The Financial Intelligence Analysis Unit (“FIAU”) wishes to bring to the attention of subject persons and interested parties that on 24 July 2019 the European Commission adopted and published a revised version of its Supranational Risk Assessment. This assessment identifies 47 products and services as potentially vulnerable to money laundering or terrorism financing within the internal market, up from 40 in the 2017 report. These 7 additional products and services are part of four new sectors that had not been previously assessed: privately-owned automated teller machines; professional football; free ports; and investor citizenship and residence schemes.

In addition, subject persons are hereby being reminded of their obligations under Regulation 5 of the Prevention of Money Laundering and Funding of Terrorism Regulations with respect to the carrying out of their business risk assessment. Amongst the aspects to consider when carrying out the said assessment, subject persons have to take into account the findings of any supranational risk assessment relating to risks of money laundering and funding of terrorism. Moreover, once carried out, subject persons have to regularly review and keep up-to-date the said assessment. These obligations are further expanded upon in Chapter 3 of the recently updated Implementing Procedures – Part I.


26 July 2019