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From:	General Secretariat of the Council
To:	JHA Counsellors / COSI Support Group Standing Committee on Operational Cooperation on Internal Security
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Subject:	Implementation 2018-2021 EU Policy Cycle for organised and serious international crime: Draft MULTI ANNUAL STRATEGIC PLAN for Criminal Finances / Money Laundering / Asset Recovery Priority

DOCUMENT PARTIALLY ACCESSIBLE TO THE PUBLIC (17.11.2017)

Delegations will find attached the Multi Annual Strategic Plan (MASP) for the Criminal Finances / Money Laundering / Asset recovery priority of the EU Policy Cycle 2018/2021, as agreed by Cosi on 27 September 2017 after a silence procedure.

EU Policy Cycle for organised and serious international crime 2018/2021

Multi Annual Strategic Plan for the Criminal Finances / Money Laundering /Asset Recovery Priority

Priority: *To combat criminal finances and money laundering and facilitate asset recovery in view of effectively confiscating the criminal profits of OCGs, especially targeting money laundering syndicates offering money laundering services to other OCGs and those OCGs making extensive use of emerging new payment methods to launder criminal proceeds*

1. Description of the scope of the problem

General description of the threat based on the EU SOCTA 2017 (6886/17).

KEY FINDINGS

- Money laundering allows OCGs to invest the illicit proceeds of their criminal activities in the legal and illicit economy. Money laundering sustains and contributes to the growth of criminal markets across the EU.
- Money laundering is linked to virtually all criminal activities generating criminal proceeds in the EU.
- Criminal proceeds generated in the EU continue to be invested outside of the EU.

Money laundering allows organised crime groups (OCGs) to introduce the proceeds of crime into the legitimate economy. Almost all criminal groups need to launder profits generated from criminal activities. However, the way in which money laundering is carried out varies greatly depending on an OCG's level of expertise, as well as the frequency and scale of money laundering activities. OCGs engaged in money laundering cooperate with OCGs of all nationalities. The OCGs specialising in money laundering are often composed of members of multiple nationalities originating from Member States and countries outside the EU. Money laundering is also increasingly a technical challenge for law enforcement authorities. Criminal networks continuously seek to exploit the latest technological developments such as cryptocurrencies and anonymous payment methods. Rapid transaction processing and the proliferation of effective anonymization tools are strong obstacles in the identification of the beneficial owners of criminal proceeds, currently just as effective as the use of front man and shell companies registered in offshore and tax havens has traditionally been. A growing number of online platforms and applications offer new ways of transferring money and are not always regulated to the same degree as traditional financial service providers. Anti-money laundering regulations and measures also shape money laundering schemes and processes. Increased and more effective controls in the regulated financial sector are prompting OCGs to make more use of unregulated systems to transfer money across borders. Money launderers frequently rely on the EUR500 banknote for its high value-to-weight ratio, which facilitates the smuggling of large amounts of money in small packages. The European Central Bank's 2016 decision to commence with a phased withdrawal of EUR500 banknotes from circulation may lead OCGs to turn to precious metals and stones instead. Money launderers heavily rely on document fraud to facilitate their activities. Fraudulent documents such as false invoices and forged ID documents are used to conceal the origin of criminal cash, to open bank accounts or to establish shell companies. Legal businesses remain a key asset for money laundering activities and are instrumental in enabling trade-based schemes which limit the movement of cash and provide a façade of legitimacy for money transfers. Developing international trade with Asia and Africa is likely to entail an increase in trade-based money laundering. OCGs involved in money laundering use corruption to infiltrate financial institutions within and outside the EU, targeting both private sector professionals and public officials. Money launderers provide services to both organised crime and terrorist organisations. Laundered proceeds from the trafficking of illicit commodities are believed to finance the activities of some terrorist groups.

1.2. Levels

1.2.1 Small-scale ad hoc laundering

Some OCGs only launder money using basic money laundering methods. Small-scale money laundering typically occurs on a regular basis and involves relatively small amounts of money invested in high-value goods, cheap properties and gambling. Launderers often use cash intensive businesses for small-scale laundering by mixing legitimate and criminal proceeds in business records. Cash intensive businesses such as catering or retail business provide a good cover to hide the source of otherwise inexplicable quantities of cash. Laundered proceeds are usually transferred abroad using cash couriers or Informal Value Transfer Systems (IVTS) and then distributed among associates and family members. The OCGs engaging in small-scale money laundering are typically involved in migrant smuggling, tax fraud, payment card fraud, motor vehicle crime, or cybercrime.

1.2.2 Medium-scale self-laundering

OCGs which generate a larger amount of criminal proceeds need to launder their money on a more regular basis. These OCGs process medium to large amounts of money using the same basic laundering methods as small-scale laundering operations. Unlike small-scale money launderers, these OCGs tend to operate using established legal businesses to process larger amounts of money. Legal businesses are an essential element of these money laundering schemes. Many OCGs involved in medium-scale laundering use legal businesses as an integral part of their activities related to trafficking of human beings, drug trafficking and organised property crime. These businesses facilitate criminal activities and also legitimise the proceeds of crime. OCG members and their associates are often involved in various aspects of the laundering process, including the depositing, transfer and withdrawal of money, smurfing, the creation of multiple bank accounts and the ownership of legal businesses. Many of the OCGs operating money laundering schemes at this level use the services of complicit bookkeepers or accountants in order to legitimise criminal cash flows by falsifying invoices, receipts and accounts. OCGs involved in medium-scale money laundering typically generate profits through drug trafficking, trafficking of human beings, organised property crime as well as Value Added Tax (VAT) fraud and cybercrime.

1.2.3 Large-scale sophisticated laundering

OCGs laundering large amounts of criminal proceeds operate sophisticated and innovative money laundering schemes in order to conceal the criminal origins of the funds at their disposal. These groups are highly adept at exploiting the banking system, creating numerous accounts and chains of shell companies across multiple Member States and outside the EU. Middlemen and front companies are used to hide the identity of the true beneficiaries and owners of the money by establishing offshore accounts in tax havens and carrying out bogus international trade transactions to justify the movement of large sums. OCGs make use of corrupt professional gatekeepers in financial or judicial institutions to facilitate their laundering activities. “Gatekeepers” or “enablers” are designated non-financial businesses and professions, including lawyers, notaries, real estate agents, trust and company service providers, casinos, accountants, and other independent legal professionals who perform the role of a trusted third party. The OCGs engaging in large-scale and sophisticated money laundering typically operate international networks involved in drug trafficking, excise fraud, trafficking of human beings, and investment fraud.

1.2.4 Money laundering syndicates

OCGs increasingly use money laundering syndicates acting as illegal service providers to launder money. In exchange for a commission of between 5% and 8%, these syndicates offer complex laundering techniques and carry out the laundering operations on behalf of other OCGs. Professional enablers such as solicitors, accountants, company formation agents provide the skills and knowledge of financial procedures necessary to operate these schemes. Although few groups are known to provide these services, they launder large amounts of money and have a considerable impact on the ability of other OCGs to disguise and invest criminal proceeds. These syndicates are a significant obstacle to tracing criminal assets.

1.3. Methods

1.3.1 Cash

Cash remains at the core of the money laundering business. Cash continues to be smuggled by couriers and, increasingly, by post and parcel services.

1.3.2 Trade-based money laundering

Trade-based money laundering is a highly effective way of concealing criminal funds by manipulating or forging purchases or sales using double invoicing, false invoicing, over- and under-invoicing by companies that are owned by OCGs, their associates and relatives.

1.3.3 Exploitation of the financial system

Using middlemen, OCGs typically operate multiple bank accounts, exploit the financial market and products such as loans, insurance, bonds, stock market trading, and create shell companies. These shell companies possess no significant assets and do not perform any significant operations, only serving the purpose of laundering funds. The shell companies used to send and receive money transfers are typically embedded in complex corporate structures which conceal the links to account beneficiaries. In many cases, these companies are registered in offshore jurisdictions. ‘Smurfing’ is widely used to obscure the movement of significant amounts of money and involves the parcelling of large financial transactions into smaller transactions below statutory reporting limits.

1.3.4 Informal Value Transfer Systems (IVTS)

Informal Value Transfer Systems (IVTS) are also referred to as Hawala. These mechanisms or networks of people receive money for the purpose of making the funds of an equivalent value payable to a third party in another geographic location. The transfers generally take place outside of the conventional banking system and are not subject to anti-money laundering regulations or due diligence practices. The implementation of stricter anti-money laundering regulations in mainstream financial institutions has made IVTS increasingly attractive to OCGs. Members of diaspora and migrant communities use Hawala extensively to send remittances to their country of origin. However, Hawala is also frequently used by criminal groups to transfer of large amounts of criminal proceeds, providing layering and remittance services within and outside of Europe.

1.3.5 New payment methods

New payment methods such as cryptocurrencies, prepaid cards, online payments and internet vouchers are continuously emerging and are generally less well-regulated than traditional payment methods. In combination with alternative banking platforms, these new payment methods allow the movement of large amounts of criminal funds. Underground banking platforms are financial networks operating outside of normal banking channels to transfer money internationally, avoiding the operative costs and regulations of conventional banks. They can operate in multiple jurisdictions and allow hidden transactions between users facilitating the laundering of large amounts of money.

1.3.6 Gatekeepers or enablers

OCGs increasingly seek out the support of professional enablers such as legal professionals, bankers, accountants, financial experts and brokers, real estate agents and trusts and company service providers in order to evade increasingly tough anti-money laundering regulations. Enablers possess the know-how, tools and influence to allow access to or create the complex structures necessary to launder large sums of money without detection. Enablers provide a façade of legitimacy to criminal assets or operate wholly outside the regulatory environment. OCGs are drawn to these criminal service providers due to the perception that these professions are protected from law enforcement scrutiny by professional secrecy privileges, mitigating the risk of being subject to investigations and prosecutions.

1.4. Case Examples:

Operation PRINSEN **DELETED**

Operation OST **DELETED**

Operation Kouri targeted a large criminal organization based in France, but operating in several other Member States (Belgium, The Netherlands and Spain) and beyond (Morocco and The United Arab Emirates), specialized in performing high end money laundering services to major international trafficking cartels (hashish and cocaine).

At the end of November 2016 a joint investigation team (JIT) consisting of investigators and judicial authorities from France, Belgium and the Netherlands, took action against the money laundering ring resulting in the arrest of 36 suspects and the seizure of 31 kg of cocaine, 2,5 kg of hashish, 2 submachine guns, 4 money counting machines, 7,350 kg of gold (worth over 800.000 EUR) and more than 7 million EUR in cash, making this operation the second biggest cash seizure in Europe during the year of 2016. Europol assisted the competent law enforcement agencies by organising and funding several operational meetings, provided a full scale analytical support and real-time intelligence analysis as well as forensic and technical support by deploying Mobile Offices to all involved Member States during the action days.

Operation Santa Lucia/Contini Blanca, **DELETED**

Operation CEDAR, conducted by France (OCRGDF) and the USA (DEA) in 2015-2016, targeted a Lebanese OCG specialised in laundering the proceeds of the Colombian drug cartels. This OCG used trade-based money laundering such as smuggling of used luxury cars and high-valued watches. It is estimated that more than 12 million euros were laundered via this modus operandi.

The investigations were carried out in the context of the very first Joint Investigation Team (JIT) signed between a Member State and the USA. In January 2016, after a year of investigations, a joint action was implemented, involving Belgium, Germany and Italy. EUROPOL provided technical support by deploying 4 mobile offices in the concerned countries. The exploitation by FP SUSTRANS of the information collected allowed to enlight multiple links with drug cases all around Europe (for example, 62 kg of cocaine seized in The Netherlands in December 2014).

Previously, in October 2015, given the international dimension of the case, an international meeting supported by EUROJUST took place in The Hague (The Netherlands) to coordinate the judicial operations. As a result, 10 high-level money launderers, including the "super facilitator" based in Lebanon, were arrested and 8 of them were sent to jail. More than 1 million euros of criminal assets were seized.

Europol assisted the competent law enforcement agencies by organising and funding several operational meetings, provided a full scale analytical support. On 5 July, an operational action day was performed by more than 300 police officers simultaneously in Italy, Spain and Germany, supported by Europol's Mobile Offices. 35 suspects were arrested and several houses searches performed. Assets seizure (estimated at 5 Million euro) took place in Spain, Italy, Germany, Portugal and United Kingdom and 500 kg of cocaine and 600 kg of hashish were also seized.

Operation PACNET **DELETED**.

2. Existing activities and policies

2.1. Europol initiatives

Analysis project (AP) Sustrans provides a platform through which operational data pertaining to Suspicious Transaction/Activity Reports filled by Financial Intelligence Units (FIUs), reports on cash detections (usually from customs) and on-going money laundering investigations from all relevant agencies (including, but not limited to, customs, tax and police services) across the EU and beyond are treated, analysed and processed. This platform serves the primary purpose of supporting and assisting competent authorities on the prevention and investigation of transnational OCGs involved in money laundering activities.

AP Sustrans provides the Member States with a unique service for the secure exchange and storage of combined financial intelligence stemming from the police, FIUs and customs, while simultaneously cross-checking it against the criminal intelligence collected by all other Focal Points (FP) of Europol. Since its creation a total of 95.429 cases were contributed by the EU FIUs, resulting in 4.201 hits on suspects within the Analytical Working Files (AWFs) Serious and Organised Crime (SOC) and Counter-Terrorism (CT), and a total of 109.120 cases were contributed by the EU customs, resulting in 1.002 hits on suspects within the AWFs SOC and CT.

THE SUPERFACILITATORS INITIATIVE (SFI) **DELETED**.

JOINT OPERATIONS are coordinated with the Customs Cooperation Working Party (CCWP) and focus on cash movements. Indeed, the fight against illicit cash movements and cash couriers is a global priority.

Analysis project (AP) Asset Recovery stores operational data pertaining to any type of crime as long as the investigators focus on, or need specific support in relation with, the recovery of the proceeds of crime. The AP was created in April 2014. It received nearly 4000 contributions since its inception and their number is constantly rising (AP received during first term of 2017 nearly as many contributions than during the whole year 2016).

The privileged counterparts of the AP are the Asset Recovery Offices (AROs) in the EU Member States, but it also provides horizontal support to investigators aiming at recovering ill-gotten proceeds.

The Europol Criminal Assets Bureau (ECAB) fosters the tracing of illicit assets and their further seizure and confiscation. It co-chairs the EU ARO Platform, holds the Secretariat of the Camden Asset Recovery Inter-agency Network (CARIN) and of the Anti-Money Laundering Operational Network (AMON) and supports the use of SIENA by the AROs and the anti-corruption authorities (ACAs).

SIENA for AROs was an initiative launched in 2009 which became effective in 2011. It was the first time that the Member States' competent authorities were proposed an access to SIENA enabling them to directly communicate with their counterparts. To date, 22 AROs are directly connected to SIENA. In the future the possibility to use SIENA could be extended to the AROs/Agencies of non-EU countries having signed operational agreements with Europol.

Based on the previous success with AROs, **SIENA for ACAs** was launched in 2015. To date 9 countries gave direct access to their anti-corruption authorities.

STRATEGIC PROJECTS: AP Sustrans provides strategic work and analysis on money laundering trends and patterns (strategic, situation, knowledge reports and early warning notifications). AP asset recovery occasionally delivers strategic products in relation with asset forfeiture issues. Most of the strategic involvement of ECAB is done through CARIN and the ARO platform.

TRAINING ACTIVITIES: AP Sustrans prepares coordinates and delivers training (the financial intelligence training of Europol), assists CEPOL on the money laundering curriculum and on specialized financial investigations courses for the EMPACT priorities and cooperates with other (such as CEIFAC and ICOFI) on anti money laundering trainings.

AP asset recovery prepares and delivers FIT (financial intelligence training in Europol), lectures in the CEPOL training on asset recovery, livens a CEPOL webinar up and provides support to countries or organizations in the process of shaping asset recovery courses (such as Ukraine or the OSCE).

The Europol Platform for Experts (EPE) is a secure environment for investigators, enabling them to share knowledge, best practices and non-personal data on crime. Access to this community is granted by invitation only. It has been designed to encourage participation of the users in order to facilitate their interaction. The Financial Crime Information Center (FCIC) and the anti-corruption portal are the specific EPE for financial investigators. More than 1000 financial investigators from the EU and beyond are registered so far.

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2.2. International initiatives

The **ARO Platform**, the informal network of the EU AROs, was established in 2009 in order to facilitate the implementation of the 2007 Council Decision on AROs. The platform is hosted by the Commission and co-chaired by Europol. Strategic and operational topics are discussed within the Platform, which meets twice a year. Since 2009 the ARO Platform has established ad-hoc Subgroups on centralised bank account registers, on the reuse of confiscated assets, on asset management and on virtual currencies. The latter two are still active.

A cycle of informal ARO peer reviews was started in 2012. The peer visits, usually led by Europol, focus on the functioning of the ARO, the exchange of information and best practices.

The trust built during the years among members of the ARO community now results in important operational successes. For example, in 2016 a bank account provisioned with more than € 200 million was frozen in one day thanks to the exchange of intelligence information and swift action undertaken by a FIU and two AROs. A judicial order confirming the freezing was then rapidly sent by the concerned country.

Created in 2004, the **Camden Asset Recovery Inter-agency Network (CARIN)** is an informal network of English speaking judicial and law enforcement practitioners, who are experts in the field of asset tracing, freezing, seizure and confiscation. The aim of CARIN is to increase the effectiveness of members' efforts, on a multiagency basis, in depriving criminals of their illicit profits.

The membership of CARIN includes representatives of 56 countries and 9 international organizations. Since 2004, the permanent secretariat is located at Europol. The Members of CARIN meet in the Annual General Meeting and in 4 Steering Group meetings per year. They discuss strategic issues, exchange best practices and build informal ties which further facilitate operational cooperation.

Six **Asset Recovery Inter-agency Networks (ARINs)** are affiliated to CARIN, namely RRAG (South America), ARIN-SA (South Africa), ARIN-WA (Western Africa), ARIN-EA (Eastern Africa), ARIN-AP (Asia-Pacific) and ARIN-CARIB (Caribbean Region). Each of these networks is modelled after CARIN. Each network has its own Secretariat, which participates regularly to the activities of CARIN. CARIN also organises every year a meeting of representatives of all the regional networks.

In total, CARIN and its affiliated networks represent more than 120 countries worldwide.

The **Anti-Money Laundering Operational Network (AMON)** is an informal network of national contacts from law enforcement anti-money laundering units, focused on all aspects related to tackling money laundering activities. Its main goals are to facilitate the exchange of information among investigators; to direct requests to the most appropriate formal channels; to provide a forum for common issues of interest and to enhance the effectiveness of cross border investigations into money laundering by providing faster responses and pooled expertise.

ALEFA is an informal network of forensic accountants created in 2012. It aims to provide a network through which its members and prospective members may share expertise, experience, knowledge, ideas and techniques to increase the effectiveness of forensic accountancy within European law enforcement.

The **Tri-Party Working Group on Virtual Currencies** is a task force jointly established between Europol, Interpol and the Basel Institute dedicated to monitor the use of Virtual Currencies for the purpose of financial crimes. The main objective is to increase the capacity of investigative agencies to successfully investigate crimes in which virtual currencies are used in money laundering scenarios, to create a network of practitioners and experts, and to collectively establish best practices and provide assistance and recommendations inside and outside the working group. Under this umbrella, the first “Global Conference on Money Laundering and Digital Currencies” took place on 16-18 January 2017 in Doha. The next conference is currently under preparation.

3. Identification of existing and potential vulnerabilities

Identified during the workshop held on 10-11 July 2017 (brainstorming between participants and their inputs) based on the key areas to target identified in the EU SOCTA 2017 (6886/17 ADD 2 EU RESTRICTED)

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4. Strategic goals: their definition and measurement of achievement

Identified during the workshop held on 10-11 July 2017 (brainstorming between participants) supported by the common horizontal strategic goals and the guidelines on designing smart key performance indicators.

1. Intelligence Picture

Objective: Develop or keep updated the intelligence picture relating to criminal finances, money laundering and asset recovery, through the detection of intelligence gaps, the monitoring of trends and new developments, related to criminal value flows, criminal syndicates and [new] payment methods and the identification of links to other crime areas and disseminate it to relevant stakeholders.

.Type of actors involved:

- Law enforcement community constituting law enforcement and judicial chain (e.g. police, customs, tax, judiciary and administrative authorities and services specialising in asset recovery), FIUs, regulators of financial institutions, other relevant non-law enforcement agencies
- EU JHA Agencies and other EU bodies / actors
- International organisations and networks
- Private sector (including currency traders, financial institutions)
- Dedicated Expert Action Leaders of other crime priorities

Type of actions:

- Detect intelligence gaps
- Collect, share and exploit relevant data and knowledge
- Develop and disseminate analytical products such as threat and risk assessments, early warnings, scenarios and future trends

Benefit:

- Identification of key threats and trends
- Support decision-making and intelligence-led investigations
- Increased cooperation and information exchange between relevant actors

KPIs:

- Number of intelligence gaps detected
- Quantity and quality of collected, shared and exploited data and knowledge
- Number of (joint) intelligence reports produced per year

2. Operational activities

Objective: Prepare and conduct operations and investigations to detect and disrupt criminal syndicates and professional enablers involved in criminal finances and money laundering, and facilitate asset recovery.

Type of actors involved:

- Law enforcement community constituting law enforcement and judicial chain (e.g. police, customs, tax, judiciary and administrative authorities and services specialising in asset recovery), FIUs and regulators of financial institutions, other relevant non-law enforcement agencies
- EU JHA Agencies and other EU bodies / actors
- International organisations and networks
- Private sector (including currency traders, financial institutions)
- Dedicated Expert Action Leaders of other crime priorities

Type of actions:

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Benefit:

- Disruption of criminal syndicates and professional enablers involved in criminal financing and money laundering
- Awareness about specific tactics, initiatives and practices
- Better understanding of criminal business model
- Establishment of coordinated operational response
- Increased freezing and seizure of assets

KPIs:**DELETED**

3. Prevention and Capacity building

Objective: Prevent criminal financing and money laundering through awareness-raising amongst relevant public and private actors, and build the law enforcement capacity to tackle crime by improving knowledge, skills and expertise based on training and the sharing of best practices.

Type of actors involved:

- Law enforcement community constituting law enforcement and judicial chain (e.g. police, customs, tax, judiciary and administrative authorities and services specialising in asset recovery), FIUs
- EU JHA Agencies and other EU bodies / actors
- International organisations and networks
- Public and private sector
- Dedicated Expert Action Leaders of other crime priorities

Type of actions:

- Crime prevention activities
- Explore crime proofing of legislation
- Identification and development of relevant policy measures and preventive tools
- Awareness raising campaigns to law enforcement, the judiciary, the public and private sector
- Training of relevant actors
- Identification and sharing of best practices including case studies, from investigations and prosecutions
- Networking
- Explore options to pool capacity between MS
- Awareness raising on the benefits of providing bank statements in a common digital format

Benefit:

- Increased awareness of relevant actors
- Preventing criminal access to the legal economy
- Improved knowledge, skills and expertise
- Implementation of best practices, state of the art techniques

KPIs:

- Number of prevention actions initiated per year
- Number of awareness raising campaigns per year and number of Member States where such campaigns have been organised
- Number of trainings (or number of trained persons) per year
- Satisfaction of trainees with training (surveys)

4. Cooperation with non EU partners

Objective: Enhance cooperation with relevant non EU partners such as third countries, international organisations and networks, regional fora and private sector in order to prevent and combat criminal finances and money laundering and to facilitate asset recovery

Type of actors involved:

- Law enforcement community constituting law enforcement and judicial chain (e.g. police, customs, tax, judiciary and administrative authorities and services specialising in asset recovery), FIUs, other relevant non-law enforcement agencies
- EU JHA Agencies and other EU bodies / actors
- International organisations and networks, such as Interpol, CARIN and AMON
- Regional fora (ARINs etc.)
- Public and private sector
- Dedicated Expert Action Leaders of other crime priorities

Type of actions:

- Joint operational activities on various steps of the enforcement chain, including JADs and regional cooperation
- Cooperation and coordination of judicial activities, including JITs
- Information collection and exchange
- Increase awareness campaigns
- Support to capacity building in key third countries and jurisdictions
- Developing and supporting international operational networks, such as CARIN and AMON
- Multilateral projects with non EU partners / countries

Benefit:

- Disruption of OCGs
- Swift access to private sector information
- Improved information exchange
- Enhance multinational law enforcement cooperation
- Better understanding of criminal financing schemes at global level
- Increase trust and cooperation with non EU partners, including key third countries and jurisdictions

KPIs:

- Number of information exchange requests with non EU partner / countries
- Number of new contact points established with relevant non EU partners / countries established
- Number of joint operational actions (including JITs) initiated per year

5. Document Fraud

Objective: When money laundering and asset recovery investigations identify the use of false and fraudulently obtained genuine documents, the dedicated experts from the horizontal working group might be engaged.

Type of actors involved:

- Horizontal expert group on document fraud

Type of actions:

- Identification of a Dedicated Action Leader to liaise with the Horizontal expert group on document fraud
- Training on document fraud for financial investigators
- Joint operations where relevant

Benefit:

- Increased number of parallel investigations in document fraud
- Identification and monitoring of criminal trends in terms of document fraud related cases
- Awareness raising and better insight into criminal market

KPIs:

- Number of trainings organised and persons trained
- Number of cases/investigations referred to the horizontal expert group to document fraud
- Number of joint operations

6. Financial Investigations

Objective: Combat criminal finances, money laundering, and facilitate asset recovery by providing specialised knowledge through guidance and support the implementation of actions, where relevant, in the other EU crime priorities.

Type of actors involved:

- Dedicated expert Action Leaders of the other crime priorities
- Driver and participants of the crime priority Criminal finances, money laundering and asset recovery

Type of actions:

- Establish the link between the Driver on criminal finances, money laundering and asset recovery and the Dedicated expert Action Leaders of the other crime priorities

Benefit:

- Coordinated approach in introducing financial investigations in all other crime priorities
- Increased attention to financial investigation in preventing and fighting organised crime
- Increased possibility to follow the money and to help in/with/at asset recovery

KPIs:

- Percentage of investigations into EU crime priorities with related financial investigations

7. On-line trade in illicit goods & services

The experts participating in the workshop held on 10-11 July 2017 did not consider that the category of Online trade in illicit goods and services was relevant for this crime priority.

Justifications:

- This category relates to illicit goods and services. Cash is not an illicit good. The use of cash (e.g. for money laundering purposes) may be illicit.
 - The MASP and OAP on cybercrime will already foresee specific actions on online trade and on new payment methods. Overlaps should be avoided.
 - This category is not relevant at MASP level. If necessary, initiatives related to online trade (eg on trade-based money laundering, use of bitcoins in money laundering etc.) may be implemented under Categories 1 or 2 (Intelligence picture or Operational actions) at OAP level.
-