

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

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Glossary of Terminologies and Acronyms

MENAFATF	Middle East and North Africa Financial Action Task Force against Money Laundering and Terrorist Financing.
Member Countries	The member countries of Middle East and North Africa Financial Action Task Force against Money Laundering and Terrorist Financing.
FATF Standards	The 40 recommendations issued by Financial Action Task Force (“FATF”) in 2012, along with their subsequent amendments and interpretive notes, are included, as well as the applicable definitions found in the glossary attached to the recommendations.
Secretariat	The Secretariat of Middle East and North Africa Financial Action Task Force against Money Laundering and Terrorist Financing.
FATF Methodology	The methodology for assessing technical compliance with FATF Recommendations and the effectiveness of AML/CFT/CFP systems, issued by FATF in 2022 and its subsequent amendments.
Principle of Peer Review	This involves experts from member countries of Middle East and North Africa Financial Action Task Force against Money Laundering and Terrorist Financing carrying out a mutual evaluation and follow-up processes conducted to member countries, in an independent and transparent manner. The assessment team and follow-up experts are selected from member countries other than the country being evaluated or followed up on.
Key Recommended Action (“KRA”)	The roadmap for the recommended actions.
Plenary Meeting	The body responsible for taking decisions in the Middle East and North Africa Financial Action Task Force against Money Laundering and Terrorist Financing, consisting of designated officials from member countries with sufficient experience in AML/CFT/CPF matters.
International Co-operation Review Group (“ICRG”)	The team established by FATF for the purpose of identifying countries with significant strategic deficiencies in their AML/CFT/CFP systems and working with them to address such in accordance with FATF Standards and the application of its Methodology.

**Financial Sector
Assessment Program
("FSAP")**

The Financial Sector Assessment Program ("FSAP") provides a comprehensive and in-depth analysis of the resilience of the financial sector in the country under evaluation. This is carried out by the International Monetary Fund ("IMF") and the World Bank ("WB"). The program includes stress tests to measure the financial sector's ability to withstand pressures, an assessment of the quality of supervision and regulation in the financial sector, as well as an evaluation of the crisis management framework.

**Detailed Assessment
Report ("DAR")**

A report for the assessment of AML/CFT/CPF systems prepared by the International Monetary Fund and World Bank. Detailed Assessment Report is considered a Mutual Evaluation Report, whereas the procedures of MENAFATF to which adoption and publication applies thereto.

**Reports on the
Observance of Standards
and Codes ("ROSC")**

A report is usually prepared by both the International Monetary Fund and World Bank, within the context of Financial Sector Assessment Program ("FSAP"). Whereby the FATF Standards are considered one of the 12 standards that constitute the ROSC.

**Mutual Evaluation
Working Group
("MEWG")**

The team was established by Middle East and North Africa Financial Action Task Force against Money Laundering and Terrorist Financing for the purpose of following up on the mutual evaluation and the follow-up processes and verifying the level of compliance with FATF Standards and Methodology.

Observers

The countries and regional and international organizations that have the capacity of observer within the Middle East and North Africa Financial Action Task Force against Money Laundering and Terrorist Financing.

The Global Network

Comprises the FATF and the nine FATF-Style Regional Bodies ("FSRB").

**Evaluation and
Compliance Group
("ECG")**

A group established by the FATF for the purposes of monitoring mutual evaluation and follow-up processes and verifying the extent to which they comply with the FATF standards and application of its Methodology.

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

I. INTRODUCTION

1. These procedures for the third round of the mutual evaluation and follow-up processes for MENAFATF have been prepared based on the universal procedures (Consolidated Processes and Procedures for Mutual Evaluations and Follow-up) issued by FATF in October 2023, along with its subsequent amendments. These serve as the foundation for the mutual evaluation and follow-up processes that MENAFATF will conduct for member countries, in accordance with FATF standards and the application of its methodology. These procedures also apply to any mutual evaluation that may be conducted by the International Monetary Fund (IMF) or the World Bank (WB) for any of the member countries.
2. These procedures are subject to periodic review by MENAFATF to continuously identify challenges and update the procedures, either to address these challenges or to align with any updates to the universal procedures issued by FATF. The MENAFATF will work to update these procedures within a reasonable timeframe.

Scope, principles and objectives for mutual evaluations and follow-up

3. As set out in the Methodology, the scope of mutual evaluations will involve two inter-related components for technical compliance and effectiveness. The technical compliance component assesses whether the necessary laws, regulations or other required measures are in force, effect, comply with the requirements of FATF 40 recommendations and whether the supporting anti-money laundering (AML), countering the financing of terrorism (CFT), and countering the financing of proliferation of weapons of mass destruction (CPF) institutional frameworks are in place. The effectiveness component assesses whether the AML/CFT/CPF systems are working, and the extent to which the country is achieving the defined set of outcomes.
4. The follow-up processes is intended to: (i) encourage members' implementation of the FATF Standards; (ii) provide regular monitoring and up-to-date information on member countries' compliance with the FATF Standards (including the effectiveness of their AML/CFT/CPF systems and progress against Key Recommended Actions (KRA); and (iii) apply peer to peer review and adequate accountability.
5. There are a number of general principles and objectives that govern AML/CFT/CPF assessments and follow-up conducted by MENAFATF to member countries. Which were taken into account to be achieved through these procedures, which are shown as follows:
 - a) Apply the peer review principle in all mutual evaluation and follow-up processes.
 - b) Produce objective and accurate reports of a high standard in a timely way.
 - c) Ensure that there is a level playing field, whereby mutual evaluation reports (MERs), including the key recommended actions and roadmap and executive summaries, are consistent, especially with respect to findings, recommendations and ratings.

- d) Ensure that there is transparency and equality of treatment, in terms of the assessment, follow-up processes, for all countries assessed.
- e) Seek to ensure that the evaluation and assessment exercises conducted by MENAFATF are equivalent, and of a high standard.¹
- f) Facilitate mutual evaluation, follow-up processes that:
 - are clear and transparent,
 - encourage the implementation of higher standards,
 - identify and promote good and effective practices, and
 - alert governments and the private sector to areas that need strengthening.
- g) Be sufficiently streamlined and efficient to ensure that there are no unnecessary delays or duplication in the processes and that resources are used effectively.

Changes in the FATF Standards

6. All members countries should be evaluated on the basis of the FATF Standards and the FATF Methodology as they exist at the date the country's mutual evaluation technical compliance submission is due. For the purposes of regular or enhanced follow-up, countries should be evaluated on the basis of the FATF Methodology as it exists at the date the country's submission is due for its follow-up report (FUR). The report should state clearly if an assessment has been made against the recently amended FATF Standards.
7. To ensure equality of treatment, and to protect the international financial systems, technical compliance with any FATF Standards that have been revised after the date the country's mutual evaluation technical compliance submission is due will be assessed as part of the follow-up process if they have not been assessed as part of the mutual evaluation.
8. Decisions taken by the FATF plenary on the interpretation of the standards and the application of the FATF Methodology and procedures are recorded in the FATF plenary's summary record. These decisions take effect immediately and apply to all reports subsequent to the date of their issuance and are not considered changes to those standards or the methodology, whereby they do not require automatic reassessment as part of the follow-up process. The MENAFATF present the decisions of the FATF relating to the interpretation of standards and methodology to the MENAFATF plenary meeting regularly, whereby all summary records of non-confidential items are made available to member countries.

Scheduling mutual evaluations

9. The schedule of mutual evaluations and the number of evaluations to be prepared each year is primarily governed by MENAFATF's resources of Secretariat members and experts qualified to participate as assessors, which member countries must provide to complete the third round of mutual

¹ This also applies to mutual evaluations conducted jointly between MENAFATF and FATF, and to mutual evaluations that may be conducted by the IMF or the World Bank of any member country.

evaluation within the timeframe specified. Therefore, the basics and standards of scheduling of the third round of mutual evaluation are as follows:

- a) The third round of mutual evaluations will commence in June 2025,² with a timeframe of 7 years, concluding at the latest by May 2033.
- b) The number of mutual evaluations to be conducted by MENAFATF annually is three.
- c) As the primary consideration, the date from adopting the country's last MER until the date of commencing the ME Process for the member country, ideally, should not exceed a maximum of 11 years or minimum of 5 years. Subsequently, the following should be considered:
 - The level of a country's implementation of FATF standards in AML/CFT/CFP, which is determined based on the results of the mutual evaluation process in the second round, and the country's placement in the relevant follow-up process (whether regular or enhanced follow-up), which leads to a general understanding of the remaining risks. The country's status in the ICRG process is also considered. When taking this into account, at least 12 months should elapse between the completion of the ICRG action plan for a country and the due date for that country to submit its technical compliance questionnaire, to avoid overlap between the mutual evaluation process and the ICRG process as much as possible. However, if a country cannot exit the ICRG process before the deadline for submitting the technical compliance questionnaire, the ICRG process and the third-round mutual evaluation process may continue concurrently.
 - Gross Domestic Product (GDP) and the average per capita GDP in Member Countries. This is determined through collected statistics that are published by international financial institutions, where priority is given to countries that have a higher GDP and average per capita GDP than others.

10. Aside from the above-mentioned standards, there are a number of issues considered when scheduling the third round, which include:

- For member countries that are simultaneously members of FATF and the Gulf Cooperation Council (GCC), the scheduling of their mutual evaluations, which are conducted jointly with FATF, will be coordinated through consultations between the Secretariats of both FATF and MENAFATF.
- Conducting mutual evaluations that MENAFATF was unable to complete during the second round of the mutual evaluation processes at the earliest possible opportunity and reflecting this in the schedule for the third round of mutual evaluation.
- MENAFATF may consider requests to volunteer for an earlier position in the sequence, provided that sufficient time has passed since the requesting country's previous mutual evaluation, and that the earlier sequencing is practicable and convenient for MENAFATF Secretariat and other affected countries. Such requests will be reviewed and decided upon by the MENAFATF plenary meeting.

² The date for submitting technical compliance questionnaire by the Assessed Country for its first mutual evaluation process.

- When setting the dates for discussing the third-round MER, the deadline for submitting the technical compliance questionnaire is set for at least 17 months before the MENAFATF plenary meeting where the report will be discussed. Additionally, the follow-up process that the country is undergoing under the current or previous round of mutual evaluation must be suspended at least 22 months before the deadline for submitting the technical compliance questionnaire.
- The scheduling of mutual evaluation process includes deadlines for the Secretariat to receive the technical compliance questionnaire and effectiveness information, the date for the on-site visit, the date for face-to-face meeting, the date for discussing the MER at the MENAFATF plenary meeting, as well as the deadline for submitting the final follow-up report within the framework of the second round of the follow-up processes. Any changes to this schedule can only be made with the approval of the MENAFATF plenary meeting.

Co-ordination with the FSAP process

11. The FATF Standards are recognized by the IMF or WB as one of 12 key standards and codes, for which ROSCs are prepared, often in the context of a FSAP. Under current FSAP policy, every FSAP and FSAP update should incorporate timely and accurate input on AML/CFT/CPF. Where possible, this input should be based on a comprehensive quality AML/CFT/CPF assessment, and in due course, on a follow-up assessment conducted against the prevailing standard. When there is a reasonable proximity between the date of the FSAP delegation and that of a mutual evaluation or follow-up assessment conducted under the prevailing methodology, the IMF or WB allows for the key findings (including the KRA Roadmap) of that evaluation or follow-up assessment to be reflected in the FSAP.
12. The basic products of the evaluation process are the MER, KRA Roadmap and the Executive Summary (for MENAFATF) and the Detailed Assessment Report (DAR) and, if requested, ROSC (for the IMF or WB). Where possible, the KRA Roadmap and Executive Summary, whether derived from a MER or follow-up assessment report, will form the basis of the ROSC.³ Following the MENAFATF plenary, and after the finalization of the Executive Summary, the summary is provided by the Secretariat to the IMF or WB so that a ROSC can be prepared, following a pro forma review.
13. The substantive text of the draft ROSC will be the same as that of the Executive Summary, though the following formal paragraph will be added at the beginning:

“This Report on the Observance of Standards and Codes for the FATF Recommendations and Effectiveness of AML/CFT/CPF Systems was prepared by MENAFATF. The report provides a summary of [the/certain]⁴ AML/CFT/CPF measures in place in [Jurisdiction] as at [date], the level of compliance with the FATF Recommendations, the level of effectiveness of the AML/CFT/CPF system and contains recommendations on how the latter could be strengthened. The views expressed in this document have been agreed by the FATF and [Jurisdiction], but do not necessarily reflect the views of the Boards or staff of the IMF or WB.”

³ Both the DAR and the ROSC use the mutual evaluation report template attached to the FATF methodology (Annex 1) and follow the same format. However, the ROSC remains the exclusive responsibility and right of the IMF and the WB.

⁴ For ROSCs based on an MER, the word “the” should be used; for ROSCs based on a MER follow-up assessment, the alternative wording “certain” would be used (since the follow-up assessment is not a comprehensive one).

II. ROLES AND RESPONSIBILITIES IN THE EVALUATION AND FOLLOW-UP PROCESSES

Responsibilities of the Assessed/Subject to Follow-up Country

14. The onus is on the assessed country to demonstrate that it has complied with the Standards and that its AML/CFT/CPF regime is effective. Therefore, the country should provide all relevant information and documents to the assessment team during the course of the mutual evaluation process, and to follow-up experts or Joint Group (JG) members during the course of follow-up or ICRG monitoring. The country should ensure that all information provided is accurate and up to date. As appropriate, assessment team, follow-up experts and JG members should be able to request or access documents (the country may redact some of the information contained in the documents if necessary), data, or other relevant information. All updates and information should be provided in an electronic format, and countries should ensure that laws, regulations, guidelines, and other relevant documents are made available in the language of the evaluation⁵ and the country's official language.
15. The assessed country/subject to follow-up should maintain the mutual evaluation or follow-up processes within its technical framework, avoiding any reasons that might lead the assessors, reviewers or follow-up experts to reach a biased assessment or conflict of interest between their responsibilities as parties to the evaluation or follow-up process and their professional or private responsibilities and interests, which might affect the analysis, findings or recommendations contained in the drafts of the MER or FUR. In case it was clear to the Secretariat, at any stage of the mutual evaluation or follow-up processes, the assessed/subject to follow-up country does not comply with the reasons abovementioned, it shall inform the MENAFATF president of those matters to take the appropriate decision thereupon alongside the issues already raised. The President's first action in this regard might be through sending an official letter to the country's head of delegation informing them to address the issue.
16. At least one year before the deadline for submitting the technical compliance questionnaire, the assessed country should consider appointing a qualified national coordinator with appropriate technical skills and political support to be responsible for the mutual evaluation process. This is to ensure proper coordination and establish clear communication channels between the Secretariat and the assessed country. The coordinator should hold a sufficiently senior position to effectively liaise with other authorities and make specific decisions when required. The coordinator should also have an understanding of the mutual evaluation process and be capable of monitoring the quality of responses provided by other entities. This includes obtaining and comparing all necessary information from various sources and communicating it to the assessment team and the Secretariat in a clear manner.
17. During the on-site visit, the assessed country should ensure that confidentiality is maintained, and appropriate security protocols are in place, including measures to prevent use of listening or recording devices during meetings with authorities and deliberations of the assessment team. If interpretation from the country's official language to the language of the evaluation is required, the

⁵ In addition to Arabic language – as official language of the MENAFATF – English can be used as language of the joint mutual evaluation processes with the FATF. English and Arabic languages can also be used as the language of mutual evaluation processes carried out by the IMF and WB.

country should ensure professional and well-prepared interpreters who are subject to confidentiality requirements as outlined in paragraphs (34-37 of these procedures) and are available to provide, ideally, simultaneous translation or consecutive interpretation.

18. The Assessed Country must provide full logistic support to the assessment team during the entire period of the onsite, including provision of meetings rooms dedicated to the works of the team, supplied with monitor(s), photocopy and printing machines and other essential appliances, in addition to provision of internet connection. Moreover, the Assessed Country must ensure the safety of the Secretariat's team and assessment team and their transportation.

Responsibilities of the Mutual Evaluation Assessment Team

19. The core function of the mutual evaluation assessment team is to collectively produce an independent report (containing analysis, findings, and recommendations) concerning the country's compliance with the FATF Standards, in terms of both technical compliance and effectiveness. To protect their independence, and safeguard confidentiality of all documents and information produced during the mutual evaluation as outlined in paragraphs (34-37 of these procedures) and disclose any potential bias or conflict of interest between their responsibilities as an assessor and their professional or private interests, in a manner that may affect the analysis, outcomes or recommendations contained the drafts MERs.
20. While each assessor should take the lead on, or take primary responsibility for, topics related to their own area of expertise, assessors must also conduct an evaluation in a fully collaborative process, whereby all aspects of the evaluation are considered holistically by the entire team. Each assessor is expected to actively contribute to all parts of the evaluation. As a result, assessors will be actively involved in all areas of the report and beyond their primary assigned areas of responsibility. Assessors need to be open and flexible and seek to avoid narrow comparisons with their own national requirements or practices.
21. It is critical that assessors are able to devote their time and resources for mutual evaluation process throughout the duration of the evaluation process. This includes reviewing all the documents (including the information updates on technical compliance, and information on effectiveness), collaborating with one another and consulting with the assessed country (via the Secretariat) on an ongoing basis, raising queries and participating in conference calls prior to the on-site, preparing and conducting the on-site assessment, drafting the MER, attending post-onsite meetings (e.g. MENAFATF's face-to-face meeting, and working group/plenary discussions), finalizing the report after adoption by MENAFATF plenary, adhering to the deadlines indicated, and, if necessary, participating in a handover meeting with ICRG JG members after MENAFATF plenary adoption of the MER. The Secretariat should provide feedback to the delegations of the countries of assessors about their performance in each mutual evaluation process.
22. The assessment team must maintain the mutual evaluation process within its technical framework, and support the quality and consistency of the MER, through complying to Q&C with the FATF methodology and MENAFATF and FATF's precedents relating to MERs, including ensuring that the analysis is written clearly, concisely, comprehensively, objectively and supported by evidence. The assessment team, as well, must respond to any issues raised by the mutual evaluation reviewers or the Secretariat and the need to provide technical justifications for responding to those issues.

Responsibilities of Mutual Evaluation Reviewers

23. The main functions of mutual evaluation reviewers are to ensure MERs are of an acceptable level of quality and consistency, and to assist both the assessment team and the assessed country by reviewing and providing timely input on the risk and scoping exercise and the draft MER, including technical compliance questionnaire and KRA Roadmap.
24. Reviewers should maintain as confidential all documents and information produced during the mutual evaluation as outlined in paragraphs (34-37 of these procedures) and disclose any potential bias or conflict of interest between their responsibilities as an mutual evaluation reviewer and their professional or private interests, in a manner that may affect the analysis, outcomes or recommendations contained the drafts MERs.
25. The mutual evaluation reviewers need to be able to commit time and resources to review the risk and scoping exercise and the quality, coherence and internal consistency of the second draft technical compliance annex, second draft MER, as well as maintain the mutual evaluation or follow-up process within its technical framework, review quality and consistency with the FATF Standards, FATF and MENAFATF precedent. Reviewers are encouraged to consider each technical compliance annex and MER in its entirety; however, each mutual evaluation reviewer could, in principle, focus on part of the report so that, at minimum, mutual evaluation reviewers collectively cover the entire technical compliance annex, MER and KRA Roadmap, in coordination with the Secretariat.

Responsibilities of Follow-up Experts

26. Follow-up experts are assigned when a request for re-rating technical compliance is submitted. The function of experts is to contribute to producing an independent report (including analysis, conclusions and proposed ratings) outlining the measures a country has taken to address the KRA in its KRA Roadmap, improve its technical compliance with the FATF Standards, to comply with FATF Standards that have changed since its mutual evaluation report or last FUR with technical compliance re-ratings (TCRR), and any area in which the country's technical compliance has diminished. The follow-up reviewers, must maintain the follow-up process within its technical framework, – and in pursuit to protect their independence and maintain confidentiality of all documents and information produced during the follow-up exercise as outlined in paragraphs (34-37 of these procedures) and disclose any potential bias or conflict of interest between their responsibilities as a follow-up expert and their professional or private interests in a manner that may affect the analysis, outcomes or recommendations contained the drafts FURs.
27. Follow-up experts will need to be able to commit time and resources to reviewing all the country's submissions (including updated information on technical compliance and effectiveness), collaborating with any other follow-up experts involved in the follow-up exercise being open and flexible and seeking to avoid narrow comparisons with their own national requirements or practices, raising queries, participating in conference calls, conducting and writing up the analysis and adhering to the deadlines indicated. If any issues for which a follow-up expert is primarily responsible require discussion in the relevant MENAFATF working group meeting or plenary, the follow-up expert should attend the working group/plenary discussions. The Secretariat should provide feedback to the delegations of the countries of follow-up experts about their performance in each follow-up process.

Responsibilities of the Secretariat

28. The Secretariat should engage and consult the assessed country well before the start of the mutual evaluation process. This may include early engagement with higher level authorities to obtain support for, and co-ordination of, the entirety of the evaluation process and training for the assessed country to familiarize stakeholders with the mutual evaluation process. The Secretariat should review from time to time whether the way in which they engage with assessed countries is satisfactory.
29. The Secretariat monitors the implementation of the country's preparation for the evaluation process and submits a report to the MENAFATF plenary meeting regarding any issues that arise in this context, so that appropriate actions can be taken. Specifically, if the Secretariat finds that the national evaluation coordinator lacks the necessary qualifications to fulfill their duties, the Secretariat should consider ways to assist in building the coordinator's knowledge of these requirements (if the timeline so permits). If the issue remains unresolved, the Secretariat should request the assessed country to change the national coordinator, or it may present the matter to the MENAFATF president, to communicate with the assessed country in this regard.
30. The Secretariat should facilitate all engagement between the assessment team and assessed country on an ongoing basis, commencing as early as possible, but not less than 34 weeks before the on-site. Throughout the process the Secretariat will ensure that the assessors can access all relevant material and that regular conference calls take place between assessors and the assessed country to ensure a smooth exchange of information and open lines of communication during the entire mutual evaluation process.
31. During the mutual evaluation process, the Secretariat, among other things:
 - a) Impartially⁶ supports both the assessment team and the assessed country and ensures consistent application of the procedures.
 - b) Focuses on quality and consistency⁷ of MERs, including taking steps necessary to ensure that the assessors' analysis is clearly and concisely written, comprehensive, objective and supported by evidence.
 - c) Assists assessors and assessed country in the interpretation of the Standards and application of the FATF Methodology in line with past FATF plenary decisions.
 - d) Ensure that Assessors and the Assessed Country can access relevant documents.
 - e) Co-ordinate the mutual evaluation process and other tasks as outlined in these Procedures.
32. During the follow-up and ICRG processes, the Secretariat should impartially⁸ assist follow-up experts and members of the joint ICRG group in achieving quality reports and consistency in the application of the FATF Standards, FATF Methodology and MENAFATF Procedures, and should impartially support the countries during these processes. Moreover, the Secretariat will also advise

⁶ The Secretariat provides support for each the assessed country and the assessment team without any bias to either through the sound application of the FATF methodology and MENAFATF procedures.

⁷ "Quality and consistency" refer to a well-conducted evaluation that aligns with the procedures established by the Financial Action Task Force (FATF), ensuring that the mutual evaluation report includes analysis consistent with FATF standards, and methodology.

⁸ For more information on the role of the secretariat in ICRG (see paragraphs 171-172 of those procedures).

the MENAFATF MEWG and plenary meetings on process and procedural issues (e.g., in cases where all KRA are not fully or largely addressed or where no progress has been made when the country is subject to enhanced follow-up).

33. Secretariat should review from time to time whether it is sufficiently staffed to adequately support the mutual evaluation process, understanding that three staff members should be considered optimal for the majority of evaluations.⁹ Where resource issues exist, the MENAFATF should review its work plan and allocation of resources to other projects to ensure that work on MERs or FURs is adequately prioritized. Members should provide sufficient resources to ensure that this prioritization does not prevent the Secretariat from fulfilling its core functions.

Confidentiality and Conflict of Interest

34. The confidentiality requirements apply to the assessed/ subject to follow up country and confidentiality and conflict of interest requirements apply to the parties participating in assessment or follow-up processes (assessment team, mutual evaluation reviewers, follow-up experts, collectively “participants”), and any other person with access to assessment or follow-up documents or information. Such confidentiality requirements should apply to all discussions, internal deliberations and documents and information produced during a mutual evaluation or follow-up processes, including information produced:
 - a) by an assessed/subject to follow-up country (e.g., updates and responses, documents describing a country’s AML/CFT/CPF regime, measures taken, or risks faced (including those for which there will be increased or decreased focus), or responses to queries by assessment team, mutual evaluation reviewers or follow-up experts.
 - b) by the Secretariat or participants (e.g., draft MER, draft FUR, etc.).
 - c) in comments received through the consultation or review mechanisms.
35. These discussions, internal deliberations and documents and information should only be used for the specific purposes provided and should not be disclosed to any person who is not a participant, unless the assessed/Subject to Follow-up country and MENAFATF (and where applicable, the originator of the document) consents to their release. These confidentiality requirements apply to the participants, the Secretariat, officials in the assessed country and any other person with access to the documents or information.
36. Before they are given access to confidential documents or information, the participants should sign a confidentiality and independence agreement, which include a requirement to maintain confidentiality of documents and information provided during the mutual evaluation and follow-up processes by any of the assessors or evaluation reviewers or follow-up experts, as well as detecting any reasons that may lead to their conclusion that the evaluation was biased or containing conflict of interest between their responsibilities as parties of the mutual evaluation and follow-up processes and their professional and personal interests in a manner that may affect the analysis, outcome or recommendations contained in the drafts MER and FUR.
37. In exceptional cases, if it came clear to the Secretariat, at any stage of the mutual evaluation or follow-up processes, that there are issues related to the disclosure of confidentiality of documents

⁹ There may be instances where more than three staff members would be optimal, depending on the size, complexity, and needs of the assessment.

and information provided during the mutual evaluation or follow-up processes by any of the assessors, mutual evaluation reviewers or follow-up experts, or that there are reasons that lead them to reach a biased assessment or a conflict of interest between their responsibilities as parties of the mutual evaluation or follow-up processes and their professional or personal interests, in a manner that may affect the analysis, outcomes or recommendations contained in the draft mutual evaluation or follow-up reports, the Secretariat will inform the MENAFATF President of such to take appropriate action towards the issues raised, in coordination with the head of the delegation to which the assessor, evaluation reviewer or follow-up expert belongs, if necessary.

Respecting Timelines

38. The timelines are intended to provide guidance on what is required if the reports are to be prepared within a reasonable timeframe, and in sufficient time for focused discussion in the MENAFATF plenary. Delays may significantly impact fairness of the processes, the quality of the report and the ability of the MENAFATF plenary to discuss the report in a meaningful way. It is therefore important that all parties respect the specified timelines.
39. The timeline of mutual evaluations should be prepared to allow enough time between the on-site visit and the MENAFATF plenary discussion and reflects the ideal that the assessed country and assessment team will gradually narrow the range of issues under discussion over the course of the mutual evaluation processes. Timelines for follow-up reports are also designed to allow enough time to complete the reports and allow for consideration by delegations. A failure to respect the timelines may mean that this would not be the case.
40. Agreement to participate in the mutual evaluation and follow-up processes is considered an undertaking by the country, the assessment team, mutual evaluation reviewers and follow-up experts to meet the necessary timelines and to provide full, accurate and timely responses, reports or other material as required under the agreed procedure. To confirm such, the MENAFATF President – upon agreement between the Secretariat and the assessed country to the overall timeline of the mutual evaluation process or follow-up process - directs a letter to the head of delegation or the competent minister from the assessed country that contains an obligation on the country to commit to the deadlines contained in the timeline table of the mutual evaluation process and follow-up process, urging them to provide all information and documents necessary in accurate and updated manner as well as committing to transparency as required by the mutual evaluation process and follow-up process, in addition to maintaining its confidentiality. The letter also contains a commitment to protect the independence of assessors or follow-up experts and maintain the technical framework in a manner that enables them to analyze and reach outcomes and recommendations consistent with the mutual evaluation process and follow-up process outcomes.
41. In the event of failure to comply with the timelines agreed upon in the mutual evaluation and follow-up processes, the following procedures are among those that can be taken, based on the nature of non-compliance:
 - a) Failure by the country:
 - MENAFATF President may write to the Head of Delegation or the relevant Minister in the assessed country to mention the non-compliance of producers and timelines.

- The report's discussion may be deferred. In the event of deferral, the MENAFATF plenary will be advised as to reasons for deferral, and publicity could be given to the deferment (as appropriate) or other, additional action considered.
 - If deferment is not practicable, the assessment team or follow-up experts, supported by the Secretariat, will finalize and conclude the report for MENAFATF plenary consideration based on the information available to them at that time. In the case of a country under active ICRG review, deferral is not possible except in extraordinary circumstances.¹⁰
 - Take any other procedures that do not conflict with the memorandum of understanding (MoU).
- b) Failure by the assessment team, mutual evaluation reviewers, follow-up experts, or the Secretariat, the MENAFATF President may write a letter to or liaise with the Head of Delegation of the assessor, mutual evaluation reviewer, follow-up expert, or the Secretariat Executive Secretary (for the Secretariat) to mention the non-compliance of producers and timelines.
42. The Secretariat should keep the President advised of any failures so to respond in an effective and timely way. The MENAFATF plenary is also to be advised if the failures result in a request to delay the discussion of the MER or follow-up report.

Meetings

43. All efforts should be made to hold all meetings related to the mutual evaluation and follow-up processes in person. However, the meetings mentioned in these procedures may be held virtually, via video or remote conferencing, when in-person meetings are not practically feasible, except in cases where physical attendance is specifically required (such as on-site visits).

Mutuality and Assessor Contributions

44. Under the principle of peer review, MENAFATF should work to ensure that the mutuality of the process is maintained. Accordingly, all member countries should provide qualified experts to be assessors and ensure that those experts are made available to meet the responsibilities of a mutual evaluation assessment team member in a timely way. The Secretariat should consider introducing mechanisms to encourage and facilitate members to contribute assessors and experts.

III. COMPOSITION OF TEAMS AND SELECTION OF PARTICIPANTS IN MUTUAL EVALUATION AND FOLLOW-UP PROCESSES

Composition and Formation of Mutual Evaluation Assessment Team

45. Assessors should be very knowledgeable about the FATF Standards and FATF Methodology. They are required to attend and successfully complete the training and qualification courses for experts before participating in the mutual evaluation processes. Whether this course was conducted by MENAFATF, FATF or jointly by both, or was conducted by any FSRB or by international or

¹⁰ See the Procedures for the FATF AML/CFT/CPF Mutual Evaluations, Follow-up and ICRG.

regional organization. At a minimum, at least one assessor must have prior experience in conducting mutual evaluation.

46. The Secretariat should ensure the availability of assessors so that the assessment team is formed at least 34 weeks prior to the on-site visit to the assessed country. Once the assessment team is formed, the President of MENAFATF formally notifies the assessed country of the names of the assessment team after obtaining approval from the countries to which the assessors belong. Also, the MENAFATF President directs a letter to heads of delegations to which the assessors belong that contain the urge to provide all possible assistance to facilitate the assessors' execution of their responsibilities during the mutual evaluation processes, including working on providing assessors for all stages of the evaluation process and complying to all timelines contained in the timeline table of mutual evaluation processes. Add to that, compliance to maintain the technical role of assessors and protect their independence and avoid the existence of any circumstance that may lead to biased evaluation or conflict of interests between their responsibilities as assessors and their professional and personal interests in a manner that may affect the analysis, outcomes or recommendations contained in the drafts MER.
47. The assessment team is composed of experts specializing in AML/CFT/CFP. The number of assessors in the team may vary depending on the assessed country, the risks of ML, TF, and PF,¹¹ as well as the context of the country. It also depends on the advancement, size, and complexity of the country's AML/CFT and financial system, and whether the assessed country is a joint member of FATF or member of the Gulf Cooperation Council.
48. An assessment team will usually consist of five to six expert assessors (comprising at least one legal, financial¹² and law enforcement expert). They are selected by the Secretariat from among the expertise available within member states. Additionally, at least three members from the Secretariat are included. If additional assessors or assessors with specific expertise are needed, the Secretariat should ensure their availability, whether from member states, observers, FATF member countries, or FSRBs. To ensure that the assessment team has appropriate balance of knowledge and skills, a number of factors should be considered when selecting the assessors, including:
 - a) their relevant AML/CFT/CPF operational and assessment experience in FATF standards and methodology.
 - b) their level of performance in the Assessor Training course , so they must be classified in categories (A) or (B).¹³
 - c) their willingness and ability to conduct the evaluation impartially and abide by the MENAFATF Procedures, including compliance with the requirements related to confidentiality, conflict of interest and independence.

¹¹ "Proliferation financing risk" refers strictly and only to the potential breach, non-implementation or evasion of the targeted financial sanctions obligations referred to in Recommendation 7.

¹² The assessment team should have assessors with expertise relating to the preventive measures necessary for the financial sector, VASPs and designated non-financial businesses and professions.

¹³ Participants who have completed the Assessor Training Course are classified into three categories: Category (A): They can be directly relied upon for mutual evaluation and follow-up processes. - Category (B): They can be directly relied upon for mutual evaluation and follow-up processes, provided that they are assisted in their work by experts from Category (A) or from the Secretariat. - Category (C): They need further development and training so that they can be used for future mutual evaluation or follow-up processes.

- d) their commitment to make available the necessary time to take part in a mutual evaluation or follow-up processes and to attend the meetings.
- e) their interpersonal skills to work well in a multi-cultural team, and to communicate with diplomatic sensitivity.
- f) language of the evaluation.
- g) nature of the legal system and institutional framework of the assessed country.
- h) regional and gender balance among members of the assessment team.
- i) specific characteristics of the assessed country (e.g., size and composition of the economy and financial sector, geographical factors, and trading or cultural links).

Selecting Mutual Evaluation Reviewers

49. According to the principle of the peer review, the Secretariat will work to ensure that the mutuality of the processes is maintained, and members should provide qualified experts as mutual evaluation reviewers, taking into consideration - upon selection for a mutual evaluation process – their successful completion of experts qualification and training course and classified under categories (a) or (b). Mutual evaluation reviewers should be experts from MENAFATF, FATF and FSRB delegations, FSRB Secretariat members, and the IMF or WB. To avoid potential conflicts and to strengthen the peer review nature of the process by involving a broader range of peers in the assessment, the mutual evaluation reviewers selected for any given quality and consistency review will be from countries other than those of the assessors and will be made known to the country and assessors in advance. Generally, at least three mutual evaluation reviewers would be allocated to each assessment; and one mutual evaluation reviewer at least should be from one of the FATF or FSRB states or the staff of the IMF or WB. The FATF Secretariat carries out the role of reviewer of the evaluation for all mutual evaluation processes not carried out by the FATF.

Selecting Follow-up Experts

50. Assessments of a country's technical compliance re-ratings and, when in enhanced follow-up, progress against its KRA will be undertaken by other members consistent with the peer review principle of the mutual evaluation processes. These follow-up experts will analyze the country submission and prepare the summary report. Member Countries should provide qualified reviewing experts, whereas to the extent possible, the follow-up expert should be selected from among members of the assessment team which carried out the MER for the country or reviewers of the evaluation (if available). As for experts not part of the members of assessment team or reviewers, they should be experts from member countries (other than the country subject to follow-up) and should have relevant legal, financial or law enforcement background, who have successfully completed the training and qualification courses for experts and classified under categories (a) and (b). They should be selected by their Heads of Delegation. The number of follow-up experts assigned to a report, and their expertise, will depend on the nature of the KRA being reviewed and any particular Recommendations to be considered for re-rating.

IV. PROCEDURES AND STEPS IN THE MUTUAL EVALUATION PROCESS

51. A summary of the key steps and timelines for the mutual evaluation processes are set out at Appendix 1. This includes the main steps for the mutual evaluation processes and their specified timeframes. These steps are described more fully below.
52. The Secretariat begins communicating with the country expected to be assessed well before the deadline for submitting the technical compliance questionnaire, by providing the country with a template for periodic updates on readiness for the mutual evaluation processes during the current round.¹⁴ This allows the country expected to be assessed to address all procedures taken regarding readiness for the mutual evaluation, particularly referring to actions taken concerning the elements listed in this template. The template should, at a minimum, include the following essential elements:
 - a) Enhancing political commitment to the mutual evaluation process.
 - b) Establishing or improving mechanisms for preparing, compiling, and analyzing statistics related to the evaluation process.
 - c) Identifying vulnerabilities according to recent updates to FATF recommendations and addressing them.
 - d) Completing and updating the national risk assessment for money laundering, terrorist financing, and proliferation financing, and taking necessary measures to mitigate these risks.
 - e) Forming committees and working groups for mutual evaluation preparation.
 - f) Supporting and strengthening local cooperation and coordination among relevant entities.
 - g) Selecting and preparing the national coordinator for the mutual evaluation process.
 - h) Providing training to all relevant entities on mutual evaluation preparation.
53. The Secretariat, in coordination with the country expected to be assessed, shall determine the date and program for a high-level mission from the MENAFATF to visit the country at a suitable time prior to the date of submission of the technical compliance questionnaire. This mission shall meet with number of relevant ministers and senior officials specialized in AML/CFT/CPF with the aim of ensuring the availability of basic knowledge regarding the nature of the mutual evaluation process, its stages and the resulting outcomes, in addition to working to raise the level of political commitment of the country and its relevant agencies to facilitate the mutual evaluation process and support its independence and transparency, and to identify all the country's responsibilities towards that process for the purpose of implementing it in accordance with what is contained in these procedures.
54. The Secretariat coordinates with the country to schedule a workshop for training various relevant entities in the country, enhancing their ability to engage with the mutual evaluation process. This workshop is held before the deadline for the assessed country to submit the technical compliance questionnaire.

¹⁴ For more details, please see the template for periodic updates on readiness for the mutual evaluation process during the third round adopted by the MENAFATF.

55. The assessed country and the Secretariat should therefore agree on the broad timeline of the evaluation at least 20 months before the MENAFATF plenary discussion. The assessed country should also advise the Secretariat of Recommendations where the country has made legal, regulatory, or operational framework changes since the country's last previous MER, or follow-up report with technical compliance re-rating (as outlined in paragraph 71 of these procedures).
56. Since the official language of the MENAFATF is Arabic, it will be considered the official language used in the mutual evaluation processes, but other common languages may be used in the joint mutual evaluation processes between the MENAFATF and the FATF, and in the mutual evaluation processes conducted by the IMF or the WB.

Preparation for the On-Site Visit

57. At least 30 weeks before the on-site visit or as early as possible, the Secretariat will fix the precise dates for the evaluation on-site visit as well as the timelines for the whole process in consultation with the country and based on the mutual evaluation timelines.
58. The assessed country should provide the Secretariat with the updates and information in order to provide key information for the preparatory work before the on-site visit, including understanding the country's ML/TF/PF risks, identifying potential areas of increased focus for the on-site, and preparing the draft MER.

Ensuring Adequate Basis to Assess International Co-operation and Input on Risk

59. Approximately 34 weeks before the on-site visit, the Secretariat will invite member states to provide feedback on their experience of international co-operation¹⁵ with the country being assessed. Moreover, the Secretariat will communicate with FATF Secretariat to invite their members and the members of FSRB, provided that to receive the information four weeks after sending the invitation.
60. The feedback could relate to: (i) general experience, (ii) positive examples, and (iii) negative examples, on the assessed country's level of international co-operation and should include information on any results achieved based on co-operation with the assessed country. Delegations may also provide any comments regarding AML/CFT/CPF issues they would like to see raised during the on-site visit or information that would assist the team to focus on areas of higher or lower risks.
61. In addition, the assessment team and the assessed country should identify countries that, based on the ML/TF/PF risks of the assessed country, would be able to provide valuable feedback on international co-operation or risk. During the risk and scoping exercise according to paragraphs (64-69 of these procedures), the assessment team should also identify the specific types of information that would be most valuable¹⁶ to be provided by these countries.
62. The Secretariat will advise the assessed country which countries the assessment team has selected for specific outreach. The Secretariat will then reach out to the selected countries 30 weeks from the onsite visit, inviting them to provide both general and specific feedback regarding their experience of participating in international co-operation with the assessed country or their

¹⁵ In this section, international co-operation refers to both informal international co-operation and formal mutual legal assistance

¹⁶ Examples may include co-operation between customs agencies where a border is shared, cooperation between tax authorities where money laundering from tax crimes is a significant risk, etc.

perspective on risks. This feedback should be provided to the Secretariat before completion of the scoping note.

63. All feedback received, whether from the general call for feedback or a specific request, will be made available to the assessment team and the assessed country. The assessed country should have an opportunity to respond to or supplement any information that may be used for the purposes of the evaluation.

Risk and Scoping Exercise

64. The assessment team will, from the beginning of the mutual evaluation processes, review the assessed country's risk, context, and general situation, to ensure the mutual evaluation is, from the outset, fully informed by risk. The assessment team may identify specific areas to which they would pay more attention to during the on-site visit and in the MER, as well as possible areas of reduced focus. This will usually relate to effectiveness issues but could also include technical compliance issues.
65. To facilitate this review, the assessed country should provide the information required to complete Chapter 1 of the MER (according to Annex 4) and any other information necessary to explain its identification, assessment and understanding of its risks, context and materiality, including material relevant to core issue 1.1 of Immediate Outcome 1. The country should include this information with its initial submission of technical compliance information approximately 30 weeks before the on-site visit. At least two weeks after making its initial submission, the country and the assessment team should begin to engage to discuss their understanding of the assessed country's risks, context, and materiality. This engagement may include an oral presentation by the assessed country, accompanied by any material it considers to be relevant, to explain its understanding of its risks, context, and materiality.
66. The assessment team may consider multiple sources of information to develop its preliminary understanding of the assessed country's risks, context and materiality and a scoping note. The assessment team will also consider information from credible and reliable sources external to the assessed jurisdiction, including the assessed country's most recent MER and FUR and the list of contextual factors outlined in the Introduction to the FATF Methodology. A list of the information sources used in the risk and scoping exercise should be attached as an annex to the MER, and the assessment team should be able to explain their use when asked by the assessed country.
67. The scoping note should set out briefly the areas for increased focus, as well as areas of reduced focus, and clearly articulate why these areas have been selected on the basis of risk, context, and materiality. While the final decision lies with the assessment team, the areas for increased or reduced focus should, to the extent possible, be mutually agreed with the assessed country. In addition to determining areas for increased or reduced focus, the assessment team should use their conclusions from the scoping exercise to determine the level of weight given to risk, context and materiality when providing ratings in MERs.
68. The draft scoping note, along with relevant background information, should be sent to the mutual evaluation reviewers and to the assessed country at least 26 weeks before the on-site. Having regard to the material made available to them, as well as their general knowledge of the jurisdiction, mutual evaluation reviewers should provide their feedback to the assessment team regarding whether the scoping note reflects a reasonable view on the focus of the assessment. Reviewers should provide this feedback at least two weeks after receiving the scoping note. The assessment team should

consider the merit of the mutual evaluation reviewers' comments, provide technical responses to the mutual evaluation reviewers, and amend the scoping note as needed, in consultation with the country.

69. After the technical compliance review and reviewing the assessed country's information on effectiveness, the assessment team should update the scoping note as needed, in consultation with the assessed country. The final version should be sent to the country at least six weeks before the on-site, along with any requests for additional information on the areas of increased focus. The country should seek to accommodate any requests arising from the additional focus on some areas.

Technical Compliance Review

Information Updates on Technical Compliance

70. The mutual evaluation technical compliance review should address only Recommendations where the country has made legal, regulatory or operational framework changes¹⁷ since the country's last previous MER (or follow-up reports with technical compliance re-rating) and Recommendations where there has been a change in the FATF Standards for which the country has not previously been assessed. The assessment team will determine the Recommendations that fall within the scope of the mutual evaluation process, referred to as "Recommendations under review," based on consultation with the assessed country and having regard to the Recommendations identified by the assessed country and previous MER and FUR. In case of any discrepancy between the assessment team and the assessed country in this regard, they should discuss the issue with the two heads of MEWG to reach an agreement.
71. The assessed country is required to identify any Recommendations related to changes made based on legal, institutional, or operational basis and should be under review as referred to in paragraph (55 of these procedures). Countries should rely on a questionnaire for the technical compliance review update to provide relevant information and explain the relevant changes within each criterion to the assessment team. The questionnaire will be used as a starting basis for the assessment team to conduct the desk-based review on technical compliance for the recommendations under review and should be submitted approximately 30 weeks before the on-site visit.
72. The questionnaire should be a guide to assist countries to provide relevant information in relation to: (i) background information on the institutional framework; and (ii) information on the measures that the country has taken to meet the criteria for each RUR. Countries should complete the questionnaire and may choose to present other information in whatever manner they deem to be most expedient or effective.
73. For Recommendations not under review, pre-existing analysis of such recommendations and ratings will be compiled from the assessed country's most recent MER or FURs with technical compliance re-rating for inclusion in the technical compliance annex.

Desk Based Review for Technical Compliance

74. Prior to the on-site visit, the assessment team will conduct a desk-based review of the country's level of technical compliance with the RUR. The assessment team will base its review on

¹⁷ Any such changes should be *material to the technical requirements of the Recommendation and the functional implications of the changes* that would warrant or lead to a re-rating, not minor changes, or changes only as to form

information provided by the country in the information updates on technical compliance, pre-existing information drawn from the country's most recent MER, FUR with technical compliance re-rating and other credible or reliable sources of information. The assessment team will carefully and comprehensively analyse this information, indicating if each sub-criterion is met, mostly met, partly met, or not met and why.

75. The assessment team may highlight relevant strengths or weaknesses not previously noted in the country's MER or FURs and should consider whether there are any significant issues from the previous MER or FURs that should be corrected in the current MER to protect the MENAFATF and FATF brand,¹⁸ and not to damage the integrity and credibility of the MERs issued thereby, in addition to ensuring that those reports accurately reflect the ML/TF risks facing the global financial system. If the assessors reach a different conclusion to previous MER or FURs (in cases where the Standards or the framework have not changed) then they should explain the reasons for their conclusion. In addition, if the team identifies changes in the assessed country's AML/CFT/CPF system that raise doubts about the ratings of a Recommendation not under review, the assessment team would reexamine that Recommendation.¹⁹
76. To ensure accurate and comprehensive analysis, the assessment team must consider all criteria of the RUR and examine the relevant legal, regulatory, or operational framework in its entirety, even when some elements of the framework remain unchanged from the country's last previous MER, or FUR. However, where a Recommendation is being assessed, but the situation relating to a particular criterion had not changed, the country should indicate that the analysis from the MER or FUR remains valid, and assessors should take a "light touch" approach in considering such criteria.
77. In conducting the review, assessors should only take into account relevant laws, regulations or other AML/CFT/CPF measures that are in force and effect at that time or will be in force and effect by the end of the on-site visit. Where relevant bills or other specific proposals to amend the system are made available, these may be referred to in the MER (including for the purpose of the recommendations to be made to the country) but should not be taken into account in the conclusions of the assessment or for ratings purposes.
78. The technical compliance annex (TC Annex) is drafted by the Secretariat on the basis of the assessment team's analysis of the RUR. When drafting the technical compliance annex for assessors, the Secretariat takes into account the quality and consistency of mutual evaluation reports, including interpretation of the FATF Standards and application of the Methodology and the application of MENAFATF procedures in line with past FATF and MENAFATF plenary decisions, and they should review the draft technical compliance questionnaire accordingly.
79. After reviewing the available information, including all relevant legislation, regulations, and other binding measures in effect, the assessment team submits its analysis of technical compliance to the Secretariat, which drafts the first version of the technical compliance annex. The assessment team then reviews this draft. This draft should include a description, analysis, and a list of potential technical deficiencies identified at that time. It does not need to include compliance ratings or

¹⁸ Examples of such issues include significant inconsistencies with the FATF Standards or Methodology, factual errors or other significant problems of quality and consistency.

¹⁹ Likewise, if the assessment team identifies any additional Recommendations (other than those under review) that are implicated by changes made to the country's AML/CFT/CPF system, it should request additional information from the assessed country to re-assess these Recommendations.

recommendations. The first draft of the technical compliance annex is provided to the country under evaluation at least five months before the on-site visit, and the country must submit clarifications and comments on the draft within three weeks of receiving it.

80. After considering the assessed country's clarifications and comments on the first draft, the assessment team will prepare a revised draft technical compliance annex. The revised technical compliance annex (second draft) will be sent to the country and the mutual evaluation reviewers three months before the on-site visit. The second draft technical compliance annex should contain preliminary ratings. The country and mutual evaluation reviewers will have three weeks to comment on this second draft technical compliance annex. Although the primary focus of the on-site visit is assessing effectiveness, a limited number of outstanding technical compliance issues may be discussed during the on-site visit.

Information and preliminary review on effectiveness

81. The assessment team will examine the country's level of effectiveness in relation to all of the 11 Immediate Outcomes identified in FATF Methodology. The assessed country should provide information on effectiveness based on the 11 Immediate Outcomes, four months before the on-site. They should set out fully how the country addresses each of the core issues as set out in each Immediate Outcome. The assessed country should provide this information by relying on the MER Template (Appendix (1) of the FATF Methodology).
82. It is important for countries to provide a full and accurate description (including examples of information, data, and other factors) that would help to demonstrate the effectiveness of the AML/CFT/CPF regime. The assessed country should highlight areas where it believes recommended actions could improve effectiveness. The assessed country should provide as much data and statistics as possible, according to the FATF guidance on AML/CFT/CPF-related data and statistics for 2015²⁰ (or any updated version).
83. The Secretariat should facilitate communications between the assessment team and assessed country to promote clarity and ensure a smooth exchange of information. In examining a country's level of effectiveness, assessors should consider the output of AML/CFT/CPF systems (data, statistics, case studies, etc.) that are complete by the end of the on-site visit.
84. After reviewing the information on effectiveness and any clarifications provided by the assessed country, the assessment team will prepare a preliminary outline of initial findings and requests for further information. In preparing this outline, the assessment team will bear in mind the assessed country's risk, context and general situation as identified in the risk and scoping exercise. The preliminary outline of initial findings and requests for further information should be provided to the assessed country approximately two months before the on-site visit. The assessed country should provide any comments on the findings and provide requested information not later than six weeks before the on-site.
85. To expedite the mutual evaluation process, and to facilitate preparing the program for the on-site visit, the assessment team will update its preliminary outline of initial findings and identify key issues and potential recommended actions for discussion. The updated outline of initial findings,

²⁰ The FATF guidance on AML/CFT/CPF-related data and statistics is available on the following link:

<https://www.fatf-gafi.org/content/dam/fatf-gafi/translations/guidance/AML-CFT%20Statistics%20FINAL%20Arabic%20version.pdf>

key issues and potential recommended actions for discussion should be provided to the assessed country at least one month before the on-site visit.

Programme for the on-site visit

86. The country, through its national coordinator, should work with the Secretariat and prepare a draft programme and coordinate the logistics for the on-site. The draft programme, together with any specific logistical arrangements, should be sent to the assessment team no later than two months before the visit. Please see Appendix (3) for an illustrative list of authorities and businesses that would usually be involved in the on-site.
87. The draft programme for the on-site visit should take into account the areas where the assessment team may want to apply increased or decreased focus based on the risk and scoping exercise. However, attention to any sector or category of financial institutions, DNFBPs or VASPs identified as an area of decreased focus should be commensurate with the level and nature of associated risk and should not be completely excluded from the programme.
88. To the extent possible, meetings should be held in a fixed location to avoid the assessors travelling between venues, which can be time-consuming and wasteful. However, this should not preclude some meetings taking place at the premises of the entities being met (e.g., the FIU). The programme should be generally finalized approximately three weeks before the on-site visit, with the understanding that the assessment team may request additional meetings shortly before or during the on-site, particularly where information gathered during meetings with country authorities and the private sector indicates higher risk levels than those identified in the risk and scoping exercise. When necessary for clarification, the assessment team may also request follow-up meetings with country authorities or the private sector.
89. Both in terms of the program and more generally, the time required for interpretation, and for translation of documents, must be taken into account. For the efficient use of time, meetings should generally be conducted in the language of the assessment. However, if translation from the country's official language into the language of the assessment is required, please see paragraph 17 of these procedures under Responsibilities of the Assessed Country.

On-site visit

90. The on-site visit provides the best opportunity to clarify issues relating to the assessed country's AML/CFT/CPF system. Assessors need to be fully prepared to review the 11 Immediate Outcomes relating to the effectiveness of the system and clarify any outstanding technical compliance issues. Assessors should also pay more attention to areas where higher ML/TF/PF risks are identified, while giving a lower focus on the low risks. Assessors must remain cognizant of the different country circumstances and risks, and that countries may adopt different approaches to meet the FATF Standards and to create an effective system. Assessors thus need to be open and flexible and seek to avoid narrow comparisons with their own national requirements or practices.
91. The on-site visit needs at least nine to ten days of meetings for countries with developed AML/CFT/CPF systems; however, the exact time needed may vary from one country to another. A typical on-site visit could thus allow for the following:

- a) In the beginning of the onsite visit, an initial half day preparatory meeting shall be held between the Secretariat and assessors²¹ to discuss the regulatory issues, the plan for the next meetings and the areas of higher or lower focus.
 - b) Nine to ten days of meetings with representatives of the country (such as relevant governmental authorities, self-regulatory bodies, and the private sector), including an opening and closing meeting between the assessed country high-level officials and the assessment team. Time may have to be set aside during the on-site for additional or follow-up meetings, if the assessors identify new issues that need to be explored, or if they need further information on an issue already discussed.
 - c) Two or three days where assessors work on the draft MER (supported by the Secretariat), ensure that all the major issues that arose during the evaluation are noted in the report, and discuss and agree on preliminary ratings, key findings, and recommended actions. The assessment team should provide a written summary of its preliminary key findings and recommended actions to the assessed country officials at the closing meeting, through the Secretariat.
92. The average total length of the on-site visit may be in the order of 13 to 16 working days. However, the actual time needed may be shorter or, in exceptional cases, longer, based on the size and complexity of the jurisdiction.
93. It is important that the assessment team be able to meet with and ask questions of all relevant agencies during the on-site, including governmental authorities, the private sector and the self-regulatory bodies concerned with AML/CFT/CPF. The assessed country and the specific agencies met should ensure that appropriate staff, including senior management officials who can represent the agency and explain its policies and procedures, are available, in addition to operational staff who are able to answer the questions of the assessment team. The staff attending the meetings should be familiar with the information that has previously been provided to the assessors, particularly information related to their area of expertise.
94. Meetings with the private sector or other non-government representatives²² are an important part of the visit. Generally, the assessors should be given the opportunity to meet with such bodies or persons in private, and without a government official present, if there is concern that the presence of the officials may inhibit the progress of the discussion. The team may also request that meetings with certain government agencies are restricted to those agencies only.
95. It is recommended not to make presentations during meetings except when necessary, with the importance of reducing their number and time to the least possible, and it is preferable to provide these presentations before the meetings so that the assessment team can see them in advance, taking into account the allocation of additional time during the meetings for the questions of the assessment team and the answers of the assessed country's representatives.
96. The assessment team sets clear objectives for each meeting during the on-site visit, in order to serve the general objective of this visit. It should also plan the conduct of meetings in a way that helps achieve such sub-objectives specifically.

²¹ The assessment team should also set aside time midway through the on-site to review the progress of the mutual evaluation and where relevant, the identified areas of increased focus for the on-site initially.

²² For example, those listed in Appendix 3.

Post on-site - Preparation of draft MER, KRA roadmap and executive summary

97. There should be a minimum of 35 weeks between the end of the on-site visit and the discussion of the MER and KRA Roadmap in MENAFATF plenary. The timely preparation of the MER, KRA Roadmap and Executive Summary²³ will require the assessors to work closely with the Secretariat and the assessed country. Depending on when the MENAFATF plenary discussion is scheduled, the time period may also be extended or adjusted. In exceptional cases and based on justified circumstances and with the consent of the assessed country, a shorter period of time may be allowed.
98. The steps in finalizing a draft report for discussion at MENAFATF plenary, and the approximate time that is required for each part, should be set out in greater detail in the agreed timeline, following the steps below (see also Appendix (1)).
99. In drafting the MER, the assessors should focus on providing their conclusions and the reasons for them rather than recitation of facts. In notes to the assessed country that accompany the first and second draft MER, assessors should aim to clarify as much as possible how information submitted by the assessed country was taken into account, what information was not taken into account and why, and areas where additional information is still needed. The Secretariat should oversee this process and improve the draft as necessary to ensure the assessors' analysis is clearly and concisely written, comprehensive, objective and supported by evidence.
100. With the aim to ensure communication between the assessment team and the assessed country, the Secretariat should facilitate regular conference calls between all parties, in particular after the circulation of an updated draft MER.

1st draft MER and Key Recommended Actions Roadmap

101. The assessment team should have approximately five weeks after the on-site visit to coordinate and refine the first draft MER (including the key findings, potential issues of note and recommended actions). The first draft MER will include the preliminary recommended actions and ratings. During this time, the assessment team should also consider which recommended actions should be considered as Key Recommended Actions (KRA) and compile the KRA in a separate list for the country (the KRA Roadmap).²⁴ These documents are then sent to the country for comments.
102. Subject to Methodology Introduction (the part related to recommendations, concerning how to enhance the AML/CFT/CPF system), Key Recommended Actions should only relate to immediate outcomes (IOs) rated moderate level of effectiveness "ME" or low level of effectiveness "LE" or Recommendations rated partially compliant "PC" or non-compliant "NC". Normally, there should be no more than two to three KRA related to each IO, including KRA for technical compliance for Recommendations related to that IO. In addition, there may be one KRA for each of Recommendations (3), (5), (6), (10), (11), and (20) that is rated non-compliant "NC" or partially

²³ The format for the Executive Summary, MER and KRA Roadmap is contained in Annex (2) of the FATF Methodology. Assessors should pay special attention to the guidance on how to complete the Executive Summary, KRA Roadmap and MER in the Introduction to the Methodology, including with respect to the expected length of the MER (100 pages or less, together with a technical annex of up to 60 pages).

²⁴ Assessors should review the FATF Methodology Introduction (the part related to recommendations, concerning how to enhance the AML/CFT/CPF system) for guidance on developing recommended actions, determining which will be Key Recommended Actions and other recommended actions and preparing the KRA Roadmap.

compliant “PC”, where these do not pertain to any IO rated moderate level of effectiveness “ME” or low level of effectiveness “LE”.

103. The assessed country should have at least four weeks to review and provide its comments on the first draft MER, including the KRA Roadmap and other recommended actions, to the assessment team, according to a template prepared by the Secretariat for this purpose. During this time, the assessment team should be prepared to respond to queries and clarifications that the country may raise and discuss the KRA Roadmap.

2nd draft MER and Key Recommended Actions Roadmap

104. On receipt of the country’s comments on the first draft MER and KRA Roadmap, the assessment team will have four weeks to review the various comments and make further amendments, as well as refine the KRA Roadmap. As in the case of the first draft, the assessment team should aim to clarify as much as possible, in writing, how specific information was taken into account in their analysis. The second draft MER and KRA Roadmap will then be sent to the country and to the mutual evaluation reviewers.²⁵

MENAFATF Pre-Plenary Quality & Consistency Review

105. As part of the mutual evaluation process, mutual evaluation reviewers will conduct a MENAFATF pre-plenary Q&C review with a view to:
- a) Commenting on assessors’ preliminary review and analysis of the country’s risks, context and materiality and the draft scoping note.
 - b) Reflecting a correct interpretation of the FATF Standards and application of the FATF Methodology (including the assessment of risks, integration of the findings on technical compliance and effectiveness, and identifying areas where the analysis and conclusions are clearly deficient).
 - c) Checking whether the description and analysis supports the assessors’ conclusions (including ratings).
 - d) Considering whether sensible, relevant, measurable, and achievable recommended actions for improvement are made and whether the most strategic recommended actions have been identified as KRA.
 - e) Where applicable, highlighting potential inconsistencies with earlier decisions adopted by the FATF and MENAFATF on technical compliance and effectiveness issues.
 - f) Checking that the substance of the report is generally coherent and comprehensible.
106. The mutual evaluation reviewers should have a copy of the comments provided by the country on the first draft MER and KRA Roadmap. Reviewers need to be able to access all key supporting documents - including the assessed country’s technical compliance and effectiveness submissions and its risk assessment.
107. The mutual evaluation reviewers should have at least three weeks to examine the second draft MER and draft KRA Roadmap and provide their comments to ensure transparency, all comments

²⁵ Appropriate translation of the 2nd draft MER should be distributed to the reviewers at this time.

from the mutual evaluation reviewers will be provided to the assessors and country. The mutual evaluation reviewers do not have any decision-making powers or powers to change a report.

108. It is the responsibility of the assessment team to consider the mutual evaluation reviewers' comments and then decide whether any changes should be made to the report. In addition to any changes made, assessors should respond to all substantive comments provided by external reviewers. When the draft MER and KRA Roadmap are circulated to member countries, observers and the Global Network for comment, the assessment team should provide a short response to the MENAFATF plenary regarding the decisions and any substantive changes it made to the report or KRA Roadmap based on the mutual evaluation reviewers' comments.
109. The assessed country will have the opportunity to submit further comments on the second draft MER and KRA Roadmap, in parallel with the Q&C review process.
110. Where any mutual evaluation reviewer in the MENAFATF pre-plenary Q&C process considers that an MER has significant problems of quality or consistency, the reviewer should wherever possible raise such concerns with the Secretariat as soon as possible during this pre-plenary Q&C process. The Secretariat, assessed country and the assessment team should consider and work, in consultation with the mutual evaluation reviewers, to appropriately address the concerns within the MER before circulation to member countries, observers and the Global Network for the Pre-plenary review, unless the assessment team had reasonable technical justifications not to address those concerns. In case such problems persist, a virtual meeting between the assessment team and the Secretariat should be held, with the attendance of the MEWG Co-Chairs, with the aim to address the unresolved problems. Save that, in such meeting, amendments to the MER should be put forward to discussion with the assessment team concerning the raised issues or those that have not been addressed, and any technical justifications and any suggested amendments to address such problems. In case significant problems persist to occur in the MER, the Secretariat, in consultation with the MEWG Co-Chairs may decide upon carrying out targeted review as outlined in paragraph (115 of these procedures).
111. After the quality and consistency review has been completed prior to the MENAFATF plenary meeting and the reviewers' comments have been received, the assessment team has at least three weeks to consider them and the assessed country's comments on the second draft of the MER and Roadmap. During this period, the country considers the reviewers' comments, and their responses are shared with the assessment team. Communication between the assessment team and the country, coordinated by the Secretariat, is held to discuss possible changes and unresolved issues, and to identify issues to be discussed in the face-to-face meeting. At this stage, the texts of the draft MER should be as close as possible to the final texts, with a narrow range of unresolved issues to discuss.

Face-to-face meeting

112. A face-to-face meeting is an important way to assist the assessed country and assessment team to resolve outstanding issues. The assessment team (including Secretariat) and the country should have a face-to-face meeting to further discuss the second draft MER and KRA Roadmap. This meeting shall be held at the Secretariat premises or at any other place agreed upon between the assessed country and the assessment team, in coordination with the Secretariat.
113. During this session, the assessment team and country should work to resolve any disagreements over technical compliance or effectiveness issues and identify potential key issues for MENAFATF plenary discussion. Sufficient time during the face-to-face meeting should be set aside to discuss

the KRA Roadmap. The face-to-face meeting should occur at least 13 weeks before the MENAFATF plenary (i.e., approximately 22 weeks after the on-site). Whenever possible, the MEWG co-chairs (or at least one of them) should attend the face-to-face meeting, as this will assist in the identification of key issues for MENAFATF plenary discussions.

114. After the face-to-face meeting, the assessment team will consider whether any further changes should be made to the draft MER or KRA Roadmap, as a result of the discussions held during this session.²⁶ The assessment team, in consultation with the assessed country, will then prepare the Executive Summary.²⁷

Targeted review (for exceptional cases only)

115. The Secretariat, in consultation with the MEWG Co-Chairs, should consider circulating a revised second draft to mutual evaluation reviewers for a targeted review in exceptional cases where:
- a) Changes made after the face-to-face meeting to the analysis or conclusions in the MER are so extensive or substantively different from the previous draft as to have a potential significant impact on the quality and consistency of the MER.
 - b) In the pre-plenary Q&C process, the mutual evaluation reviewers identified fundamental concerns with the MER quality and consistency or misapplication of the FATF Standards or FATF Methodology that had not been addressed or avoided as per paragraph (110 of these procedures).
116. Ideally, a targeted review should involve no more than five substantive issues, and the Secretariat should ensure that at least two weeks is allocated for the mutual evaluation reviewers and the assessment team to respond to any reviewers' comments prior to circulating the pre-MENAFATF plenary draft MER to member countries, observers and the Global Network. The comments provided in the targeted review will be circulated with the draft MER, or as soon as possible thereafter.
117. Acting on the recommendation of the mutual evaluation Reviewers, the Secretariat, in consultation with the MEWG Co-Chairs, presents the agreed opinion to the MENAFATF President, based on the internal governance processes of the MENAFATF,²⁸ in order to consider postponing the circulation of the pre-MENAFATF plenary draft MER to member countries, observers and the Global Network in exceptional cases where:
- a) A targeted review is triggered but there is not enough time to conduct such a review.
 - b) there remain fundamental concerns with the quality and consistency of the MER or misapplication of the FATF Standards or FATF Methodology²⁹ that cannot be addressed in time to circulate the pre-MENAFATF plenary draft MER at least eight weeks before plenary.

²⁶ Changes should only rely on information or documents, relating either to technical compliance or effectiveness, describing or further elaborating what has already been submitted by the country until the end of the on-site.

²⁷ The Executive Summary will describe the key risks, the strengths, and weaknesses of the system, and the KRA for the country to improve its AML/CFT/CFR regime.

²⁸ The policies, rules and procedures related to MENAFATF.

²⁹ Any such concerns should be consistent with the substantive threshold required to trigger the post-plenary Q&C process (see Part related to the MENAFATF post-plenary Q&C process) and the Q&C aspects of draft MERs in line with FATF plenary decisions.

118. Postponement of the circulation of the pre-plenary draft MER to member countries, observers and the Global Network in exceptional cases as mentioned in the preceding paragraph shall be considered until the review process is completed by the mutual evaluation reviewers or the fundamental concerns related to the report are addressed, provided that any such postponement does not exceed a single MENAFATF plenary cycle.

Identifying key issues for MENAFATF plenary discussion

119. The Secretariat shall circulate the (pre-plenary draft) MER, KRA Roadmap and Executive Summary at least eight weeks before plenary,³⁰ in addition to the reviewers' and country's comments and the assessors' responses regarding the draft MER, to all member countries and observers, including the FATF Secretariat, for further circulation to FATF members and other FSRBs. Delegations will have two weeks³¹ to provide any written comments on the pre-plenary drafts. The comments should focus in particular on identifying any substantive key issues that they wish to discuss in the MEWG and plenary, or on other high-level or horizontal aspects of the assessment, though other observations may also be made. The comments received will be made available to all member countries, observers, and the Global Network.
120. Based on the MER, KRA Roadmap, Executive Summary and members', observers and the Global Network's comments received, the MEWG Co-Chairs will engage with the country and the assessment team - with the support of the Secretariat - and prepare a list of (usually three to five and not more than seven) key issues that will be discussed in the MEWG. The key issues selected should give the assessed country the opportunity to raise several key issues in coordination with the co-chairs and reflect equally the key issues that the assessed country, member countries, observers and the Global Network are most keen to discuss. The list of key issues would include the key issues arising from the report (whether raised by the country, the assessment team, member countries, observers, or the Global Network), as well as any questions of interpretation or inconsistency with other MERs adopted by the FATF.³² The identified key issues should focus particularly on issues concerning effectiveness and the KRA Roadmap. Technical compliance issues can also be discussed. To the extent possible, the Secretariat staff directly involved in preparing the MER should not be included in the process of identifying and selecting key issues.
121. The Secretariat will circulate the list of key issues to members and observers at least two weeks before the MENAFATF plenary. Key issues will be discussed at the MEWG meeting (for no longer than 6 hours) in order to give sufficient time to discuss these issues and reflect different points of view regarding these issues to the MENAFATF plenary which will include recommendations on issues that have been agreed upon, while keeping the power to amend the compliance ratings and take decisions related to the amendment of the report, to the MENAFATF plenary Meeting alone. The MEWG has no decision-making powers with respect to a MER, as the MENAFATF plenary is the only body that has the powers to take such decisions. Such discussion during the meeting should be limited to technical matters related to the Key Issues. The Member Countries and Observers'

³⁰ The original draft and its translation will be distributed to facilitate the plenary discussion.

³¹ Member Countries may submit any written comments to the pre-plenary drafts against MERs issued by the Global Network, which are disseminated thereto by the Secretariat after receipt from the FATF Secretariat.

³² The representative of the FATF Secretariat at the plenary will be expected to assist and advise on all issues relating to the interpretation of the FATF Standards, and the quality and consistency aspects of the draft MER in line with past FATF plenary decisions. The plenary discussion will provide members and observers an opportunity to raise and discuss concerns about the quality and consistency of an MER.

comments should be supported by technical justifications in order to be considered by the Co-Chairs. The assessment team should also commit to respond to any issues raised with relation to quality and consistency.

122. Co-chairs of MEWG must provide to the MENAFATF plenary a summary of the discussions on the key issues that took place during the MEWG meeting, including proposals to amend the compliance ratings of any Recommendation or Immediate Outcome, and any proposed amendments to the texts of the MER, KRA or Executive Summary. This summary will be presented to the plenary for further discussion, and those agreed as information items only. For this purpose, after discussions in the working group meeting, the Secretariat will prepare a revised key issue document and any proposed amendments to the MER, KRA Roadmap and Executive Summary are submitted to the MENAFATF plenary for discussion³³ provided that the revised KID is circulated at least 24 hours before the MENAFATF plenary. Proposed amendments to the MER, KRA Roadmap or Executive Summary can be made after the MENAFATF plenary.

The MENAFATF Plenary Discussion

123. The discussion of the MER, KRA Roadmap and Executive Summary in MENAFATF plenary will be based on the summary of the discussions on the key issues that took place during the MEWG meeting. The MENAFATF President/one of the MEWG co-chairs shall manage the discussions, The discussion should focus of high-level and substantive issues relating mainly to the Effectiveness and Roadmap. Where possible, also, important technical matters shall be discussed, add to that, discussion at the MENAFATF plenary should focus on technical matters only, therefore, inputs received from member countries and observers should be supported by technical justifications in order to be considered by the MENAFATF president/MEWG Co-Chairs, whereby the assessment team should commit to respond to any raised issues relating to quality and consistency. Adequate time should be set aside to discuss the KRA Roadmap. These discussions during the MENAFATF plenary should be given no more than 4 hours.
124. The procedure for the discussion of the MER at the MENAFATF plenary will be as follows:
- a) Introduction of the assessment team by the Secretariat.
 - b) The assessment team briefly presents the key issues from the report. The team will have the opportunity to intervene or comment on any issue concerning the MER, KRA Roadmap or Executive Summary.
 - c) Assessed country makes a short opening statement.
 - d) The MENAFATF plenary discusses the list of key issues identified by the MEWG and the KRA Roadmap. These issues would usually be introduced briefly by the MEWG co-chairs, with the assessors and the assessed country having the opportunity to provide additional information on these issues.
 - e) Time permitting, other issues could be raised from the floor and discussed by the MENAFATF plenary.

³³ The Mutual Evaluation Working Group co-chairs will consult with the assessed country and assessment team when changes are proposed to the text of the MER, KRA Roadmap or Executive Summary in the revised key issue document for plenary discussion.

125. In highly exceptional circumstances, fundamental concerns may be raised regarding the quality of either the draft MER or KRA Roadmap or misapplication of the FATF Standards or FATF Methodology which cannot be addressed during MEWG or plenary discussions.³⁴ In such an event, the MENAFATF and FATF Secretariats will work to resolve any such issues arising from misapplication of the FATF Standards or FATF Methodology. If, despite best efforts, the issues cannot be resolved, the Secretariat should consider, in consultation with the MEWG co-chairs and MENAFATF President for presentation at the MENAFATF plenary meeting, postponing the discussion or further discussion of the draft MER and the KRA Roadmap, until the concerns can be addressed. Any such postponement should be highly exceptional and should not exceed a single MENAFATF plenary cycle.

Adoption of the MER, KRA Roadmap and Executive Summary

126. At the end of the MENAFATF plenary discussion, the MENAFATF plenary adopts the MER, KRA Roadmap and Executive Summary and directs that any changes agreed upon be made, provided that typographical or other similar errors are checked before publication.

127. Following the adoption of the report, the Secretariat will indicate to the MENAFATF plenary in which level of follow-up the assessed country should be placed based on the final ratings and the date of the plenary at which the assessed country will be expected to submit its first follow-up report on its progress in implementing the KRA. Based on MENAFATF plenary's decision regarding follow-up, the KRA Roadmap will be updated to reflect the expected reporting date.

128. If MENAFATF plenary does not agree with proposed text, or does not adopt the MER, KRA Roadmap and the Executive Summary, then the assessors, the assessed country and the Secretariat should prepare amendments to meet the issues raised by the plenary. Where substantive changes are required whether due to the need for additional information or due to the need to modify the MER substantially, then the MENAFATF plenary could decide to:

- a) adopt the report subject to it being amended, and the amended report being approved through the post-plenary Q&C process.
- b) defer adoption of the report and agree to have a further discussion of an amended report at the following plenary, where the required changes are significant.

129. The final report is a report of the MENAFATF, and not a report by the assessors. As such, the MENAFATF plenary will retain the final decision on the wording of any report, consistent with the requirements of the FATF Standards and FATF Methodology. The MENAFATF plenary will give careful consideration to the views of the assessors and the country when deciding on the wording, as well as take into account the need to ensure consistency between reports.

130. The assessment team is responsible for ensuring that all the changes to the report agreed by the MENAFATF plenary have been made. Care will be taken to ensure that no confidential information is included in any published report. The Secretariat will check the adopted report, KRA Roadmap and Executive Summary for typographical or similar non-substantive errors and will circulate a revised version of the report to the country within one week of the MENAFATF plenary. Within

³⁴ These issues should be consistent with the substantive threshold required to trigger the post-plenary Q&C process. See the part related to the post-plenary Q&C process. Deferring plenary discussion or adoption of an MER should not be based on any disagreement between the assessment team and assessed country regarding the assessment team's conclusions or provide an opportunity for the assessed country to unilaterally delay the adoption and publication of an MER.

two weeks of receiving, it from the Secretariat, the country must confirm that the report is accurate and advise of any typographical or similar errors or any confidential information the report contains. The report, KRA Roadmap and Executive Summary will then be subject to MENAFATF post-plenary Q&C review (see Chapter 8).

KRA Roadmaps

Notice to Minister

131. When an MER is published (following MENAFATF post-plenary Q&C review), the MENAFATF President will provide a copy of the KRA Roadmap to the appropriate Minister of the assessed country and advise the Minister regarding the MENAFATF's expectations for follow-up by the assessed country. For countries in regular and enhanced follow-up processes, the MENAFATF Executive Secretary should provide a copy of this communication, or a similarly informative communication, to the assessed country's Head of Delegation annually while the assessed country remains in the follow-up process.

ICRG Handover

132. When an assessed country meets ICRG entry criteria based on its MER results and a preliminary determination by the MENAFATF Secretariat that the country also meets the ICRG prioritization criteria, the assessment team and assessed country, supported by the Secretariat, should meet briefly with representatives of the ICRG Joint Group that has responsibility for the country's geographical region. Whenever possible, this meeting should take place on the margins of the MENAFATF plenary at which the MER is adopted and virtual participation of ICRG JG Co-chairs, interested JG members and FATF Secretariat supporting the JG, should be facilitated. If such a meeting is not possible, a virtual handover meeting should take place as soon as possible, and not later than two months after adoption of the MER. This meeting is for information only to ensure a shared understanding of the KRA Roadmap.

V. JOINT MUTUAL EVALUATION WITH THE FATF

133. In line with the FATF Procedures, MENAFATF members that are also FATF members will undergo a joint evaluation by these bodies. Gulf Cooperation Council Members in MENAFATF undergo the same process,³⁵ being part of FATF through the GCC's membership. The joint mutual evaluation will be conducted on the following bases:

- a) FATF will take primary responsibility for organizing the joint evaluations in accordance with its respective mutual evaluation procedures. The FATF and MENAFATF Secretariats will coordinate and consult closely on the evaluation timeline, to ensure there are mutually agreed dates, including the date of the on-site visit and the respective plenary discussions.
- b) FATF will provide at least three assessors, whereas the MENAFATF provides two assessors, in addition to members of the FATF Secretariat and the Secretariat.
- c) Expert reviewers are provided from member countries of both the MENAFATF and FATF, as well as experts from FSRBs, the IMF or the WB. To ensure adequate attention is given

³⁵ The GCC comprises United Arab of Emirates, Kingdom of Bahrain, Kingdom of Saudi Arabia, Sultanate Oman, State of Qatar, and State of Kuwait.

to the Q&C review, a joint evaluation may use additional mutual evaluation reviewers beyond the three set out in the paragraph (49 of these procedures).

- d) The MER, KRA Roadmap and Executive Summary of the country undergoing a joint mutual evaluation will be discussed and adopted first at the FATF plenary, and then discussed at the following plenary of MENAFATF. Taking into consideration the additional measures adopted for joint evaluations, it is expected that the FATF opinion shall be considered final.
- e) The processes (including following the FATF Procedures for preparing the draft MER, KRA Roadmap and Executive Summary and follow-up monitoring) for joint evaluations would be the same as for other FATF evaluations.
- f) The MENAFATF members have opportunities to participate in the joint mutual evaluation directly through being part of the assessment team and providing comments and input on the draft MER, KRA Roadmap, Executive Summary, and follow-up reports like other delegations of the Global Network. A limited opportunity for the MENAFATF representative shall be given to submit its interventions during the joint MER at the FATF meeting. The MENAFATF allows reciprocal participation in mutual evaluation discussions for FATF members.
- g) All assessors provided by the FATF to the assessment team should be encouraged to attend the MENAFATF plenary meeting at which the joint MER will be considered, and at least one assessor should attend the MENAFATF plenary meeting. The same approach should be followed for joint MERs conducted by the IMF or the WB of MENAFATF member countries and the FATF at the same time.
- h) In an exceptional case, when the joint MER is adopted by the FATF and the MENAFATF plenary finds substantive comments on its text, the Secretariat shall communicate these comments to the FATF Secretariat for discussion at the next FATF plenary Meeting.
- i) If the joint MER is discussed and adopted at the FATF plenary, but not yet discussed at the MENAFATF plenary, consideration will be given to reaching a publication date agreed upon by the two Task Forces.
- j) After the FATF plenary approves the MER, KRA Roadmap and Executive Summary, the MENAFATF Secretariat will coordinate with the FATF Secretariat to obtain such documents, in addition to the revised key issue document already discussed at the FATF plenary, at the soonest, to translate them into Arabic.
- k) The Secretariat sends the MER, KRA Roadmap and Executive Summary, in addition to the revised KID already discussed at the FATF plenary, to all member countries and observers, at least two weeks before the MENAFATF plenary.
- l) The MER, KRA Roadmap and Executive Summary shall be discussed at the MEWG meeting based on the key issues contained in the revised version of the Key Issues Document discussed at the FATF plenary, and recommendations thereon shall be made to the MENAFATF plenary.
- m) In case the timeline of the MENAFATF and FATF allows, the joint MER can be discussed and adopted in joint plenary meeting between the two Task Forces, with full participation from their members.

- n) The joint FATF/MENAFATF evaluations will be conducted in a common official language which is English, with Secretariat taking such action as it deems appropriate regarding the translation of the MER, the KRA Roadmap and the Executive Summary into Arabic. In exceptional cases, evaluation may be conducted in Arabic, provided that FATF has sufficient resources from Secretariat staff, assessors, and reviewers with bilingual skills. In this case, all relevant legislation and information are submitted in Arabic, and meetings are held in Arabic. The final draft is translated before the MENAFATF plenary (after the face-to-face meeting) into English for circulation to member countries, observers, and the Global Network. English will be the main language for the discussion of the MER during the ECG meeting and FATF plenary.
- o) The FATF undertakes follow-up processes for member countries that – at the same time – have membership with the FATF, whilst the MENAFATF undertakes follow-up processes for member countries of the GCC.

VI. IMF OR WORLD BANK LED ASSESSMENTS

134. The MENAFATF plenary, with the agreement of the assessed country, has discretion to decide that an assessment of any member country could be conducted by the IMF or WB. Any such assessments should be agreed and fixed on the same basis as other evaluations in the schedule. The MENAFATF Secretariat should be involved at an early stage in the process of determining which of their countries will be assessed by the IMF or WB, and the MENAFATF plenary will decide on any such requests.
135. IMF or WB led assessments of a MENAFATF member should use procedures and a timetable similar to those of the MENAFATF. Joint evaluations should be conducted in a common language,³⁶ the IMF and WB should do the necessary to translate the MER, to make it available in Arabic, English, or French. The Secretariat should maintain continuous coordination with IMF and WB throughout the assessment process. The MER, Roadmap and the Executive Summary shall be adopted by the MENAFATF plenary.

VII. FOLLOW-UP AND ICRG PROCESSES

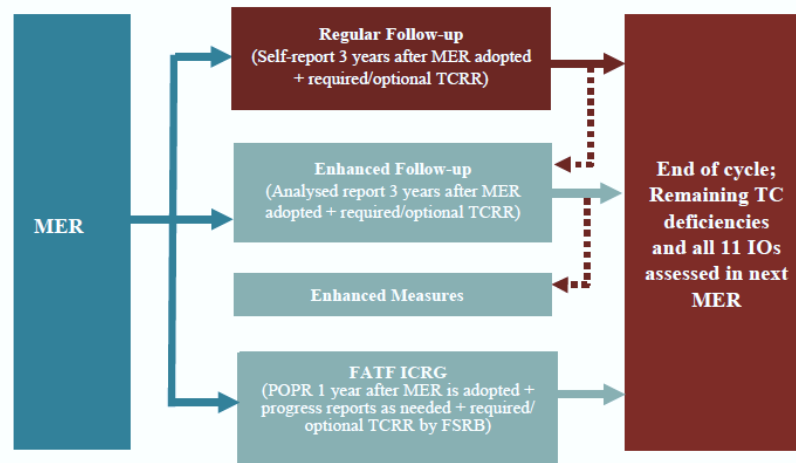
Overview

136. This section regulates the rules-based follow-up procedures, to which all members commit and which they apply rigorously and consistently. The follow-up processes aim to track progress made by countries in addressing their AML/CFT/CPF risks and deficiencies, in the third round of mutual evaluation, to focus on countries which do not make sufficient progress in addressing their risks and deficiencies, and to exert pressure on such countries to improve their performance.
137. Following the discussion and adoption of an MER, the country could be placed in either regular follow-up, or enhanced follow-up, or referred to the ICRG. Regular follow-up is the default monitoring mechanism for all countries. Members are placed in enhanced follow-up where the AML/CFT/CPF system needs major improvements (for technical compliance or effectiveness) and involves a more intensive process of follow-up. The ICRG is a compliance enhancing mechanism for countries across the Global Network where the system needs fundamental improvements and

³⁶ Arabic is the official language. English and French can be used as common languages, as needed.

involves more direct monitoring by the FATF. The following figure provides a basic overview of the follow-up and ICRG processes.

Follow-up and ICRG Processes



General expectations

138. Ideally, in the three-year period since the MER was adopted,³⁷ countries should have:

- a) fully or largely addressed all KRA in their KRA Roadmap.
- b) improved their technical compliance with all Recommendation rated non-compliance “NC” or partially compliant “PC” to the extent that re-rating to largely compliant “LC” or compliant “C” is warranted.
- c) made necessary changes to comply with any FATF Standards revised since the date the country’s technical compliance submission was due.

139. Each assessed member countries that are not subject to active ICRG monitoring (including countries in the “ICRG Pool”)³⁸ should submit the follow-up report to the Secretariat 3 years after the adoption of the country’s MER. The approximate date of the MENAFATF plenary at which the follow-up report will be presented will be included as part of the KRA Roadmap.³⁹ This follow-up report is intended to be a targeted but more comprehensive report on the extent to which the country has addressed the KRA in its KRA Roadmap and any actions taken that might justify technical compliance re-rating request. Countries that qualify for ICRG review and meet the prioritization threshold⁴⁰ will report to the FATF ICRG as outlined in the FATF Procedures.

³⁷ In line with the FATF Procedures, deadlines to address specific KRA may be shorter than 3 years for countries in the ICRG process which meet the necessary criteria and any prioritization threshold criteria, on the basis of particular risks identified in the assessment process.

³⁸ Countries under ICRG review are those which qualified for ICRG review but did not meet one of the prioritization threshold criteria.

³⁹ The plenary may retain the discretion to vary the specific reporting date.

⁴⁰ This means meeting any of the following criteria: (1) if the country is a FATF member; (2) if the country is represented on the WB list of High Income Countries; (3) if it has broad money set above USD 10 billion, in this case, this country is granted priority for active review by the ICRG.

140. Each member countries should seek re-ratings for technical compliance with Recommendations rated as non-compliant “NC” or partially compliant “PC”⁴¹ as part of the follow-up process,⁴² for once after 3 years from adopting the MER. Requests for technical compliance re-ratings will not be considered where the expert(s) determines that the legal, institutional, or operational framework has not changed since the country’s MER (or previous FUR, if applicable) and there have been no changes to the FATF Standards.
141. If any of the FATF Standards have been revised since the date the country’s mutual evaluation technical compliance submission was due, the country will be assessed for compliance with all revised Standards at the time its follow-up report is considered as outlined in paragraph (7 of these procedures). This includes cases where the revised Recommendation was previously rated LC or C.
142. Any recommended actions which are not the subject of a KRA or technical compliance issues that remain after the follow-up report or exit from the ICRG process will be assessed as part of the country’s next mutual evaluation, unless MENAFATF plenary directs the country to report sooner.

Reporting Requirements

143. For both regular and enhanced follow-up reports, the country will provide an update to the Secretariat identifying changes made to the legal, regulatory, or operational AML/CFT/CPF framework since its MER was adopted and setting out the actions it has taken or is taking to address the KRA Roadmap.⁴³ Information relevant to KRA may include information identified in the lists in the FATF Methodology on the Examples of Information that could support the conclusions on core issues for each Immediate Outcome and should demonstrate sufficient progress against the relevant KRA so that the KRA is fully or largely addressed.
144. Some KRA may relate to technical compliance deficiencies, and the country will also submit material on its progress to improve compliance with any Recommendation rated NC or PC where it is requesting re-rating and with any revised FATF Standards as outlined in paragraph (7 of these procedures). Technical compliance updates should be provided in a similar format to the mutual evaluation technical compliance questionnaire.
145. For countries under active ICRG review, requests for technical compliance re-rating request should be made to the Secretariat in line with these Procedures once they have exited ICRG, or three years after adoption of their MER, whichever comes first.
146. For any follow-up report, only relevant laws, regulations or other AML/CFT/CPF measures that are in force and effect by the deadline to submit information for a follow-up report, will be taken

⁴¹ Requests for technical compliance re-rating may include Recommendations not included in the KRA Roadmap that are rated partially compliant “PC” or non-compliant “NC” where the legal, regulatory or operational AML/CFT/CPF framework has changed.

⁴² Countries under ICRG review should make their technical compliance re-rating requests to the MENAFATF in line with paragraph (137 and other relevant paragraphs of these procedures).

⁴³ Representative timelines for preparing follow-up reports are outlined in Appendix (2).

into account for determining the extent to which a KRA is addressed, or a technical compliance re-rating is justified.⁴⁴

147. To ensure accurate and comprehensive analysis, the follow-up experts should consider all criteria of the Recommendations under review and examine the relevant legal, regulatory, or operational framework in its entirety, even when some elements of the framework remain unchanged from the country's MER. The follow-up experts may highlight relevant strengths or weaknesses not previously noted in the country's MER. If the follow-up experts reach a different conclusion to previous MER (in cases where the Standards or the relevant legal, regulatory, or operational framework have not changed), then they should explain the reasons for their conclusion.

Diminished compliance

148. If, at any time, delegations or the Secretariat become aware that a country has significantly diminished its technical compliance to a level that the MENAFATF plenary considers as equivalent to Non-Compliant or Partially Compliant on any one or more of Recommendation (3), (5), (6), (10), (11) and (20) the plenary may require a technical compliance re-rating request report on the Recommendation. If it comes to the MENAFATF plenary's attention that a country has significantly lowered its compliance with any other FATF Standards, the plenary may request the country to address any new deficiencies as part of the follow-up process.
149. If, at any time, delegations or the Secretariat become aware that a country has significantly diminished its level of effectiveness for any one or more Immediate Outcome since its MER, plenary may require the country to provide an a report of the relevant Immediate Outcome to the upcoming plenary to determine whether a more comprehensive analysis of the Immediate Outcome by a follow-up expert is required.
150. In cases where MENAFATF plenary considers whether a country's level of technical compliance or effectiveness is significantly diminished,⁴⁵ the Secretariat will contact the assessed country for comment and prepare a decision paper for consideration by MENAFATF plenary to take decision thereon. The assessed country will have an opportunity to explain its position to MENAFATF plenary orally or in writing.

KRA rating scale

151. To ensure clear and comparable decisions, follow-up experts in coordination with the country in regular follow-up should reach a conclusion about the extent to which the country has (or has not) addressed each KRA. For each KRA, there are four possible ratings based on the extent to which the KRA is addressed, as follows:

⁴⁴ This rule may only be relaxed in the exceptional case where the legislation is not yet in force at the deadline to submit information for follow up, but the text will not change and will be in force by the time the report is adopted. In other words, the legislation has been enacted, but is awaiting the expiry of an implementation or transitional period before it is enforceable. In all other cases, the procedural deadlines should be strictly followed to ensure that experts have sufficient time to do their analysis.

⁴⁵ The examples may include judicial provisions explaining the reduction of powers or responsibilities entrusted to LEAs or FIU or any other relevant authorities, or those provisions that make AML/CFT/CPF legal framework un-enforceable, or repealing or replacing significant elements of the AML/CFT/CPF legal framework.

KRA rating scale		
Fully addressed	FA	The country has fully addressed the KRA.
Largely addressed	LA	The country has addressed the KRA to a large extent, but minor improvements are needed.
Partly addressed	PA	The country has addressed the KRA to some extent, but moderate improvements are needed.
Not addressed	NA	The country has not taken any action or steps or has only taken negligible steps to address the KRA; major improvements are needed.

152. In cases where a country is under active ICRG review and a KRA relates to technical compliance,⁴⁶ progress against that KRA should be rated using the KRA rating scale until the country requests technical compliance re-rating from the Secretariat.

Follow-up Monitoring Mechanisms

Regular follow-up

153. Regular follow-up provides a light-touch process for monitoring member countries whose MERs reflect substantial to high levels of effectiveness and technical compliance. Countries in regular follow-up will present their follow-up report as a self-assessment, including application of the KRA rating scale outlined above, three years after adoption of their MER. Review of progress on KRA relating to effectiveness will not be analyzed but will be circulated to member countries and observers for information.
154. Compliance with FATF Standards that have changed since the date the country's technical compliance submission was due and any Recommendation where the country requests technical compliance re-rating will be analyzed for re-rating by follow-up experts. Where a country in regular follow-up seeks technical compliance re-rating request, it should indicate which Recommendations should be considered for re-rating at least eight months in advance of the relevant MENAFATF plenary meeting. The technical compliance update by the country should be submitted to the Secretariat one month after seeking technical compliance re-rating request, which is at least seven months in advance of the relevant MENAFATF plenary meeting.
155. The KRA Roadmap self-assessment report outlines progress against KRA that do not involve technical compliance re-rating request and should be submitted at least two months in advance of the MENAFATF plenary meeting. The Secretariat will prepare a cover note briefly summarizing which KRA the country reports as being fully or largely addressed and which KRA the country reports as being partly or not addressed and making a recommendation regarding the next step in the follow-up process, if any.
156. The cover notes and any technical compliance re-rating report will be provided to the country for its comments before it is sent to member countries, observers, and the Global Network. The cover note and the country's self-assessment follow-up report will be considered by plenary as information items, unless all KRA are not fully or largely addressed. If a country has not fully or largely addressed all KRA, the follow-up report will be discussed in the MENAFATF MEWG and plenary as outlined in paragraphs (176-177 of these procedures). Any technical compliance re-rating

⁴⁶ See paragraph (101 of these procedures) and related footnote regarding KRA on technical compliance.

request report will be considered as outlined below in the section entitled Analysis of KRA Progress and technical compliance re-rating.

157. After considering a regular follow-up report in which the country reports that all KRA have not been fully or largely addressed, the MENAFATF plenary may direct that the country submits an updated report for analysis as outlined for enhanced follow-up. Using a risk-based approach, MENAFATF plenary may also decide to apply enhanced measures if strategic shortcomings remain.

Enhanced follow-up

158. After the discussion of the MER, MENAFATF plenary will place the country in enhanced follow-up if any one of the following applies:
- a) It has 5 or more partially compliant “PC” ratings for technical compliance.
 - b) It has 1 or more non-compliant “NC” ratings for technical compliance.
 - c) It is rated partially compliant “PC” on any one or more of Rs. 3, 5, 6, 10, 11 and 20.
 - d) It has a moderate level of effectiveness “ME” for 6 or more of the 11 effectiveness outcomes.
 - e) It has a low level of effectiveness “LE” for 1 or more of the 11 effectiveness outcomes.
159. Countries that qualify for ICRG review but do not meet the prioritization threshold should follow the enhanced follow-up process of the MENAFATF.
160. For countries in enhanced follow-up, progress against all KRA will be analyzed by follow-up experts based on the information submitted by the country, consistent with the peer review principle of the mutual evaluation process. Compliance with FATF Standards that have changed since the date the country’s technical compliance submission was due and any Recommendation where re-rating is requested will be analyzed for re-rating as part of this process.
161. Where a country in enhanced follow-up seeks technical compliance re-ratings, it should send its request to the Secretariat at least ten months in advance of the relevant MENAFATF plenary meeting indicating which Recommendations only rated as non-compliance “NC” or partially compliant “PC” should be considered for re-rating. The update by the country on steps taken to address its KRA, including both effectiveness and technical compliance, should be submitted to the Secretariat one month later (at least nine months in advance of the relevant MENAFATF plenary meeting). The country’s submission will be analyzed for progress against the KRA and for any technical compliance re-ratings by a group of follow-up experts, consistent with the peer review principle of the mutual evaluation process.
162. The follow-up experts will prepare a follow-up report comprising an analysis of the measures taken to address the KRA and improve technical compliance and conclusions regarding the extent to which those measures address the KRA and whether technical compliance re-rating is warranted. The analysis and conclusions will be provided to the country for its comments before it is sent to member countries, observers, and the Global Network.
163. After the discussion of an enhanced follow-up report in which all KRA have not been fully or largely addressed, the MENAFATF plenary should apply enhanced measures, as outlined in paragraph (180 of these procedures).

International Cooperation Review Group's ("ICRG") Process:

164. ICRG's process aims to assess a country's progress on Key Recommended Actions, which is different from that of directly assessing a country's legal, regulatory, or operational framework opposed to the criteria set out in the FATF Methodology.⁴⁷
165. The country will be referred to ICRG observation after discussion of the MER. should any of the following criteria apply:
- a) If the country obtained rating of non-compliant "NC" or partially compliant "PC" in 15 recommendations or more of the technical compliance's recommendations.
 - b) If the country obtained rating of non-compliant "NC" or partially compliant "PC" in 3 recommendations or more from Rs. 3, 5, 6, 10, 11 and 20.
 - c) If the country obtained rating of low level of effectiveness "LE" or moderate level of effectiveness" in nine (9) or more of the eleven (11) Immediate Outcomes ("IOs.") of the effectiveness assessment, including at least two IOs at low level of effectiveness "LE".
 - d) If the country obtained rating of low level of effectiveness "LE" in six (6) or more of the eleven IOs of the effectiveness assessment.
166. Any member countries or members of the FATF or FSRBs may nominate a country for ICRG active review based on the availability of direct and specific knowledge⁴⁸ any of the following criteria are met:
- a) Where there appear to be substantial ML, TF, or PF threats or risks likely to meet the criteria for an ICRG review based on MER results.
 - b) Where the legal and regulatory framework of a country appears to not comply with important portions of the FATF Standards, which may result in serious vulnerabilities in the AML/CFT framework.
 - c) Where, after its MER is adopted, the country has lowered its level of commitment to the implementation of the FATF Standards, has seriously weakened its legal and regulatory framework, or has substantially backtracked on technical compliance or effectiveness.
 - d) Where a country consistently fails to provide adequate international cooperation related to AML/CFT/CPF.
167. In the event a member country wishes to nominate any country for active ICRG review, such should be made in writing to the FATF Secretariat, through the MENAFATF Secretariat, at least one month before the next ICRG meeting. The nomination should clearly indicate the reasons for the referral or outline the nature of the difficulties encountered and include supporting materials (e.g., concrete cases, reasonable findings).

⁴⁷ Procedures for all stages of the ICR process are published in the FATF Procedures.

⁴⁸ Direct and specific knowledge may include information collected from other international assessments of topics related to AML/CFT/CPF, or any information collected from other international organizations or groups in topics related to financial transparency, including information that were shared of tax topics, market integrity, financial and banking stability, and supervision.

168. Any member country that does not allow the publication of its MER (or DAR) in a timely manner shall be subject to the ICRG review process. Whereas the ICRG Pool shall look into the extent to which prioritization threshold applies thereto.
169. To avoid duplication of effort and potential inconsistencies, the ICRG has exclusive jurisdiction over any issue included in a country's Roadmap,⁴⁹ including any technical compliance issues included in the roadmap of any country subject to ICRG active review. Once a Country exits the ICRG process (whether at the end of its Post-Observation Period Report⁵⁰ or by completing its Roadmap), that Country should request the Secretariat to re-assess its technical compliance ratings on any technical compliance issues listed in its Roadmap.
170. If a Member Country remains under ICRG active review, it may, in the third year following the adoption of its MER, request the Secretariat to reassess the technical compliance ratings of any non-Roadmap Recommendation rated non-compliant "NC" or partially compliant "PC", if the Country has made changes to its legal, regulatory or operational framework since the adoption of the MER, as well as for recommendations for which changes to the FATF standards have been made and for which the Country has not previously been assessed. To request a technical compliance re-rating of any non-compliant "NC" or partially compliant "PC" recommendation included in the Country's Roadmap:
- a) The ICRG must have determined that the KRA regarding that technical deficiency has been fully or largely addressed.
 - b) In preparing the technical compliance analysis for technical compliance re-ratings the expert reviewers should, to the extent possible, draw on the work already done by the ICRG as set out in the ICRG progress reports and adopted by the FATF plenary. If the expert reviewers reach a conclusion that is different from the ICRG's report (in cases where the criteria or frameworks have not changed), they should explain the reasons for that conclusion.

Role of the Secretariat in the ICRG's process

171. As outlined in Paragraph 32, the Secretariat should impartially assist ICRG JG members in achieving quality reports and consistency in the application of the FATF Standards, FATF Methodology and MENAFATF procedures, and should impartially support their members under the ICRG process criteria apply. This support may include:
- a) Facilitate communication between the assessment team, country, and relevant virtual participation of the two Co-chairs of ICRG JG, the interested assessor members from the relevant JG and FATF Secretariat supporting the ICRG JG during the ICRG handover meeting.⁵¹
 - b) Close coordination with the FATF Secretariat, to assist countries under review with ICRG country training.

⁴⁹ The reference to Roadmap includes any revised roadmaps.

⁵⁰ A Post-Observation Period Report ("POPR") is prepared by a Country that meets the criteria for referral to the ICRG process within one year of the adoption of its MER and is submitted to the ICRG Joint Group ("ICRG JG") for an assessment of the Country's progress, determining whether the Country has achieved the Priority Actions and Recommended Actions and making appropriate recommendations.

⁵¹ See paragraph (132 of these procedures).

- c) When possible, help identify and source technical assistance from donors and providers to assist countries under review to address or largely address their Roadmaps.
- d) Help inform ICRG JG discussion by providing contextual information on the region, risks, and materiality of countries under review and such other relevant and objective information as the ICRG JG may find useful.
- e) Guide countries under review on understanding the type of information and statistics that could be provided to demonstrate progress against its Roadmaps.⁵²

172. For countries in the ICRG Pool, the Secretariat:

- a) Should conduct enhanced follow-up in line with the MENAFATF's procedures and highlight the importance of addressing the roadmap.
- b) The Secretariat may:
 - Explain the consequences of the countries MER results, including the possibility that the country could be referred for active ICRG review should they come to meet the prioritization threshold or the MENAFATF plenary agrees that active review is necessary based upon risk and context.
 - Facilitate communication with the FATF Secretariat to answer any questions that the country under review has on the ICRG process.

Analysis of KRA Progress and Technical Compliance Re-rating

173. As outlined in the relevant sections above, progress against KRA by countries in enhanced follow-up must be subject to expert analysis and approved by the MENAFATF plenary. Likewise, re-ratings for technical compliance may only be made with plenary approval. Generally, MENAFATF plenary's approval for these reports will be sought by written process. In cases where follow-up experts conclude that a country has not fully or largely addressed all KRA, the follow-up reports will be discussed in the relevant working group and MENAFATF plenary as outlined in paragraphs (176-177 of these procedures). Reports on technical compliance re-rating requests will likewise be discussed in the relevant MENAFATF MEWG and plenary if they are not adopted by written process.

Reporting of analysis and approval by written process

174. At least ten weeks before the relevant MENAFATF MEWG and plenary meeting, the follow-up experts should report their analysis of progress against KRA and/or technical compliance to all member countries, observers, and global network, who will have two weeks to comment on the report. If no comments are received (including from the follow-up country), the report will be circulated for MENAFATF plenary approval by written process and then proceed to publication.

175. If comments are received, a revised report will be circulated at least seven weeks before the relevant MENAFATF MEWG and plenary meeting. Member Countries, observers and global network will have one week to comment on the revised text. Unless two or more delegations (not

⁵² The onus is on the country under ICRG review to demonstrate progress against its Roadmap. The Secretariat should not be responsible for drafting the country's submission. Nor should the Secretariat represent or advocate on behalf of the country during ICRG JG deliberations

including the follow-up country) raise concerns regarding the follow-up experts' analysis of a particular KRA or Recommendation in the revised report, the report will be circulated for approval by written process and then proceed to publication.

MEWG consideration of enhanced follow-up or Technical Compliance Re-rating reports

176. If two or more delegations (not including the follow-up country) raise concerns regarding the follow-up experts' analysis of a particular KRA or Recommendation in the revised report, that KRA or Recommendation and the issues raised will be discussed at the MEWG level before MENAFATF plenary. In these circumstances, the Secretariat – in coordination with the Co-chairs and review experts - should compile a short list of the priority issues for discussion (no more than four issues), taking into consideration, with regards to technical compliance re-rating, the issues linked to sub-categories that would not affect the overall rating of the recommendation shall not be discussed, and should circulate this list to all member countries, observers and global network at least two weeks prior to the MEWG discussion. The discussion should not exceed two hours of the working group's dedicated meeting time. Although follow-up and technical compliance re-rating reports will be first discussed at the MEWG level, MENAFATF plenary remains the only decision-making body. If the MEWG agrees on the issues for discussion, the report will be circulated for approval by written process and then proceed to publication.

MENAFATF Plenary consideration of enhanced follow-up or Technical Compliance Re-rating reports

177. Where the MEWG does not reach agreement on the issues for discussion, any unresolved issues will be considered by plenary as a discussion item, and a revised list of issues for MENAFATF plenary discussion will be distributed. The MENAFATF plenary discussions of an enhanced follow-up or technical compliance re-rating report should take, on average, no more than one hour of plenary time. In relation to a technical compliance Re-rating report, plenary will not discuss an individual criterion rating unless it will impact an overall Recommendation rating. The MENAFATF plenary agreement is required to change a report.

Consideration of follow-up reports with substantive issues or where all KRA are not fully or largely addressed

178. The MEWG and MENAFATF plenary will discuss follow-up reports in cases where follow-up experts conclude that a country has not fully or largely addressed all KRA.

179. Plenary may also opt to discuss follow-up reports that involve strategic or substantive issues. If the issue involves highly technical matters, MENAFATF plenary may request that the MEWG consider the issue first and make a recommendation to MENAFATF plenary. Examples of substantive issues include, but are not limited to:

- a) Significant changes in a country leading to a decline in technical compliance or effectiveness.
- b) Insufficient progress made by a country against its Roadmap.
- c) Recommendations to analyze a self-report or apply enhanced measures.

Enhanced measures

180. If the MENAFATF plenary decides, after discussing the follow-up report, that a country does not fully or largely address all KRA outlined in its roadmap, the MENAFATF plenary will apply enhanced measures, which may include the following, on an escalating basis:
- a) As soon as possible, but not later than six months after the MENAFATF plenary adopts the follow-up report, a high-level mission to the member country will be arranged to ascertain the level of political commitment to effective implementation of the FATF Standards. This mission would meet with Ministers and senior officials and will result in a report at the following MENAFATF plenary to advise whether there is sufficient political commitment. The MENAFATF will also require the country to report on progress against any remaining KRA at the MENAFATF plenary following consideration of the report submitted from the mission.
 - b) If the high-level mission concludes there is insufficient political commitment, or if a country has still not addressed or largely addressed all KRA, the MENAFATF and the FATF will issue a formal statement to the effect that the member country is insufficiently in compliance with the FATF Standards. The FATF may consider, in the context of application of Recommendation 19 by its members and based on risk and proportionality, recommending appropriate action.
 - c) In cases referred to in sub-paragraph (b), the MENAFATF plenary may also call on the President to raise the issue of whether the country's MENAFATF membership status should be suspended or withdrawn as outlined in the Rules and Procedures of MENAFATF).
181. To end the enhanced measures process at any time, the country must demonstrate that it has addressed or largely addressed all of its KRA. To do so, the country should inform the Secretariat and submit a progress report for analysis by one or more follow-up experts. MENAFATF plenary will consider the expert's analysis as a matter of urgency and decide to terminate or continue the enhanced measures process.

VIII. MENAFATF POST-PLENARY QUALITY AND CONSISTENCY REVIEW

Application

182. Highly exceptional situations may arise where significant concerns about the quality and consistency of a report remain after its adoption. The MENAFATF post-plenary Q&C process seeks to prevent the publication of reports with significant Q&C problems and ensure that poor quality assessments do not damage the MENAFATF and FATF brand, and do not damage the integrity and credibility of the MERs issues thereby, add to that, such reports accurately reflect ML/TF risks facing the global financial system.
183. The MENAFATF post-plenary Q&C review process applies to the MENAFATF, concerning:
- a) All MERs (including the roadmaps and executive summaries).
 - b) Detailed Assessment Reports (DARs) carried by the IMF or WB, including the roadmaps and executive summaries.

- c) Enhanced follow-up reports or any technical compliance re-rating reports that issues related thereto were discussed in the MEWG meeting or the MENAFATF plenary.⁵³

Steps in the MENAFATF Post-Plenary Q&C process

184. After adoption of the MER by the MENAFATF plenary and after making proper amendments, as directed by the MENAFATF plenary, and ensure its accuracy, the Secretariat informs the FATF Secretariat of the MER as soon as possible after adoption. the FATF Secretariat will circulate the report to all FATF members, including associate members, observers and FSRB secretariats for further circulation to their members⁵⁴ along with a template for raising Q&C issues for consideration. Parties will have two weeks to notify the FATF Secretariat⁵⁵ in writing of any serious or major issue of quality or consistency. Parties should use the template provided to indicate their specific concerns and how these concerns meet the substantive threshold. For MERs of the MENAFATF, delegations should notify both the FATF Secretariat and the MENAFATF Secretariat using the same template.
185. The substantive threshold is when serious or major issues that might affect the FATF brand and damage the integrity and credibility of MERs issued thereby. Examples of situations meeting this substantive threshold include (but are not limited to) the following:
- a) The ratings, KRA or other recommended actions are clearly inappropriate and not consistent with the analysis.
 - b) There has been a serious misinterpretation of the Standards, FATF Methodology or Procedures.
 - c) An important part of the FATF Methodology has been systematically misapplied.
 - d) Laws that are not in force and effect have been taken into account in the analysis and ratings of a report.
186. If two or more parties identify the same specific concern - having at least one of which participated in the adoption of the report using the required template - prior the deadline for receiving comments, the Q&C review process after the MENAFATF plenary shall be considered complete in this stage. The FATF Secretariat will advise the Secretariat accordingly and the report will be published.
187. If two or more parties identify the same specific concern - having at least one of which participated in the adoption of the report using the required template - prior the deadline for receiving comments, the ECG Co-chairs will review the concern to determine the extent to which it meets the substantive threshold and procedural requirements. The FATF Secretariat - in coordination with the Secretariat - will provide the ECG Co-Chairs with any relevant information, which may include the following:
- a) Information submitted by parties raising the Q&C issue.

⁵³ Regular FURs or FURs with technical compliance re-rating requests adopted during the written process of post-plenary Q&C review.

⁵⁴ Parties under this section should mean all member countries and observers, FATF Secretariat, its members and observers and members of FSRBs and its secretariat

⁴⁹applies to joint MERs with FATF

- b) Any related comments raised at the pre- MENAFATF plenary stage.
- c) An overview of any discussion of the issue by the MEWG and MENAFATF plenary, including the pertinent facts in the report, the co-chairs' report or summary record from the MEWG and MENAFATF plenary meeting where the report was discussed, whether the issue was discussed in detail, the outcome of the discussions and any rationale or reasons cited for maintaining or changing the report.
- d) Objective comparisons with previous FATF reports that address similar issues.
- e) The report's consistency with the FATF Standards or FATF Methodology.
- f) Any implications for the follow-up or ICRG processes.
- g) Recommendations to resolve the issue, including appropriate next steps.

188. If the ECG Co-Chairs conclude that prima facie the substantive threshold and procedural requirements are not met, the FATF Secretariat will present an information paper to plenary explaining the basis for the Co-chairs' conclusion. The MENAFATF post- plenary Q&C review process is then complete. The FATF Secretariat will advise the Secretariat accordingly and the report will be published.

189. If the ECG Co-Chairs conclude that prima facie the substantive threshold and procedural requirements are met, the FATF Secretariat will circulate the report to all FATF delegations for consideration by the ECG with a decision paper prepared by the FATF Secretariat. The decision paper will include any relevant information referred to in paragraph (187 of these procedures). The ECG will decide whether the report meets the substantive threshold. Concerns identified less than four to six weeks before an ECG meeting will be discussed at the next ECG meeting to ensure sufficient time for preparation and consideration of the decision paper.

190. If the ECG decides that the report does not meet the substantive threshold, the decision will be reported to FATF plenary as an information item. The post-plenary Q&C review process is then complete. The FATF Secretariat will advise the Secretariat accordingly and the report will be published.

191. If the ECG decides that the concerns identified meet the substantive threshold, it will refer the matter to the FATF plenary with recommendations for the actions needed to resolve the Q&C issue.⁵⁶ The FATF plenary will decide whether to adopt the recommendations made by ECG and indicate the actions needed to resolve the Q&C issue.

192. The FATF Secretariat will advise the Secretariat of the FATF plenary's decision. If the MENAFATF declines to take the actions indicated by the FATF, the FATF plenary will consider what further action may be necessary. The MENAFATF will not publish the report until the issue is resolved and the FATF Secretariat advises that the post- MENAFATF plenary Q&C review process is complete.

193. With regards to MERs issued through the Global Network, the Secretariat receives those reports from the FATF Secretariat, accompanies with template for quality and consistency issues. The

⁵⁶Next steps might include requesting that the relevant assessment body reconsider elements of the report where the issues of concern are addressed; revise the text of the report as directed to address the concerns raised.

Secretariat then, disseminate such to Member Countries for their inputs as per the aforementioned procedures.

IX. PUBLICATION, MEDIA OUTREACH AND AUXILIARY PROCESSES

Publication of MERs

194. After completion of all previous procedures and completion of the MER post- MENAFATF plenary review, in the event of no concerns were raised during the Q&C process, the Secretariat in coordination with the FATF Secretariat should publish all MERs on their respective websites to in timely manner - ordinarily within six weeks of the report being adopted⁵⁷ without the need to advise the MENAFATF plenary. If any substantive issues are raised that materially affect the key conclusions and outcomes of the report (such as the results of the technical compliance and effectiveness assessment), then in this case the new version of the MER will be passed on to the member countries, and the decision to publish will be taken in coordination with the MENAFATF' president and the FATF Secretariat. The Secretariat will work in coordination with the FATF Secretariat to publish the report on their websites.

Publication of Other Documents

195. The general publication policy of the MENAFATF applies to actions taken under the follow-up process. Enhanced follow-up reports and technical compliance re-rating reports will be published at the conclusion of the MENAFATF post-plenary Q&C review process.

196. For regular follow-up reports, only the technical compliance analysis is published, as assessment of progress against the roadmap is not analyzed or discussed by MENAFATF plenary. If requested by a country, a link may be provided from the MENAFATF website to a website of the country on which it has placed additional updates or other information relevant to the actions it has taken to enhance its AML/CFT/CPF system, including for effectiveness.

197. The Secretariat should endeavor to publish and maintain an up-to-date version of their assessment and follow-up procedures on their public website.

Media Outreach

198. Immediately following the end of the MENAFATF post- plenary Q&C process the Secretariat will contact the assessed country to plan for the release of the report to the media and determine the most suitable date and time of publication (ideally, sharing with the media within six weeks of adopting the report). In the case of a joint or IMF/WB-led assessment, the FATF Secretariat and the Secretariat will also coordinate the publication of the report. Both the assessed country and the Secretariat may provide access to the report under strict embargo to selected members of the media no more than one week before publication

⁵⁷ This does not apply to the reports of the joint MER with the FATF, as after the report has been discussed by the plenary meeting of the MENAFATF and finally adopted, the publication policy adopted by the two task forces applies. The secretariats of the two task forces agree on a date for publishing the report.

Auxiliary Processes

199. To help ensure the common and consistent interpretation of the FATF Standards and FATF Methodology across the Global Network, the FATF approved a mechanism for MENAFATF to bring potential consistency issues to the attention of the FATF.
200. The MENAFATF should have procedures to examine specific voluntary tax compliance programs⁵⁸ to ensure that they do not impede the effective implementation of AML/CFT/CPF measures.

⁵⁸ The term voluntary tax compliance programs is defined in the FATF Best Practices Paper on Managing the AML/CFT Policy Implication of Voluntary Tax Compliance Programs:
www.fatf-gafi.org/en/publications/fatfrecommendations/documents/best-practices-managing-vtc.html

APPENDIX 1 – SAMPLE TIMELINES FOR THE MUTUAL EVALUATION PROCESS

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
Prior the Mutual Evaluation Process					
Pre-ME	-	As early as possible before the country's submission of its technical compliance Questionnaire (paragraphs 52-54 of these procedures)	The Secretariat: <ul style="list-style-type: none">▪ Provide the country with template on the periodic update for ME preparation within the current round.▪ Early communication with the assessed country to appoint national coordinator.▪ Determine the timeline and program of the high-level mission visit from the MENAFATF to the assessed country.▪ Determine the timeline for providing workshop for the country's relevant authorities concerning raising awareness of the ME process.▪ Providing workshop for the assessed country.	<ul style="list-style-type: none">▪ Secretariat's receipt of the template for the periodic update on preparation to the ME process during the current round after completed.▪ Designate national coordinator (at least one year prior the date of technical compliance annex submission) and set up an internal coordination mechanism (as necessary).▪ Coordinate with the secretariat to determine a timeline and a program for the high-level mission's visit from the MENAFATF to the assessed country.▪ Coordinate with the secretariat to determine the timeline for providing workshop for the country's relevant authorities concerning raising awareness of the ME process.▪ Making all arrangements to provide the workshop for the assessed country.	
ME-3 months	On-site visit – at least 42 weeks earlier	At least 20 months before the MENAFATF plenary (paragraph 55 of these procedures)		<ul style="list-style-type: none">▪ Agree on the broad timeline of the evaluation with the Secretariat.▪ Advise the Secretariat which Recommendations are impacted by change to laws, regulations, or operational framework.	
ME-1 month	On-site visit – at least 34 weeks earlier	(Paragraphs 59-60 of these procedures)	The Secretariat: <ul style="list-style-type: none">▪ Gather material from previous MERs and FURs; prepare		

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
			<p>technical compliance annex template.</p> <ul style="list-style-type: none"> Form assessment team as per procedures. Advise the country of the assessors after obtaining approvals of the countries of which assessors belong. Invite Member countries and global network to provide information about: <ul style="list-style-type: none"> A.Their expertise in international cooperation with the assessed country. B.Assessed country's risk situation and determination of potential increased or decreased focus. 		
First	On-site visit – at least 30 weeks earlier	(Paragraphs 57-63, 65 and 71 of these procedures)	<ul style="list-style-type: none"> Review background material, including material from previous MERs and FURs. Review material sent by country including technical compliance submission and discuss risk, context, materiality, and scoping with assessed country. Develop understanding of risks, context, and materiality. Consider information submitted by member countries and global network on international cooperation matters. Identify countries able to submit add value feedback on international co-operation and risk. Coordinate and communicate with assessed country with that regard (deadline: 6 weeks before the MENAFATF Plenary). 	<ul style="list-style-type: none"> Fix the precise dates for the evaluation on-site visit as well as the timelines for the whole process in consultation with the Secretariat. Submit technical compliance update questionnaire, providing updated information including on risk and context and scoping material, and material relevant to core issue 1.1 to assessment team. 	

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
			The Secretariat: <ul style="list-style-type: none"> Send feedback received from countries to the assessed country. 		
	On-site visit – at least 28 weeks earlier	(Paragraphs 65 of these procedures)	Facilitated by the Secretariat: <ol style="list-style-type: none"> Engage with assessed country to discuss understanding of risk, context, and materiality. Begin preparing preliminary draft scoping note in consultation with the assessed country (two weeks). The Secretariat: <ul style="list-style-type: none"> Translation of the preliminary paper of risks and scoping note. 	Facilitated by the Secretariat: <ul style="list-style-type: none"> Engage with assessment team, including oral presentation on risk, context, and materiality Respond to or supplement any risk and international co-operation information received. 	
Second	On-site visit – at least 26 weeks earlier	(Paragraph 68 of these procedures)	<ul style="list-style-type: none"> Finalize and send preliminary draft risk and scoping note and any other relevant background information to reviewers and country. The Secretariat: <ul style="list-style-type: none"> Finalize translation of preliminary risk paper and scoping note, send it with any other relevant information to the ME reviewers and the assessed country. 	Review and comment on draft risk and scoping note (two weeks).	Review draft risk and scoping note and other relevant background information (two weeks).
	On-site visit – at least 24 weeks earlier	(Paragraphs 68 and 74-78 of these procedures)	<ul style="list-style-type: none"> Consider assessed country and reviewer comments and amend the risk and scoping note as needed, in consultation with the country. Complete initial technical compliance analysis based on the technical compliance annex template received from Secretariat; give preliminary views on whether each criterion is met, mostly met, partly met, or 		

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
			not met. Give preliminary views on the overall rating for each Recommendation, if possible (two weeks).		
Third	On-site visit – at least 22 weeks earlier	(paragraph 79 of these procedures)	<ul style="list-style-type: none"> Revise and finalize 1st draft technical compliance annex and send to country. The Secretariat: <ul style="list-style-type: none"> Start translating the first draft of technical compliance annex. 	Review 1 st draft technical compliance annex (3 weeks).	
	On-site visit – at least 19 weeks earlier	(Paragraphs 80 of these procedures)	Consider and reflect country's comments on 1 st draft technical compliance annex (3 weeks).		
Fourth	On-site visit – at least 18 weeks earlier	(Paragraphs 81-82 of these procedures)	Start reviewing the information provided by the assessed country on effectiveness based on the 11 immediate outcomes and core issues.	Provide information on effectiveness based on the 11 Immediate Outcomes and the underlying core issues.	
	On-site visit – at least 16 weeks earlier	(Paragraph 80 of these procedures)	Start reviewing the information provided by the assessed country on effectiveness based on the 11 immediate outcomes and core issues. The Secretariat: <ul style="list-style-type: none"> Finalize 2nd draft technical compliance annex. 		
Fifth	On-site visit – at least 14 weeks earlier	-	The Secretariat: <ul style="list-style-type: none"> Review the quality and consistency of the second draft of the technical compliance annex by the Secretariat team and update it according to any comments. Finalize translation of 2nd draft technical compliance annex. 		
	On-site visit – at least 12 weeks earlier	(Paragraphs 80 of these procedures)	Secretariat: <ul style="list-style-type: none"> Send 2nd draft technical compliance annex to the country and reviewers. 	Review and comments on 2 nd draft technical compliance annex (3 weeks).	Review and comments on 2 nd draft technical compliance annex (3 weeks).

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
Sixth	On-site visit – at least 9 weeks earlier	(Paragraphs 80 of these procedures)	Consider and Reflect country and reviewer comments on 2 nd draft technical compliance annex.		
	On-site visit – at least 8 weeks earlier	(Paragraphs 84 and 86 of these procedures)	<ul style="list-style-type: none"> ▪ Send outline of initial findings, questions, and requests for further information on effectiveness to assessed country. ▪ Review draft on-site program (two weeks). 	Providing the draft onsite visit program to the assessment team through the Secretariat, in addition to arranging the logistics of the onsite visit through the National Coordinator.	
	On-site visit – at least 6 weeks earlier	(Paragraphs 63, 69, 84 and 85 of these procedures)	<ul style="list-style-type: none"> ▪ Deadline for the member countries and global network to provide additional information on the risk situation and international cooperation with the assessed country - The Secretariat to share feedback with assessed country. ▪ Review risk and scoping information based on the country's effectiveness information and update scoping note; request additional information on areas of increased focus. ▪ Finalize areas of increased focus and decreased focus and determine key government agencies and private sector to meet for onsite visit. ▪ Update outline of initial findings, key issues and develop potential recommended actions for discussion (two weeks). 	Provide comments on the findings and respond to questions and requests for information on effectiveness materials to assessment team.	
Seventh	On-site visit – at least 5 weeks earlier	-	Provide comments to assessed country on draft on-site program.		
	On-site visit – at least 4 weeks earlier	(Paragraph 85-of these procedures)	Send updated outline of initial findings, key issues, and potential recommended actions for discussion to the assessed country		

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
	On-site visit – at least 3 weeks earlier	(Paragraphs 88 of these procedures)	Facilitated by Secretariat, assessment team and assessed country, final amends are made to the program and logistical arrangements for on-site.		
	At least two weeks prior the onsite visit	-	Refine outline of initial findings and key issues to discuss during on-site.	Provide responses to any outstanding questions from assessment team.	
Eighth	At least 38 weeks before the MENAFATF Plenary	(Paragraphs 90-96 of these procedures)	ONSITE VISIT (Approx. 13 to 16 working days)⁵⁹		
Ninth	At least 35 weeks before the MENAFATF Plenary	(Paragraphs 101 and 102 of these procedures)	Prepare 1 st draft MER and Roadmap, including updated technical compliance annex (4 weeks).		
Tenth	At least 31 weeks before the MENAFATF Plenary	(Paragraphs 101 and 102 of these procedures)	Finalize 1 st draft MER and Roadmap and send to country (one week).		
	At least 30 weeks before the MENAFATF Plenary	(Paragraphs 103 of these procedures)	Facilitated by Secretariat, liaise with assessed country as needed.	Respond to 1 st draft MER and Roadmap (4 weeks).	
Eleventh	At least 26 weeks before the MENAFATF Plenary	(Paragraphs 104 of these procedures)	Consider country response and prepare 2 nd draft MER and Roadmap (3 weeks).		
	At least 23 weeks before the MENAFATF Plenary	-	The Secretariat: <ul style="list-style-type: none"> Review the quality and consistency of the second draft of the MER by the Secretariat team. Start translation of the second draft of the MER and Roadmap. 		
Twelfth	At least 21 weeks before the MENAFATF Plenary	(Paragraph 104 of these procedures)	<ul style="list-style-type: none"> Finalize the second draft of the MER and Roadmap based on quality and consistency feedback provided by the Secretariat team and send it to the country and ME reviewers (one week). 		

⁵⁹ This reflects the average length of an on-site visit. Actual time needed may be shorter or, in exceptional cases longer, based on the size and complexity of the assessed country.

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
			The Secretariat: <ul style="list-style-type: none"> Complete and update the translation of the second draft of the MER and Roadmap in accordance with the quality and consistency feedback provided by the Secretariat team and any other final amendments. 		
	At least 20 weeks before the MENAFATF Plenary	(Paragraphs 106, 107 and 109 of these procedures)		Respond to 2 nd draft MER and Roadmap (3 weeks).	Revise to 2 nd draft MER and Roadmap (3 weeks).
Thirteenth	At least 17 weeks before the MENAFATF Plenary	(Paragraphs 108, 109 and 111 of these procedures)	<ul style="list-style-type: none"> Consider country and ME reviewers' comments received on the second draft MER and Roadmap (3 weeks). In coordination with the Secretariat, the assessment team, and the assessed country, participate in discussing potential changes and unresolved issues and identifying issues to be discussed in the face-to-face meeting. 		
			<ul style="list-style-type: none"> Update MER draft based on reviewer and country comments (one week). The Secretariat: <ul style="list-style-type: none"> Translate assessment reviewers' comments and assessment team's responses. 		
Fourteenth	At least 13 weeks before the MENAFATF Plenary	(Paragraphs 113 of these procedures)	Face-to-Face meeting (1.5 days)		
			Work with country to resolve potential disagreements and identify potential key issues for Plenary discussion.	Work with assessment team to resolve potential disagreements and identify potential key issues for Plenary discussion.	
		(Paragraphs 114 of these procedures)	<ul style="list-style-type: none"> Finalise pre-Plenary draft (one week). Prepare Executive Summary in consultation with assessed country. The Secretariat:	Consult with assessment team regarding Executive Summary.	

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
			<ul style="list-style-type: none"> Review of the quality and consistency of the MER by the Secretariat team.⁶⁰ Update the translation of the draft pre-plenary MER, Roadmap and Executive Summary. 		
Fifteenth	At least 8 weeks before the MENAFATF Plenary	(Paragraphs 119 of these procedures)	Circulation of the pre-plenary draft of the MER, together with the comments of the ME reviewers, the views of the assessed country and the responses of the assessment team, to all member countries, observers, and the global network for comments (two weeks).		
Sixteenth	At least 6 weeks before the MENAFATF Plenary	(Paragraphs 119-120 of these procedures)	<ul style="list-style-type: none"> Consider member countries, observers, and global networks' comments Identify priority issues for MEWG and Plenary discussion. 		
			<p>The Secretariat:</p> <ul style="list-style-type: none"> Preparation of member countries, observers, and global networks' comments consolidated document. Coordinating the MEWG Co-Chairs' communication with the assessment team and the assessed country to prepare a list of key issues (two weeks). Translate the compilation of comments of member countries, observers, and global network as well as the KID. Add to that, update the translation of MER, Roadmap, and executive summary. Update the translation of reviewers comments and assessment team's responses (as needed). 		
Seventeenth	At least two weeks before the MENAFATF Plenary	(Paragraphs 120-121 of these procedures)	<ul style="list-style-type: none"> Engage country on priority key issues and other comments received on MER or Executive Summary. 	Work with assessment team on Roadmap and other comments received on MER or Executive Summary.	

⁶⁰ In exceptional cases, the review of the quality and consistency by the Secretariat team may result in the report being referred for a targeted review by the mutual evaluation reviewers as set out in paragraph 110 of these procedures.

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
Post-Plenary			<ul style="list-style-type: none"> Review and provide input on priority key issues and other comments received on MER or Executive Summary. The Secretariat: <ul style="list-style-type: none"> Circulate: <ul style="list-style-type: none"> A.The compilation of member countries, observers, and global network comments. B.KID to be determined for discussion. 		
	The MENAFATF Plenary Meeting	Date of MER discussion	Discussion of MER at the MEWG and Plenary level		
	Three weeks after the MENAFATF Plenary	(Paragraph 130 of these procedures)	<ul style="list-style-type: none"> Modify MER as directed by Plenary and perform accuracy checks (one week). The Secretariat: <ul style="list-style-type: none"> Circulate report to member countries, observers, and global network for two weeks comment period. 	<ul style="list-style-type: none"> Confirm MER is accurate and advise of any typographical or similar errors (two weeks). 	
	Five weeks after the MENAFATF Plenary	Deadline for member countries, observers, and global network comments (paragraph 184-193 of these procedures)	Post-Plenary Quality and Consistency Review		
			The Secretariat: <ul style="list-style-type: none"> Send the report to the FATF Secretariat for dissemination to the global network (for comments within two weeks). If no substantive issues are raised during post-plenary Q&C, MER proceeds to publication after consultation with the FATF on the publication date. If any substantive issues are raised, the Secretariat will circulate the new version of the MER to member countries after it has been translated (one week for comments). 		
		(Paragraph 198 of these procedures)	Media Outreach: <ul style="list-style-type: none"> The Secretariat will liaise with the country to make the report available to the media and determine the most appropriate date and time for publication. 		
	Six weeks after the MENAFATF Plenary	(Paragraphs 194 of these procedures)	Publishing the MER: <ul style="list-style-type: none"> If no issues are raised during post-plenary Q&C, publication would ordinarily happen within 6 weeks of the report being adopted. After coordinating with FATF on the date of publication. 		

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

Duration of the ME process	Dates of taking action (in Weeks)	Reference	Key Actions		
			Assessment Team/Secretariat	Assessed Country:	Reviewers
			<ul style="list-style-type: none"> If substantive issues are raised, the new version of the MER will be circulated to member countries, and the decision to publish will be taken in coordination with the MENAFATF president and the FATF Secretariat. 		
		(Paragraphs 131 of these procedures)	The MENAFATF president submits a copy of the Roadmap to the relevant minister in the assessed country and informs it of the MENAFATF's expectations from the country's follow-up process.		

APPENDIX 2 – TIMELINES FOR THE FOLLOW-UP PROCESS

Regular Follow-up

FUR month	Week	Reference	Key Milestones		
			FUR Expert(s)	Secretariat	Assessed Country
First	At least 32 weeks before the MENAFATF Plenary	(Paragraph 154 of these procedures)		<p>If the country requests Technical Compliance Re-rating:</p> <ul style="list-style-type: none"> Confirm follow-up expert(s) from member countries. Prepare the adapted Technical Compliance analytical tool template based on the deficiencies in the MER to facilitate country's update on technical compliance submission (two weeks). 	Inform Secretariat whether it is requesting Technical Compliance Re-Rating and, if so, identify which recommendations are implicated.
If the country requests Technical Compliance Re-rating					
Second	At least 28 weeks before the MENAFATF Plenary	(Paragraph 154 of these procedures)	Review and analyze any requests for technical compliance re-rating (4 weeks).		Submit technical compliance update and re-rating request to the Secretariat.
Third	At least 24 weeks before the MENAFATF Plenary	-		Finalize and send draft technical compliance analytical tool to the follow-up country. (one week).	
	At least 23 weeks before the MENAFATF Plenary	-			Provide comments on draft technical compliance analytical tool (two weeks).
Fourth	At least 21 weeks before the MENAFATF Plenary	-	<ul style="list-style-type: none"> Consider follow-up country comments on technical compliance and make necessary edits. Work on the draft follow-up report with a technical compliance re-rating request and reflect the necessary amendments according to the quality and consistency notes 	<ul style="list-style-type: none"> Consolidate the technical compliance Analysis Tool and prepare the revised FUR. Review the technical compliance Analysis Tool and the revised FUR by the Secretariat team to review quality and consistency, and reflect the necessary amendments by the follow-up expert. 	

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

FUR month	Week	Reference	Key Milestones		
			FUR Expert(s)	Secretariat	Assessed Country
			submitted by the relevant personnel in the secretariat.	<ul style="list-style-type: none"> Translate technical compliance analytical tool and FUR. 	
Fifth	At least 17 weeks before the MENAFATF Plenary	-			Provide final comments on FUR and technical compliance analytical tool (one week).
	At least 16 weeks before the MENAFATF Plenary	-			Submit self-assessment of progress made against the roadmap.
		-		<ul style="list-style-type: none"> Prepare a draft cover note for progress made against the roadmap and incorporate it into the draft FUR (two weeks). Review of the quality and consistency of the draft FUR by the Secretariat team. Update translation of technical compliance analytical tool and FUR. 	
Sixth	At least 12 weeks before the MENAFATF Plenary	-	All parties agree on the version of the report which will be circulated to member countries, observers, and global network (two weeks).		
	At least 10 weeks before the MENAFATF Plenary	(Paragraph 174 of these procedures)		Circulate draft FUR to member countries, observers, and global network for two weeks comment period.	
If the country does not request Technical Compliance Re-rating					
Sixth	At least 8 weeks before the MENAFATF Plenary	(Paragraph 155 of these procedures)		<ul style="list-style-type: none"> Prepare summary of self-assessment and send to country subject to follow-up for comment (two weeks). Translate summary of the self-assessment. 	Send self-assessment of progress made against the Roadmap.
	At least 6 weeks before the MENAFATF Plenary	-			Comment on draft summary (one week).

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

FUR month	Week	Reference	Key Milestones		
			FUR Expert(s)	Secretariat	Assessed Country
	At least 5 weeks before the MENAFATF Plenary	-		<ul style="list-style-type: none"> Amend summary of the self-assessment. Update translation of self-assessment. 	
	At least 2 weeks before the MENAFATF Plenary	-		Circulate FUR (self-assessment and its summary) to member countries and observers for information.	

Note: This timeline is an example and does not include all possible steps of adoption by written process if comments are received.

Enhanced Follow-up

FUR month	Week	Reference	Key Milestones		
			FUR Expert(s)	Secretariat	Assessed Country
First	At least 40 weeks before the MENAFATF plenary	(Paragraph 161 of these procedures)		<ul style="list-style-type: none"> Confirm follow-up expert(s) from member countries. Prepare the adapted technical compliance analytical tool template based on the deficiencies in the MER to facilitate country's technical compliance submission (two weeks). 	Inform the Secretariat which recommendations it is requesting to be re-rated.
Second	At least 36 weeks before the MENAFATF plenary	(Paragraph 161 of these procedures)	Review and analyse the extent to which the country has addressed KRAs (including any KRA related to technical compliance) (3 weeks).		<ul style="list-style-type: none"> Submit information to support country's progress made against the roadmap. Submit technical compliance update and re-rating request to the Secretariat.
	At least 33 weeks before the MENAFATF plenary	-	Liaise with Secretariat on questions for assessed country and draft analysis of progress against KRA (two weeks).		Respond to questions and requests for information from follow-up experts.
Third	At least 31 weeks before	-	Analysis of technical compliance re-rating requests (4 weeks).	Prepare the 1 st draft KRA analysis and send to the country (two weeks).	

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

FUR month	Week	Reference	Key Milestones		
			FUR Expert(s)	Secretariat	Assessed Country
	the MENAFATF plenary				
	At least 29 weeks before the MENAFATF plenary	-			Provide comments on draft analysis of progress against the roadmap (3 weeks).
Fourth	At least 27 weeks before the MENAFATF plenary	-		Finalize draft analysis on technical compliance re-rating request and send to country (one week).	
	At least 26 weeks before the MENAFATF plenary	-	<ul style="list-style-type: none"> Consider country comments on KRA progress and make necessary edits. Prepare Draft FUR. Send revised progress analysis on amended KRA to country (two weeks). 		Provide comments on draft technical compliance analytical tool (two weeks).
Fifth	At least 24 weeks before the MENAFATF plenary	-	Consider country comments on technical compliance and make necessary edits. Incorporate updated technical compliance analysis into draft FUR (two weeks).		Provide comments on revised analysis of progress against the roadmap (3 weeks).
	At least 21 weeks before the MENAFATF plenary	-	Consider the country's comments on the revised progress on KRA and make necessary adjustments and finalize the FUR (two weeks).		
	At least 19 weeks before the MENAFATF Plenary	-	Review of the Secretariat Team's comments on quality and consistency of each FUR and analytical tool of technical compliance in addition to inserting the necessary amendments thereto based on such comments.	<ul style="list-style-type: none"> Review the quality and consistency of the FUR and analytical tool by the Secretariat team and reflect necessary adjustments by the reviewing expert to send it to the Country for review (one week). Translate FUR and technical compliance analytical tool (one week). Send the amended FUR and analytical tool to the country. 	

Procedures for the Third Round of the Mutual Evaluation and Follow-up Processes

FUR month	Week	Reference	Key Milestones		
			FUR Expert(s)	Secretariat	Assessed Country
Sixth	At least 17 weeks before the MENAFATF plenary	-			Provide final comments on revised FUR (including technical compliance analytical tool and analysis of progress against the roadmap) (3 weeks).
	At least 14 weeks before the MENAFATF Plenary	-	Review of final amendments to the FUR and technical compliance Analytical tool with the Secretariat.	<ul style="list-style-type: none"> Review of the quality and consistency of the FUR by the Secretariat team. Reflect final edit to the FUR and technical compliance analytical tool (one week). Update translation of the FUR and technical compliance analytical tool (one week). 	
	At least 12 weeks before the MENAFATF plenary	-	Facilitated by the Secretariat, all parties agree on the version of the report which will be circulated to member countries, observers, and global network (two weeks).		
	At least 10 weeks before the MENAFATF plenary	(Paragraphs 174 of these procedures)		Circulate FUR to member countries, observers, and global network for two weeks comment period.	

Note: This timeline is an example and does not include all possible steps of adoption by written process if comments are received.

APPENDIX 3- AUTHORITIES AND BUSINESSES TYPICALLY INVOLVED FOR ON-SITE VISIT

Ministries:

- Ministry of Finance
- Ministry of Justice, including central authorities for international co-operation
- Ministry of Interior
- Ministry of Foreign Affairs
- Ministry responsible for the law relating to legal persons, legal arrangements, and non-profit organizations
- Other relevant bodies or committees to co-ordinate AML/CFT/CPF action, including the assessment of the money laundering and terrorist financing risks at the national level

Criminal justice and operational agencies:

- The FIU
- Law enforcement agencies including police and other relevant investigative bodies
- Prosecution authorities including any specialized confiscation agencies
- Customs service, border agencies, and where relevant, trade promotion and investment agencies
- If relevant - specialized drug or anti-corruption agencies, tax authorities, intelligence, or security services
- Task forces or commissions on AML, CFT, CPF or organized crime

Financial sector bodies:

- Ministries/agencies responsible for licensing, registering or otherwise authorizing financial institutions
- Supervisors of financial institutions, including the supervisors for banking and other credit institutions, insurance, and securities and investment
- Supervisors or authorities responsible for monitoring and ensuring AML/CFT/CPF compliance by other types of financial institutions, in particular exchange offices and money remittance businesses
- Exchanges for securities, futures, and other traded instruments
- If relevant, Central Bank
- The relevant financial sector associations, and a representative sample of financial institutions (including both senior executives and compliance officers, and where appropriate internal auditors)
- A representative sample of external auditors

DNFBP, VASP and other matters:

- Casino supervisory body
- Supervisor or other authority or Self-Regulatory Body (SRB) responsible for monitoring AML/CFT/CPF compliance by other DNFBPs
- Supervisors or authorities responsible for monitoring and ensuring AML/CFT/CPF compliance by VASPs
- Registry for companies and other legal persons, and for legal arrangements (if applicable)
- Bodies or mechanisms that have oversight of non-profit organizations, for example tax authorities (where relevant)
- A representative sample of professionals involved in non-financial businesses and professions (managers or persons in charge of AML/CFT/CPF matters (e.g., compliance officers) in

casinos, real estate agencies, precious metals/stones businesses as well as lawyers, notaries, accountants, and any person providing trust and company services)

- Any other agencies or bodies that may be relevant (e.g., reputable academics relating to AML/CFT/CPF and civil societies)

Efficient use has to be made of the time available on-site, and it is therefore suggested that the meetings with the financial sector, DNFBP and VASP associations also have the representative sample of institutions/DNFBP/VASP present.

APPENDIX 4 – QUESTIONNAIRE FOR CHAPTER 1 OF THE MER

Update on risk and context

Instructions

Instructions for Assessed Country

The assessed country should briefly summaries any significant developments in their AML/CFT/CPF system which have taken place since the MER or the last follow-up report. In particular, identify any changes to risk and context that are relevant to any recommendations to be re-assessed (e.g., a dramatic increase in the number of companies registered would be relevant context in the re-rating of R.24). This includes:

- New risk and context information, including new national risk assessments, predicate or ML/TF threat profile, and significant changes to the structure of the financial institutions, DNFBP and VASP sectors. This information will assist experts in weighing the relative importance of each criterion in the re-rating.
- Major new AML/CFT/CPF laws.
- Significant changes to co-ordination arrangements, competent authorities, or significant reallocation of responsibility between competent authorities.

For further details, the assessed country should see the FATF Methodology for Assessing Technical Compliance with the FATF Recommendations and the Effectiveness of AML/CFT/CPF Systems, Annex 1, MER Template for Chapter 1.

For example, since the mutual evaluation, the following major changes have been made to Country X's AML/CFT/CPF framework

- Country X completed and published its second ML risk assessment in 2018 (Annex B).
- Country X passed the 'Law on Suspicious Transaction Reporting (2018) which came into effect on 12 June 2018.
- Responsibility for investigating suspicious transactions has been transferred from the Ministry of Interior to the FIU as of 23 August 2018, according to Government Order number 2018-1503.

Size and Structure of the Financial, DNFBP and VASP Sectors

AML/CFT/CPF Preventive Measures for Financial Institutions, DNFBPs and VASPs (R.10 to R.23)

Type of Entity*	No. Licensed/Regulated/Registered	AML/CFT/CPF Laws**/Enforceable Means Preventive Measures for	Date in Force or Last Updated (where applicable)	Other additional Information (e.g., highlights of substantive changes etc.) ***
Banks				
Life insurance				
Securities				
MVTS				
VASPs				
Casinos				
Lawyers				
Notaries:				
Accountants				
DPMS				
Trust Companies				
Service Providers				
Others				

* Additional rows may be added for other type of financial institutions and DNFBPs. Countries may also choose to have more granular and specific classification of the types of financial institutions and DNFBPs.

** Countries should indicate the specific provisions in the AML/CFT/CPF laws that set out the customer due diligence, record keeping and suspicious transaction or suspicious activity reporting obligations.

*** Where there have been changes since its last update or where relevant, countries should also set out the specific provisions in the AML/CFT/CPF laws or enforceable means and key highlights of the obligations for other preventive measures (e.g., politically exposed persons (PEPs), wire transfers, internal controls and foreign branches and subsidiaries etc.).

Legal Persons and Arrangements (R.8, R.24 and R.25)

Type of Legal Persons/Arrangements*	No. Registered (where available)	Applicable Laws/Regulations/Requirements	Date in Force or Last Updated (where applicable)	Other additional Information (e.g., highlights of substantive changes etc.) **

* Additional rows may be added for other type of legal persons or arrangements. Countries may also choose to have more granular and specific classification of the types of legal persons or arrangements

** Countries should indicate the specific provisions in the applicable laws/regulations/requirements and key highlights that set out the obligations to maintain the requisite information in R.24 (e.g., basic and beneficial ownership) and R.25 (e.g., settlors, trustees, protectors (if any), the (class of) beneficiaries, and any other natural person exercising control) respectively.

