



First Follow-Up Report

Anti-Money Laundering and Combating the Financing of Terrorism

25 September 2009

Grenada

GRENADA – FIRST FOLLOW-UP REPORT

I. Introduction

1. This report presents an analysis of Grenada’s report to the CFATF Plenary regarding progress made to correct the deficiencies identified in its third round Mutual Evaluation Report. The third round Mutual Evaluation Report of Grenada was adopted by the CFATF Council of Ministers in May 2009 in Trinidad and Tobago. Grenada has submitted information in the attached matrix on measures taken since the Mutual Evaluation to comply with the examiners’ recommendations. Based on the review of actions taken by Grenada to meet the recommendations made by the examiners, a recommendation will be made as to whether Grenada should remain on enhanced follow-up or be placed on regular follow-up. Grenada was rated partially compliant or non-compliant on 10 Core and Key Recommendations and 25 other Recommendations. The Core and Key Recommendations are indicated in italics in the table below.

Partially Compliant (PC)	Non-Complaint (NC)
<i>R. 1 (ML offence)</i>	<i>R. 5 (Customer due diligence)</i>
R. 14 (Protection & no tipping-off)	R. 6 (Politically exposed persons)
R. 17 (Sanctions)	R. 7 (Correspondent banking)
R. 20 (Other NFBP & secure transaction)	R. 8 (New technologies & non face-to-face business)
<i>R. 23 (Regulation, supervision and monitoring)</i>	R. 9 (Third parties and introducers)
R. 25 (Guidelines & Feedback)	R. 11 (Unusual transactions)
R. 30 (Resources, integrity and training)	R. 12 (DNFBP – R.5,6,8-11)
R. 31 (National co-operation)	<i>R. 13 (Suspicious transaction reporting)</i>
R. 32 (Statistics)	R. 15 (Internal controls, compliance & audit)
<i>R. 35 (Conventions)</i>	R. 16 (DNFBP – R.13-15 & 21)
<i>SR. I (Implement UN instruments)</i>	R. 18 (Shell banks)
<i>SR. V (International co-operation)</i>	R. 19 (Other forms of reporting)
	R. 21 (Special attention for higher risk countries)
	R.22 (Foreign branches & subsidiaries)
	R. 24 (DNFBP – regulation, supervision and monitoring)
	R.33 (Legal persons – beneficial owners)
	R. 34 (Legal arrangements – beneficial owners)
	<i>SR. II (Criminalise terrorist financing)</i>
	<i>SR. III (Freeze and confiscate terrorist assets)</i>
	<i>SR. IV (Suspicious transaction reporting)</i>
	SR. VI (AML requirements for money value transfer services)
	SR. VII (Wire transfer rules)
	SR. IX (Cross Border Declaration & Disclosure)

II. Summary of progress made by Grenada

2. Since the MER, the authorities in Grenada have begun to assess the various means to achieve compliance. The main focus of the authorities is instituting changes in the legal framework including consolidation of previous statutes, legislative amendments to specific laws and proposals for new legislation. A Legal Drafter has been engaged in reviewing the relevant statutes and draft legislation is being prepared. This process is almost complete and draft legislation will be presented to Parliament shortly.

Recommendation 1

4. The recommendations have been adopted and incorporated into draft legislation. The Supervisory Authority is due to issue guidelines regarding the recommendation requiring the inclusion of all narcotic drugs and psychotropic substances listed in the Vienna Convention. Definitive action to implement these measures is to be taken. Accordingly, this Recommendation remains outstanding.

Recommendation 5

5. The recommendations have been adopted and incorporated into draft legislation. Accordingly, this Recommendation remains outstanding.

Recommendation 6

6. Further discussions are planned by the authorities to deal with the examiners' recommendations. This Recommendation remains outstanding.

Recommendation 7

7. The examiners' recommendations have been adopted and incorporated into the draft revised Proceeds of Crime Bill 2009. This Recommendation remains outstanding.

Recommendation 8

8. The examiners' recommendations have been adopted and incorporated into the draft revised Proceeds of Crime Bill 2009. This Recommendation remains outstanding.

Recommendation 9

9. The examiners' recommendations have been adopted and incorporated into the draft revised Proceeds of Crime Bill 2009. This Recommendation remains outstanding.

Recommendation 11

10. The examiners' recommendations have been adopted and incorporated into the draft revised Proceeds of Crime Bill 2009. This Recommendation remains outstanding.

Recommendation 12

11. The examiners' recommendations have been adopted and incorporated into the draft revised Proceeds of Crime Bill 2009. Training and public awareness programs for the DNFBPs are being considered. This Recommendation remains outstanding.

Recommendation 13

12. Further discussions are planned by the authorities to deal with the examiners' recommendations. This Recommendation remains outstanding.

Recommendation 14

13. The examiners' recommendations have been adopted and incorporated into the draft revised Proceeds of Crime Bill 2009. This Recommendation remains outstanding.

Recommendations 15 - 17

14. Further discussions are planned by the authorities to deal with the examiners' recommendations. These Recommendations remains outstanding.

Recommendation 18

15. The examiners' recommendations are being reviewed by a consultant who will make proposals for legislative amendments.

Recommendations 19 - 23

16. Further discussions are planned by the authorities to deal with the examiners' recommendations. These Recommendations remain outstanding.

Recommendation 24

17. The examiners' recommendations have been adopted and incorporated into draft legislation.

Recommendation 25

18. The examiners' recommendations have been adopted and incorporated into a draft FIU Bill. The Recommendation remains outstanding.

Recommendation 30

19. Further discussions are planned by the authorities to deal with the examiners' recommendations. This Recommendation remains outstanding.

Recommendation 31

20. The authorities advise that public education will be included in the responsibility of the Supervisory Authority. Information on the implementation of this matter will have to be submitted. This recommendation remains outstanding.

Recommendation 32

21. Further discussions are planned by the authorities to deal with the examiners' recommendations. This Recommendation remains outstanding.

Recommendation 33

22. Authorities advise that the examiners' recommendations will require legislative amendments. This recommendation remains outstanding.

Recommendation 34 to 35

23. Further discussions are planned by the authorities to deal with the examiners' recommendations. These Recommendations remain outstanding

Special Recommendation I to VIII

24. Further discussions are planned by the authorities to deal with the examiners' recommendations. These Recommendations remain outstanding.

Special Recommendation IX

25. The authorities advise that a document outlining a disclosure system for passengers is being developed for Customs. The examiners' recommended threshold for such disclosure system has been included in a draft Customs Act which is due to be passed by all Organization of Eastern Caribbean States (OECS) in the first quarter of 2010. New x-ray and scanner equipment is to be acquired for Customs. Discussions have been held with the Permanent secretary of the Ministry of Finance to have Custom officers attached to the FIU to allow for joint training programmes. The Supervisory Authority will also be providing training. Systems for information sharing, domestic co-operation and reporting of cross-border transactions are to be improved. Since the above measures remain to be implemented, this Recommendation remains outstanding.

III. Conclusion

26. Since the finalization of the MER in May this year, the authorities in Grenada have sought to implement measures to deal with some of the examiners' recommendations in a short space of time. As noted above, the main focus of the authorities in Grenada are measures designed to change the AML/CFT legislative framework either by amending or drafting legislation. This process is well advanced and legislation should be enacted shortly. Once enacted, these statutes will need to be evaluated for compliance with the examiners' recommendations. Additionally, the resources of the Supervisory Authority have been enhanced and a public education and awareness programme is to be implemented. Further discussions are planned to determine measures for those recommendations that have not been addressed. Given the above, all recommendations remain outstanding. It is therefore recommended that Grenada remain on enhanced follow-up and be required to report to the next Plenary on measures to implement recommendations in the MER.

**Matrix with Ratings and Follow Up Action Plan 3rd Round Mutual Evaluation
Grenada**

Forty Recommendations	Rating	Summary of factors underlying rating	Recommended Actions	Undertaken Actions
Legal systems				
1. ML offence	PC	<ul style="list-style-type: none"> The list of psychotropic substances in DAPCA is not in accordance with the list under the Vienna Convention The list of predicate offences for ML does not cover five (5) of the FATF's designated category of offences, particularly trafficking in human beings and migrant smuggling, counterfeiting and piracy of products, environmental crime and piracy or terrorist financing offence of providing or receiving money or other property in support of terrorist acts. The low number of ML convictions suggests ineffective use of ML provisions given the wide range of measures available under the legislation. 	<ul style="list-style-type: none"> The authorities should consider pursuing ML as a stand-alone offence. Schedules I to III of DAPCA should be amended to include all narcotic drugs and psychotropic substances listed in Tables I and II of the Vienna Convention. The authorities should extend the range of predicate offences for ML to include all the FATF designated categories of offences i.e. trafficking in human beings and migrant smuggling, counterfeiting and piracy of products, environmental crime and piracy and the terrorist financing offence of providing or receiving money or other property in support of terrorist acts. 	<p>Recommendation has been adopted and has been approved in draft legislation.</p> <p>Supervisory Authority to issue guidelines, as regulation</p> <p>Recommendation has been adopted and has been approved in draft legislation.</p>
2. ML offence – mental element and corporate liability	LC	<ul style="list-style-type: none"> The low number of money laundering convictions suggest ineffective use of ML provisions 	<ul style="list-style-type: none"> The authorities should consider consolidating the three pieces of legislation governing money laundering. Having the MLPA, POCA 1992 and POCA 2003 in force with differing penalties for ML and definitions for certain key terms will give rise to confusion and has affected the ability of law enforcement and prosecutorial authorities to aggressively pursue ML offences. 	<p>Drafter retained to consolidate Money Laundering (Prevention) Act, the Money Laundering (Prevention) (Amendment) Act, 2003, the Proceeds of Crime Act, 1992 and the Proceeds of Crime (Amendment) Act, 1993</p>
3. Confiscation and provisional measures	LC	<ul style="list-style-type: none"> Ineffective implementation of the forfeiture and freezing regime. 	<ul style="list-style-type: none"> Given the high rate of drug-related offences occurring in Grenada, authorities should place greater emphasis on the automatic confiscation mechanism following conviction available to the DPP in accordance with POCA 1992 and 2003 	<p>Recommendation has been adopted and has been approved in draft legislation.</p>

Preventive measures				
5. Customer due diligence	NC	<ul style="list-style-type: none"> • CDD measures are required when there is suspicion of money laundering and only with one-off transactions • CDD measures for wire transfers are for occasional transactions over US\$10,000 rather than over the FATF US\$1,000 limit. • CDD measures are not required when there are doubts about the veracity of previously obtained due diligence • No provision to verify that any person purporting to act on behalf of the customer is so authorised, and identify and verify the identity of that person • No requirement in law or regulation for the verification of identification of customers • No provision to understand the ownership and control structure of customers that are legal persons or legal arrangement • No provision to determine the natural persons that ultimately own or control the customer • No requirement for financial institution to obtain information on the purpose and intended nature of the business relationship • No legislative provision for financial institutions to conduct ongoing due diligence to include scrutiny of transactions and ensuring that CDD documents and information are kept up-to-date 	<ul style="list-style-type: none"> • Competent authorities may consider carrying out a national risk assessment to determine the risk of money laundering and terrorist financing to enable the application of reduced or simplified anti-money laundering and counter terrorist financing measures. • Competent authorities should consider making the Guidelines mandatory and enforceable with effective, proportionate and dissuasive sanctions. • Regulations or legislative amendments should be introduced to require CDD measures when there is suspicion of money laundering or terrorist financing and for occasional transactions over US\$1,000 that are wire transfers. • Regulations or legislative amendments should be introduced for financial institutions to be required to undertake CDD measures where there are doubts about the veracity or adequacy of previously obtained CDD. • Regulations or legislative amendments should be introduced for financial institutions to be required to verify that any person purporting to act on behalf of the customer is so authorised, and identify and verify the identity of that person. • Financial institutions should be legislatively required to verify the identification of customers. • Financial institutions should be required to understand the ownership and control structure of customers that are legal persons or legal arrangements • Financial institutions should be legislatively required to determine the natural persons that ultimately own or control the customer • Financial institutions should be required to obtain information on the purpose and intended nature of the 	Recommendation has been adopted and has been approved in draft legislation.

		<ul style="list-style-type: none"> • No requirement for financial institutions to perform enhanced due diligence for higher risk categories of customer • The exemptions for reduced or simplified CDD measures are not justified on the basis of low risk • No requirement for financial institutions to limit simplified or reduced CDD measures to non-resident customers from countries that the authorities are satisfied are in compliance with FATF Recommendations • No provisions prohibiting simplified CDD measures whenever there is suspicion of money laundering or terrorist financing • No requirement for financial institutions to apply CDD measures to existing customers on the basis of materiality and risk. 	<p>business relationship.</p> <ul style="list-style-type: none"> • Legislative amendments should be introduced to require that financial institutions and other relevant persons apply ongoing due diligence measures to their client base. This should include scrutiny of transactions and ensuring that CDD documents and information are kept up-to-date. • Financial institutions should be required to perform enhanced due diligence for higher risk categories of customers. • Financial institutions should be required to limit the application of simplified or reduced CDD measures to non-resident customers from countries that the authorities in Grenada are satisfied are in compliance with FATF Recommendations. • Simplified CDD measures should be prohibited whenever there is suspicion of money laundering or terrorist financing. • Financial institutions should be required to terminate a business relationship if the verification of a customer cannot be completed. • Financial institutions should be required to perform CDD measures on existing clients and to conduct due diligence on existing relationships at appropriate times. Financial institutions should also be required to review and consider closing existing accounts where due diligence is inadequate against the requirements of Recommendation 5. 	
6. Politically exposed persons	NC	<ul style="list-style-type: none"> • No requirement for financial institutions to have appropriate risk management systems to determine whether a potential customer, a customer or the beneficial owner is a PEP. • No requirement for financial institutions to obtain senior management approval for establishing a business relationship with a PEP or continuing one with a customer who becomes 	<ul style="list-style-type: none"> • Financial institutions should be required to have appropriate risk management systems to determine whether a potential customer, a customer or the beneficial owner is a PEP. • Financial institutions should be required to obtain senior management approval for establishing a business relationship with a PEP or continuing one with a customer who becomes a PEP. 	Further discussions are planned to determine specific measures

		<ul style="list-style-type: none"> • a PEP. • No requirement for financial institutions to take reasonable measures to establish the source of wealth and the source of funds of customers and beneficial owners identified as PEPs. • No requirement for financial institutions to conduct enhanced ongoing monitoring on relationships with PEPs 	<ul style="list-style-type: none"> • Financial institutions should be required to take reasonable measures to establish the source of wealth and the source of funds of customers and beneficial owners identified as PEPs. • Financial institutions should be required to conduct enhanced ongoing monitoring on relationships with PEPs. • Grenada should undertake steps to sign the 2003 United Nations Convention against Corruption. 	
7. Correspondent banking	NC	<ul style="list-style-type: none"> • No requirement for financial institutions to gather sufficient information about a respondent institution to understand the nature of the respondent's business and to determine from publicly available information the reputation of the institution and the quality of supervision.. • No requirement for financial institutions to have written procedures to obtain and assess the anti-money laundering procedures and CDD procedures of a respondent institution. • No requirement for financial institutions to obtain approval from senior management to establish new correspondent relationships in all cases. • No requirement for financial institutions to document the respective AML/CFT responsibilities of each institution in cross-border correspondent relationships • No requirement for financial institutions to be satisfied that respondent financial institutions have performed all the normal CDD obligations on customers who have access to "payable-through accounts" and can provide relevant customer identification data upon request 	<ul style="list-style-type: none"> • Financial institutions should be fully aware and document a respondent institution's circumstances: - this should include details of its business, management, regulated status and other information that may be publicly available or available upon request for the purposes of establishing a relationship. • Financial institutions should be required to have written procedures to obtain and assess the anti-money laundering procedures and CDD procedures of a respondent institution. • Financial institutions should be required to obtain approval from senior management to establish new correspondent relationships in all cases. • Financial institutions should document the respective AML/CFT responsibilities of each institution in cross-border correspondent relationships • Financial institutions should be satisfied that respondent financial institutions have performed all the normal CDD obligations on customers who have access to "payable-through accounts" and can provide relevant customer identification data upon request. 	Recommendation has been adopted and has been approved in Draft Legislation (draft revised Proceeds of Crime Bill 2009)
8. New technologies & non face-to-face business	NC	<ul style="list-style-type: none"> • No requirement for financial institutions to have policies in place that mitigate the misuse of technological developments by money laundering and/or terrorist financing schemes. • No requirement for financial institutions to have 	<ul style="list-style-type: none"> • Financial institutions should be required to have policies in place that mitigate the misuse of technological developments by money laundering and/or terrorist financing schemes. • Financial institutions should be required to have 	Recommendation has been adopted and has been approved in Draft Legislation (draft revised Proceeds of Crime Bill 2009)

		written procedures and a suitably robust risk management framework that mitigates the risks associated with non-face to face transactions. Measures for mitigating risks should include specific and effective CDD procedures that apply to non-face to face customers	written procedures and a suitably robust risk management framework that mitigates the risks associated with non-face to face transactions. Measures for mitigating risks should include specific and effective CDD procedures that apply to non-face to face customers.	
9. Third parties and introducers	NC	<ul style="list-style-type: none"> • No requirement for financial institutions relying upon a third party to immediately obtain from the third party the necessary information concerning certain elements of the CDD process (criteria 5.3 to 5.6) • No requirement for financial institutions to take adequate steps to satisfy themselves that copies of identification data and other relevant documentation relating to CDD requirements will be made available from the third party upon request without delay • No requirement for financial institutions to satisfy themselves that the third party is regulated and supervised (in accordance with Recommendations 23, 24 and 29) and has measures in place to comply with the CDD requirements set out in R.5 and R.10 • Unable to assess whether competent authorities in determining the list of countries that are recognised as having AML regimes equivalent to Grenada, used information as to whether these countries adequately applied FATF standards • No specific provision that ultimate responsibility for customer identification and verification remain with the financial institution relying on the third party. 	<ul style="list-style-type: none"> • Financial institutions should be required to immediately obtain from introducers the necessary information concerning certain elements of the CDD process (criteria 5.3 to 5.6). • Financial institutions should be required to test agreements with third parties to ensure that CDD held satisfies the provisions of Recommendations 5 and 10. This testing should also confirm whether information can be provided by the third party without delay. • Financial institutions should be required to satisfy themselves that the third party is regulated and supervised in accordance with Recommendations 23, 24 and 29. • Competent authorities should consider the issuance of a list of jurisdictions that adequately apply the FATF Recommendations, for third parties that may operate in foreign jurisdictions. • Amendment to legislation or guidance to stipulate that the verification and identification of a client remains the responsibility of the financial institution, regardless of whether or otherwise it has relied on a third party to conduct the verification and identification of the client 	Recommendation has been adopted and has been approved in Draft Legislation (draft revised Proceeds of Crime Bill 2009)
10. Record keeping	LC	<ul style="list-style-type: none"> • No legislation to require financial institutions to maintain records of account files and business correspondence for a period of at least five years after the completion of a business relationship. 	<ul style="list-style-type: none"> • Amend legislation to require financial institutions to maintain records of account files and business correspondence for a period of at least five years after the completion of a business relationship. 	Recommendation has been adopted and has been approved in Draft Legislation (draft revised Proceeds of Crime Bill 2009)

11. Unusual transactions	NC	<ul style="list-style-type: none"> No requirement for financial institutions to examine the background and purpose of large, complex and unusual transactions or unusual patterns of transactions that have no apparent or visible economic or lawful purpose and to set forth their findings in writing. No requirement to maintain written records from the findings of reviews of complex, unusually large or unusual patterns of transactions for competent authorities for at least five years 	<ul style="list-style-type: none"> Guidance and legislation should be amended to require financial institutions to examine the background and purpose of all complex, unusual large transactions or unusual patterns of transactions that have no apparent or visible economic or lawful purpose and to set forth their findings in writing. Guidance and legislation should be amended to require financial institutions to retain written findings from the review of complex, unusually large or unusual patterns of transactions for no less than five years. 	Recommendation has been adopted and has been approved in Draft Legislation (draft revised Proceeds of Crime Bill 2009)
12. DNFBP – R.5, 6, 8-11	NC	<ul style="list-style-type: none"> Dealers in precious metals and precious stones are not included in the AML/CFT regime Deficiencies identified for financial institutions with regard to Recs. 5, 6, 8 to 11 are also applicable to DNFBPs. Lack of awareness of requirements by DNFBP resulting in ineffective implementation of AML/CFT obligations 	<ul style="list-style-type: none"> Deficiencies identified for financial institutions with regard to Recs. 5, 6, 8 to 11 are also applicable to DNFBPs. Specific recommendations in the relevant sections of this report will also apply to DNFBPs. Authorities should consider specific training and/or awareness programs to educate DNFBPs about AML/CFT requirements Dealers in precious metals and precious stones should be subject to AML/CFT requirements in accordance with FATF standards 	<p>Recommendation has been adopted and has been approved in Draft Legislation (draft revised Proceeds of Crime Bill 2009)</p> <p>Recommendation has been adopted for training and public awareness programs for DNFBPs.</p>
13. Suspicious transaction reporting	NC	<ul style="list-style-type: none"> The obligation to submit suspicious transaction reports does not apply to the proceeds of all FATF predicate offences. Requirement to report STRs relating to the financing of terrorism is discretionary and does not include funds used for terrorism or by terrorist organisations or those who finance terrorism No requirement to report all suspicious transactions including attempted transactions regardless of the amount of the transaction. No requirement to report suspicious transactions 	<ul style="list-style-type: none"> The authorities should extend the range of predicate offences for ML to include all the FATF designated categories of offences by criminalising trafficking in human beings and migrant smuggling, counterfeiting and piracy of products, environmental crime and piracy and the terrorist financing offence of providing or receiving money or other property in support of terrorist acts. The TA should be amended to make the reporting of suspicious transactions relating to financing of terrorism mandatory and include funds used for terrorism or by terrorist organisation or those who finance terrorism All suspicious transactions, including attempted 	Further discussions are planned to determine specific measures

		<p>regardless of whether they are thought, among other things to involve tax matters.</p> <ul style="list-style-type: none"> The reporting of suspicious transactions is ineffective. 	<p>transactions should be legislatively required to be reported regardless of the amount of transaction</p> <ul style="list-style-type: none"> The requirement to report suspicious transactions should apply regardless of whether they are thought, among other things to involve tax matters. 	
14. Protection & no tipping-off	PC	Tipping off offence does not include disclosure of the fact that a STR concerning money laundering is being reported or provided to the FIU	<ul style="list-style-type: none"> The POCA, 2003 should be amended to extend the tipping off offence to include disclosure of the fact that a STR concerning money laundering is being reported or provided to the FIU 	Recommendation has been adopted and has been approved ed in draft revised Proceeds of Crime Act
15. Internal controls, compliance & audit	NC	<p>No requirement for financial institutions to establish and maintain internal procedures, policies and controls to prevent money laundering and financing of terrorism.</p> <p>The requirement for financial institutions to develop appropriate compliance management arrangements which include at a minimum the designation of an AML/CFT compliance officer at management level is not enforceable.</p> <p>The requirement for AML/CFT compliance officer and other appropriate staff to have timely access to customer identification data and other CDD information, etc is not enforceable.</p> <p>No requirement for financial institutions to maintain an adequately resourced and independent audit function to test compliance with the procedures, policies and controls.</p> <p>No requirement for financial institutions to train all staff on an ongoing and regular basis to ensure that employees are aware of money laundering and terrorist financing mechanisms, as well as the requirements of anti-money laundering and counter-terrorist financing laws and their obligations under these laws.</p> <p>The requirement for financial institution to put in place screening procedures to ensure high standards when hiring employees is not enforceable.</p>	<ul style="list-style-type: none"> All financial institutions should be required to establish and maintain internal procedures, policies and controls to prevent money laundering and financing of terrorism. The requirement for financial institutions to develop appropriate compliance management arrangements which include at a minimum the designation of an AML/CFT compliance officer at management level should be enforceable. The requirement for AML/CFT compliance officer and other appropriate staff to have timely access to customer identification data and other CDD information, etc should be enforceable. Financial institutions should be required to maintain an adequately resourced and independent audit function to test compliance with the procedures, policies and controls. All financial institutions should be required to train all staff on an ongoing and regular basis to ensure that employees are aware of money laundering and terrorist financing mechanisms, as well as the requirements of anti-money laundering and counter-terrorist financing laws and their obligations under these laws. The requirement for financial institution to put in place screening procedures to ensure high standards 	Further discussions are planned to determine specific measures

			when hiring employees should be enforceable	
16. DNFBP – R.13-15 & 21	NC	<ul style="list-style-type: none"> Dealers in precious metals and precious stones are not included in the AML/CFT regime Deficiencies identified for financial institutions with regard to Recs. 13 to 15 and 21 are also applicable to DNFBPs. Lack of awareness of requirements by DNFBP resulting in ineffective implementation of AML/CFT obligations 	<ul style="list-style-type: none"> Deficiencies identified for financial institutions with regard to Recs. 13 to 15 and 21 are also applicable to DNFBPs. Specific recommendations in the relevant sections of this report will also apply to DNFBPs. Authorities should consider specific training and/or awareness programs to educate DNFBPs about AML/CFT requirements Dealers in precious metals and precious stones should be subject to AML/CFT requirements in accordance with FATF standards 	Further discussions are planned to determine specific measures
17. Sanctions	PC	<ul style="list-style-type: none"> Sanctions under the POCA and MLPA are inconsistent in severity. Additionally, the application of sanctions has to go through the courts and no broad range of sanctions are available for breaches of statute 	<ul style="list-style-type: none"> Authorities should amend the POCA and the MLPA to ensure that sanctions are consistent and broad in range 	Further discussions are planned to determine specific measures
18. Shell banks	NC	<ul style="list-style-type: none"> No provision to prevent the establishment of a shell bank. No provision applicable to financial institutions to prevent them from entering into or continuing correspondent relationships with shell banks. No requirement for financial institutions to satisfy themselves that respondent financial institutions in a foreign country do not permit their accounts to be used by shell banks. 	<ul style="list-style-type: none"> Legislative amendments should be effected to prohibit the establishment and licensing of a shell bank. The amendment should also require an entity licensed under the Offshore Banking Act, 2003 to have its mind and management within Grenada. Amend legislative provisions to prevent financial institutions from entering into or continuing correspondent relationships with shell banks. Amend legislation to require financial institutions to satisfy themselves that respondent financial institutions in a foreign country do not permit their accounts to be used by shell banks. 	Currently being reviewed by a consultant who will make recommendations for their improvement.
19. Other forms of reporting	NC	<ul style="list-style-type: none"> The authorities have not considered the feasibility and utility of implementing a system where financial institutions report all transactions in currency above a fixed threshold to a national central agency. 	<ul style="list-style-type: none"> Competent authorities should consider the feasibility and utility of implementing a system where financial institutions report transactions in currency above a prescribed threshold to a centralised national authority. 	Further discussions are planned to determine specific measures
20. Other NFBP & secure transaction	PC	<ul style="list-style-type: none"> Unable to assess whether consideration has been given to apply FATF recommendations to non-financial businesses and professions other than DNFBPs 		
21. Special attention for higher risk countries	NC	<ul style="list-style-type: none"> Requirement for financial institutions to pay special attention, to business relationships and transactions with persons from or in countries 	<ul style="list-style-type: none"> Mandatory requirements should be imposed on financial institutions to pay special attention, to business relationships and transactions with persons 	Further discussions are planned to determine specific measures

		<p>which do not or insufficiently apply the FATF Recommendations is not enforceable.</p> <ul style="list-style-type: none"> • No measures to ensure that financial institutions are advised of concerns about the weaknesses in the AML/CFT systems of other countries. • No requirement for financial institutions to examine transactions with no apparent economic or visible lawful purpose from countries which do not or insufficiently apply the FATF Recommendations and make written findings of such available to assist competent authorities. • Authorities in Grenada are not able to apply appropriate counter-measures where a country continues not to apply or insufficiently applies the FATF Recommendations 	<p>from or in countries which do not or insufficiently apply the FATF Recommendations.</p> <ul style="list-style-type: none"> • Effective measures should be put in place to ensure that financial institutions are advised of concerns about the weaknesses in the AML/CFT systems of other countries. • Financial institutions should be required to examine transactions with no apparent economic or visible lawful purpose from countries which do not or insufficiently apply the FATF Recommendations and make written findings of such available to assist competent authorities. • Authorities in Grenada should be empowered to apply appropriate counter-measures where a country continues not to apply or insufficiently applies the FATF Recommendations 	
22. Foreign branches & subsidiaries	NC	<ul style="list-style-type: none"> • The requirement for financial institutions to ensure that their foreign branches and subsidiaries observe anti-money laundering and counter terrorist financing measures consistent with Grenada is not enforceable. • No requirement for financial institutions to pay particular attention to foreign branches and subsidiaries in countries which do not or insufficiently apply the FATF Recommendation to ensure they observe measures consistent with home country requirements and the FATF Recommendations. • No requirement for branches and subsidiaries of financial institutions in host countries to apply the higher standard where minimum AML/CFT requirements of the home and host countries differ. • No requirement for financial institutions to inform their home supervisor when a foreign branch or subsidiary is unable to observe appropriate anti-money laundering and counter-terrorist financing measures because it is 	<ul style="list-style-type: none"> • The requirement for financial institutions to ensure that their foreign branches and subsidiaries observe anti-money laundering and counter terrorist financing measures consistent with Grenada should be enforceable. • Financial institutions should be required to pay particular attention to foreign branches and subsidiaries in countries which do not or insufficiently apply the FATF Recommendation to ensure they observe measures consistent with home country requirements and the FATF Recommendations. • Branches and subsidiaries of financial institutions in host countries should be required to apply the higher standard where minimum AML/CFT requirements of the home and host countries differ. • Financial institutions should be required to inform their home supervisor of when a foreign branch or subsidiary is unable to observe appropriate anti-money laundering and counter-terrorist financing measures because it is prohibited by the host country's laws, regulations or other measures. 	Further discussions are planned to determine specific measures

		prohibited by the host country's laws, regulations or other measures.		
23. Regulation, supervision and monitoring	PC	<ul style="list-style-type: none"> Limited number of inspections by ECCB in the last four years is ineffective to ensure compliance of its licensees. No indication in law that fitness and probity checks on directors, shareholders, management of licensees, is a requirement for the licensees of the ECSRC. No requirement in law for fitness and probity checks on directors, shareholders, management of licensees, is a requirement for the licensees of GARFIN No supervisory regime and by extension, no reporting obligations are in place for money service business. 	<ul style="list-style-type: none"> The ECCB should review its inspection program to ensure effective compliance of its licensees with AML/CFT obligations Legal provisions should be enacted for fitness and probity checks on directors, shareholders, and management of licensees of the ECSRC and GARFIN. Money value transfer service operators should be subject to effective systems for monitoring and ensuring compliance with national AML/CFT requirements 	Further discussions are planned to determine specific measures
24. DNFBP - regulation, supervision and monitoring	NC	<ul style="list-style-type: none"> Dealers in precious metals and precious stones are not included in the AML/CFT regime There is no designated competent authority with responsibility for monitoring and ensuring compliance of the DNFBPs with the AML/CFT requirements. 	<ul style="list-style-type: none"> The authorities should designate a competent authority with the responsibility for monitoring and ensuring compliance of DNFBPs with AML/CFT requirements. Dealers in precious metals and precious stones should be subject to AML/CFT requirements in accordance with FATF standards 	Recommendation has been adopted and has been approved in draft legislation.
25. Guidelines & Feedback	PC	<ul style="list-style-type: none"> The FIU has not provided consistent feedback on suspicious transaction reports filed by financial institutions. Guidelines do not include instructions covering terrorist financing 	<ul style="list-style-type: none"> The FIU should provide financial institutions and DNFBPs with consistent feedback on filed suspicious transaction reports. The Guidelines should include specific instructions relating to the requirements for combating the financing of terrorism 	Recommendation has been adopted and has been approved in draft legislation. (FIU Bill) See clause 28 "Consultation on proposed guidelines"
Institutional and other measures				
26. The FIU	LC	<ul style="list-style-type: none"> Annual reports do not include analysis of typologies and trends The increasing number of ongoing investigations suggests that the FIU is not 	<ul style="list-style-type: none"> The authorities should act promptly in appointing a FIU Director. The absence of a director significantly hampers the functioning of the Unit. There should be specified grounds for the removal of 	Decision to re organise FIU, develop job description and appoint Director. Recommendation has been adopted and has been approved in draft legislation (FIU Bill)

		performing effectively	<p>the director.</p> <ul style="list-style-type: none"> The annual report of the FIU should include an analysis of trends and AML/CFT typologies. The FIU along with the Supervisory Authority should consider undertaking an education drive in order to inform reporting parties and the general public on various typologies and trends and other matters related to AML/CFT. The FIU should consider reviewing its work processes so that there are unambiguous roles between analysts and investigators and in doing so consideration should be given to sourcing additional specialized training for financial intelligence analysts. 	<p>Terms to be set for removal of director. (See clause 15 of new Bill). An analysis of trends and AML/CFT typologies will be included in the annual report.</p> <p>Plan to be developed for education drive</p> <p>Structure of FIU to be reviewed</p>
27. Law enforcement authorities	LC	<ul style="list-style-type: none"> The decision to postpone or waive the arrest of suspected persons and/or the seizure of money is taken on a case by case basis and is not laid down in any law or procedure 	<ul style="list-style-type: none"> Competent authorities should consider developing a standard operating procedure, delineating the parameters within which they should operate when the decision is made to postpone or waive the arrest of suspected persons and/or the seizure of money or to use special investigative techniques. Greater priority should be given to the investigation of ML / TF cases by the Police and the DPP's Office. 	Further discussions are planned to determine specific measures
28. Powers of competent authorities	LC	<ul style="list-style-type: none"> Unable to assess whether the RGPF has specific legislative power to take witness statements. 		
29. Supervisors	LC	<ul style="list-style-type: none"> GARFIN's powers of enforcement and sanctions are inadequate since there are no ladder of enforcement powers 	<ul style="list-style-type: none"> The GARFIN Act should be amended to provide for ladder of enforcement powers 	Further study of the GARFIN's Act because GARFIN's enforcement powers does not come from the GARFIN Act. They come from each individual piece of legislation which it supervises.
30. Resources, integrity and training	PC	<ul style="list-style-type: none"> The RGPF does not have adequate technical, financial and human resources Members of the RGPF and Office of the DPP involved in AML and CFT are not adequately trained. Integrity of RGPF is of concern due to number of officers involved in breaches of discipline and criminal activity Attorney General's office is understaffed and under-resourced 	<ul style="list-style-type: none"> Grenadian authorities should consider providing additional financial and technical resources to law enforcement agencies. Authorities should consider reviewing the measures in place for ensuring that persons of high integrity and good moral character are recruited into the RGPF and that there is continuous monitoring of officers professionalism, integrity and lifestyle. Authorities should consider reviewing the training needs of the ODPP as well as RGPF. The CID which is primarily responsible for investigating financial 	Further discussions are planned to determine specific measures

			<p>crime is inadequately trained in that area.</p> <ul style="list-style-type: none"> The authorities should consider providing additional staff and resources to the Attorney General's office. 	
31. National co-operation	PC	<ul style="list-style-type: none"> There are no effective mechanisms in place to allow policy makers to cooperate with each other 	<ul style="list-style-type: none"> The Supervisory Authority should be given the legal authority to bring together the various authorities on a regular basis to develop and implement policies and strategies to tackle ML and TF. The provision of public education on issues of ML and TF should be added to their responsibilities. 	Public Education to be included in responsibility of Supervisory Authority
32. Statistics	PC	<ul style="list-style-type: none"> No established mechanism for the review of the effectiveness of Grenada's AML/CFT systems No information about spontaneous referrals made by the FIU to foreign authorities Statistics on the total number of cross-border disclosures or the amount of currency involved were not available. Statistics submitted do not contain sufficient information on mutual legal assistance requests 	<ul style="list-style-type: none"> The Supervisory Authority may wish to consider setting up a secretariat to monitor the implementation of Grenada's AML/CFT Regime. The authorities should maintain statistics on spontaneous referrals made by the FIU to foreign authorities Comprehensive statistics should be maintained on all aspects of Customs and Excise operations including records of seizures; these statistics should be readily available for use by Customs and other LEAs. It is recommended that additional technical resources be dedicated to the compilation of statistical data to provide more comprehensive and timely presentation of statistics The authorities should maintain comprehensive statistics on MLA and extradition request received, made and granted. 	Further discussions are planned to determine specific measures
33. Legal persons – beneficial owners	NC	<ul style="list-style-type: none"> No measures in place to ensure that bearer shares issued under the International Companies Act are not misused for money laundering No legislative requirement for the disclosure of beneficial ownership of companies 	<ul style="list-style-type: none"> Appropriate measures should be taken to ensure that bearer shares issued under the ICA are not misused for money laundering. There should be statutory requirements for the provision of information on the beneficial ownership of companies. 	Further discussions are planned to determine specific measures

		<ul style="list-style-type: none"> • Insufficient resources delegated to the functions of the Registrar of Companies. • No mechanism to ensure the timely filing of annual returns. • No access to current information on companies' beneficial ownership to competent authorities due to the failure of companies to file annual returns. • No legislation requires the filing or notification of changes to the particulars, including beneficial ownership, of companies. 	<ul style="list-style-type: none"> • Adequate resources should be delegated to the functions of the Registrar of Companies and Intellectual Property. • A mechanism should be developed to ensure the timely filing of annual returns as well as the timely access by competent authorities and other relevant parties to the current information on companies' beneficial ownership. • Legislative amendments should be introduced to require the timely notification of any changes in the beneficial ownership of companies, along with changes to other particulars. 	
34. Legal arrangements – beneficial owners	NC	<ul style="list-style-type: none"> • No system of central registration or national registry where records of local trust are kept • No requirement for the filing/keeping of adequate and accurate information on the beneficial ownership and control of local trusts • The requirement for trust service providers to obtain, verify and retain records of the details of trusts or other similar legal arrangements in the Guidelines is not enforceable. 	<ul style="list-style-type: none"> • Authorities should put in place measures for the registration and monitoring of local trusts in accordance with FATF requirements. • Authorities should consider including adequate and accurate information on the beneficial ownership and control of trusts as part of the registration process for local trusts 	Further discussions are planned to determine specific measures
International Co-operation				
35. Conventions	PC	<ul style="list-style-type: none"> • All designated categories of offences are not adequately addressed in the range of predicate offences • Not all relevant articles of the Conventions have been fully implemented 	<ul style="list-style-type: none"> • The authorities should extend the range of predicate offences for ML to accord with the FATF Designated Categories of Offences. • The authorities should amend relevant legislation to cover all the activities required to be criminalised in accordance with the Conventions 	Further discussions are planned to determine specific measures
38. MLA on confiscation and freezing	LC	<ul style="list-style-type: none"> • There is no provision under MLACMA for the tracing and restraining of instrumentalities intended for use in the commission of an offence. • The authorities should establish arrangements 	<ul style="list-style-type: none"> • Grenadian authorities should consider putting in place mechanisms for the determining of the best venue for the prosecution of defendants when issues of dual jurisdictional conflict arise. • The MLACMA should be amended to include 	Further discussions are planned to determine specific measures

		<ul style="list-style-type: none"> for coordinating seizure and confiscation actions with other jurisdictions. There are no asset-sharing arrangements in place between Grenada and other countries. 	<ul style="list-style-type: none"> provisions for the tracing and restraining of instrumentalities intended for use in the commission of an offence. The authorities should establish arrangements for coordinating seizure and confiscation actions with other jurisdictions. The authorities should consider making arrangements with other countries for the sharing of funds forfeited and seized. 	
40. Other forms of co-operation	LC	<ul style="list-style-type: none"> The EIA and the FIUA do not address whether requests are refused on the sole ground that it is considered to involve fiscal matters. 	<ul style="list-style-type: none"> Consideration should be given to making amendments to FIUA and the EIA to state specifically that requests should not be refused on the sole ground that the request pertains to fiscal matters 	Further discussions are planned to determine specific measures
Nine Special Recommendations		Summary of factors underlying rating		
SR.I Implement UN instruments	PC	<ul style="list-style-type: none"> No requirement to freeze terrorist funds or other assets of person in accordance with UN Resolutions (S/RES/1267(1999) and (S/RES/1373(2001)). 	<ul style="list-style-type: none"> The authorities should implement the United Nations Security Council Resolutions relating to the prevention and suppression of terrorist financing (S/RES/1267(1999) and S/RES/1373(2001). 	Further discussions are planned to determine specific measures
SR. II Criminalise terrorist financing	NC	<ul style="list-style-type: none"> Criminalisation of terrorist financing does not include all offences in the Annex to the Terrorist Financing Convention. The terrorist financing offences do not cover the provision/collection of funds for an individual terrorist. The terrorist financing offence of fund-raising is not subject to any sanctions and therefore is not a predicate offence for money laundering. The terrorist financing offence of fund-raising does not apply regardless of whether the person alleged to have committed the offence is in the same country or a different country from the one in which the terrorist/terrorist organization is or the terrorist act occurred/will occur. 	<ul style="list-style-type: none"> Schedule 2 of the TA should be amended to include the treaties on the Convention on the Physical Protection of Nuclear Material and the International Convention for the Suppression of Terrorist Bombing. The TA should be amended to include the terrorist financing offences of the provision/collection of funds for an individual terrorist. The TA should be amended to provide sanctions for the terrorist financing offence of providing or receiving money or other property in support of terrorist acts. The TA should be amended to provide for the terrorist financing offence of fund-raising to apply regardless of whether the person alleged to have committed the offence is in the same country or a different country 	Further discussions are planned to determine specific measures

		<ul style="list-style-type: none"> Effectiveness of terrorist financing regime is difficult to assess in light of the absence of investigations, prosecutions and convictions for FT 	<p>from the one in which the terrorist/terrorist organization is or the terrorist act occurred/or will occur</p>	
SR.III Freeze and confiscate terrorist assets	NC	<ul style="list-style-type: none"> No provision in TA for the freezing of property other than restraint orders No provision for freezing of terrorist funds or other assets of designated persons in accordance with S/RES/1267(1999) and S/RES/1373(2001). No provision in TA to provide for the confiscation of property used in connection with the commission of the terrorist financing offence of fund-raising under section 8 of TA. No mechanism available where victims of offences committed under the TA are compensated consistent with Article 8 of the Terrorist Financing Convention. No clear guidance issued to financial institutions concerning their obligations in taking action for freezing accounts in relation to the circulated lists of terrorists and/or terrorist organisations. No publicly-known procedure for the de-listing of names of proscribed organisations and terrorists listed in the Schedule to the TA No procedures for authorising access to funds or other assets that were frozen via restraint orders, necessary for basic expenses and the payment of certain types of fees in accordance with S/RES/1452(2002). Difficult to assess effectiveness of mechanism for ensuring compliance with TA due to lack of statistics 	<ul style="list-style-type: none"> The TA should be amended to allow for the freezing of terrorist funds or other assets of persons designated by the United Nations Al-Qaida and Taliban Sanctions Committee in accordance with S/RES/1267(1999). The TA should be amended to provide for the freezing of terrorist funds or other assets of person designated in the context of S/RES/1373(2001). The Taliban should be added as a proscribed organisation under the TA. The authorities should issue clear guidance to financial institutions concerning their obligations in taking action for freezing accounts in relation to the circulated lists of terrorists. The TA should contain procedures for the de-listing of names of proscribed organisations and terrorists listed in the Schedule to the TA. The TA should be amended to provide for the authorising of access to funds or other assets that were frozen via restraint orders, necessary for basic expenses and the payment of certain types of fees in accordance with S/RES/1452(2002). The TA should be amended to provide for the confiscation of property used in connection with the commission of the terrorist financing offence of fund-raising under section 8 of TA. The TA should be amended to provide a mechanism where victims of offences committed under the TA are compensated consistent with Article 8 of the Terrorist Financing Convention. 	Further discussions are planned to determine specific measures

SR.IV Suspicious transaction reporting	NC	<ul style="list-style-type: none"> Requirement to report STRs relating to the financing of terrorism is discretionary and does not include funds used for terrorism or by terrorist organisations or those who finance terrorism No requirement to report all suspicious transactions including attempted transactions regardless of the amount of the transaction. No requirement to report suspicious transactions regardless of whether they are thought, among other things to involve tax matters. 	<ul style="list-style-type: none"> The TA should be amended to make the reporting of suspicious transactions relating to financing of terrorism mandatory and include funds used for terrorism or by terrorist organisation or those who finance terrorism. All suspicious transactions, including attempted transactions should be legislatively required to be reported regardless of the amount of transaction The requirement to report suspicious transactions should apply regardless of whether they are thought, among other things to involve tax matters 	Further discussions are planned to determine specific measures
SR.V International co-operation	PC	<ul style="list-style-type: none"> Not all FT offences are covered by mutual legal assistance mechanisms The terrorist financing offence of fund-raising is not an extraditable offence The provision/collection of funds for an individual terrorist is not an offence and is not extraditable. 	<ul style="list-style-type: none"> The provision/collection of funds for an individual terrorist should be criminalized under the TA. The TA should be amended to include penalties that are proportionate and dissuasive for the terrorist financing offence of fund-raising. The provision/collection of funds for an individual terrorist should be criminalised under TA. 	Further discussions are planned to determine specific measures
SR.VI AML requirements for money/value transfer services	NC	<ul style="list-style-type: none"> No systems in place for monitoring MVT service operators and ensuring that they comply with the FATF Recommendations Deficiencies noted with regard to Recs. 4-11, 13-15 and 21-23 are also applicable to MVT service operators No requirement for licensed or registered MVT operators to maintain a current list of their agents to be made available to the designated competent authority Sanctions applicable with regard to GARFIN's supervisory function are not proportionate or dissuasive. 	<ul style="list-style-type: none"> Legislation for money services providers that meets the FATF requirements should be enacted. Introduce systems for monitoring MVT service operators and ensuring that they comply with the FATF Recommendations. Licensed MVT service operators should be required to maintain a current list of their agents to be made available to the designated competent authority. GARFIN's supervisory sanctions should be made proportionate and dissuasive 	. Further discussions are planned to determine specific measures
SR.VII Wire transfer rules	NC	<ul style="list-style-type: none"> No requirement for ordering financial institutions to obtain and maintain full originator information for all wire transfers of US\$1,000 	<ul style="list-style-type: none"> The authorities should institute enforceable measures in accordance with all the requirements of SR.VII and 	Further discussions are planned to determine specific measures

		<p>and above</p> <ul style="list-style-type: none"> • No requirement for ordering financial institutions to include full originator information along with cross-border and domestic wire transfers • No requirement for intermediary and beneficiary financial institutions in the payment chain to ensure that all originator information that accompanies a wire transfer is transmitted with the wire transfer • No requirement for beneficiary financial institutions to adopt effective risk-based procedures for identifying and handling wire transfers that are not accompanied by complete originator information. 	<p>establish a regime to effectively monitor the compliance of the financial institutions with said enforceable measures.</p>	
SR.VIII Non-profit organisations	NC	<ul style="list-style-type: none"> • Registering of NPOs is not mandatory. • No review has been undertaken of the adequacy of domestic laws in relation to non-profit organisations (NPOs) to determine whether they are (i) susceptible to being used by terrorist organisations or (ii) particularly vulnerable to terrorist activities. • No outreach to NPOs to protect the sector from terrorist financing abuse. • No effective supervisory regime to monitor non-compliance and sanction violations of oversight measures. • No record keeping and retention requirements for NPOs. • No investigative expertise with regard to examining NPOs suspected of either being exploited by or actively supporting terrorist activity. 	<ul style="list-style-type: none"> • The authorities should make the registering of NPOs mandatory. • The authorities should undertake a review of the adequacy of domestic laws in relation to non-profit organisations (NPOs) to determine whether they are (i) susceptible to being used by terrorist organisations or (ii) particularly vulnerable to terrorist activities. • The authorities should undertake outreach to the NPO sector with a view to protecting the sector from terrorist financing abuse. • An effective supervisory regime should be established to monitor non-compliance and sanction violations of oversight measures. • Record keeping and retention requirements should extend to NPOs. • Authorities should develop investigative expertise with regard to examining NPOs suspected of either being exploited by or actively supporting terrorist activity. 	<p>Further discussions are planned to determine specific measures</p>

<p>SR.IX Cross Border Declaration & Disclosure</p>	<p>NC</p>	<ul style="list-style-type: none"> • Penalty for false disclosure/declaration is not dissuasive • Domestic cooperation between customs and other agencies is insufficient • Information-sharing among Customs and other law enforcement authorities is inadequate. • Customs' participation in AML/CFT is not sufficient • Unable to assess whether systems for reporting cross-border transactions are subject to strict safeguards. • Unable to assess effective of disclosure system due to insufficient statistics 	<ul style="list-style-type: none"> • Customs should consider implementing a declaration system to be used in conjunction with the disclosure system for incoming and outgoing passengers. The threshold should not be higher than EUR/US15000.00 • Consideration should be given to the increased use of specific technical expertise such as canine units (that can sniff for concealed currency), x-rays and scanners. These activities should be well funded. • Customs should explore the involvement of airline and vessel senior management in currency interdiction operations. • Customs officials should be trained in the use passenger screening systems to analyse behaviour, appearance and communication style of potential currency carriers. In so doing baseline questions should be identified to identify red flags. • Authorities should review legislation concerning the making of false disclosures/declarations to ensure that these are strict liability offences. • Penalties under the Customs Ordinance should be amended with the aim of making them dissuasive • Consideration should be given for the provision of training in counterfeit currency identification to Customs Personnel, especially those working the ports. • Customs should consider fostering closer relationships with the FIU, the RGPF and ODPP • There is a need for increased participation by the Customs Department in combating money laundering and terrorist financing. • Customs Authorities should also give consideration to reporting all incidences of currency interdictions where untrue disclosures/declarations are made to the FIU, whether or not administrative or criminal proceedings are being considered. 	<p>Threshold included in new legislation "Draft Customs Act"</p> <p>Recommendation has been adopted and has been approved in Draft Legislation: Draft Customs Act.</p> <p>Customs Act, which will be passed by all OECS member states in first quarter of 2010.</p> <p>New x-ray and scanner equipment to be acquired. Letters to be issued to relevant authorities namely Minister of Finance, Minister of National Security and Commissioner of Police.</p> <p>Discussion held with PS Finance to have officers attached to FIU, so that there could be a joint training programme between FIU and customs for customs officials. There will also be training conducted by the Supervisory Authority.</p> <p>Plans are to be developed to increase the participation of the Customs Department in AML/CFT.</p> <p>Plan to improve system of information sharing, domestic cooperation and systems for reporting cross-border transactions and create document outlining</p>
--	-----------	--	---	---

				systems including the disclosure system..
--	--	--	--	---