



Евразийская группа по противодействию легализации  
преступных доходов  
и финансированию терроризма

Eurasian Group on Combating Money Laundering  
and Financing of Terrorism

# EAG STRATEGY FOR 2024-2028

2023

## **Strategy of the Eurasian Group on Combating Money Laundering and Financing of Terrorism (EAG) for 2024 - 2028**

### **Introduction**

1. This Strategy of the Eurasian Group on combating money laundering and financing of terrorism for 2024 - 2028 (hereinafter referred to as the Strategy) has been developed in accordance with the Agreement on the EAG, as well as other documents regulating its activities.
2. The Strategy is a fundamental high-level policy document for the EAG Member States (hereinafter - Member States), the EAG Secretariat (hereinafter – Secretariat), technical assistance donors that defines priority areas of activity, the mechanisms and resources involved, and the expected achievable results. The Strategy does not replace or change the relevance of ongoing work, such as the assessment of the state of national AML/CFT/CPF systems, interaction with the FATF, etc., but is a tool for prioritizing activities to achieve the objectives set out in the Agreement on the EAG (Article 2 of the Agreement). The strategy is also focused on ensuring professional, expert cooperation in the field of AML/CFT/CPF, taking into account the EAG mandate.
3. The short-term and medium-term planning of the activities of the EAG is carried out in accordance with the priorities defined in the Strategy. The areas of activity and the activities envisaged in the Strategy are open to accession and participation of observers and other parties concerned.
4. The Strategy has been developed taking into account the current level of development of national AML/CFT/CPF systems in the region, existing risks and vulnerabilities of the regional and national level, actual needs to achieve the set objectives, identified trends in the international system of combating legalization (laundering) of criminal proceeds, financing of terrorism and financing of proliferation of weapons of mass destruction (hereinafter - the Global Network), as well as the results of the Strategy implementation for 2019-2023.

### **Results of the implementation of the EAG Strategy for 2019-2023**

5. The Strategy for 2019-2023 was adopted during the 30th EAG Plenary Meeting in May 2019.
6. The EAG strategic priorities for 2019-2023 included:
  - Strengthening national AML/CFT systems;
  - Assessing regional ML/TF risks and developing recommendations to mitigate them;
  - Ensuring effective interaction and cooperation at the regional level.
7. In general, the main results declared as the expected effect of the implementation of the Strategy for 2019-2023 have been achieved.
8. The second round of the EAG mutual evaluations has been completed. As the summary results show, Member States have to some extent improved the state of their national AML/CFT/CPF systems.<sup>1</sup> The following 4 countries remain under increased monitoring: Kyrgyzstan, Tajikistan, Turkmenistan China (FATF monitoring). However, some time has elapsed since the reports were approved, the countries have made some progress in technical compliance with the FATF Standards, and the level of effectiveness of the measures taken will be assessed in the next round of mutual evaluations. Compared to the results of the first round of mutual evaluations, the situation shows largely positive changes. For example, according to the results of the first round, seven out of nine Member States were under increased monitoring. Significant progress has also been made in comparison with the average ratings of the effectiveness of mutual evaluation reports of other FSRBs and the FATF. The average ratings

---

<sup>1</sup> The Republic of India continues to undergo a joint FATF, EAG and APG mutual evaluation.

for all IOs practically correspond to the FATF level, and for IO.6 and IO.9 the EAG is among the leaders in the Global Network.

9. At the same time, it should be noted that the first round of mutual evaluations did not assess the effectiveness of national AML/CFT/CPF systems. In the current round, the EAG, as the evaluation body, has made efforts to ensure reciprocity and transparency in the evaluation process (e.g., it has adopted a document on new approaches to the selection of assessors, held a series of training sessions on standards, conducted a horizontal analysis of the most important recommendations and immediate outcomes, and launched on the FATF platform the initiative to provide feedback from FSRBs on horizontal issues).
10. In 2020-2022, the EAG conducted a risk assessment of money laundering and terrorist financing in the Eurasian region, identifying both regional risks, threats and vulnerabilities and sub-regional risks (for specific groups of Member States or supranational entities). Based on the results of the assessment, an Action Plan (Roadmap) to mitigate the identified risks was developed, which includes general (organizational) measures, as well as specific supranational measures aimed at minimizing risks, threats and vulnerabilities, including through the formation of regional mechanisms and tools to address technical compliance deficiencies in national legislation and to improve the effectiveness of national AML/CFT/CPF systems.
11. As a result of changes in the approach to coordinating technical assistance (hereinafter – TA) in the implementation of the FATF Standards and the effectiveness of AML/CFT/CPF systems, the quality of the assistance provided has improved significantly, as evidenced by the positive feedback from Member States. Technical assistance has become more focused and comprehensive, and work with donors and providers has become more goal-oriented.
12. A system for evaluating the contributions of Member States and observers to the activities of the EAG has been established, allowing the level of participation in the activity of the organisation to be assessed and areas for increased attention to be identified in order to strengthen interaction with the EAG. Active steps are being taken to engage a wider range of stakeholders, including the annual Forum of Parliamentarians of the EAG Member States for national legislative authorities and the International Compliance Council for the private sector. Representatives of law enforcement agencies actively participate in the activities of WGTYP, including the annual Eurasian Group AML/CFT Forum, which was held for the first time in 2019.
13. The EAG as a FATF-Style Regional Body, despite the relatively small number of Member States, has a stable position in the Global Network, actively participates in the activities of the FATF and FSRBs that are EAG observers (APG, MONEYVAL, MENAFATF), maintains close relations with international and regional organizations including their bodies and units (UNODC, UNOCT, EGMONT, INTERPOL, OSCE, CIS CHFIU, CIS ATC, BKBOP, CARICC, SCO RATS, EEC and others), international financial institutions (ADB, EDB, World Bank, EBRD, IMF, NDB, etc.) and states-observers. NDB, BKBOP, Germany and CIS CHFIU have been accepted as observers to the EAG between 2019 and 2023.
14. At the same time, some of the objectives were not fully achieved.
15. The number of deficiencies in technical compliance of legislation with the FATF Standards in the mutual evaluation reports do not allow to fully claim the success of the completion of the second round of mutual evaluations. The reasons for incomplete transposition of the FATF Standards into national legislation are usually related to lack of sufficient resources, difficulties in selection of national experts, insufficient involvement of legislative bodies in EAG activities, difficulties in regulation of international cooperation and exchange between Member States.
16. Interaction and coordination with EAG observers needs to be further improved, as reflected in the Action Plan to mitigate regional ML/TF risks. It is necessary to increase the involvement of the various competent authorities and the private sector of Member States participating in the national

AML/CFT/CPF systems in the work of the EAG, as well as strengthening of intergovernmental cooperation at the level of competent authorities, thereby increasing mutual trust between countries.

17. Further steps should also be taken to avoid duplication in the provision of technical assistance to different Member States to achieve the same result.
18. The level of horizontal links with other FSRBs remains insignificant, as does the number of joint activities and projects.

### **Strategic priorities of EAG activities in 2024-2028**

#### ***Conducting high-level evaluations (mutual evaluations and progress evaluations) in accordance with the Standards, FATF Methodology and EAG Procedures, and in line with the FATF quality and consistency process***

19. Conducting Mutual Evaluations and Follow-up progress assessments is one of the main tasks of the EAG activity, defined in Article 2 of the Agreement on the EAG and an indicator of the degree of effectiveness of improvement of the national AML/CFT/CPF systems. The new 3rd round of Mutual Evaluations may start in 2026 and will be the most important priority of the EAG activity in the specified period of the Strategy.
20. Preparation and conduct of the Mutual Evaluation is a long and labor-consuming process, including training of expert-evaluators, activities on preparation of the evaluated country, formation of the team of the experts-evaluators, organization of the on-site visits, preparation and approval of the Mutual Evaluation Report, subsequent monitoring of the progress. At the same time, the coordination of the whole process of mutual evaluations is carried out by the EAG Secretariat.
21. Realization of the task of successful implementation of the 3rd round of the Mutual Evaluations and Follow-up progress assessments will be carried out through the following activities:
  - Formation of the pool and training of highly qualified expert-evaluators from among the representatives of national competent authorities of the EAG Member States;
  - Training and professional development of the Secretariat staff in the organization of the Mutual Evaluations, on-site visits, etc..;
  - Training of highly qualified experts from among the representatives of state authorities of EAG Member States for successful realization of the 3rd round of Mutual Evaluations of the AML/CFT/CPF system;
  - Development of methodological documents of recommendatory nature to improve the efficiency of AML/CFT systems of the EAG Member States;
  - Preparation, discussion at the Plenary Meetings and approval of qualitative reports of the Mutual Evaluations and Follow-up progress reports in accordance with the Standards, FATF Methodology and EAG Procedures, as well as in accordance with the FATF quality and consistency process.

#### ***Further strengthening Member States' national AML/CFT/CPF systems and enhancing compliance with the FATF Standards through improved provision and coordination of technical assistance.***

22. Strengthening national AML/CFT/CPF systems and improving their compliance with FATF Standards is a means of achieving the objectives set out in the Agreement on the EAG. The result in this area should be achieved within the planned timeframe through improved coordination of technical assistance.
23. Work on the provision of technical assistance and its coordination in the EAG is carried out on the basis of the Rules for the Coordination of Technical Assistance to the EAG Member States approved at the

35th Plenary Meeting and includes both coordination by international donors and providers and direct provision of technical assistance by other Member States, the Secretariat and its experts.

24. In 2024-2028, the technical assistance coordination work will focus on prioritizing and addressing the gaps identified in the second round of mutual evaluations and included in the relevant plans, and will also include the provision of TA in the most important and relevant areas that will allow Member States to be as prepared as possible for the 3rd round of mutual evaluations. Coordination of technical assistance will be improved by eliminating the duplication of activities with the same goal in different plans for individual Member States, thereby saving financial resources and covering a greater number of tasks.
25. The following activities can be used to successfully achieve the objectives of technical assistance coordination:
  - Assisting EAG countries in implementing action plans to address the gaps identified in the second round of mutual evaluations as well as assisting in the implementation of the new requirements of the FATF Recommendations;
  - Implementation of capacity building, training and awareness raising programs;
  - Coordination of efforts to identify and engage donors and providers to implement TA plans;
  - Providing TA to minimize regional risks, threats and ML/TF/PF vulnerabilities, including by Member States to each other, as well as directly by the Secretariat, within the limits of its expertise, technical capacity, and possible involvement of regional and international organizations;
  - Establishment of a separate EAG fund for the implementation of TA tasks at the expense of voluntary contributions from Member States, observers and other donors;
  - Analysis of the effectiveness of technical assistance provided, the degree of impact in addressing deficiencies or mitigating regional risks, as well as the reasons for the possible lack of positive effect.

***Strengthening coordination within the EAG and increasing the level of cooperation between countries.***

26. Despite the many measures proposed in recent years to improve national AML/CFT/CPF systems, including at the supranational level, as well as to enhance bilateral and multilateral cooperation, a number of initiatives remain without due attention, both because of an objective lack of necessary resources among countries and because of a lack of understanding among competent authorities of the need to implement such measures and to adopt changes, including legislative ones. A large number of proposed activities are not supported by Member States due to a lack of analysis in terms of "expected positive effect/possible costs".
27. Ways to increase the level of cooperation among Member States include greater involvement of all stakeholders of national anti-money laundering systems, as well as representatives of legislative, executive and judicial authorities and political bodies of Member States, in AML/CFT/CPF activities.
28. Strengthening unity and coordination within the EAG, increasing intergovernmental and interagency cooperation among the competent authorities, and attracting the attention of Member States' political bodies in 2024-2028 will be achieved through the implementation of the following strategic initiatives:
  - Conducting events at the interstate level for specific categories of competent authorities and political officials (Forum of Parliamentarians of the EAG Member States, Law Enforcement and Judiciary, Eurasian Group AML/CFT Forum, International Compliance Council, etc.) in order to increase their involvement in AML/CFT/CPF

and to improve their understanding of the need for and importance of the measures implemented on the EAG platform<sup>2</sup>;

- Implementation of practical mechanisms and tools that strengthen bilateral AML/CFT/CPF cooperation between countries<sup>3</sup>;
- Timely action and coordination within the EAG based on periodic monitoring of the operational situation in the EAG Member States in terms of new ML/TF/CPF risks.

***Monitoring the situation with respect to ML/TF/PF risks, threats and vulnerabilities in Member States and in the region as a whole, and taking measures to mitigate them.***

29. The EAG's efforts to identify regional ML/TF risks, threats, and vulnerabilities, and subsequent monitoring of the situation, allow for the identification of the need for action and risk mitigation at the supranational level. Regional risk assessments and ongoing monitoring can be used both by Member States in conducting national risk assessments and preparing for mutual evaluations.
30. Ongoing monitoring of ML/TF/PF risks, threats and vulnerabilities also allows for optimal identification and prioritization of technical assistance needs of countries.
31. As part of the implementation of the Action Plan (Roadmap) to mitigate regional ML/TF risks, the possible creation of mechanisms is envisaged, which will not affect political issues, but will increase international cooperation and information exchange between Member States in the AML/CFT/CPF sphere (creation of common information resources, etc.).
32. In 2024-2028, the strategic activities in this area will include:
  - Implementation of the 2<sup>nd</sup> round of the supranational assessment of ML/TF risks in the Eurasian region based on the adopted in 2021 Methodology in purposes of studying non-observable risks, threats and vulnerabilities<sup>4</sup>;
  - Ensuring systematisation and regular updating of ML/TF typologies (including those established as a result of typology projects), improving approaches to conducting research and increasing the efficiency of using their results in practice;
  - Regular monitoring the situation in Member States with regard to emerging risks, threats and vulnerabilities, as well as trends in AML/CFT/CPF<sup>5</sup>;
  - Developing and implementing measures to minimise identified ML/TF risks, including taking into account the results of supranational risk assessments and monitoring of the operational environment;
  - Identifying priority areas for technical assistance and the technical assistance needs of Member States.

***Interaction with other members of the Global AML/CFT/CPF Network and observers and improvement of coordination and cooperation with FATF and FSRBs<sup>6</sup>***

33. The level of horizontal interaction between the EAG and other FSRBs remains at an insignificant level, especially with those that are not EAG observers. In recent years, for objective reasons (in particular

<sup>2</sup> The decision to organise and hold forums for representatives of competent authorities shall be made on the basis of proposals by Member States delegations and preliminary consideration of the possibility of holding the event. The decision on the possibility of participation of representatives of competent authorities shall be taken by delegations independently.

<sup>3</sup> The list of practical mechanisms and tools is defined in the Plan (roadmap) for minimising regional risks (document [WGYP \(2022\) 10 rev.2](#) as amended), or the development of such mechanisms and tools is approved by the Plenary Meeting on the basis of proposals by Member States.

<sup>4</sup> The subject matter and methods of the regional ML/TF risk assessment are regulated in the Methodology for ML/TF risk assessment in the Eurasian region ([WGYP \(2020\) 2 rev. 3](#)).

<sup>5</sup> The project on the implementation of operational situation monitoring was approved during the 35th Plenary Meeting (documents [WGYP \(2021\) 3](#), [WGYP \(2021\) 11 rev. 1](#), [WGYP \(2022\) 15](#)).

<sup>6</sup> Strengthening international cooperation and information exchange, especially bilateral ones, will be based on voluntary participation by the Member States and consultations with the Members and relevant FSRBs adequately before the official launch of such interactions.

the spread of the COVID-19 pandemic), the number of joint projects and activities with FSRBs that are EAG Observers (including APG, MONEYVAL, and MENAFATF) has decreased.

34. Given the apparent cross-regional nature of certain ML/TF/PF trends (e.g. laundering of proceeds of drug trafficking along the Northern route, financing of terrorist organizations and individuals residing in Asian and Middle Eastern countries at the expense of the funds received in the EAG region, etc.), it is necessary not only to intensify joint activities with other FSRBs, but also to conduct joint research on typologies and trends in risks, threats and vulnerabilities. However, it is important to take into account that the FATF is coordinating the global typologies work and to inform the FATF of what initiatives and actions are being taken to ensure consistency at the Global Network level.
35. The Action Plan (Roadmap) to mitigate regional ML/TF risks, approved at the 37th EAG Plenary Meeting, provides for a number of measures to strengthen the interaction and cooperation of the EAG with other regional and international organizations, initially for the period up to 2024. In case of a positive effect, this work should be continued and extended to the results of the second round of ML/TF risk assessment in the Eurasian region (assessment of non-observable ML schemes and TF methods).
36. Strategically, in the period 2024-2028, the increase in the level of interaction with other FSRBs, international and regional organizations will be achieved through activities in the following areas:
  - Continuing to improve coordination and cooperation with the FATF, including on typologies and other projects;
  - Study of existing trends and specificities in other FSRBs with a view to enhancing interaction and developing joint actions on horizontal/common issues;
  - More active participation in projects organized by FSRBs and EAG observers, joint typology and other projects;
  - Facilitate participation of Member States of other FSRBs in the EAG's organised activities of analytical and research nature;
  - Assisting Member States in building bilateral and multilateral international cooperation in combating ML/TF/PF through cooperation with the Secretariats of other FSRBs and FATF.

### **Expected achievable results of EAG Strategy implementation**

37. The overall result of the implementation of the EAG Strategy is the adoption of measures to achieve the objectives of the Agreement on the EAG, which are aimed at improving the conditions for the protection of the financial systems and economies of Member States against ML/TF/PF threats.
38. The specific results expected from the implementation of the EAG Strategy are as follows:
  - a. The most comprehensive implementation by Member States of the current versions of the FATF Standards into national law;
  - b. Achieving the best results by Member States in the third round of mutual evaluations according to the following criteria:
    - High-quality mutual evaluations of the Member States and Follow-up progress evaluations conducted according to the timetable;
    - Availability of a pool of highly qualified and quality trained assessors from Member States;
    - Approving correct reports that are in line with the FATF Standards, Methodology and Procedures and in accordance with the FATF quality and consistency process;

- Not more than 1/3 of Member States under enhanced monitoring of the effectiveness of national AML/CFT/CPF systems.
  - c. Providing adequate and targeted technical assistance to Member States, increasing the effectiveness of technical assistance provided according to the following criteria:
    - Reduction of the time required for TA provision within a project;
    - Positive results of monitoring the effectiveness of TA provision and feedback from the Member State concerned;
    - No repeated TA on the same issue.
  - d. Strengthening bilateral and multilateral cooperation between Member States' competent authorities, improving international AML/CFT/CPF cooperation between Member States, according to the following criteria:
    - Improving the efficiency of execution of MLA and extradition requests;
    - Increased use of joint international investigative groups;
    - Implementation of asset recovery and sharing;
    - Possible introduction of simplified extradition mechanisms;
    - Possible bilateral exchange of data on ML schemes and TF methods uncovered in cross-border crimes committed in both countries.
  - e. Establishment of mechanisms and tools to facilitate international information exchange;
  - f. Responding to emerging ML/TF/PF risks, threats and vulnerabilities in a timely manner, making it possible to reduce the effort and cost of mitigating them;
  - g. Collaboration with other FSRBs and FATF on joint projects and activities.
39. Detailed efficiency criteria for projects will be determined on a case-by-case basis, taking into account the nature and objectives of the project. To assess the efficiency of the Strategy activities implementation, the criteria for determining the efficiency of individual EAG activities contained in other EAG legal acts<sup>7</sup> can also be applied, and the efficiency of the EAG Budget allocation and use is determined by the results of the EAG Secretariat external audit, conducted in accordance with the Regulation on External Audit of the EAG Secretariat ([WGTA \(2022\) 17 rev.1](#)).

### **Resources required to achieve the goals and objectives**

40. The implementation of the strategic goals and objectives for 2024-2028 will require appropriate resources from Member States and the Secretariat. In recent years, the Secretariat's functions have evolved considerably and the workload has been significantly on the increase. The task of transforming the Secretariat from an administrative and technical body into an expert advisory body for Member States (while continuing to perform administrative functions) that reviews their projects to improve national AML/CFT/CPF systems and provides objective and professional assistance is consistently implemented. There is a trend towards greater direct involvement of the Secretariat in analytical and research work. Within its capacity, the Secretariat provides technical assistance to countries in enhancing the expertise of national competent authorities. The increased role of the Secretariat in the direct activities of the EAG imposes on it a greater responsibility for the proposed initiatives and the

<sup>7</sup> Specific indicators of the effectiveness of EAG projects are contained in the Rules for Coordination of Technical Assistance to EAG Member States ([WGTA \(2021\) 14 rev.1](#)), Guidelines on conducting EAG Typology Projects ([WGTyp \(2017\) 2 rev.5](#)), Procedures for EAG Mutual Evaluations, etc.

results of the activities and projects, which certainly improves the overall level of effectiveness of the EAG's efforts.

41. In this regard, an important aspect of the effective implementation of the EAG Strategy is to maintain existing funding of the EAG Budget. At the same time, the Secretariat, when preparing projects for discussion by Member States within the framework of the Strategy implementation and annual planning of EAG activities, will continuously analyse the state of financial and human resources availability in order to ensure their priority involvement in the processes of mutual evaluation and Follow-up progress assessment, to manage the workload of the Secretariat staff and delegations, as well as to maintain a reasonable approach to the planning of budget expenditures and distribution of Member States' share contributions. The implementation of the strategy will be based on the existing budget size, so as to avoid a substantial increase in the budget for the following years and excessive economic burden on Member States.
42. On the part of Member States, it will be necessary to increase the involvement of government authorities and competent AML/CFT/CPF authorities in the ongoing work of the EAG, to intensify participation in typology and other projects, to allocate adequate financial and other resources at the national level to improve efficiency in this area, including a sufficient number of highly qualified experts for conducting the third round of the EAG mutual evaluations as well as ensuring their participation in the entire mutual evaluation process.
43. An important aspect for mutual evaluations and evaluations of Follow-up progress is the availability of highly qualified and trained expert evaluators from Member States. This will require recruitment activities and training on the Standards and the evaluation process. The EAG Secretariat together with FATF will organise trainings (such as STCs, JATs), which will require the EAG Member States to participate in such events to increase the level of knowledge of candidates and include them in the pool of experts for EAG evaluations.
44. Identifying and engaging donors and providers of technical assistance to Member States continue to be an important source of funding for ongoing projects. However, a greater commitment to mutual support at the regional level is needed from Member States with the capacity to provide technical assistance to other Member States.
45. A number of activities in the current and subsequent technical assistance coordination plans can be implemented successfully and in the shortest possible time, provided that adequate resources are available, without the need to search for donors. It should be noted that in many cases the search for donors to implement technical assistance activities, due to its extreme complexity, takes more time than the implementation of the activity itself. Establishing a technical assistance fund may be the solution in such a situation.
46. The improvement and optimization of the activities of the EAG Secretariat and the Working Groups with regard to the mutual and Follow-up progress evaluations, regularity of typology research, technical assistance coordination projects, the development of mechanisms to keep existing documents and project results up to date without excessive increase in the flow of documents will also contribute to increasing the resource capacity of the EAG Secretariat and the EAG as a whole.

### **Final provisions**

47. Detailed activities for the implementation of the EAG Strategy are set out in annual work plans, technical assistance plans, schedules and procedures for mutual evaluation and follow-up, and other documents.
48. The strategic priorities may be adjusted during the implementation of the Strategy as new global or regional ML/TF/PF risks, threats and vulnerabilities as well as priorities emerge.
49. The effectiveness of the EAG Strategy will be determined by the Plenary on the basis of the results of its implementation.