

Mr. John Carlson
Principal Administrator
FATF Secretariat
2, rue André Pascal
75016 – Paris
France

Brussels, 20 June 2011

Re: Review of the Standards—Preparation for the 4th Round of Mutual Evaluations

Dear Mr Carlson,

I am writing to you regarding the level of engagement between FATF and the international legal profession during “The Review of the Standards—Preparation for the 4th Round of Mutual Evaluations”.

The CCBE had been hoping to follow developments with regard to this review. We were glad to have the opportunity to participate in the meeting in Paris in November 2010 on the issue, and to submit comments to the October FATF consultation paper.

In the CCBE response, we mentioned that the CCBE would appreciate an early opportunity to comment on the next stage of the FATF consultation. Regrettably, the CCBE has not been informed of any developments since the November 2010 meeting.

The CCBE was initially encouraged when we read in the Foreword to the FATF October 2010 Consultation paper that the FATF is “committed to conducting this review in an open and transparent manner, and the FATF is keen to involve the private sector, in particular members of the Consultative Forum, and other interested parties in order to ensure that all the proposals receive proper consideration by all stakeholders. The financial sector and other businesses and professions are key partners in the FATF’s efforts to combat money laundering and terrorist financing: financial institutions and other gatekeepers are the lead actors in the daily fight against this criminality. It is therefore essential for us to reflect that practical knowledge and experience in our review of the standards and how they are implemented.”

Following this, the CCBE is disappointed with the level of engagement to date. As you know, the CCBE through its member bars and law societies represents around 1 million European lawyers. We share your view from the Foreword quoted above about the importance of practitioner input with regard to the revision of the standards. It is in everyone’s interest that consultations with key players are genuine. This evidently has not been the case to date.

The CCBE is aware that other organisations representing the legal profession across the globe share these concerns and have communicated similar views, to which we urge you to respond constructively.

I look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G. Dal', written over a long, thin horizontal line that tapers to a point on the right side.

Georges-Albert Dal
CCBE President