional network of AML/CFT CSO forum, there also emerged a pool of highly motivated CSOs with more in-depth knowledge on the deleterious effects of ML/FT and full understanding of GIABA mandate.

226. The participants expressed readiness to conduct training among their peers on AML/CFT in their respective countries and communities.

Inter-Universities Speech Contest on the Impact of Anti-Money Laundering and Countering the Financing of Terrorism on the Economies of West Africa, Banjul, The Gambia, December 14th, 2022

227. The Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) organized the 5th Inter-Universities Debate on the Impact of Anti-Money Laundering and Countering the Financing of Terrorism on the Economies of West Africa on December 14th, 2022 in Banjul, The Gambia. The theme of the Speech Contest was: Promoting Collective Action against Money Laundering and Terrorist Financing in West Africa.

228. The Speech Contest was designed to mobilize youths, especially students of tertiary institutions across West Africa to take leading roles in the fight against money laundering and terrorist financing in the region. It was also designed to strengthen research into ML/TF and predicate offences of ML in West Africa thereby increasing students' interest in AML/CFT issues and their roles in combating ML/TF.

229. Five (5) contestants who were undergraduate students from each of the English-speaking West African countries participated in the Speech Contest. One hundred and four (104) students from the University of The Gambia participated as audience at the event. At the end of the Speech Contest, the audience benefitted from well researched speeches on the theme, as well as a presentation on GIABA, its mandates, activities and achievements.



Group photo of participants and dignitaries at the 5th Inter-Universities Debate on the Impact of Anti-Money Laundering and Countering the Financing of Terrorism on the Economies of West Africa on December 14th, 2022 in Banjul, The Gambia

Conclusion

230. Communication and advocacy remain a central co-ordinating factor for GIABA and its stakeholders. Internal and external communication and stakeholder mobilisation is essential to fulfilling GIABA's mandate. The region started stabilising after the negative impact of Covid-

19 in 2020 and 2021. More activities took place physically, and the unit engaged stakeholders in the region on a larger scale. During the year under review, the new website of GIABA received accelerated attention and the first draft was released and reviewed. In the coming year, the unit intends to revise the GIABA Communication Strategy, extend the implementation of the internal communication component, and expand GIABA's social media presence. The year 2023 is also expected to launch the new interactive website and broader engagement with stakeholders and the public, both physically and virtually. GIABA will work with other ECOWAS Community institutions to support and advance the ECOWAS Communication Policy and to develop joint and collaborative work and increase visibility for GIABA, her partners and ECOWAS at large.

CHAPTER 6 - REGIONAL INTEGRATION, INTERNATIONAL COOPERATION AND PARTNERSHIPS

INTRODUCTION

231. Money laundering and terrorist financing are transnational organized crimes. Thus, regional and international cooperation play important role in the effective implementation of AML/CFT & PF regime. In this regard, the GIABA Secretariat strengthen its engagements with technical and financial partners to enhance compliance with AML/CFT & PF international standards in its region. The Secretariat consolidated on its partnership with the European Union under the Organized Crime – West Africa Response to Money Laundering and the Financing of Terrorism (OCWAR-M) Project, the African Development Bank under the Transition Support Facility (TSF), as well as collaborated with the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) and other partners to strengthen regional and global alliances against ML/TF, and to strengthen the capacity of member States to improve their AML/CFT/CPF systems. The Secretariat also enhanced working relationships and coordination with the FATF other, other FSRBs, especially ESAAMLG and GABAC, Egmont Group and its Leadership Center (ECOFEL), and other regional and international partners through participation and contributions in their activities, including Plenary meetings, and training programmes.

232. Year 2022 witnessed significant recovery in the Covid 19 pandemic and was marked by the gradual resumption of physical activities in GIABA's cooperation with its technical and financial partners. This allowed GIABA to continue to work with development partners under the GIABA Technical Assistance Coordination Forum to enhance technical support to member States and improve TA coordination in regional AML/ CFT & PF efforts, which contributed to minimizing duplication in the provision of technical assistance and the efficient management of available resources. In parallel, we actively explore new ways to establish new vista of partnership to further promote the effectiveness of the AML/CFT & PF regime in the region. The summary and outcomes of activities undertaken by the Secretariat to strengthen regional integration and cooperation with its partners in 2022 are presented below:

I - GIABA STATUTORY MEETINGS

233. The statutory meetings of GIABA consist of Technical Commission/Plenary and GIABA Ministerial Committee (GMC). The 36th, 37th and 38th Technical Commission/Plenary Meetings of GIABA were held in February, May/June and November 2022, respectively, to discuss progress made by member States in the implementation of AML/CFT measures. The meetings discussed technical reports presented by the GIABA Secretariat, follow-up reports submitted by member States, and GIABA research and typologies studies. The 2nd round MERs of Guinea Bissau, The Gambia and Togo were discussed and adopted. Similarly, the 24th and 25th GIABA Ministerial Committee (GMC) meetings were held in February and June 2022, respectively, to consider and approve the three adopted Mutual Evaluation Reports and the reports of the 36th and 37th Plenary meetings and other issues presented to it.

234. The summaries of the GIABA 36th, 37th and 38th Technical Commission/Plenary Meetings are highlighted below.

The 36th Technical Commission (TC)/Plenary Meetings, Accra, Ghana, 13th -18th February 2022

235. The 36th Technical Commission/Plenary Meeting of GIABA was held in hybrid mode from 13th to 18th February 2022, in Accra, Ghana. Meetings of the Evaluation and Compliance Group (ECG), the Risk and Methods Group (RTMG), as well as the meeting of the Forum of Financial Intelligence Units of GIABA member States were held as part of the preliminary meetings leading to the 36th GIABA Technical Commission/Plenary Meeting.



The Director General of GIABA Mr Kimelabalou ABA and the Honourable Minister of Finance of Ghana, Ken OFORI-ATTA at the opening ceremony of the 36th Plenary Meeting of the Technical Commission of the Community Institution

236. The Plenary considered the recommendations of the ECG on the Second Follow-Up Report (with rerating) of Senegal in relation to the progress made in addressing the deficiencies identified in its Mutual Evaluation Report (MER) and decided to upgrade the ratings of Senegal on some recommendations in compliance with international standards. Senegal was maintained on the Enhanced Follow-up process and directed to submit its 3rd FUR to the Plenary in May 2022. The first Follow-up Report of Sierra Leone was presented to the Plenary as Information Paper since the country did not seek re-ratings. The Plenary took note of the measures taken to improve the country's technical compliance with the FATF Standards and the effectiveness of its AML/CFT system from the adoption of its Mutual Evaluation Report in December 2020 to 1st September 2021, and encouraged Sierra Leone to continue its efforts at addressing the gaps

identified in its MER. The country remains under the enhanced follow-up and expected to submit its second follow-up report to GIABA Plenary in November 2022.

237. The 36th Technical Commission/Plenary Meeting also adopted the 2nd round MER of Guinea Bissau. In line with the GIABA Mutual Evaluation Process and procedures, the Plenary placed the country on Enhanced Follow Up process and directed it to submit its first FUR to the Plenary in May 2023. Also, the DG's Summary Activity Report and RTMG co-chairs report were presented to the Plenary and adopted.

238. The plenary adopted a memorandum on the rescheduling of the on-site visits of mutual evaluation of Côte d'Ivoire from March 2022 to June 2022, Liberia from August 2022 to September 2022, and those of Sao Tome & Principe, Guinea and the Union of the Comoros Islands to the second quarter of 2023. The Plenary also took updates on the implementation of the GIABA Effectiveness Improvement Programme and measures taken by the Republic of Comoros to address the outstanding items on its action plan.

The 37th Technical Commission /Plenary Meetings, Saly-Portudal, Senegal, 29th May – 3rd June 2022

239. The 37th Technical Commission/Plenary Meeting of GIABA was held in Saly-Portudal, Senegal from 29th May to 3rd June, 2022. Meetings of the ECG, the Risk and Methods Group/Policy Review Group (RTMG/PRG), GIABA Technical Assistance Coordination Forum as well as the meeting of the Forum of Financial Intelligence Units of GIABA member States were held as part of the preliminary meetings leading to the 37th GIABA Technical Commission/Plenary Meeting.

240. The Plenary considered the recommendations of the ECG on the 3rd and 5th Follow-Up Reports with rerating of Senegal and Ghana in relation to the progress made in addressing the deficiencies identified in their Mutual Evaluation Reports (MERs) and decided to upgrade the ratings on some FATF Recommendations in compliance with international standards. Both countries were maintained on the Enhanced Follow-up process. Senegal is to submit its 4th FUR to the Plenary in November 2022 while Ghana will submit its 6th FUR in May 2023. The first Follow-up Report of Benin and the 3rd FURs of Cabo Verde and Burkina Faso were presented to Plenary as Information items. The Plenary took note of the measures taken to improve the countries' technical compliance with the FATF Standards and the effectiveness of their AML/CFT regimes since the adoption of their Mutual Evaluation Reports or/and the last FUR. The Plenary encouraged the countries to continue their efforts in addressing the gaps identified in their MERs. The countries remain on the enhanced follow-up process and are expected to submit their next follow-up reports to GIABA plenary in May 2023.



Participants at the 37th Plenary Meeting of the GIABA Technical Commission

241. The meeting also adopted the 2nd round MERs of The Gambia and Togo. In line with the GIABA Mutual Evaluation Process and procedures, Plenary placed both countries on Enhanced Follow Up process and directed them to submit their first FURs to the Plenary in May 2023. The Plenary also discussed and took decisions on DG's Activity Report; Report of the RTMG/PRG; Summary of Country AML/CFT Activities Report for 2021, and Memorandums on the reconstitution of ECG and RTMG/PRG membership. The Plenary also took updates on the implementation of the GIABA Effectiveness Improvement Programme. Other key activity during the GIABA 37th Technical Commission/Plenary Meeting was the presentation of awards to member States (Senegal, Nigeria, Ghana and Cabo Verde) that provided mentorship to other GIABA members and member States (Niger, Nigeria and Senegal) that have consistently provided comments on MERs and FURs.

The 38th Technical Commission /Plenary Meetings, Saly, Senegal, 27th to 30th November, 2022.

242. The 38th Technical Commission/Plenary Meeting of GIABA was held in Saly-Portudal, Senegal from 27th to 30th November, 2022. Meetings of the ECG, RTMG/PRG, GIABA Technical Assistance Coordination Forum as well as the meeting of the Forum of Financial Intelligence Units of GIABA member States were held as part of the preliminary meetings leading to the 38th GIABA Technical Commission/Plenary Meeting.



Authorities, Director General and participants in the 38th Plenary Meeting of the GIABA Technical Commission

243. The Plenary considered the recommendations of the ECG on the first Follow-Up Report (with rerating) of Nigeria in relation to the progress made in addressing the deficiencies identified in its Mutual Evaluation Report (MER) and decided to upgrade the ratings on some FATF Recommendations in compliance with international standards. Nigeria was maintained on the Enhanced Follow-up process and directed to submit its 2nd FUR to the Plenary in November 2023. The first Follow-up Report of Niger, the 2nd Follow-up Report of Sierra Leone, the 3rd Follow-up Report of Mali and the 4th Follow-up Report of Senegal were presented to Plenary as Information items as there were no re-ratings requests by the countries. The Plenary took note of the progress made by the countries and encourage them to continue their efforts in addressing the gaps identified in their MERs. The countries were maintained on the enhanced follow-up process and are expected to submit their next follow-up reports to GIABA Plenary in November 2023. Also, the DG's Summary Activity Report and RTMG CoC-chairs report were presented to the Plenary and adopted.

244. The Plenary also considered and adopted the GIABA Strategic Action Plan 2023-2027 (GSAP) as well as updates on the implementation of the GIABA Effectiveness Improvements Programme.

GIABA 24th Ministerial Committee Meeting, Accra, Ghana, 19th February, 2022

245. The 24th GMC Meeting was held on 19th February 2022 in Accra, Ghana. The meeting was preceded by the 36th Technical Commission/Plenary meeting. The GMC approved the reports of the 36th TC/Plenary, the Director General's Summary Activity Report, and the 2nd round MER of Guinea Bissau. The GMC also approved the rescheduling of the on-site visits of mutual evaluation of Côte d'Ivoire from March 2022 to June 2022, Liberia from August 2022 to September 2022, Sao Tome & Principe, Guinea and the Union of the Comoros Islands to the second quarter of 2023. The GMC took a presentation on the performance of GIABA Member States assessed under the Second Round of Mutual Evaluations. Based on the presentation and the ensuing deliberations, the GMC recommended that GIABA Secretariat should be equipped with additional staff to enable it meet the demands of accomplishing its AML/CFT mandate; that assistance be provided to Nigeria and other interested member States in their efforts to join FATF; that advocacy missions be undertaken with the authorities of

UEMOA, OHADA and CIMA, urging them to revise and improve the AML/CFT texts and make them compliant with the FATF standards and facilitate the exit of their member States from the ICRG process; UMOA Banking Commission to adopt and implement appropriate tools for risk-based supervision of AML/CFT; and that member States should allocate adequate human, material and financial resources to critical agencies, especially the FIUs, to enhance implementation of AML/CFT measures.



Ministers and Ministers' Representatives at the 24th Meeting of the GIABA Ministerial Committee

GIABA 25th Ministerial Committee Meeting, Saly-Portudal, Senegal, 4th June 2022

246. The 25th GMC Meeting was held on 4th June, 2022 in Saly-Portudal, Senegal. The meeting was preceded by the 37th Technical Commission/Plenary meeting. The meeting considered and approved the Director General's Summary Activity Report; and Report of the GIABA 37th Technical Commission/ Plenary Meetings. It also considered and adopted the 2nd round Mutual Evaluation Reports (MERs) of The Gambia and Togo and encouraged the two countries to address the Priority and Recommended Actions in their reports in order to improve their compliance with AML/CFT international standards. Similarly, the GMC enjoined the GIABA Secretariat to continue to support the two member States to adequately address the deficiencies identified in their AML/CFT regimes. The GMC took note of the presentation on the ICRG Process and Challenges the GIABA Member States under this process are facing. The GMC committed to make proposals to the ECOWAS leadership to take concerted actions to strengthen the region's capacity to fight ML/TF.



From left to right: Mr. Kimelabalou ABA, Director General of GIABA, Ogbeni Rauf AREGBESHOLA, Nigerian Minister of the Interior and S.E.M. Malick SALL, Minister of Justice of Senegal

Risks, Trends and Methods Group (RTMG) / Policy Review Group (PRG) meetings, Saly Portudal, Senegal, 28 November 2022

247. The RTMG/PRG met in hybrid form (virtually and in-person) on Monday, 28th November 2022, in Saly, Republic of Senegal ahead of the Plenary Meeting of the 38th GIABA Technical Commission, to discuss on matters related to its mandate and activities. The meeting, which was co-chaired by the Gambia and Senegal, brought together one hundred and fifty five (155) participants composed of the RTMG/PRG membership, delegates of GIABA member States, the FATF, and other regional and international partners.

248. The meeting provided an overview of the preliminary findings of the typologies study on money laundering and terrorist financing linked to cybercrime in West Africa as well as on the assessment of illicit financial flows, money laundering and terrorist financing associated with maritime crime in the Gulf of Guinea. The main objectives of both studies are to equip practitioners and policy makers of member States with adequate knowledge on these sectors and more importantly to trigger a sectoral risk assessment to better apply mitigation measures and effectively counter the illicit funds generated, transferred and utilized for ML/TF purposes.

249. The RTMG/PRG Meeting heard a summary from the FATF Secretariat in relation to the revised recommendation 24 and the development of a guidance document in relation to the amendment. The meeting also served as platform for the FATF and IMF to present papers on issues related to Recommendations 24 and 25.

Risks, Trends and Methods Group (RTMG) / Policy Review Group (PRG) meetings, Saly Portudal, Senegal, 31 May 2022.

250. The Risks, Trends and Methods Group (RTMG) and Policy Review Group (PRG) met in hybrid form (virtually and in-person) on Tuesday, 31st May 2022, in Saly, Republic of Senegal ahead of the Plenary Meeting of the 37th GIABA Technical Commission, to discuss on matters related to its mandate and activities. The meeting, which was co-chaired by the Gambia and Senegal, brought together one hundred and fifty-five (155) participants composed of the RTMG/PRG membership, delegates of GIABA member States, the FATF, and other regional and international partners - UEMOA, CREPMF, SGCB UMOA Banking Commission, the Central Bank of West African States (BCEAO), West African Development Bank (WADB), Africa Development Bank (AfDB); the Central Banks of Cabo Verde, The Gambia, Ghana, Guinea, Liberia, Nigeria and Sierra Leone, as well as the International Monetary Fund (IMF), the World Bank, the Egmont Group, United Nations Office on Drugs and Crime (UNODC), United Nations (UN), Committee of Intelligence and Security Services of Africa (CISSA), ECOFEL, WAIFEM, BIDC, WAMA, WAMI, GIZ, Expertise France, France, the United States of America, the United Kingdom.

251. The Meeting discussed the preliminary findings and recommendations of the Assessment of the Status of FinTech Deployment in GIABA Member States and related ML/TF risks. It also provided a sharing session on the experience and challenges facing the conduct of National Risk Assessment on legal persons and legal arrangements in GIABA member States and the implementation of the Risk Based Approach (RBA) for AML/CFT purposes. At this Meeting, the FATF Secretariat made a presentation on issues of interests to the GIABA delegates discussed from February to May 2022, at the FATF RTMG/PDG Meetings; while the GIABA Secretariat's updated on the PRG meetings scheduled for 2022, including ongoing sharing sessions by the GIABA and FATF Secretariats.

252. Some delegations emphasised the need to adopt common supervisory frameworks for FinTech under the leadership of the regional supervisory authorities supported by countries that have more experience on the issue; link the outcomes of RTMG/PRG's work with mutual evaluations outcomes, particularly matters bordering on the structural elements required for an effective AML/CFT system (for example, the rule of law); have a legal basis to facilitate seamless collaboration and cooperation between Central Banks and FIUs on AML/CFT issues; and circulate and adhere to timelines of the RTMG/PRG's work. Ghana and Nigeria were urged to work more closely together to provide leadership in the region for the adoption of common standards.

253. The May RTMG/PRG Session heard a presentation from the GIABA Secretariat on the summary of country activity reports covering the period spanning from January to December 2021. It revealed that despite the health constraints related to the COVID-19 Pandemic, several legal and institutional initiatives have been taken by countries to improve their national AML/CFT systems. The Secretariat particularly noted a relatively more encouraging dynamism in the areas of investigations and prosecutions with 61 cases of conviction for ML and 67 cases of seizures and confiscations during the review period. Furthermore, the Secretariat noted an improvement in the reporting activity of reporting entities, with an impressive contribution from the financial sector to suspicious transaction reports, when compared to the DNFBPs sector.

254. On developments in security threats and emerging ML/TF risks, the Secretariat's analysis revealed an increase in terrorist attacks in the region on the period under review, with a higher victimization rate, compared to previous years. The Secretariat further noted relaxed law enforcement, weak capacity of competent AML/CFT authorities and ineffective supervision of reporting entities as the main factors that countries indicated in their reports that may have undermined AML/CFT efforts during the review period. The Secretariat seized the opportunity to invite technical and financial partners to further support the efforts of Member States, particularly in areas requiring urgent attention, namely obtaining sustained political commitment, FIU capacities, the operationality of national coordination committees, risk mitigation and the implementation of action plans affiliated with national AML/CFT strategies.

REGIONAL FIU FORUM

255. The 19th, 20th and 21st meetings of the Forum of the Financial Intelligence Units of GIABA member States were held on February 16, 2022, June 1, 2022 and November 27, 2022, respectively, as part of the preliminary meetings to the 36th, 37th, and 38th GIABA Plenary meetings.

256. The 19th meeting reviewed and adopted the report of its 18th meeting, held in May 2021. It also considered and adopted updates on the activities of the Forum Secretariat, adopted the 2022/2023 Action Plan and took updates on Egmont Group Membership application status of the FIUs of Liberia, Sierra Leone and The Gambia.

257. The 20th meeting of the Forum was held on 1st June 2022. The Forum reviewed and adopted the report of its 19th meeting held in Accra, Ghana, and considered updates on the Egmont Group membership application status of the FIUs of The Gambia, Guinea, Guinea Bissau, Liberia, and Sierra Leone. The Forum also considered and adopted the Progress Report on the Activities of the Forum Secretariat. The Forum appointed Mr. Edwin Woryonwon Harris, the head of the FIU of Liberia as its new Chair for 2022/2023.



The national correspondents and chairpersons of the CRFs/Centifs and the representatives at the Regional Forum on the sidelines of the statutory meetings of GIABA in June 2022 in Saly (Senegal).

258. The 21st meeting of the Forum was held on 27th November 2022. The Forum reviewed and adopted the report of its 20th meeting held in Saly, Senegal, and considered updates on the Egmont Group membership application status of the FIUs of The Gambia, Guinea, Guinea Bissau, Liberia, and Sierra Leone. The Forum also considered and adopted the Report from the Technical Session of the First High-Level Meeting of the Forum that was held in Abuja – Nigeria and the Progress Report on the Activities of the Secretariat and the Forum.

GIABA TECHNICAL ASSISTANCE FORUM

259. The GIABA Technical Assistance Coordination Forum was held on June 1, 2022 and November 28, 2022 respectively. The Secretariat presented a summary of its technical support activities, including technical assistance for member States under ICRG at the June Forum. Similarly, technical partners briefed the Forum of assistance provided to member States between January 2020 and 2021 as well as activities planned for 2022 and how member States can access the TAs. In the same vein, the GIABA Secretariat presented the highlights of the strategic objectives for its Work Plan for 2023 – 2025 and the African Development Bank (AfDB) Grant, as well as the technical assistance portal through which the GIABA Secretariat coordinates, collaborates, and shares information with technical and financial partners regarding technical assistance being provided to member States during the November meeting. Technical and financial partners also presented their current and planned capacity building efforts for the region and opportunities for member States for accessing technical assistance.

260. Member States expressed profound gratitude to the GIABA Secretariat and technical/financial partners for their assistance and underscored the need to sustain the support in order to assist them to adequately address existing and emerging ML/TF challenges in their countries. The Plenary encouraged member States to acquaint themselves with the modalities for securing relevant TA, identify key priorities for further assistance and take full ownership of the on-going support to ensure sustainability. Member States were also encouraged to engage technical and financial partners bilaterally on their TA needs via appropriate channels provided by the partners.

II - REGIONAL AND INTERNATIONAL COLLABORATIVE PROGRAMMES

GIABA/SWAIMS Methodological virtual Workshop on Conducting the Study on ML/TF, IFFs and Maritime Crime in the Gulf of Guinea, 7th January 2022

261. This workshop was organized within the framework of the 11th EDF, and particularly the component relating to the Support of West Africa Integrated Maritime Security (SWAIMS) project on “strengthening integrated maritime security in West Africa” assigned to GIABA. This component relates to the conduct of a study on money laundering, terrorist financing, illicit financial flows and maritime crime in the Gulf of Guinea.

262. The workshop brought together country researchers, SWAIMS project representatives and members of the GIABA Risks, Trends and Methods Working Group (RTMG) and Policy Review Group (PRG) and was aimed at providing methodological orientations to the consultants recruited for the study to ensure that they have a clear and common understanding of the expectations of the study considering the specificities and the complexity of the issues involved in dealing with the link between maritime crime and illicit financial flows. The workshop also served as a platform for exchanges between experts and consultants on good research practices and typologies.

GIABA Secretariat virtual Bilateral Meetings with Member States on Effectiveness Improvement Action Plan, 11th – 12th January 2022 and 23rd - 24th March 2022

263. GIABA held virtual bilateral meetings with authorities of Cabo Verde, Ghana and Côte d'Ivoire from 11th to 12th January 2022, and Benin, Guinea-Bissau, Sierra Leone and Niger from March 23-24, 2022 as part of efforts to mobilize member States towards the implementation of GIABA's Effectiveness Improvement Action Plan (EIAP). This was consistent with Pillar 3 of the EIAP, relating to the commitment/mobilization of Member States, and organized to explain the roles and expectations from member States under the EIAP.

FATF Targeted Online Training on Standards (STC-11) for Anglophone GIABA Member States, 28th March - 7th April 2022

264. The STC-11 was organized by the FATF Training Institute (FATF-TRAIN) and targeted at the AML/CFT stakeholders from Anglophone member States. The main objective was to improve participants' understanding of the FATF AML/CFT standards and enhance the implementation of measures to combat ML/TF. The training was also designed to equip participants who would like to become mutual evaluation assessors. A total of thirty-three (33)

participants drawn from FIUs, Ministries of Justice, Security/Interior and Finance, State Intelligence Services, supervisory authorities and law enforcement agencies and GIABA Secretariat participated in this workshop.

Plenary Meeting of the Global Counter-Terrorism Forum (GCTF), Accra, Ghana, April 21-23, 2022

265. Algeria and Germany, which jointly chair the Global Counter-Terrorism Forum (GCTF) Working Group on Capacity Building in West Africa for the period 2022-2024, invited GCTF members and partners in the region, as well as relevant regional and international organizations, to participate in the Fourth Plenary Meeting of the Working Group, which took place in Accra, Ghana, on June 21-23, 2022. The GIABA Secretariat was also invited to participate as an Expert to deliver a paper on Terrorism Financing from a West African perspective.

266. The main objective of this meeting was to assess the implementation, cooperation and capacity building efforts deployed with regard to the priority areas identified by the co-chairs of the West Africa Capacity Building Working Group in their 2019-2022 Work Program on the one hand, and to discuss the needs and challenges in preventing and combating terrorism and violent extremism that may lead to terrorism in the West African context, with a view to developing the Working Group's agenda for the period 2022-2024.

267. The meeting was effectively attended by one hundred and twenty (120) participants representing experts in the security and justice sector, as well as policy makers from West African member states and countries in the region that are not members of the GCTF, including Germany, France, the United States, the United Kingdom, Russia, China, Saudi Arabia, Mali, Burkina Faso, etc., as well as representatives of regional and international organizations including ECOWAS, CTED, IJJ, Interpol, UNDP, ACSRT, G5 Sahel, Accra Initiative etc.

268. Highlights of the findings include the need to develop and coordinate intelligence-led cross-border interagency operations to interdict trafficking in explosive precursor chemicals, CBRN materials, and IED components. Competent authorities were also called upon to strengthening the security network by building and equipping police stations (water, solar panels, vehicles, thematic maps of border areas, etc.) and outposts to bring security closer to the population in border areas.

WAIFEM Regional Virtual Training on Anti-Money Laundering and Other Financial Crimes, 16th – 20th May, 2022

269. GIABA supported the delivery of the WAIFEM's Regional Training on AML/ CFT and Other Financial Crimes from 16 – 20 May, 2022. Consistent with its objectives, GIABA collaborated with WAIFEM in the delivery of this program by providing expert and also sponsoring other regional experts as resource persons to facilitate at the program. This is part of its collaborative efforts to strengthen the capacity of relevant stakeholder institutions to ensure effective implementation of AML/ CFT regimes in the region. Discussions at the program focused on emerging AML/CFT issues, including threat of ML/TF and challenges posed by FinTech and cryptocurrencies; financial crimes and production of fraudulent

documents (identity theft, credit cards, visas and passports, forgery crimes, etc.); designing anti-money laundering compliance systems for implementation in financial institutions; customer due diligence: the link to a robust AML/CFT framework.

FATF Secretariat Virtual Training and Sharing Session for ECG Co-Chairs and GIABA Technical Commission/Plenary, 18th May, 2022

270. The training / sharing session was organized by FATF as part of efforts to strengthen the capacity ECG Co-chairs and Chair of GIABA Technical Commission / Plenary meeting on how to effectively manage mutual evaluation discussions in ECG and the TC/Plenary. The Chair of the GIABA Technical Commission, all ECG Co-chairs and some representatives of the Secretariat participated in the training.

9th Annual General Assembly of the Asset Recovery Inter-Agency Network for West Africa (ARINWA), 5 - 9 December 2022, Pullman Hotel, in Abidjan, Côte d'Ivoire

271. The 9th Annual General Meeting of the Asset Recovery Inter-Agency Network for West Africa (ARINWA) was held from December 05 to 09, 2022, at the Pullman Hotel in Abidjan, Côte d'Ivoire. This meeting was organized by the Government of the Republic of Côte d'Ivoire with the technical and financial support from the United Nations Office on Drugs and Crime (UNODC) and the German Agency for International Cooperation (Gesellschaft für Internationale Zusammenarbeit-GIZ), through its Global Program to Fight Illicit Financial Flows.

272. Among the participants, were representatives of relevant institutions and agencies of GIABA member states, GIABA Secretariat, the African Union Commission; the Coalition for Dialogue on Africa (CODA) of the Secretariat of the African Union High Level Panel on Illicit Financial Flows; the Inter-Agency Network on Asset Recovery for East Africa (ARINEA); the Inter-Agency Asset Recovery Network for Southern Africa (ARINSA); the Central Directorate of the French Judicial Police; the Committee for the Safeguarding of Integrity (CSI) of Madagascar; the Anti-Corruption Pole (PAC) of Madagascar; the Agency for the Recovery of Illicit Assets (ARAI) of Madagascar; and the Agency for the Management and Recovery of Criminal Assets of Côte d'Ivoire.

273. The main objective of this session was to present the Activity Report of 2022 and the objectives of the 2021-2026 Strategic Plan. The following activities were carried out during the review period: (i) Development of an integrated and comprehensive information system linked to the Secretariat. (ii) Development of communication tools; (iii) Establishment of information exchange and sharing platforms; (iv) establishment of a WhatsApp group of Focal Points, and which includes thirty-nine (39) members to date. The Session reiterated to the GIABA Secretariat the ARINWA's request to become an observer to GIABA. It has also requested GIABA to support the President of ARINWA to explore the feasibility of its institutional anchoring.

Joint FATF-GABAC-GIABA Assessors' Training (JAT-2022), Douala, Cameroon, 4th -8th July, 2022

274. The FATF Joint Assessors Training (JAT-2022) was jointly organized by FATF, GABAC and GIABA for French-speaking assessors, to strengthen the capacity of the pool of assessors for the finalization of the 2nd cycle of mutual evaluations.

Retreat on the Finalization of the Community Strategic Framework 2023-2027, Lomé, Togo, 3rd - 7th October 2022.

275. GIABA participated and contributed to the retreat on the finalization of the Community Strategic Framework (CSF) 2023-2027. The retreat provided opportunity for GIABA to draw inspiration that assisted it in the finalization of its 2023-2027 Strategic Plan and ensure its alignment with the ECOWAS Vision 2050.

INTERPOL Financial Crime and Anti-Corruption Centre (IFCACC) - Training Workshop on Anti-Corruption, Financial Crimes and Asset Recovery, Jakarta, Indonesia, 4th - 6th October 2022

276. GIABA participated virtually and made presentation on regional experience.

INTERPOL Regional Capacity Building on Financial Investigations related to Maritime Piracy in West Africa, Lome, Togo, 10th – 14th October 2022

277. This specialized training was organized by INTERPOL for law enforcement authorities to enhance their capacity on financial investigations relating to maritime piracy and/or other organized maritime criminal activities. The main objective of the program was to promote cooperation between law enforcement authorities responsible for maritime security and financial investigation to address the regional/international dimension of financial investigations. GIABA participated and share regional perspectives.

Regional Webinar on Fighting Transnational Organized Crime, Terrorist Financing and Money Laundering on 12th – 13th October 2022

278. This workshop was organized by ACSRT to allow experts and participants to share their experiences on measures to combat ML/TF/F and the TOC, including: the identification of vulnerabilities and threats as well as proposals for appropriate measures to strengthen the fight against illicit financial flows through the sharing of experiences. GIABA participated and shared regional perspectives.

National Capacity Building Workshop on Financial Investigations related to Maritime Piracy in West Africa under the AGWE-INTERPOL Project, 10-14 October 2022 - Lome, Togo

279. The Gulf of Guinea is a strategic crossroads and a hub of global trade. Oil from Nigeria and other oil-producing countries are transported through these strategic waters, as do goods to and from the rest of Africa and other regions. Criminals target merchant ships and their crews along West African trade routes. Given the diversity and transnational nature of the threats, law enforcement agencies in the various countries involved are to cooperate and collaborate to ensure the safety and security of the maritime space.

280. The AGWE project, an INTERPOL initiative in collaboration with the U.S. Department of State's Bureau of International Narcotics Control and Law Enforcement (INL), is building the capacity of maritime law enforcement agencies in five (5) countries in the Gulf of Guinea

- **Benin, Côte d'Ivoire, Ghana, Nigeria, and Togo** - by linking investigators and prosecutors and facilitating inter-agency collaboration.

281. It is within this framework that INTERPOL invited GIABA to co-facilitate at the national training on financial investigations in Lome, Togo from October 10 to 14, 2022. This workshop brought together twenty-four (24) participants composed of Magistrates, Sailors, Gendarmes, and Police Officers, all of whom have the status of Judicial Police Officers.

282. The objectives of the workshop were to improve the skills and capacities of Togolese national criminal justice officials to effectively investigate, prosecute and adjudicate cases of money laundering and terrorist financing related to the maritime sector; and also to facilitate the sharing of experiences among key personnel of services involved in the detection, investigation and prosecution of economic and financial crimes committed at sea in West African coastal member states.

Virtual regional workshop on the fight against money laundering, terrorist financing and transnational organized crime in GIABA member States, 12-13 October 2022

283. The consequences of terrorism on the African continent are of great concern. The links between ML, TF and the TOC in all regions of Africa is well documented. Researchers have established that the TOC has become an integral facilitator of terrorist operations through direct financing, logistical facilitation, including smuggling, cross-border physical transportation of cash and other negotiable bearer instruments, human trafficking, kidnapping for ransom, maritime piracy, illicit exploitation and trafficking of mineral and wildlife resources, and counterfeiting. In view of the foregoing, African Union through its African Center of Research and Studies (ACSRT) took leading role to curb these crimes.

284. At the invitation of the ACSRT (AU), the GIABA Secretariat participated in a virtual meeting on AML/CFT and CTO. This initiative to which UNODC, Interpol, AFRIPOL, GIABA, GABAC, ESAAMLG and MENAFATF have been associated aimed to provide a platform for exchanges between African FSRBs on AML/CFT methods and trends as well as on TOC threats prevalent in the region. In addition to providing opportunity to note the efforts made on both sides, the common challenges and good practices, particularly in terms of international cooperation, it also served as an advocacy forum for the ACSRT with a view to calling for the pooling of operations. The GIABA Secretariat delivered a series of communications on the above-mentioned challenges, especially in terms of the emerging TF trends.

FATF-FSRBs Secretariat Training on the Conduct of Mutual Evaluations, Manama, Bahrain, 26th - 30th June, 2022 and Paris, France, 21st – 25th November 2022

285. GIABA Secretariat participated in the two FATF-FSRBs Secretariat Trainings to enhance the capacity of Secretariat staff to manage the conduct mutual evaluations of member States in accordance with the FATF Standards and the FATF Methodology for assessing both technical compliance and effectiveness of the AML/CFT systems.

Joint GIABA-OCWAR-M Regional Workshop on the Development of National Strategies and Action Plan for Member States' Inter-Ministerial Committees/National Coordination Committees, Saly, Senegal, 31st October – 2nd November 2022

286. GIABA in collaboration with Expertise France, under the EU OCWAR-M project, conducted an assessment of the state of the AML/CFT Coordination Committees in West Africa (plus Mauritania, a non-GIABA/ECOWAS country). To implement the recommendations of the assessment, GIABA and the Expertise France jointly organized this workshop to support the Inter-Ministerial Committees (IMCs) / National Coordination Committees (NCCs) in member States on understanding their roles and responsibilities.



The Director General of GIABA, Mr Edwin HARRIS Jr. surrounded by the participants of the meeting

287. The workshop was part of GIABA's efforts to help revive and strengthen the work of the IMCs and create a Forum which will serve as a coordination mechanism for member States IMCs/NCCs. The forum will further serve as a platform for technical partners to provide support to member States for the development of relevant AML/CFT/P activities, development of action plans and strategies and their implementations.

Workshop on the Development of the GIABA 2023 – 2027 Strategic Plan, Saly, Senegal, 12th - 16th October 2022 and Validation Workshop, Saly, Senegal, 22nd November 2022

288. The main objective of the October workshop was to develop GIABA's 2023-2027 Strategic Plan. Participants were drawn from member States including the National Correspondents and key members of GIABA staff. The workshop provided the opportunity for the stakeholders to carry out a thorough analysis of GIABA's internal and external environment

within the context of the fight against money laundering and terrorism financing. The following four pillars were identified as the main focus of GIABA's action in the next five years: i) Improving the organizational effectiveness of the GIABA Secretariat; ii) Enhancing national coordination, collaboration and international cooperation; iii) Improving the performance of AML/CFT stakeholders; and iv) Enhancing risk understanding and compliance.

289. As an integral part of ECOWAS, steps were taken to ensure that the development of the Strategic Plan aligns with the ECOWAS Community Strategic Framework (CSF) with direct contribution to pillars one (outcome 1.1.1.7 - Proliferation of small arms and light weapons and transnational organized crime are reduced) and three (outcome 3.1.2.4 - Improved financial integrity) of the ECOWAS Vision 2050.

290. A second workshop was organised on November 22, 2022, to validate the Strategic Plan.

1st High-Level Summit of the Forum of FIUs of the GIABA Member States, Abuja, Nigeria 8th - 10th November 2022

291. The Summit and the General Assembly of the Forum of FIUs (FFIUs) of GIABA Member States was organized by the Secretariat of the Forum. GIABA participated at the summit to offer support, and encouragement for a better AML/CFT regime in the region. The main outcome of the summit was the need for collaboration, information sharing, and cooperation amongst member FIUs to effectively combat money laundering, terrorism financing and other forms of trans-national organized crimes.

GIABA Public-Private Sectors Consultative Forum: Cooperation and Coordination in the Implementation of AML/CFT Measures in GIABA Member States, Saly, Senegal, 26th November 2022

292. GIABA organized its median edition of the Public-Private Sectors Consultative Forum under the theme: Cooperation and Coordination in the Implementation of AML/CFT Measures in GIABA Member States at the Palm Beach Hotel, Saly, Senegal, on November 26, 2022.

293. The programme was aimed at promoting the adoption and best practices of public-private partnership (PPP) amongst GIABA members. Specific objectives included providing a platform for: (a) sharing experiences on public-private partnership in the implementation of AML/CFT measures from other regions; (a) discussing benefits partnership can bring to the next level of effectiveness, challenges of public-private sector cooperation and proffer solutions to facilitate the shared responsibility of effective implementation of AML/CFT measures in the region; and (d) galvanizing support for the development of public-private partnership (PPP) across member States to effectively address ML/TF and associate predicate offences.



The Director General of GIABA Mr Edwin W. HARRIS Jr answering questions from journalists

294. The Forum provided an opportunity for stakeholders to reflect and develop a deeper understanding on the benefits that partnership can bring to the next level of effectiveness, challenges of public-private sector cooperation and what needs to be done to strengthen PPP in the implementation of AML/CFT measures in the region.

295. The Forum was attended by Seventy (70) officials drawn from the public and private sectors and representatives from development partners.

III - INTERNATIONAL MEETINGS

43rd Meeting of the Working Group (Plenary) of Senior ESAAMLG officials, Arusha, Tanzania, 3rd – 8th April 2022

296. The GIABA Secretariat participated in the 43rd Meeting of the ESAAMLG Plenary in Arusha, Tanzania, from 3rd to 8th April 2022. GIABA's participation in the meeting was to strengthen regional alliances and collaboration with the FSRBs and to share experiences and exchange best practices.

Joint virtual FATF/GIABA Secretariats meeting on the GIABA Effectiveness Improvement Action Plan (EIAP), 22nd April 2022

297. This meeting was held at the initiative of the FATF Secretariat to create an opportunity for engagement between the GIABA Secretariat and the FATF Contact Group to discuss critical issues with regard to the Effectiveness Improvement Action Plan (EIAP). The overall objective was to assist the FATF Contact Group to better assess ongoing progress and to

facilitate reporting of progress to the FATF Plenary in June 2022. Issues discussed include staff recruitment, the transition arrangements for the incoming/ new DG and the completion of the second round of mutual evaluations.

FATF Plenaries, Paris, France, 21st - 25th February 2022; Berlin, Germany, 13th - 17th June, 2022; and Paris, France, 17th - 20th October 2022,

298. GIABA participated in the three (3) Plenary meetings of FATF held in 2022. These meetings discussed and adopted the MERs of some member States of FATF and FSRBs, as well as Follow-Up Reports of some FATF member States. Other important outcomes of these meetings include adoption of the Strategic vision for the Global Network, New beneficial ownership standards to combat money laundering (by revising Recommendation 24 and its Interpretive Note). In addition, FATF has completed the strategic review in order to make the next (5th) round of mutual evaluations more focused, timely and effective. Other issues discussed that are relevant to GIABA are summarized below:

- **Progress report on the implementation of individual FSRB roadmaps:** FATF Plenaries welcomed the progress made by all the FSRBs in implementing their roadmaps and noted that at this stage, they were all well on track to complete their round of mutual evaluations in line with the FATF expectations, despite the challenges related to COVID-19 and a number of risks and dependencies some of them have been grappling with in terms of funding and resources. The FSRBs discussed their latest developments in ME, highlighting the benefits of receiving support from FATF members and the FATF Secretariat to build the knowledge base and expertise of the Secretariat staff and assessors, and calling for the continuation of this type of support activity. The Plenary also took note of the challenges some FSRBs have been grappling with in terms of funding and Secretariat staffing. In particular, GIABA and GABAC have been grappling with severe resource scarcities that could prevent them from completing the ME round and follow-up processes on time. It was against this backdrop that the Plenary urged all FSRBs to ensure that they have adequate resources in pursuit of their core objectives to produce timely and quality reports and requested the FATF Secretariat to monitor developments on this issue.
- **Improving GIABA's Effectiveness:** FATF Plenaries approved the 2nd, 3rd, and 4th Progress Reports on the implementation of GIABA's Effectiveness Improvement Action Plan (EIAP) and urged GIABA to lay emphasis on the key priorities already identified as well as other impending actions. The FATF noted the progress made since October 2021, including a higher quality of recently adopted MERs, the design of tools for managing and monitoring the pool of assessors and more effective involvement of certain Member States. The Plenary also noted that the effectiveness and impact of a number of measures taken were yet to be demonstrated, and expressed particular concern over the non-alignment of GIABA's 2022 Work Plan with the Action Plan and the need to prioritize ME/Follow-up exercises, the heavy reliance on the wave of impending recruitments despite the lack of a skills mapping at the Secretariat, as well as changes at the helm of the GIABA Secretariat scheduled for mid-2022, and the limited commitment and lack of ownership by majority of member States to support the work of GIABA;
- With respect to GIABA member States under ICRG process, FATF Plenaries discussed the progress made by Burkina Faso, Mali and Senegal in the implementation of their respective action plans agreed with the ICRG Africa and Middle East Joint Group reports. The October Plenary urged the countries to continue to implement their action plans and

ensure high-level political commitment for a swift exit from the ICRG monitoring process. GIABA expects to see some member States that meet the prioritization criteria going into the ICRG process after exit from the one year observation period. Overall, GIABA is taking steps to provide necessary technical support to the countries, especially in the implementation of their action plans.

Egmont Group Meetings, Riga, Latvia, 10th -15th July 2022

299. The GIABA Secretariat took part in the 28th Plenary of the Egmont Group held in Riga, Latvia, from July 10-15, 2022, as part of efforts to strengthen its partnership and collaboration with the Egmont Group.

300. The main highlights of the meeting that are relevant to the region include, the approval of Senegal to host the 2023 Egmont Working and Regional Groups Meetings from January 30 to 3 February 2023 in Dakar, Senegal; and the award of the StAR (Stolen Asset Recovery) trophy to Nigeria. Important lessons for the region from the thematic discussions during the meeting include: multilateral information exchange can enhance FIUs effectiveness; FIUs should actively participate in domestic intelligence exchange partnership to understand priorities that they will be tasked to implement; FIUs should be able to prioritize and deprioritized based on changing environment, and FIU should match government priorities with their capabilities to deliver against the needs, and identify the most appropriate tools and measures to do so.

301. Membership application status of GIABA member FIUs (Guinea Bissau, Liberia, The Gambia and Sierra Leone) to the Egmont Group Updates was discussed. These member States are at various levels of the application process. The admission of these countries will strengthen their national AML/CFT efforts and, ultimately, facilitate the achievement of GIABA's overall objectives. Consequently, GIABA will continue to work with and prioritize support to these member FIUs to promote their eligibility for membership.

ICRG Africa/Middle East Joint Group Meeting, Livingston, Zambia, 6th – 14th September 2022.

302. GIABA participated in the ICRG Africa/Middle East Joint Group meeting. The progress reports of GIABA members (Senegal, Burkina Faso, and Mali) among others were discussed. GIABA's participation was to provide technical support to the member States. The ICRG did not approve the POPR schedule for Benin that recently met the ICRG's broad money threshold. Instead, the discussion of whether to schedule a POPR for Benin is postponed until February 2023, at which time ICRG will consider whether the ML/TF risk situation of the country warrants review, with reference to the risk factors in section 5 of the ICRG Procedures.

FATF-INTERPOL Roundtable Engagement (FIRE), Singapore, 12th - 13th September 2022

303. At the invitation of the FATF and International Criminal Police Organization (INTERPOL), GIABA participated in the inaugural FATF-INTERPOL Roundtable Engagement (FIRE) on tackling global financial crime through enhanced international collaboration and enabling recovery of greater asset. The key takeaway was the need for countries to strengthen informal and formal cooperation and ensure parallel investigation as well as seizure of assets when dealing with financial crimes. The Roundtable brought together

key stakeholders such as law enforcement agencies, financial intelligence units, prosecutors, policymakers and regulators, asset recovery offices/networks, regional and international organizations, as well as the financial institutions).

Technical meeting and 3rd Ministerial Conference on counter terrorist financing “No Money for Terror”, September 2022 (virtual) and New Delhi, India, 18th – 19th November 2022

304. GIABA participated virtually in the technical meeting on “**No Money for Terror**” organized by the Counter Terrorism Executive Directorate (CTED) in September 2022 and physically in the 3rd Ministerial Conference on Counter Terrorist Financing at the invitation of the Government of India held in New Delhi.

305. The 3rd Ministerial Conference reemphasized the agenda of the integrated approach and collective involvement adopted by the 1st Ministerial Conference held in Paris in 2018 and further agreed in the 2nd Conference in 2019 in Australia. The 3rd conference focused on the inclusion of the technical aspects of the various facets of terrorist financing.

National Capacity Building Workshop for Members of the National AML/CFT Committee of Senegal, 22-23 November 2022, Dakar, Senegal

306. A national capacity building workshop for members of the National AML/CFT Coordination Committee (CNC-LBC-FT) of Senegal was held from November 22 to 23, 2022 in Dakar. The workshop was conducted by the Senegalese Authorities in partnership with GIZ and the CENTIF of Senegal, and with the support of the GIABA Secretariat.

307. The main objective of the workshop was to strengthen the capacities of the members of the National AML/CFT Committee on the emerging issues occasioned by the FATF requirements in the context of the ICRG close supervision process.

308. The workshop was attended by about fifty (50) participants. The themes covered at the workshop include: (i) Basic AML/CFT concepts; (ii) Overview of the forty (40) FATF recommendations; (iii) The role of the Coordination Committee with regard to Senegalese Law No. 2018-03 of February 23, 2018 on AML/CFT; (iv) Emerging ML/TF typologies; (v) Mutual Evaluation methodology; and (vi) Mutual Evaluation and National Risk Assessment: Constraints and challenges.

309. The workshop recommended among others the following, that: (i) national competent authorities should provide the National Coordination Committee with adequate human, financial, material, and technical resources to enable them to fully carry out their roles and responsibilities. And (ii) GIABA and its technical partners should continue to build the capacity of the National AML/CFT Committee members. Another high point of the Workshop is the call on the judicial authorities to create a centralized and interconnected inter-agency database (Register of Companies) that can provide information on the creation and life of commercial companies in order to supervise beneficial owners.

CHAPTER 7: SUPPORT SERVICES AND ADMINISTRATION, MONITORING & EVALUATION

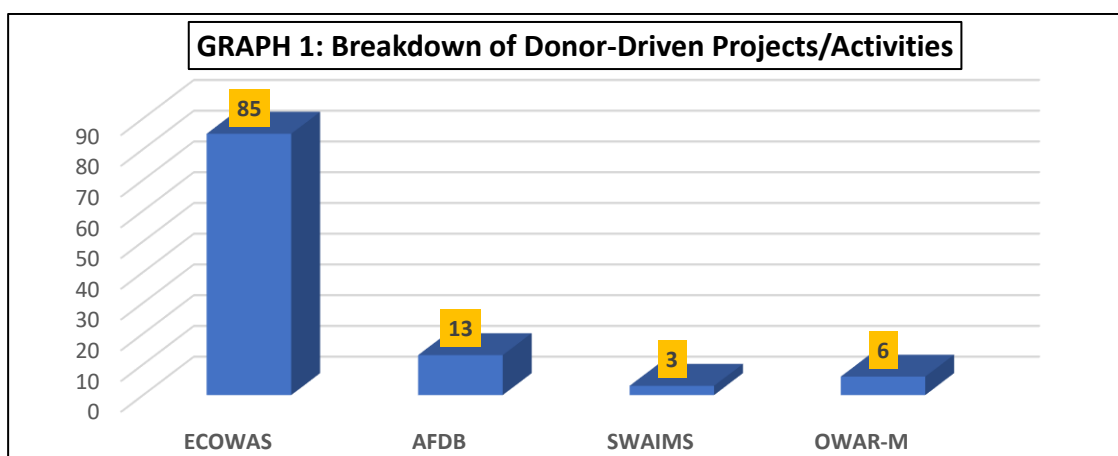
INTRODUCTION

310. In line with established practice, GIABA organized its operational planning workshop, in Saly, from 22nd to 24th November 2021 to facilitate adequate preparation for year 2022 activities,. This annual activity was designed to ensure good planning in time and space, and hitch-free implementation of the 2022 planned projects/activities approved by the ECOWAS Council of Ministers

311. As a result of COVID-19 pandemic, the completion of the GIABA 2016-2020 Strategic Plan could not be achieved as originally envisaged. Thus, the year 2022, like the preceding 2021, was a year earmarked for the consolidation of the objectives mapped out within the framework of the 2016-2020 Strategic Plan, pending the adoption of the new 2023-2027 Strategic Plan, currently being developed. It should be noted that GIABA has evaluated the implementation of the 2016-2020 Plan which has come to an end. This chapter provides an overview of the operational planning which determines the distribution of the projects/activities based on the objectives, implementation responsibilities, status of implementation of the activities according to period and those pending, presentation of the objectives as well as the results framework of the new 2023-2027 Strategic Plan.

OPERATIONAL PLANNING OF 2022 WORK PLAN PROJECTS/ACTIVITIES

312. At the end of the operational planning exercise held in November 2021, one hundred and seven (107) projects/activities in six (6) program areas were approved in GIABA's 2022 Work Plan. Also, in the course of the year, four (4) activities were brought forward from the previous year and three new programs were added following the signing of agreements with the European Union (OCWAR-M and SWAIMS) or pending of signature by the African Development Bank (AfDB). These donor-driven projects/activities were distributed as follows



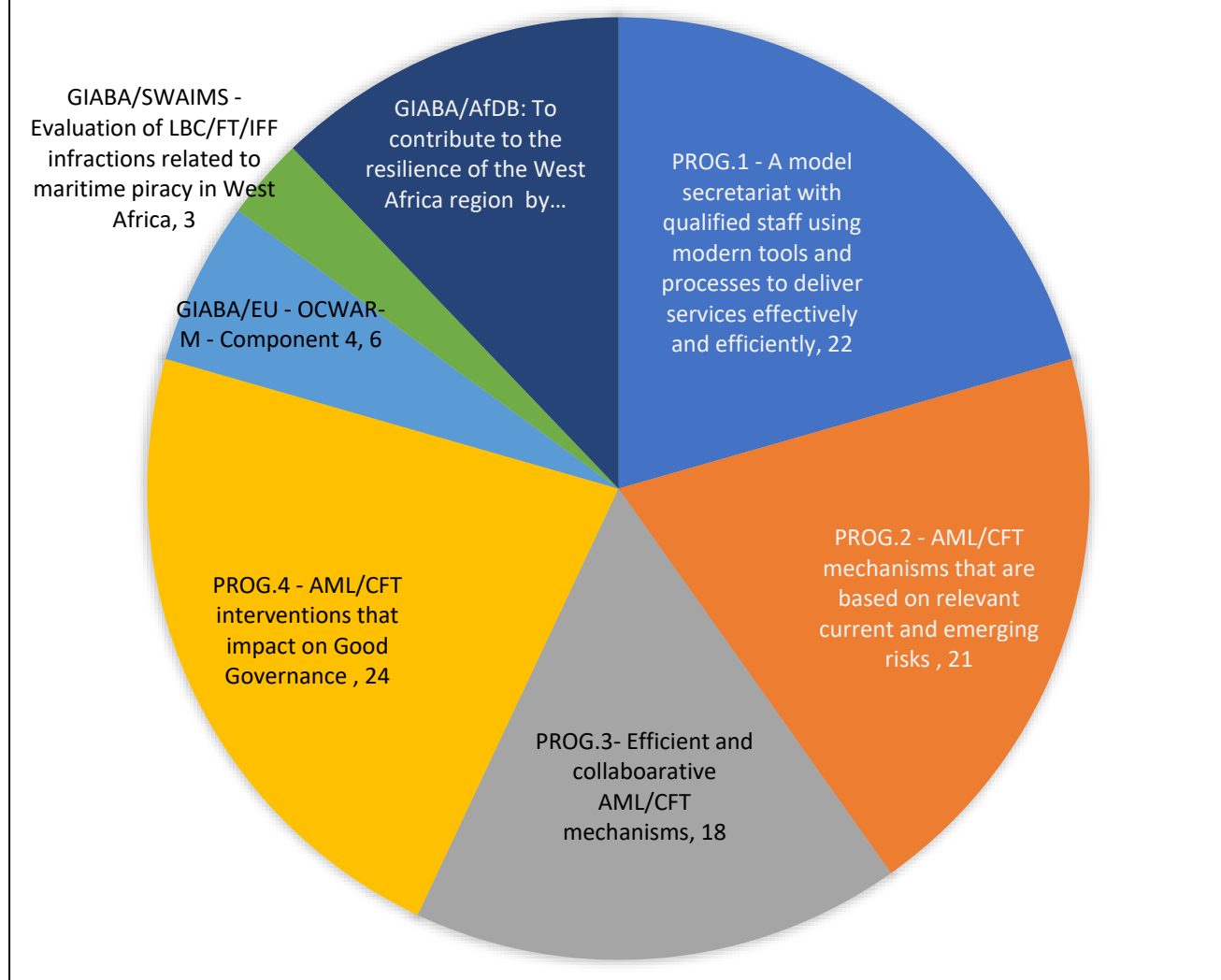
¹⁰OCWAR-M and SWAIMS are European Union (EU) funded projects/activities.

313. The projects/activities based on the main programs selected were distributed as follows:

TABLE 1: MAIN PROGRAMS	Number of Projects/Activities
PROG.1 - A model Secretariat with skilled staff equipped with modern tools and processes to effectively and efficiently deliver services	22
PROG.2 - AML/CFT systems based on relevant current and emerging risks	21
PROG.3- Effective and collaborative AML/CFT regimes	18
PROG.4 - AML/CFT interventions impacting Good Governance	24
GIABA/EU - OCWAR-M - Component 4	6
GIABA/SWAIMS - Assessment of ML/TF/IFF offences relating to maritime piracy in West Africa	3
GIABA/AfDB: Contributing to the resilience of the West African region by improving Anti-money Laundering and Counter Financing of Terrorism regimes and building the capacity of transitional States in West Africa 'West.	13
TOTAL	107

314. It should be noted that the six (6) projects/activities under Component 4 of OCWAR-M are designed to strengthen those contained in Program 1 and contribute to the same strategic objective of improving the GIABA Secretariat's working conditions. The OCWAR-M component is being implemented through a project team set up at the Secretariat.

GRAPHIQUE 2: DISTRIBUTION OF PROJETS/ACTIVITIES BY PROGRAMME



315. The projects/activities approved following the operational planning could not all be confirmed for implementation. Indeed, the thirteen (13) projects/activities under the agreement with the AfDB were step down in GIABA's 2022 Work Plan then postponed to 2023, due to the delay in signing the Financing Agreement. Consequently, the total planned projects/activities for 2022 was reduced to a portfolio of ninety-four (94) projects/activities.

316. In terms of the responsibility for the implementation of the projects/activities, the Directorate-based distribution was as follows:

TABLE 2: RESPONSIBILITY FOR IMPLEMENTATION

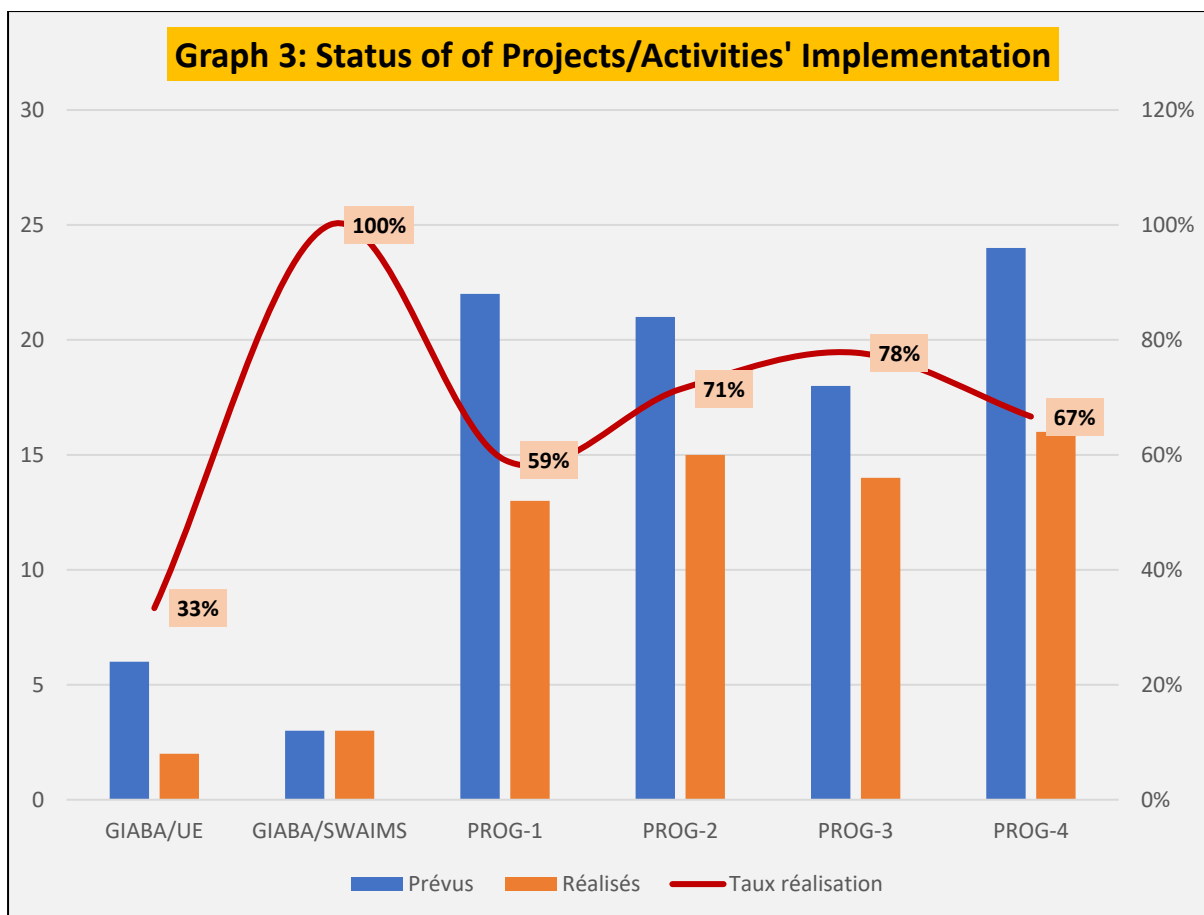
Directorates	No. of Planned Projects/Activities	No. of Confirmed Projects/Activities in 2022
DGO	25	24
DAF	16	16
DRP	22	19
DEC	44	35
TOTAL	107	94

IMPLEMENTATION OF 2022 WORK PLAN PROJECTS/ACTIVITIES

317. Following there scheduling of the thirteen (13) projects/activities provided for in the Financing Agreement with the African Development Bank, GIABA's Work Plan for 2022 reduced from one hundred and seven (107) to ninety- seven (94) projects/activities to be implemented. At the end of the review period, the completion level of the said projects/activities is captured in Table 3 below.

Table 3: PROGRAM	Number of Projects/Activities	Planned	Completed	Completion rate
GIABA/EU - OCWAR-M - Component 4	6	6	2	33%
GIABA/SWAIMS - Assessment of ML/TF/IFF to the Maritime Crimes in WA	3	3	3	100%
GIABA/AfDB: Contribute to resilience in the West African Region through improved AML/CFT regimes and capacity development for West African Transition States	13	-	-	-
PROG.1 - A model Secretariat with appropriately skilled staff using modern tools and processes to effectively and efficiently deliver services	22	22	13	59%
PROG.2 - AML/CFT Regimes that are based on pertinent current and emerging risks	21	21	15	71%
PROG.3- AML/CFT Regimes that are effective and collaborative	18	18	14	78%
PROG.4 - AML/CFT Interventions that impact positively on good governance	24	24	16	67%
TOTAL	107	94	63	67%

318. At the end of the review period, the overall implementation rate of the 2022 Work Plan was 67%. The implementation rates for program areas is about 60%, while “GIABA/UE-OCWAR-M” Program recorded a 33% implementation rate.



319. The low implementation rate of the "GIABA/EU-OCWAR-M" program is attributed to alacuna observed while GIABA and the EU Delegation were negotiating an amendment to the financing.

DEVELOPING THE NEW 2023 - 2027 STRATEGIC PLAN

320. GIABA launched its new strategic planning cycle during the fourth quarter of 2022. To ensure harmonization across all ECOWAS Institutions and Agencies, the period 2023-2027 was agreed as common cycle for development of the Strategic Plans. Thus, against this backdrop GIABA organized from 13th to 18th October 2022, two successive diagnostic and planning workshops. These workshops were preceded by a sharing session of the outcomes of the independent assessment of the implementation of the 2016-2020 Strategic Plan.

321. To promote ownership and inclusiveness of stakeholders, GIABA adopted a participatory approach by enlisting key staff at the Secretariat and the and the National Correspondents or their representatives in the development of the new 2023-2027 Strategic Plan. Consequently, GIABA organised planning sessions with the following outcomes.

- **Outcomes of Planning Session**

322. At the end of the working sessions with the support of an independent Consultant, the participants resolved to achieve GIABA Vision 2050, sustain the actualization of GIABA's mandate and its core values which are as follows.

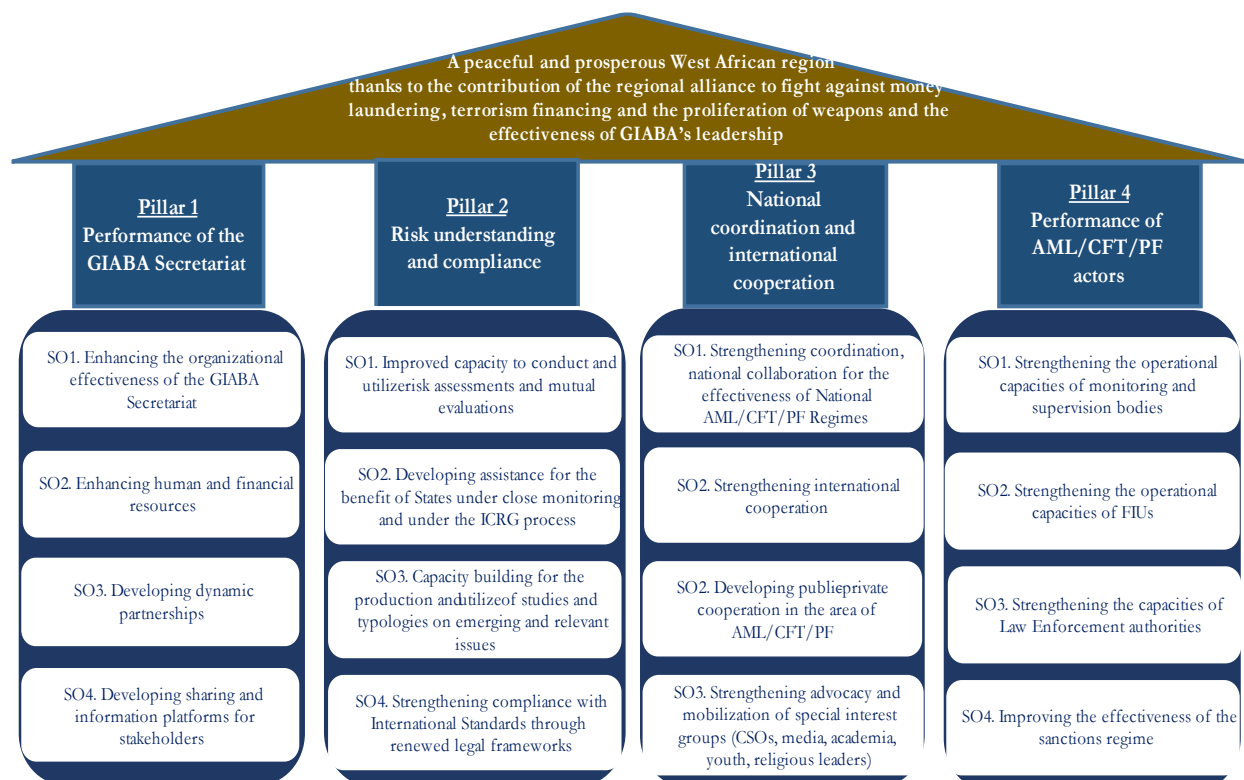
- **GIABA Vision 2050:** “A peaceful and prosperous West African region through inputs from the regional alliance to combat money laundering, financing of terrorism and the proliferation of arms of mass destruction as well as the effectiveness of GIABA's leadership.”
- **GIABA's Key Mandates:**
 - To facilitate and ensure the adoption by member States of measures against money laundering, terrorist financing and the proliferation of weapons of mass destruction, in accordance with internationally accepted standards and practices, in particular the FATF Recommendations, taking into account the specific regional particularities and conditions;
 - To serve as a forum for dialogue and knowledge sharing among member States on issues of regional interest, thereby enhancing intra-regional cooperation;
 - To organize self-evaluation and mutual evaluation exercises of member States based on the FATF Methodology;
 - To coordinate and provide support to member States for the implementation of robust AML/CFT/PF regimes, including the enforcement of laws against the proceeds of crime through Mutual Legal Assistance (MLA) and the strengthening of the Financial Intelligence Units (FIUs).
- **GIABA's Cardinal Values**
 - ⇒ ***Integrity*** : This is one of the Institution's fundamental values owing to the nature of its mandate and its responsibility in supporting the development of an effective response against ML, TF and PF. Consistent with its mandate and with a view to optimizing its credibility, GIABA makes integrity a cardinal value in all its actions and interactions, both internally and externally. Putting this value into practice imposes a responsibility of moral probity, exemplarity, honesty and respect for rules and standards on all staff and stakeholders in GIABA's action. For the Institution, it translates into its loyalty to the rules and principles it promotes and to those it has prescribed. It also translates into a responsibility of justice, impartiality and fairness in every decision or action.
 - ⇒ ***Professionalism***: This refers to all behaviors and attitudes likely to ensure the full effectiveness of GIABA's action. The practice of professionalism is demonstrated by all staff members and actors in charge of implementing the intervention through the development of competences, skills and optimal qualities in the provision of services and achievement of the Institution's mandate. For GIABA, professionalism translates into the priority given to the swift implementation and monitoring of all interventions and the promotion of rigor, competence and skills conducive to optimum performance.
 - ⇒ ***Respect for diversity***: This takes on its full significance in an organizational and action-oriented environment characterized by diversity and multiculturalism. Respect for diversity must be reflected in every decision and intervention, particularly through the promotion of equality and inclusion, as well as respect for differences and for others. Putting this value into practice translates for GIABA into the requisite construction of a common culture, a summary reference and a vehicle for the successful integration of all categories of Staff. It is manifested by taking the necessary measures to respect balance in terms of representation of countries and categories of Member States in Staff recruitment and the carrying out of interventions, including taking into account linguistic diversity in communication. Respect for diversity also concerns the

promotion of gender equality by and within the Institution. It also covers equal access for all to opportunities and interventions.

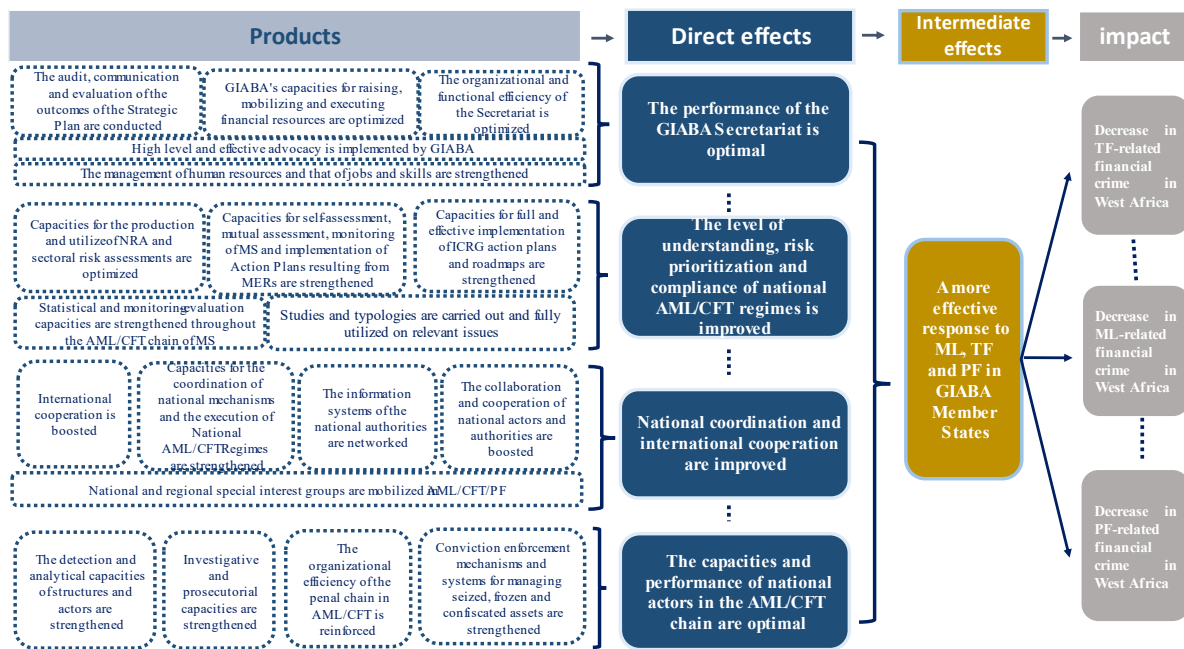
⇒ **Solidarity** is an issue of efficiency for the GIABA Secretariat and the alliance of national and regional actors in charge of the fight against ML/TF/PF. Through this value, GIABA promotes collaboration and mutual support at all levels of its action and that of its partners. From the perspective of organizational efficiency, putting **solidarity** into practice translates into the continuous effort to optimize the methods of communication, knowledge sharing and access to information for all. From the regional alliance perspective, solidarity translates into the implementation of effective mechanisms of coordination and international cooperation. At Member States' level, it refers to the priority given to the frank and effective collaboration of all players in the AML/CFT/PF chain in order to guarantee the full effectiveness of the response.

- **Framework of the 2023-2027 Strategic Plan**

323. At the end of the workshop, the main conclusions of the planning workshop focused on building a strategic framework with pillars to support the vision and strategic objectives which will guide the development of future programs.



324. To drive the management and performance monitoring of the 2023-2027 Strategic Plan., the following logical framework was adopted in accordance with the Results-Based Management (RBM) approach.



325. The GIABA 2023-2027 Strategic Plan was validated at a workshop held on 22nd November 2022 and then approved by the 38th GIABA Technical Commission/Plenary on 29th November 2022. The 2023-2027 Strategic Plan now constitutes the benchmark for developing GIABA's annual work programs over the defined period. In addition, it will serve as the basis for providing any intervention support by development partners.

CONCLUSION

326. During the review period, GIABA maintained impressive trends in the implementation of its programs, despite the institutional transition that occurred in mid-2022. The status of implementation of planned projects/activities stood at 67% against 52% in 2021. In harmony with the other ECOWAS Institutions, GIABA has concluded the development of a new Strategic Plan spanning 2023-2027. The approved Strategic Plan will serve as a guide seeking and/or providing intervention programs by developments for GIABA member State. Regular monitoring of its progress and performance evaluation shall be undertaken to keep the implementation by all the stakeholders on track.

CHAPTER 8: ADMINISTRATION AND FINANCE MATTERS

Introduction

327. The year 2022, administrative and financial activities were guided by the annual work plan as part of efforts to complete the implementation of the GIABA 2016 – 2020 Strategic Plan. The Admin and Finance activities consist of Human Resources, General Administration (maintenance, procurement; language services, travels; protocols, and transport), and Finance.

Organizational Structure

328. In line with the approval by the ECOWAS Council of Ministers, GIABA is implementing the pooling framework comprising human resources, finance and administrative functions for both GIABA Secretariat and the ECOWAS Gender Development Centre (EGDC). With the consolidated organogram, GIABA focused on the delivery of its mandate as provided in its enabling statute.

Staffing

329. Within the year 2022, the Director of Evaluation and Compliance, Dr. Buno Nduka retired from GIABA upon attaining the required retirement age. In his place, Dr. Jeffery Isima was appointed Acting Director. Also, upon completion of the statutory tenure of four (4) years non-renewable for ECOWAS Statutory appointees, Mr. Kimelabalou Aba, the Director General disengaged from the system and the new Director General, Mr. Edwin. Harris Jr took over the leadership of the institution on August 1, 2022. As at December 31, 2022, there were fifty-five (55) staff made of thirty-four (34) males and twenty-one (21) females in the following job categories:

S/N	Category	Number
1	Statutory (Director General)	1
2	Director ¹¹	3
3	Professional Staff ¹²	20
4	General Staff	32
Total		55

330. The age distribution of the staff compliment of GIABA Secretariat is as follows;

30 - 39 years	40 - 49 years	50 - 59 years	60 and above
4	25	25	1

¹¹ One in Acting capacity

¹² One in Acting capacity

331. There were about twenty-six (26) vacant positions in the approved organogram with twenty-three (23) already advertised while three (3) are on hold. Eighteen (18) of the vacant positions will be filled competitively at the institutional level. The GIABA Secretariat has commenced the procurement of the services of a professional Human Resource firm to undertake the exercise, and the entire recruitment process is expected to be completed in the third quarter of 2023. The remaining positions will be handled by the Management Succession Committee of ECOWAS Institutions. The process is expected to attract the best personnel from within the GIABA Secretariat and outside the Secretariat from ECOWAS member States.

General Administration Service

Institutional Events

Staff Retreat and Other Social Activities

332. Part of the strategy to foster collective responsibilities and promote inclusiveness of all staff in the implementation of GIABA mandate is the institutionalization of Annual Staff Retreat. Consequently in 2022, through the instrumentalities of the Director General, the 2022 GIABA Staff Retreat was organised from November 4 – 5, 2022 in Saly, Senegal. Unlike previous editions of the Retreat, participation at the Retreat was open to colleagues from the EGDC within the framework of GIABA/EGDC Pooling mechanism on Administrative, Finance and Human Resources activities. A total of fifty-nine (59) persons participated in the Retreat. The themes covered at the Retreat were how to promote effective and efficient work environment. The Retreat afforded the participating staff the opportunity in an open and objective manner to assess the performance of the institutions vis-à-vis its mandate, identify challenges and make far-reaching recommendations for improving the system. At the end of the Retreat, the Director General established a committee to develop an action plan for implementing the recommendations.

International Women's Day, 8 March 2022

333. Gender equality is one of the Millennium Sustainable Development Goals (SDGs) and a key principle in ECOWAS regional integration. As part of efforts by management to demonstrate its commitment to the realization of this goal, GIABA celebrated the International Women's Day at GIABA Secretariat on 8 March 2022. Management used the occasion to acknowledge the tremendous contributions by the female colleagues to the success of GIABA. The event was crowned with the presentation of gifts by the Director General to all female staff of GIABA.

Staff General Assembly/Town Hall Meeting

334. On his first day at work, August 1, 2022, the Director General, Mr. Edwin W. Harris Jr held an interactive session with all staff of GIABA through in-person and virtual participation. The new DG used the opportunity to present his vision for his tenure (next four years) and solicited the cooperation and commitment of every staff towards the achievement of the set goals. Mr. Harris Jr also highlighted what he intended to do differently to facilitate the attainment of the vision. Principally, the DG emphasised the creation of a reward system that promotes discipline, commitment and productivity.

Financial Management

Funding

335. The year under review, GIABA was supported with funds from the following:

Source of Funds	Percentage Contribution	Key Funding Activities
ECOWAS Community Levy Funds	97%	Staff Salaries, Programs, Administrative and Capital Expenditure
Donor/Partners	3%	Capacity building

Budget Implementation

336. The 89th Ordinary Session of the ECOWAS Council Ministers approved a budget of UA 10,634,021 for the implementation of GIABA's 2022 activities, representing a 0% increase in funds made available to the institution over the previous year. This budget was expected to be financed at 97% (representing UA 10,326,569) from Community Levy and 3% (representing UA 307452) from external funds. During the period under review, about 73% of the budget provision was implemented.

Audit of Financial Statements

The Office of the Auditor General of ECOWAS institutions will conduct the annual audit of the GIABA books in May 2023.



GIABA ANNUAL REPORT 2022

We thank all our member States, FATF Secretariat, and our Technical and Financial Partners for your continued support in our efforts in effective implementation of AML/CFT/PF.

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