Enhancing International Information Exchange between FIUs

„There is no efficient cooperation at the international level without efficient cooperation at the national level, and opposite.“

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Results of evaluation of international information exchange with the counterparts of the Czech FIU

(On the basis of researches of experience of Analytical Division of the Czech FIU, which had been elaborated in 2003, 2005, 2009 and 2011)

- New EU countries have been evaluated as the best
- Old EU countries have been evaluated worse than new countries
- Non EU countries have been evaluated worst of all
Obstacles in the international information exchange

• Non co-operative countries and territories
• Access to financial information on the basis of foreign request
• Quality and complexity of responses
• Delay in responding

Czech template for Responses to foreign requests

FIU database
Commercial databases
Law enforcement databases
Information from financial sector
Information from Property Register
Information from Tax Administration
Enclosures
Czech template for Spontaneous Information

Subject of STR
Results of investigation in the Czech Republic (description of the case)
Reason for investigation in other country
Consent for dissemination to the competent authorities
Enclosures

The Czech approach to the international info exchange

All FIUs must have (direct?) access to financial informations – also for response to foreign request
FIU must deal with foreign requests in the same way as it deals with „domestic“ STR’s
FIU provide foreign counterparts with the same scale of information as it is used for analyzing own STR
All crime approach – no list of predicate offences
Tasks for future

• Full support as much comprehensive EU AML/CFT Directive in relation to EC

• Pressure to national legislations of countries, where FIUs are not able to obtain financial information for the purposes of international information exchange

• Good example for new EU AML Directive: Council Directive 2011/16/EU on administrative cooperation in the field of taxation – Article 6 (3)

Q and A

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