

Convergence Romania Financial Sector Modernization

Special Projects Initiative Public-Private Steering Committee



Amendment of the AML law

Project Objective

Draft amendment of the AML law in line with the EU Third Directive provisions, which will address both banks' concerns for cost-effectiveness of reporting and avoidance of reputational and legal risks, and authorities' concerns for maintaining high standards about AML.

Project Management Team

Project Owner (PO): Petre Bunescu (RBA Vice President)

Project Manager (PM): Doru Bebe Bulata (Director, BCR)

Deputy Project Manager (DPM): an AML Office manager (to be appointed)

Minutes

First Meeting

November 29th 2006 – RBI Premises

Attendees: Doru Bulata, PM
Liana Teodorescu, member
Constantin Jumuga, member
Ramona Bratu, Oana Nedelescu, SPI Secretariat

Agenda

1. Status of the SPI actionable paper;
2. Working at the forth chapter of the SPI actionable paper on amendment proposals in the light of the Third Directive and international experience;
3. Discussions on the draft RIA questionnaire.

I. Status of the SPI actionable paper

SPI Secretariat made the inventory of the individual contributions received (see attached file containing the draft of the SPI actionable paper) and of the missing parts.

II. Working at the fourth chapter of the SPI actionable paper on amendment proposals in the light of the Third Directive and international experience

As the amendments in the table provided by RBA were counter-proposals to some changes proposed by the AML Office in the past and as new issues arose from searching in the international experience, the PWG decided to review again the law and consider the amendment proposals in the light of the Third Directive and if the international experience. The results of the discussions are presented attached.

III. Discussion of the draft RIA questionnaire

SPI Secretariat presented the reasons why the findings of the Roland Berger study can be only partially used: the costs don't include training costs (which could be considerable) and scenario used in the study doesn't match with the current amendment proposals. The draft questionnaire will be sent to PWG members for comments after including the suggestions received from the Convergence RIA expert (see attached).

PWG members agreed to have the next meeting on December 7th, at 9:00, at RBI premises (2nd floor, suite 213) in order to work on the fourth chapter of the document, to provide feedback on the draft of the SPI actionable paper and to provide comments to or answers to the questions in the draft RIA questionnaire.