Financial Transactions and Reports Analysis Centre of Canada

Centre d'analyse des opérations et déclarations financières du Canada

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"Strengthening International cooperation through formal and informal channels"
- A Canadian perspective

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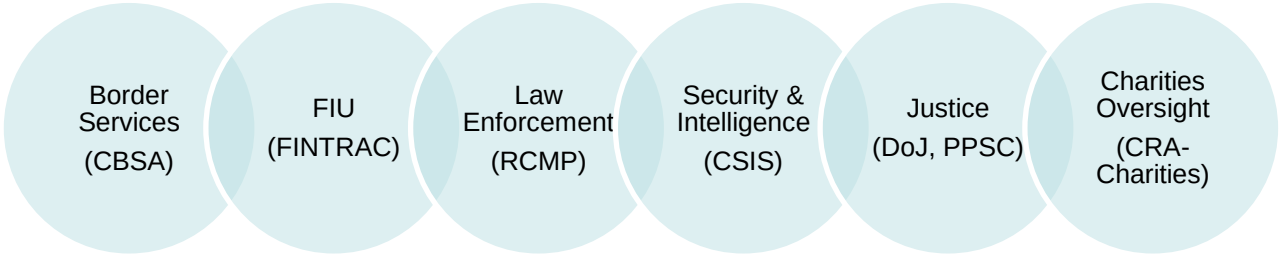
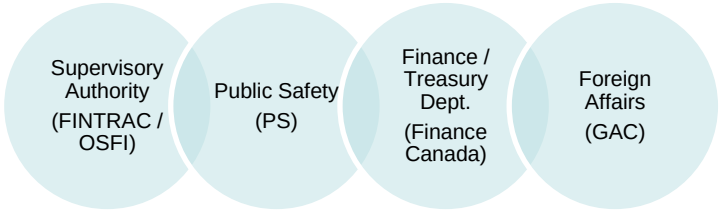
Canada

Good International Cooperation Starts Domestically

Domestic Operational Pillars



Policy, Supervisory and Engagement Pillars



✓ ***Informal channels ensures cooperation***

The Platform of FININT: Reporting Entity Efforts

- Within Anti-Terrorism Regime, often the front line is the reporting entities;
  - The reporting entities may be the first to detect suspicion;
  - Promoting Reporting Entity TF-vigilance to enhance STR Reporting;
  - STRs trigger new cases and potentially instigating a LE investigation
- Private sector have expanding corporate and AML/CTF risks, and have an interest in collaborating outside of the compliance context.

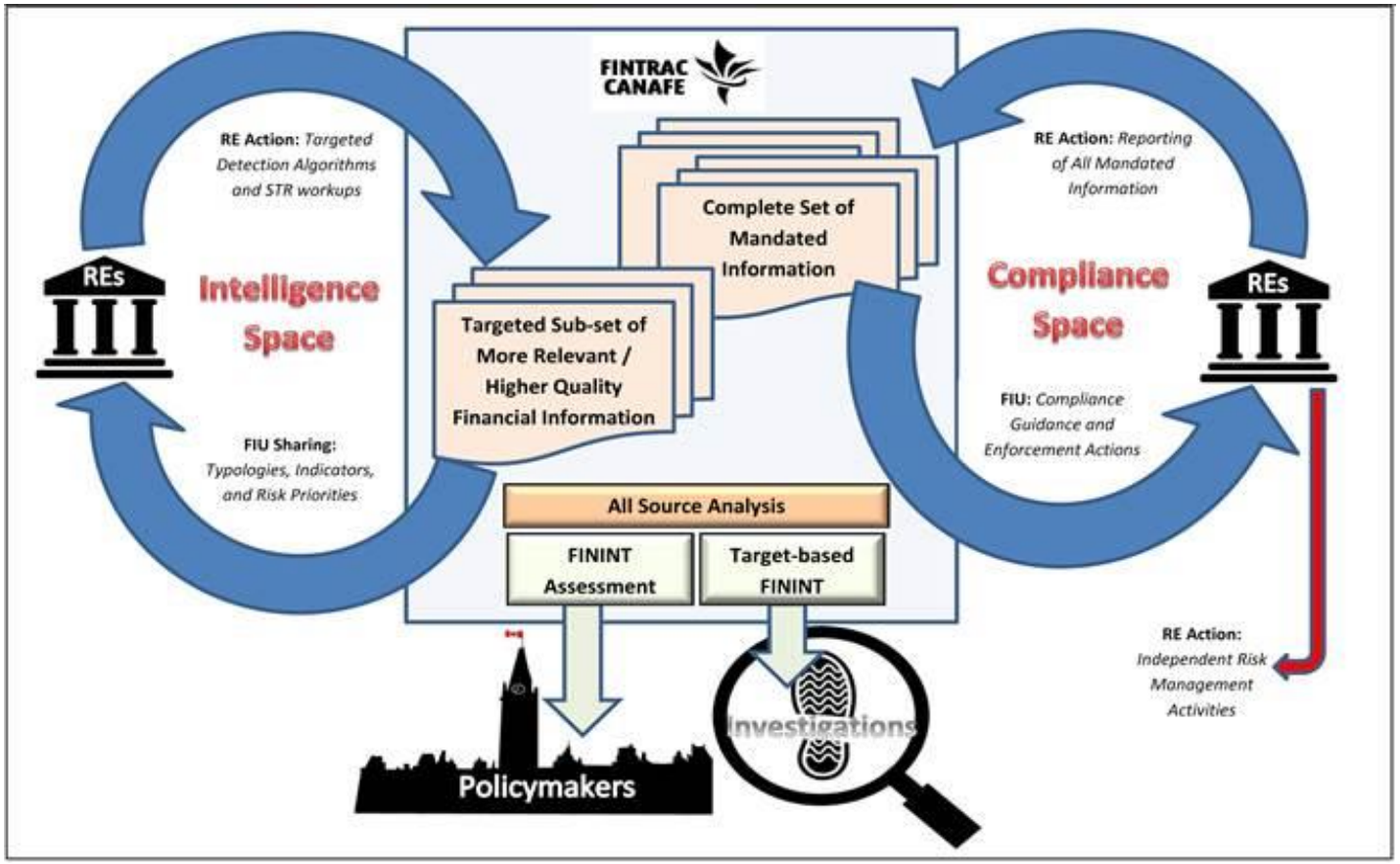
✓ ***Engaging and Educating our RE's strengthens a hostile environment for Terrorist Financing.***

Extending the Outreach: New Areas of Sharing – Operationally-relevant TF Indicators

- FINTRAC has made significant efforts to grow past traditional outreach
- Began the process of developing unclassified indicators
- Recognition that a lone indicator is almost never a suspicion of terrorist financing, however, in the CTF context a person's financial activities leading up to attack planning / travelling abroad are vital in getting in front of the threat.

✓ ***Relationship between FIU & Supervision is key to enhance TF reporting.***

FIU – At the center of an evolving concept of partnership

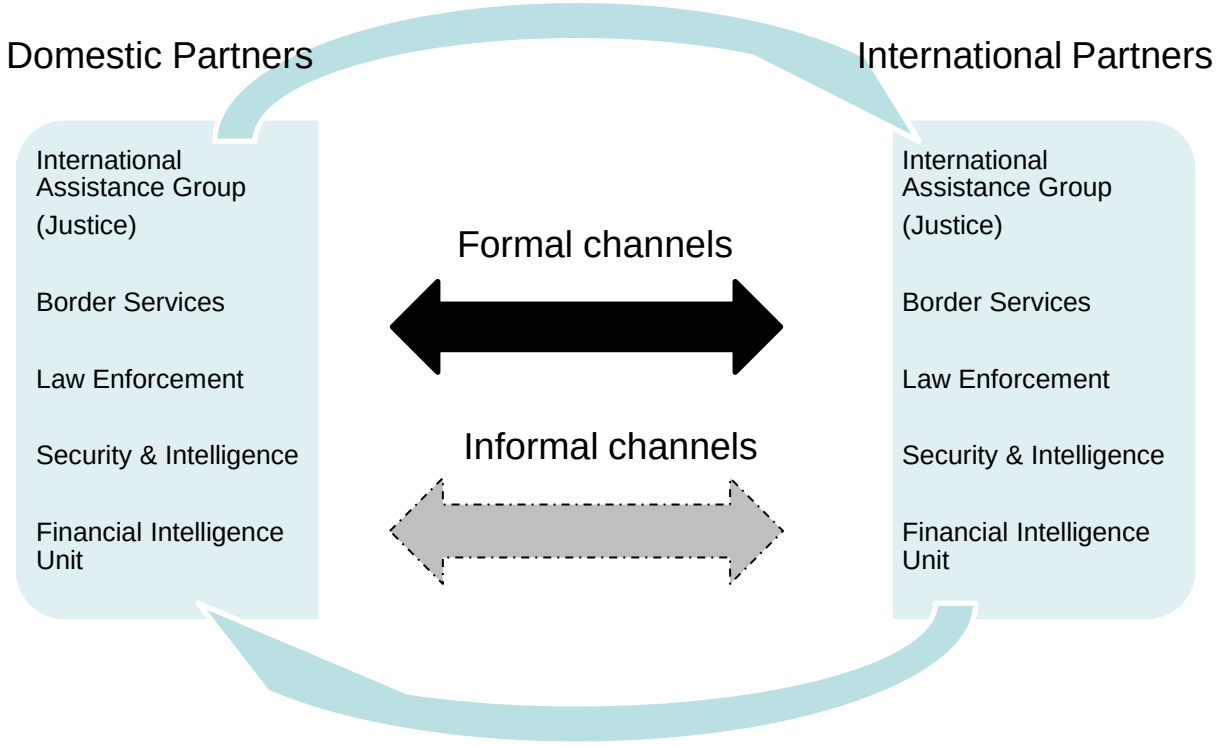


- ✓ ***The FIU is uniquely position to play a instrumental role in international cooperation***

Providing Global Access to Domestic Information

- ❑ Domestic information relevant to terrorism or terrorist financing investigation need to be accessible
- ❑ Example of information essential to combat TF:
  - National registries
    - Corporate information
    - Charities;
    - Reporting Entities (e.g. Banks, MSBs)
  - Court documents
  - Administrative / criminal penalties information
  - Sanctions / Listed entities
    - Focusing on individuals & front organizations link to terrorist entities
      - Use of proper identifier
- ✓ ***Access to information leads to efficiency***

Multi-Layer Approach
- Leveraging existing networks



✓ ***Formal channels are essential to international cooperation but informal channels are required to make it work.***

Egmont ISIL Project
- A model of international cooperation

- ISIL Multilateral Project Phase 1
  - 40 FIUs exploited their data sets to identify and track FTF's traveling to Iraq and the Levant.

- ISIL Multilateral Project Phase 2
  - Year long project will focus on uncovering new FTF facilitation networks.

- Presentations and training sessions on best practices and lessons learned

✓ ***Need to leverage lessons learned and to actions***

Barriers / Challenges to Optimal Information Sharing

- Country' domestic factors
  - Lack of resources
  - System limitation
  - Language barriers
  - Privacy vs. National Security
- Country's international factors
  - Minimal informal channels
  - Inexistent MOUs
- International organizations assessment results
- Caveated information

Foundations of Strong International Cooperation

- Strong domestic collaboration / coordination
- Find common ground
- Focused technical assistance
- Be part and use formal channels …and continue to develop new informal channels
- International integrated units
- Actionable intelligence
- Have a strategic perspective
- Establish system that allows for the exchange of information above protected level
- Go beyond international assessments:
  - Assess the foreign agency safeguards of the information shared
- Use the indirect route