



**Joint special meeting of the Counter-Terrorism Committee and the
1267/1989/2253 ISIL (Da'esh) and Al-Qaida Sanctions Committee
on “*Terrorist-financing threats and trends and the implementation
of Security Council resolution 2462 (2019)*”**

Statement by Ambassador Brian Flynn, Deputy Permanent Representative

18 November 2021

- Thank you Madam Chair.
- We welcome today's joint special meeting and thank all the panellists for their insightful contributions this afternoon.
- Madam Chair,
- The financing of terrorism is an ever-evolving phenomenon, with terrorist groups constantly adapting to exploit new technologies and financing opportunities.
- Ireland, as a small, open economy with a thriving financial services industry, recognises that countering the financing of terrorism (CFT) is a central part of our global counter-terrorism response.
- At a domestic level, we have a robust, institutional CFT framework and understand the need to ensure this framework remains under review to reflect new and emerging trends, as well as EU requirements and FATF recommendations. For example, our most

recent domestic legislation extends CFT obligations to virtual asset service providers.

- Madam Chair,
- The joint report by CTED and the 1267 Monitoring Team reveals that Member States have a comprehensive understanding of CFT requirements. However, at the same time it demonstrates that certain CFT measures called for in Resolution 2462 have not yet been tested or fully operationalized in domestic contexts.
- One area where further implementation is required is in mitigation of the impacts of CFT measures on principled humanitarian action.
- On a number of occasions this year, both the Council and the Counter Terrorism Committee have heard about how the application of CFT regulations on humanitarian actors, and the de-risking practices that result, have particularly adverse consequences for the provision of humanitarian aid. Indeed, the Secretary General has shared similar concerns.
- Council resolutions, including Resolution 2462, should be operationalised through well-framed humanitarian exemptions; enhanced dialogue with humanitarian organisations; and engagement with the financial sector. We look forward to further discussion on this point following publication of CTED’s report on the intersection between international humanitarian law and CT frameworks.
- We also commend the Financial Action Task Force for its ongoing “unintended consequences” project, which seeks to proactively address and mitigate the incorrect implementation of FATF Standards and their potential adverse effects.

- Similar to humanitarian organisations, CFT efforts can also have harmful consequences for civil society organisations. These can include inhibited access to financial services, the arbitrary closure of accounts, or overly restrictive administrative requirements. CFT approaches should be based on empirically devised risk assessments, tailored to different contexts.
- We reiterate once more that CFT measures must not impede the delivery of principled humanitarian assistance or infringe upon the legitimate activities of humanitarian and civil society organisations carrying out vital work.
- Additionally, CFT measures should never be misused to target or criminalise civil society, humanitarian organisations or human rights defenders. The UN Special Rapporteur on Counter Terrorism and Human Rights, as well as OHCHR, has alerted us to a number of worrying developments in this regard, and we would welcome further CTED attention to this issue.
- Furthermore, the joint report notes the need for further research on measures to ensure that terrorism-financing investigations comply with international human rights obligations, including those concerning due process, fair trial, privacy and data protection. Ireland supports this call.
- Finally, Special Rapporteur Ní Aoláin has reported on the gender impacts of CFT measures, highlighting that they can place a particular burden on women's rights organizations. This underlines the importance of a gender responsive approach across the entire counter-terrorism agenda, including CFT approaches.
- Thank you Madam Chair.