

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?) acces 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

JT

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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