



Financial Transactions and
Reports Analysis Centre
of Canada

Centre d'analyse des opérations
et déclarations financières
du Canada

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2018 FINTRAC's Report to the Minister of Finance on Compliance and Related Activities

September 2018

I. INTRODUCTION

This report provides details on the Financial Transaction and Reports Analysis Centre of Canada (FINTRAC)'s compliance activities and highlights major developments, trends, and challenges throughout 2017-18. This report also discusses examination findings conducted in the financial entities (banks, credit unions, caisses populaires), money services businesses (MSB), casinos, and real estate sectors, as well any follow-up action taken to respond to non-compliance.

The last section of the report provides an overview of key contributions made by FINTRAC to further advance and improve the overall effectiveness of the Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) Regime, and presents FINTRAC's priorities for the year ahead.

II. OVERVIEW

FINTRAC, as Canada's financial intelligence unit (FIU) and AML/ATF regulator, operates under the authority of the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA) and associated Regulations. The Centre is one of several domestic partners in Canada's AML/ATF Regime.

The Centre's mandate is to detect, deter, and prevent money laundering and terrorist financing (ML/TF) through its unique regulatory and intelligence responsibilities. FINTRAC ensures that reporting entities (REs) comply with their obligations under the PCMLTFA and associated Regulations through various compliance activities that range from engagement to enforcement. Ultimately, compliance activities serve to protect the safety and security of Canadians and the integrity of Canada's financial system by making it difficult and unattractive to criminals who wish to exploit the financial system and other sectors for illegal monetary gains.

FINTRAC develops and delivers high-quality, relevant and timely tactical and strategic financial intelligence as part of its role within the AML/ATF continuum in Canada. FINTRAC discloses tactical intelligence to authorized domestic law enforcement and intelligence agencies, as well as to foreign counterparts once it has reached reasonable grounds to suspect that the designated information would be relevant to an investigation or the prosecution of an ML/TF offence. The Centre also develops strategic financial intelligence for federal policy makers, reporting entities, international partners and other stakeholders in order to provide a wide analytical perspective on the nature and scope of ML/TF threats, and help strengthen Canada's ability to prevent, detect, and deter the methods and techniques used by criminals to launder money or fund terrorist activities.

Whether carrying out compliance activities or developing intelligence, the protection of Canadians and their privacy is paramount and as shown over the past year, FINTRAC continues to take steps to demonstrate this commitment.

III. COMPLIANCE ACTIVITY HIGHLIGHTS FOR 2017-18

A) Engagement Activities

In 2017-18, engagement with reporting entities (REs) continued to be a major focus for FINTRAC's Compliance sector. FINTRAC maintained its presence at key conferences and engaged its regulatory counterparts and international partners to promote collaboration and education on the important role everyone plays in the AML/ATF Regime. FINTRAC also conducted extensive outreach with REs in support of the implementation of new legislative and regulatory obligations highlighted in the *2017 FINTRAC Report to the Minister on Compliance and Related Activities*. The outreach focused on developing positions on the proposed second regulatory package and modernizing guidance products.

Major Reporters

FINTRAC's major reporters include HSBC Bank Canada, Canadian Imperial Bank of Commerce, Bank of Nova Scotia, Bank of Montreal, Royal Bank of Canada, Toronto Dominion Bank, Banque Nationale du Canada, and Fédération des Caisses Desjardins du Québec. These major reporters accounted for 88% of all reports submitted to FINTRAC in 2017-18.

The Centre hosted its 4th Annual Major Reporters Forum on June 13-14, 2017, with representation from all major reporters. This allowed for candid discussions and open dialogue on:

- FINTRAC's examination process;
- Mitigating AML/ATF risks in an increasingly digitized world;
- Strategic intelligence updates;
- Special warrants; and
- Canada Revenue Agency's compliance priorities, as well as updates from its Criminal Investigations Program and Offshore and Aggressive Tax Planning Programs that highlight the nexus between money laundering and tax evasion.

The Forum is an important venue as it allows the Chief Anti-Money Laundering Officers (CAMLOs) to raise concerns/issues with senior representatives from FINTRAC, Finance Canada, the Office of the Superintendent of Financial Institutions (OSFI), and other federal Regime partners. It also brings together REs facing comparable issues who have solutions or suggestions to harmonize business practices with their PCMLTFA obligations.

Reporting entities raised the following points at the Forum:

- The feedback sessions with CAMLOs, FINTRAC and OSFI were valuable.
- REs want to be briefed on how law enforcement agencies prioritize ML/TF and triage incoming disclosures from FINTRAC.
- Public-private partnerships are desirable and are becoming more popular, not just with the major reporters, but with other REs (money services businesses) and other government departments (e.g., Health Canada, Canada Border Services Agency) as well.

- REs want to have ongoing discussions early and often with respect to their business models and how the burden can be reduced on their processes while still enabling and benefitting the objectives of the AML/ATF regime.
- REs would like more transparency with examination results, specifically on best practices, and especially at a learning opportunity like the Forum.

Major reporters, in conjunction with FINTRAC and law enforcement agencies in Canada, also contributed to several public/private partnership (PPP) projects designed to target specific predicate offences of ML/TF. The projects have generated many positive outcomes and have fulfilled two major objectives: (1) reporting on suspected ML in relation to romance fraud (Project Chameleon), human trafficking in the sex trade (Project Protect) and the trafficking of fentanyl and other synthetic opioids (Project Guardian); (2) raising awareness about the project specific topics and their links. These projects have contributed to an increase in the reporting of quality suspicious transactions that have allowed FINTRAC to produce actionable financial intelligence for partners investigating these types of criminal offences. Public-partnership project highlights can be found in the Centre's 2017-2018 Annual Report.

All Reporting Entity Sectors

FINTRAC recognizes that there is still a need for greater collaboration between AML/ATF regime partners and private sector entities and agrees with international organizations, such as the Financial Action Task Force (FATF), the Egmont Group and allied partners, that information sharing between public and private Regime actors is important.

This is why reporting entity sectors were engaged at various times throughout the year to allow for open discussions on the PCMLTFA and associated regulations. FINTRAC has also developed a strategy to enhance information sharing, training and competencies among new partners. The strategy led to further engagement with key stakeholders in the real estate and securities sectors.

Consultation Activities

As highlighted in last year's Report, FINTRAC initiated a Guidance Project in 2015 to renew its website architecture, review and re-write all guidance. The goal was to provide REs with more clear and concise guidance, increase website accessibility and improve navigation, and clarify FINTRAC's expectations during an examination. Due to the magnitude of the Project it was divided into phases and the past year marked the closure of Phase 1 and the launch of Phase 2.

Phase 1

FINTRAC continued to meet with sector representatives and industry associations individually. During the consultations, FINTRAC aimed to enhance the sectors' understanding of new obligations, as well as to provide an overview of the renewed website architecture and the new guidance products. FINTRAC took into account comments received from the sectors and finalized the following guidance documents that were published in June 2017:

- Know your client obligation guidance: client ID methods, business relationships, ongoing monitoring, beneficial ownership, third party, and PEPs;
- Foreign branches, subsidiaries and affiliates;
- Correspondent banking relationships;
- Sector specific record keeping guidance; and
- Glossary.

Phase 2 (Highlights for 2017-18)

Phase 2 began in June 2017 and consisted of revising the Compliance Program Guidance (published December 2017) and the Suspicious Transaction Reporting (STR) Guidance, which is still going through consultation with the various sectors. The Suspicious Transaction Guidance ensures that REs understand how to reach the reasonable grounds to suspect ML/TF threshold by explaining the elements to consider before submitting an STR to FINTRAC. This serves to improve reporting volume, timing and quality. The Suspicious Transaction Reporting Guidance also outlines FINTRAC's expectations for completing an STR, common deficiencies to avoid, quality tips for providing the narrative in the report, and the field-by-field instructions. Finally, FINTRAC is developing an internal methodology to create and approve suspicious transaction indicators, and is meeting with each RE sector to develop sector-specific indicators.

FINTRAC received a lot of positive feedback from all sectors around its efforts to make the PCMLTFA guidance more accessible and for taking ample time to consult. More consultation time also allowed FINTRAC to provide REs with the necessary information, tools and techniques to identify, assess and submit high quality STRs to the Centre. REs also felt that the consultation process ensured that the final products reflected all regulated sectors and gave them an opportunity to voice their opinions in an open and transparent manner. In the end, the consultation process was beneficial to both FINTRAC and the REs and it resulted in better products.

In addition to the work and engagement sessions that FINTRAC carried out to ensure inclusivity on important Regime discussions, the following outreach activities were also conducted:

- 21 policy interpretations were disseminated and discussed with the Guidance and Policy Interpretation Working Group (GPIWG), a sub-group of the Advisory Committee on Money Laundering and Terrorist Financing (ACMLTF);
- Industry discussions were held and positions on beneficial ownership and ongoing monitoring were shared through the GPIWG; and
- 94 outreach presentations, training sessions or consultations were delivered to further engage with REs by outlining the current obligations, gaps, and ongoing work at FINTRAC.

B) Compliance Examinations

This past year, FINTRAC conducted a total of 500 examinations (228 desk and 272 onsite examinations) across various RE sectors, which is a decrease in the number when compared to 661 in 2016-17. These examinations focused on suspicious transaction reporting obligations and required significantly more time and effort to complete. This,

coupled with the Centre's shift from conducting technical audits to broader assessments of the overall effectiveness of reporting entities' compliance programs, led to a slight decrease in the number of examinations. FINTRAC's assessment approach to compliance now evaluates the overall effectiveness of a business' compliance program, as well as on the impact of non-compliance on the Centre's ability to carry out its mandate, including generating financial intelligence.

Table 1: Examination Highlights 2017-18

Examinations per Sector	
Sector	Number of Examinations Completed in 2017-18
Real Estate	172
Financial Entities (i.e., banks, credit unions and caisses populaires)	66
Money Services Businesses	64
Life Insurance Companies, Brokers and Agents	53
British Columbia Notaries	53
Securities Dealers	47
Dealers in Precious Metals and Stones	43
Casinos	1
Agents of the Crown	1
Accountants	0

Additional Examination Tools	
Follow-up examinations form part of FINTRAC's strategy to validate if non-compliance observed in previous exam(s) has been corrected. In this methodology, the scope of the examinations remains consistent to concretely measure the improvement in REs' compliance levels. Out of the 500 examinations conducted in 2017-18, FINTRAC conducted 40 follow-up examinations. Overall, 63% of the follow-up examinations resulted in significant improvements. The life insurance, real estate and credit union sectors demonstrated the most improvement.	

In addition to follow-up examinations, database examination reviews ¹ are used to measure change in compliance behaviour. FINTRAC conducted 85 database examination reviews, in addition to the 500 examinations conducted for 2017-18. The database examination reviews resulted in the following:	
<ul style="list-style-type: none"> • 3% were recommended for a follow-up examination as a result of continued reporting deficiencies. • Of the remaining 97%, 65% showed an improvement in the RE's reporting behaviour, while 32% did not have sufficient data² for FINTRAC to conduct an assessment. 	

¹ Database examination review: When an examination is conducted and the outcome of that examination shows significant reporting deficiencies, a database examination review is conducted on the REs reporting behaviour approximately six months following to examination to determine if they have demonstrated a change in their reporting behaviour.

² There were an insufficient number of reports submitted by those REs to provide a proper assessment of their reporting quality.

- The most common deficiencies across all sectors included quality issues with the information provided in some of the reporting fields (such as address and occupation) for all report types.

IV. COMPLIANCE ACTIVITIES AND EFFECTIVENESS

A) Financial Entities

FINTRAC continues to work in partnership with OSFI to examine Federally Regulated Financial Institutions (FRFIs) through a pilot ‘joint assessment approach’. This approach was developed as a way to reduce FRFIs’ business interruption and burden during an examination and was the optimal supervisory model to leverage both agencies’ respective efforts. The agencies have been issuing a joint assessment notification letter, co-leading on-site assessments, sharing scoping responsibilities and issuing a joint findings letter when feasible. FINTRAC and OSFI, in consideration of the feedback from FRFIs that were examined under the joint assessment approach, will be evaluating the results of the pilot to make a final determination about the viability of formalizing the joint assessment approach moving forward.

In 2017-18, OSFI and FINTRAC undertook [REDACTED] joint bank examinations. Overall, some positive elements were identified as well as some issues, in relation to reporting and the compliance regime (e.g., policies and procedures and training program), that needed to be resolved were identified. FINTRAC met with each FRFI to discuss their examination results and was satisfied that they would take steps to correct the non-compliance.

FINTRAC conducted 54 examinations of credit unions in 2017-18, which accounts for approximately 11% of all examinations. Compliance with suspicious transaction reporting remained stable in 2017-18 when compared to the previous year, and examinations continued to focus on compliance program elements, most specifically on policies and procedures, risk-based approach (RBA) and training, as well as reporting and record keeping.

As shown in Table 3, the examined financial entities (banks, credit unions and caisses populaires), overall, performed very well in all of the compliance regime elements that were scoped in. FINTRAC continues to work with those entities that had deficiencies, some of which have provided an action plan to address them. In those instances, FINTRAC usually follows up a few months later to assess whether the entities have improved their practices.

Table 3: Financial Entities Examination Performance Highlights

Obligation	% of Compliant FEs³
Compliance officer	100%
Client ID	96%
Third party determination	98%
Training	91%
Timing of LCTR submission	98%
Timing of EFTR submission	95%
Volume of LCTRs	92%
Two-year review	87%

Moving forward, FINTRAC will enhance its capability to analyze the compliance data compiled from the ever-growing population in this sector to determine which REs face the most challenges in meeting their PCMLTFA obligations so that the Centre can better assist them. The focus will be to find innovative ways that reduce the compliance burden for REs while improving the effectiveness of the AML/ATF Regime.

B) Money Services Businesses (MSBs)

RE (P)(I) The proper administration or enforcement of an Act FINTRAC allocates approximately [REDACTED] of its examination resources to the MSB sector. Sixty-four examinations were conducted in the MSB sector in 2017-18, which was a decrease compared to the previous year. This decrease was in part due to:

- A higher than expected employee turnover in the regional offices; and
- A regional restructuring to ensure sufficient coverage of the higher-risk areas, including major financial entities.

As shown in Table 4, the majority of examined MSBs performed well in all of the compliance regime elements that were scoped in.

Table 4: MSB Examination Performance Highlights

Obligation	% of Compliant MSBs⁴
Compliance officer	95%
Client ID and third party determination	91%
Third party determination	97%
Training	85%
Timing of EFTR submission	91%
Volume of LCTRs	85%

One of the constant challenges for this sector is determining whether or not all Canadian MSBs are in fact registered with FINTRAC. An internal process is used to validate and

³ The compliance percentages are in relation to the examinations conducted in 2017-18 where the elements were scoped in.

⁴ These compliance percentages are in relation to the examinations conducted in 2017-18 where the elements were scoped in.

identify all MSBs that should be registered. In addition, of those registered with FINTRAC, some have a very limited operating lifespan (less than three years) before closing. R6 (PII) The proper administration or enforcement of an Act

Throughout the year, FINTRAC registered 295 new MSBs and renewed the registration for 191. There were no denials or revocations and, by the end of the fiscal year, 961 MSBs were registered with FINTRAC.

C) Real Estate Developers, Brokers, and Sales Representatives (Real Estate)

FINTRAC continued to prioritize the real estate sector in its examination strategy throughout 2017-18 due to sector-wide vulnerabilities to ML. A total of 172 entities in this sector were examined, which accounted for approximately 34% of all examinations for the year.

Approximately half of FINTRAC's examinations in this sector targeted large brokerages in Vancouver and the Lower Mainland as well as those from the Greater Toronto Area and Montreal. Considering that these areas exhibit indicators congruent with ML risks identified in the *Assessment of Inherent Risks of ML/TF in Canada* (also known as the National Inherent Risk Assessment (NIRA))

R6 (PII) The proper administration or enforcement of an Act

Although the reporting of STRs continued to increase for 2017-18, the sector still has one of the lowest reporting levels. As a result, FINTRAC's examinations continue to focus on compliance program elements, client identification, record keeping and third-party determination obligations.

As shown in Table 5, REs in this sector performed well in two areas, but still need to improve in the areas of client ID and training.

Table 5: Real Estate Examination Performance Highlights

Obligation	% of Compliant Real Estate ⁵
Compliance Officer	100%
Client ID	53%
Third party determination	95%
Training	52%

There is still a misunderstanding across the sector as to how the real estate sector can be used for ML/TF. As such, future examinations will continue to assess compliance with the various obligations but will also include debrief sessions following each examination that will focus on helping those REs recognize ML/TF indicators within their sector and

⁵ These compliance percentages are in relation to the examinations conducted in 2017-18 where the elements were scoped in.

knowing when and how to report timely and high-quality suspicious transactions to FINTRAC.

D) Casinos

Examinations in the casino sector occur on a cyclical basis. In 2017-2018, FINTRAC conducted only one examination. However, during the last three fiscal years (2015-2016, 2016-2017 and 2017-2018), FINTRAC has examined 82% of all REs in this sector, which represents 98% of all casino locations in Canada.

As indicated in the 2017 Report to the Minister, FINTRAC has generally observed high levels of compliance in the sector but, in some instances, has found deficiencies in relation to risk assessments, training, policies and procedures, and the two-year review of the compliance regime. When deficiencies were found, FINTRAC took follow-up action in some cases and in other instances, advised the reporting entities that they may be subject to follow-up examinations which could lead to further enforcement action, such as an administrative monetary penalty.

In terms of reporting from this sector, FINTRAC has observed a steady increase in the volume of all report types during the last three years. For example, the volume of STRs increased by 51.4% during that period. The quality and timeliness of the reports remain high.

In 2017-2018, FINTRAC also engaged with the gaming regulators in [REDACTED] and reporting entities to share information and discuss relevant issues. In addition, FINTRAC provided support to the province of British Columbia and held numerous meetings with Mr. Peter German who was appointed by the Attorney General of BC, the Honorable David Eby, as an independent expert to conduct a review of British Columbia's AML policies and practices in the gambling industry.

Finally, FINTRAC will continue to conduct examinations of casinos on a regular basis with an enhanced focus on measures to mitigate ML/TF risks and on online gaming, which is relatively new in Canada. In 2018-19, FINTRAC is planning to examine [REDACTED]

R6 (P1) The proper administration or enforcement of an Act; R5 (P1) Confidential reports to a regulatory body or commission; R7 (P1) Protection of Federal-Provincial relations

E) Administrative Monetary Penalties (AMP)

Following decisions at the Federal Court, FINTRAC has undertaken a comprehensive review of its administrative monetary penalties (AMP) program to ensure that it is one of the most open, transparent and effective penalty programs in the AML/ATF international community.

Federal Court decisions in 2016 required that FINTRAC's penalty determination consider the specific circumstances of each case and the requirement for transparency in the AMP process. FINTRAC has conducted extensive analysis and is consulting with legal experts (including a former jurist) and stakeholders. Below are some highlights of the work completed to date and next steps:

- AMP policies and procedures have been updated to reflect a revised penalty calculation methodology, as well as a detailed documentation of “harm”, “compliance history” and “non-punitive” criteria. This included the development of seven harm assessment guides for 200 violations under the PCMLTFA, which are currently undergoing a plain language review.
- Three training sessions were delivered to compliance staff on the new way forward.
- Developed and implemented strategies to manage cases before the federal courts and those still being considered for an AMP.
- Identified items for future legislative review in order to increase the Regime’s effectiveness in ensuring compliance and encouraging change in behaviour.
- FINTRAC presented the initial methodology to Finance Canada in November 2017 and to OSFI in January 2018.
- FINTRAC plans to post the revised AMP policy and the seven guides publicly in the 2018-19 fiscal year.

F) Non-Compliance Disclosures (NCDs)

An increase in law enforcement interest for proceeding with investigations and prosecutions of non-compliance offences has resulted in FINTRAC responding to 13 voluntary information records related to general non-compliance offences and delivering five non-compliance disclosures. Training sessions on non-compliance offences and NCDs were also provided to law enforcement.

V. FURTHER CONTRIBUTIONS TO IMPROVING THE EFFECTIVENESS OF THE AML/ATF REGIME

In addition to FINTRAC’s activities described above, the Centre is also committed to improving Canada’s AML/ATF Regime. Some of the work accomplished in 2017-18 is highlighted below.

A) 2018 Parliamentary Review of the PCMLTFA

In 2017-18, FINTRAC finalized a number of proposals for consideration and consultations as part of the statutory review of the PCMLTFA that aim to further improve the effectiveness of the AML/ATF Regime by enhancing FINTRAC’s regulatory and intelligence roles.

In the Fall of 2017, FINTRAC also reviewed and commented on the draft Discussion Paper developed by Finance Canada, which was published on February 7, 2018 in support of the House of Commons Finance Committee (FINA) statutory review of the PCMLTFA that was initiated on February 8, 2018. FINTRAC closely monitored the FINA Committee discussions and looks forward to receiving its recommendations.

B) Development of Regulatory Amendments: Package #2 and Consultations with REs

In 2017-18, FINTRAC worked closely with Finance Canada on the development of the second package of regulatory amendments and completed various activities in preparation for prepublication consultations.

A Regulations Working Group was established at FINTRAC to dedicate resources to the review of the proposed amendments and provide technical advice to FINTRAC management and Finance Canada. This group assesses the new requirements in the second package of regulatory amendments, how they will be implemented, and also identifies required and potential legislative or regulatory changes.

C) Role in the Advisory Committee on ML/TF (ACMLTF) and its Working Groups

The ACMLTF is a high-level public-private discussion forum to address emerging issues. Members advise on Canada's AML/ATF Regime both within a domestic context, including its effectiveness and efficiency, and in support of international developments. It also offers the Government of Canada with an opportunity to provide valuable feedback to the private sector on overall AML/ATF trends and efforts, and benefits all participants by fostering more effective results for the Regime at large.

FINTRAC uses the ACMLTF as a main vehicle to interact with various industry sectors on AML/ATF policy and to address emerging issues. In the last fiscal year, FINTRAC participated in a number of working group meetings and committed itself to a number of initiatives:

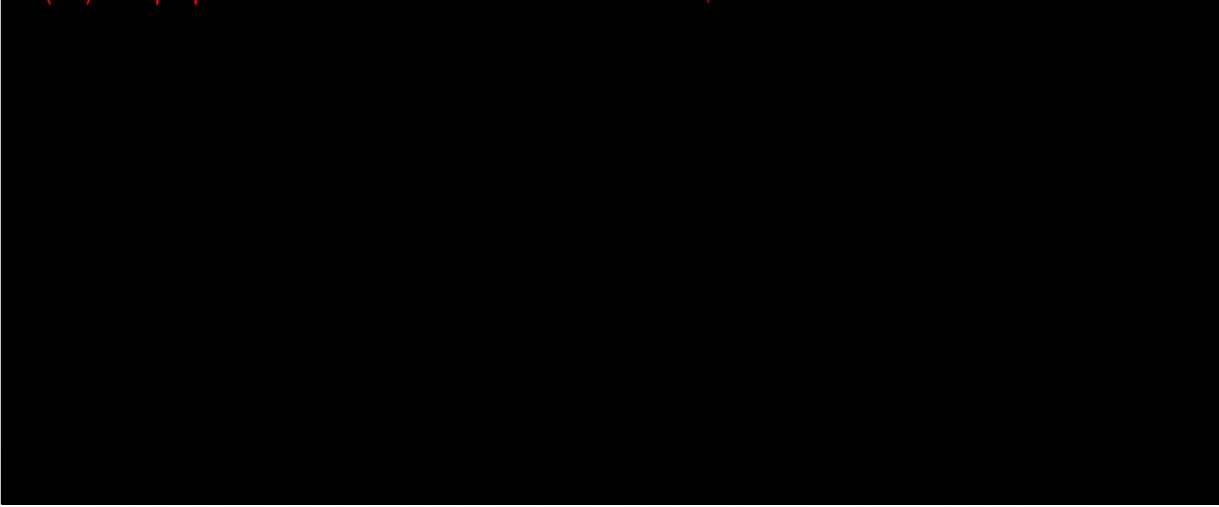
- Legislation and Regulations Working Group: FINTRAC is working closely with industry representatives to develop policy proposals
R6 (PII) The proper administration or enforcement of an Act; R11 Cabinet Confidence
- National Risk Assessment Working Group: FINTRAC co-leads this working group with the Department of Finance, which focuses on how the private sector could incorporate the results of the 2015 NIRA into their operations.
R6 (PII) The proper administration or enforcement of an Act; R11 Cabinet Confidence

D) FINTRAC's Participation in Key Interdepartmental Working Groups

National Inherent Risk Assessment Working Group (NIRA WG)

Since June 2017, FINTRAC has been actively contributing to the interdepartmental NIRA WG with the aim of updating Canada's 2015 Assessment of Inherent ML/TF risks. FINTRAC provided advice to Finance Canada as to which new sectors or industries may need to be assessed for ML/TF risk, and helped to advance the interdepartmental approach.

R6 (PII) The proper administration or enforcement of an Act; R11 Cabinet Confidence



Federal-Provincial-Territorial (F/P/T) on Corporate Transparency (Beneficial Ownership)

Since October 2017, FINTRAC has actively engaged with Finance Canada and Innovation, Science and Economic Development (ISED) Canada to help advance F/P/T efforts to strengthen beneficial ownership transparency. FINTRAC provided policy, compliance and strategic intelligence input to a discussion paper used by Finance Canada and ISED to engage with provincial stakeholders to set the policy context and direction for future legislative changes. The Centre also regularly provided recommendations on the nature of the information that should be kept on beneficial ownership by corporations across Canada, and assessed ways in which this new initiative could be used to help REs meet existing obligations under the PCMLTFA. Results of these F/P/T discussions led to an agreement between Finance Ministers to ensure appropriate safeguards are in place to prevent the misuse of corporations and other legal entities for tax evasion and other criminal purposes, such as ML/TF, and corruption.

F/P/T Working Group on Housing

In 2017-18, FINTRAC continued to support the work of the F/P/T Working Group on Housing by sharing existing analysis on the real estate sector's transaction reporting to FINTRAC, specifically focusing on Ontario, Quebec and British Columbia. FINTRAC also provided overviews of its compliance examinations in the real estate sector and outlined the Centre's outreach initiatives that help improve the understanding of the PCMLTFA obligations within the real estate sector. FINTRAC continues to work directly with provincial and municipal real estate boards, as well as national industry associations (e.g., CREA), to raise awareness of key ML/TF issues, provide feedback, and ensure open dialogue.

VI. CONCLUSION

FINTRAC is a dynamic organization that is multifaceted and unique. As both the FIU and regulator it has an exclusive view of the Regime, given its sole mandate is AML/ATF.

In this vein, the PCMLTFA and the actors within the AML/ATF sphere all become increasingly more important. How we all work together will dictate Canada's success in combatting the transnational nature of ML/TF.

Over the next year, most of the work being done by the Centre will focus on public-private relationships along with other targeted efforts with Regime and other allied partners. With the increased information flow and more coordinated approach, Canada will be better positioned to combat ML/TF and continue to make it harder for criminals to fund their operations and tougher for them to enjoy the benefits of their laundered proceeds of crime. The Centre will focus on the following major initiatives over the next year:

- Contribute to the Government's response to results of the 2018 Parliamentary Review;
- Support, complete and implement the legislative and regulatory agendas of the broader AML/ATF Regime, while seeking ways to enhance its effectiveness and to reduce burden on reporting entities;
- Solidify the AMPs policy / process and move forward from the implications of the federal court decisions;
- Ensure that public facing guidance remains current and reflects the changes in the observed methods and trends used by criminals and is responsive to the risks and opportunities of new technologies in the financial sector and changes in ML/TF techniques;
- Build on the public-private partnerships and improve the ability of entities to comply with their obligations under the PCMLTFA and increase public awareness through the publication of various products on ML/TF trends and typologies (e.g., Operational Alerts and Briefs) and numerous outreach events, ultimately supporting the effectiveness of the AML/ATF Regime;
- Keep working with OSFI on the 2018-19 joint assessments plan to maximize the effective use of resources and expertise; and
- FINTRAC will continue to engage internationally to share its experience and expertise with FIUs worldwide, to gain additional insight and information on important trending ML/TF topics, and to contribute to global efforts to combat ML/TF.