

2019 Risk Assessment Report on Money Laundering

Thomas Wahl



News

The [Supranational Risk Assessment \(SNRA\) report](#) of 24 July 2019 systematically analyses the money laundering or terrorist financing risks of specific products and services. It focuses on vulnerabilities identified at the EU level, both in terms of legal framework and in terms of effective application, and provides recommendations for addressing them. The report is published bi-annually as required by Art. 6 of the 4th AML Directive. The 2019 SNRA updates the first SNRA report published on 26 June 2017 (see [eucrim 2/2017](#), pp. 65-66) and follows up on recommendations made to actors involved in the fight against money laundering/terrorist financing.

The SNRA assesses the risks in various sectors, e.g. cash/cash-like assets, the financial and gambling sector, and the collection and transfers of funds through non-profit organisations. Compared to the 2017 report, the 2019 report identified additional products and services that are potentially vulnerable to money laundering and terrorist financing, including privately owned automated teller machines (ATMs), professional football, free ports, and investor citizenship and residence schemes (“golden passports/visas”).

The report found that most recommendations of the first report have been implemented by the various actors; however, several horizontal vulnerabilities common to all sectors were identified. The major snags are:

- Anonymity in financial transactions, which is particularly the case for some e-money products, virtual currencies, and unregulated crowdfunding platforms;
- Difficulties with identification of and access to beneficial ownership information;
- Weaknesses in supervision within the internal market in terms of controls, guidance, and the level of reporting by legal professionals;
- Gaps in cooperation between Financial Intelligence Units (see also FIU report).

The 2019 SNRA also makes a number of recommendations that are addressed to the European Supervisory Authorities, non-financial supervisors, and the Member States. Sector-specific recommendations are included. The Commission will follow up these recommendations in the next report in 2021.

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