

STANDARD SUMMARY PROJECT FICHE

Project Number: RO-9907-04

Title: Strengthening the capacity of the Romanian institutions for the Prevention and Control of Money Laundering

Sub-Programme: RO-9907 - Meeting the Obligations of the “Acquis”

Geographical Location: Bucharest, National Office for the Prevention and Control of Laundering Money

1. Objectives

1.1. Overall Objectives:

The overall objectives of this project are:

- the preparation of the Romanian capital market for the implementation of the EU Regulations concerning the operation of the Internal market and the liberalisation of capital movements;
- implementing the EU Directives concerning the prevention and punishment of crime and money laundering, as well as the Convention of the Council of Europe on money laundering and the 40 recommendations of the OECD (FATF) and the United Nations' Vienna Convention.

1.2. Immediate Objectives:

The immediate objectives of this project are:

- assuring that the Law regarding the prevention and punishment of money laundering (the “Law”) is completely in line with the EU Regulation;
- strengthening the capacity of the National Office for the Prevention and Control of Laundering Money (the “NOPCLM”) to fulfil their obligations, including the improvement of its investigation and analysis methods;
- improving the awareness of the Reporting entities – i.e. the financial institutions and anybody else who could be confronted with money laundering and who is obliged by article 8 of the Law to report on this issue - of the law concerning the fight against money laundering and strengthen their capacity to implement it;
- increasing the domestic and international co-operation between the NOPCLM and its national and international counterparts.

2. Description

2.1. Background and justification

Money laundering is closely linked to organised crime and especially to its most profitable sectors: drugs and weapon traffic. Romania becomes more and more an important transit country for drug trafficking, due to its strategic position on the "Balkan Route". Drugs are entering the country by road and by sea, via the Black Sea port of Constanta. Due to the recent wars in former Yugoslavia, it appears that drug traffickers have turned to routes through Romania, i.e. the "northern alternative" of the Balkan Route (Iran-Turkey-Bulgaria-Romania-Hungary-Slovakia-Czech Republic- Germany). Consumption of hard drugs is low in Romania, but some economic agents of the country become increasingly involved in organised drugs dealing.

The customs guards, the police forces and the financial control institutions have difficulties to cope with the growing drug smuggling and money laundering business, because their personnel is underpaid and insufficiently trained, due to lack of resources. All these elements create favourable conditions for the growth of money laundering activities, which could act as constraints on the further integration of the Romanian capital market in the world financial markets. Moreover, the fight against money laundering is recognised as a major instrument in the fight against crime, as it lowers the profitability of crime.

The Romanian official Government policy is fully committed to the liberalisation of capital movements and is convinced of the need to fight crime and money laundering. It seeks support from member states as well as from the European Commission and other international institutions in order to pursue and reach these goals.

Romania recently adopted a law on the fight against money laundering and has set up an Office for the fight against money laundering. (See below). The NOPCML is starting to establish working methods and it needs proper equipment. The law is in the start up phase of implementation.

The need for international co-operation is strongly felt and the responsible institutions fully collaborate with their counterparts in the EU member states and with the international bodies involved in the fight against crime and money laundering, such as the EC, the Council of Europe, the United Nations and the OECD.

This official government policy is reflected in all relations with the EU.

Reference to the Accession Partnership.

The Accession Partnership includes:

- the liberalisation of capital movements as soon as possible (chapter on internal market);
- the fight against organised crime, in particular money laundering, as a medium term priority (chapter on Justice and Home Affairs).

Reference to the National Programme for the Adoption of the Acquis.

The National Programme for the Adoption of the Acquis includes:

- the priority attached by the Romanian government to liberalise capital movements;
- the requirement to combat money laundering, to adopt the specific law and to set up the institutional framework.

Reference to the Regular Report from the European Commission on Romania's Progress towards Accession.

The Regular report asks Romania to give effect to the reforms announced in the field of justice and home affairs and to allocate the human and financial resources necessary for their effective implementation.

Reference to the EU-Romania Sub-Committee on Customs matters, Audit and Financial Control, Drug issues and Statistics.

The Sub-Committee meeting of 26 May 1999 stressed the need for Romania to receive further technical assistance to implement the new anti-money laundering law and recommends:

- to prepare the involvement of the Financial Services and the Law Enforcement authorities in anti-money laundering activities via training, exchange of experience and via twinning with EU anti money laundering authorities both in the financial and law enforcement sectors;
- to elaborate regulations containing provisions on money laundering as well as on the structure of the Financial Intelligence Unit.

2.2. Project Scope

The project falls into two subprojects:

- *Institutional Development* via twinning.
Twinning projects with EU member states will be used as the best and only instrument to transfer knowledge from Financial Information Units (FIU's) in EU member states to the NOPCLM and to the Reporting entities which are responsible for the implementation of the law (i.e. the financial sector in the broad sense).
- *Equipment*.
The purchase of equipment will be co-financed. This will contribute to the efficient and effective functioning of the NOPCLM.

2.2.1. Institutional Development

The Beneficiary will be, in first instance, the NOPCLM. Secondary beneficiaries will be the institutions defined in Article 8 of the Law on the prevention and punishment of laundering money, the "Reporting entities".

a) The project will perform an analysis of the Romanian legislation regarding money laundering and of the Office for the Prevention and Control of Money Laundering competencies compared with the same legislation enforced in the European Union, aiming at harmonising the Romanian legislation to the European legislation, so that the proposed objectives will be reached. This has to be done by experts from EU member states with relevant experience – such as Belgium, France, the Netherlands, Spain, Sweden, the UK and Finland – and by the experts of the NOPCML.

b) The main part of the twinning component is related to the start up of the NOPCLM and the implementation of the Law by the Reporting entities:

- It will be necessary to set up and to improve specific procedures aimed at the effective functioning of the NOPCLM and of the Reporting entities.
Concerning the first, procedures and systems should be developed for the optimal gathering and processing of information, for the design of procedures for reporting, for the setting up of a database and to connect it with similar databases of the Reporting

entities, for the effective supervision of the implementation of the legal obligations of the Reporting entities, for the effective co-operation with other institutions (the National Securities Commission, the Office for the Supervision of Insurance and Reinsurance activities, the police authorities, the Ministry of Finance, the Ministry of Justice, the Ministry of the Interior, the Public Prosecutor's Office attached to the Supreme Court of Justice, the National Bank of Romania, the Romanian Association of Banks, and the State Audit Office), as well as the transfer of any other know how which is necessary to execute the responsibilities foreseen in the Law.

Concerning the support for the Reporting entities, procedures and systems must be designed for the identification of suspicious clients and transactions, for the registration of these data in a database, for the transfer of these data to the NOPCLM, and for all other actions to be taken to allow them to fulfil the tasks described in the law.

- Manuals should be developed which describe these procedures and mechanisms.
- Specialised training should be provided for the NOPCLM staff to help them understand and to apply the new working methods, to establish a proper relationship of mutual trust with the Reporting entities (this includes training to get a good understanding of the banking and insurance sector) and to train them as trainers for the staff of the Reporting entities (Training of Trainers);
- The Reporting entities should be made aware of the existence of the Law, which is new to them and they are unfamiliar with it. Moreover, the Law can be in conflict with some unwritten common sense concerning respect of bank confidentiality and this conflict should be resolved by the awareness raising activities.
- Some training courses can be made accessible at this moment for the staff of the Reporting entities, as far as the time input allows this. In principle, the staff of the NOPCLM should be trained to perform this task.
- In order to maintain a permanent contact with the latest developments of the EU legislation in the field, the provision of the relevant documentation is obviously necessary.
- The establishment of a database for the storage and retrieval of the information coming from the Reporting entities and from elsewhere.

c) Support should also be provided to improve the international networking of the NOPCLM. The exchange of information with other Financial Information Units is crucial in this respect and should be established via, among others, connections between the databases of different FIU's. The fact that Romania is not yet member of the FATF of the OECD is a constraint in this respect.

d) Updated documentation should be provided.

2.2.2. Equipment

The necessary equipment will be co-financed.

It is necessary to acquire adequate hardware and software in order to establish a local computer network as well as other office equipment directly or indirectly needed for the proper functioning of the NOPCLM and for the establishment of an information network which ensures the exchange of information between the NOPCLM, the reporting entities and the supervising authorities of the financial and banking system.

2.3. Project Results and Outputs

2.3.1. Institution building

- a) The outputs of the screening of legislation include:
- Comparative analysis of the Romanian legislation versus the relevant EU acquis; examples of some implementing experiences in the relevant EU member states;
 - Action plan prepared with the NOPCLM, for full harmonisation of the Romanian legislation with the EU acquis, including the achievement of the necessary *enforcement capacity* of the Office. The latter is important. Otherwise, the legal harmonisation will be useless;
 - Legal changes;
 - Implementing new or modified norms.
- b) The major part of the institution building support will result in:
- Effective functioning of the NOPCLM and of the Reporting entities in view of implementing the law;
 - Effective co-operation with other Romanian institutions which can contribute to the fight against money laundering;
 - Manuals describing procedures and mechanisms;
 - Trained staff of the NOPCLM, capable of running the NOPCLM itself, but also of training the staff of the Reporting entities;
 - A relationship of mutual trust with the Reporting entities;
 - Awareness by the Reporting entities of the existence of the Law and of the need to implement it;
 - Improved international networking of the NOPCLM.
 - A solid database and an information network which ensures the exchange of information between the NOPCLM, the reporting entities and the supervision authorities of the financial and banking system;
- c) Co-operation with national and international institutions dealing with the fight against money laundering will have been improved.
- d) Relevant documentation is delivered.

2.3.2. Equipment

A significant contribution to the necessary office equipment, including a server and local computer network, PC's, copy machines, scanners,...

2.4. Project Inputs and activities

2.4.1. Institution building

The activities of the Project will be co-ordinated by the pre-accession advisor and by the Chairman of the NOPCLM.

The profile of the pre-accession advisor meets the following requirements:

- experience in project management
- general knowledge of the *acquis communautaire* in the field of money laundering and related offences
- experience in investigating and processing information of money laundering
- fluency in English

The pre-accession advisor will be assisted by short-term experts, who will address the issues, mentioned sub 2.2., as well as others, identified by the long-term expert and the chairman of the NOPCLM during the implementation of the project.

The profile of the short term experts include the following elements:

- detailed knowledge of certain areas of the *acquis communautaire* in the field of money laundering and related offences
- and/or experience in investigating and processing information on money laundering
- fluency in English

This team will:

- screen the law as far as needed;
- prepare manuals;
- organise training courses, seminars, and workshops, for the staff of the NOPCLM and of Reporting institutions...
- organise study visits to FIU's in the EU member states and to the EU institutions as far as necessary for the staff of the FIU. Three to four study visits will be organised, each for 5-8 people, duration 1 week.
- disseminate information to reporting institutions
- establish a database
- provide advise on the equipment to be purchased
- provide legal and other information

The thematic scope of the training will focus on, among others:

- methods of transactions analyses,
- methods of detection of suspicious transactions,
- rules of transactions registering,
- rules of clients identification,
- procedures of informing the financial intelligence unit about suspicious transactions.

The thematic scope of the study visits will focus on, among others:

- organisational structure of the financial intelligence unit
- information processing of information gathered by the financial intelligence unit (hardware and software applied by the units in the Member States)
- methods of the unusual transaction identification
- procedures of transferring of information about unusual transactions
- experience of the Member States financial intelligence units in suspending unusual transactions
- methods of data gathering and analyses and security techniques
- co-operation with other Member States institutions in regard to money laundering prevention

The experts will provide the EC Delegation and the NOPCLM with regular progress reports.

The pre-accession advisor will spent 12 months in the country.

The short-term time input will amount to approximately 5 months.

2.4.2. Equipment

The inputs for the infrastructure include the purchase of a local computer network, a telecommunication network and other office equipment.

2.5. Conditionality and Risks

The NOPCLM and the Romanian Government should provide for:

- a sufficient number of staff,
- housing and other infrastructure,
- at least 50% of the office equipment of which at least 50,000 EURO will be paid before the end of the 1999 Phare Programme,

and must be willing to co-operate closely with the Pre-accession adviser and the other EU experts and to adapt legal and organisational provisions if deemed necessary.

3. Institutional framework:

In accordance with the priorities mentioned in the NPAA and in the conclusions of the Sub-Committee, the following initiatives have been taken by the Romanian government:

- Law no.21/1999 regarding the prevention and punishment of money laundering has been approved by Parliament and published in the Official Gazette of Romania, January 21, 1999. The law came recently into force. It is based on Council Directive 91/308/EEC of 10 June 1991 and it takes into account the 40 Recommendations of the OECD/FATF. Article 118 of the Penal Code states that money resulting from criminal activities should be seized.
- The National Office for the Prevention and Control of the Money Laundering was formally established as a specialist body with legal personality, subordinated to the Government. The NOPCLM is responsible for the prevention and control of the laundering of money, to which end it receives, analyses and processes information and informs the authorities entitled by law. The NOPCLM is formed by one representative each from the Ministry of Finance, the Ministry of Justice, the Ministry of the Interior, the Public Prosecutor's Office attached to the Supreme Court of Justice, the National Bank of Romania, the Romanian Association of Banks, and the State Audit Office. All members are appointed for a period of five years by Government Decision. The chairman of the NOPCLM has the rank of Secretary of State and is appointed by the Government. He is entitled to authorise expenditures from the budget.

The functions of the NOPCLM include:

- gathering and analysing data submitted by financial and credit institutions;
- examination of suspicious transactions;
- suspend transactions which have the features of money laundering;
- informing the Public Prosecutors Office about cases of money laundering;
- ensuring special instruction programmes for the representatives of Reporting institutions;
- supervision over enforcement of the law;
- co-operation with foreign institutions dealing with the prevention of money laundering.

To perform these tasks, it is planned to recruit 50 staff members.

The new law requires that all Reporting institutions collaborate with the Office. This implies that the financial and credit institutions have to register participants, specific transactions, keep records and disclose information on transactions outreaching the set value, or of suspicious nature.

- In connection with the implementation of the new Anti-Money Laundering Law, the Unit for the Fight against organised crime and corruption (National Police) will receive competence in measures against money laundering.

4. Budget: MEURO 0.5

	Investment	Institution building	Total Phare	Recipient	IFI	Total
Institutional Development		375000	375000			375000
Long term advisor		175000	175000			175000
Short term expertise		75000	75000			75000
Study visits		50000	50000			50000
Documents, databases,...		75000	75000			75000
Equipment	125000		125000	50000		175000
Computers, office equipment	125000		125000	50000		175000
Total	125000	375000	500000	50000		550000

5. Implementation arrangements

The project will be achieved in conformity with the methodology of the Twinning Manual for the TA and of the Decentralised Implementation System (DIS) for the equipment component:

- The Central Financing and Contracting Unit (CFCU) within the Ministry of Finance will be the Implementing Agency and thus responsible for tendering, contracting, payments and financial reporting.
- The National Office for the Prevention and Control of the Money Laundering will be the Implementing Authority responsible for technical implementation of the project.

6. Implementation schedule:

- Start of tendering: September 1999
- Start of projects activity: December 1999
- Completion: January 2001

7. Environment:	N/A
8. Equal opportunity	N/A
9. Rates of return::	N/A
10. Investment criteria:	N/A
11. Conditionality and sequencing:	N/A

ANNEX 1 LOGFRAME MATRIX

Strengthening the capacity of the Romanian institutions for the Prevention and Control of Money Laundering

Project Number: RO-9907-04			Planning Period: September 1999-December 2000
			Total budget: 550,000 EURO Phare part: 500,000 EURO
Wider Objectives	Indicators of Achievement	How, When and by Whom Indicators will be Measured	Assumption and Risks
1	2	3	4
<ul style="list-style-type: none"> - the preparation of the Romanian capital market for the implementation of the EU regulations concerning the operation of internal market and the liberalisation of capital movements; - implementing the EU Directives concerning the prevention and punishment of crime and money laundering 	<ul style="list-style-type: none"> - progress in regard of the free flow of capital - EU Directives are implemented 	<ul style="list-style-type: none"> - Balance of Payments Statistics - Legal documents, Official Gazette 	<ul style="list-style-type: none"> - massive capital outflows and speculation against the national currency - lack of political will
Immediate Objectives	Indicators of Achievement	How, When and by Whom Indicators will be Measured	Assumption and Risks
5	6	7	8
<ul style="list-style-type: none"> - assure that the Law on anti money laundering (the "Law") is completely in line with the EU Regulation in this regard - strengthening the capacity of the National Office for the Prevention and Control of Money Laundering (the "NOPCLM") in order to improve their investigation and analysis methods; - improving the awareness of the Reporting entities and strengthen their capacity to implement the Law - increasing the domestic and 	<ul style="list-style-type: none"> - Romanian law is completely in line with EU Regulation - Effective Functioning of the NOPCML - Trained Staff, capable of implementing the Law on the prevention and punishment of laundering money 	<ul style="list-style-type: none"> - Annual Report of Activity of NOPCML submitted to the Government - Progress reports made by the experts - Statistics on the flows of money laundering (when available) 	<ul style="list-style-type: none"> - lack of political will to change the law if necessary - lack of political will and tight budgetary constraints preventing sufficient investments in the NOPCLM - lack of interest by the Reporting institutions

international co-operation in this area.			
Output	Indicators of Achievement	How, When and by Whom Indicators will be Measured	Assumption and Risks
9	10	11	12
<ul style="list-style-type: none"> - Change in the law if necessary - training sessions - information dissemination - study visits - computer and office equipment - documentation 	<ul style="list-style-type: none"> - Changes in the law - No. of trained personnel - No. of seminars, workshops,... - No. of study visits - Equipment - Documentation 	<ul style="list-style-type: none"> - Annual Report of Activity of National Office submitted to the Government - Progress reports of the expert 	<ul style="list-style-type: none"> - lack of political will to change the law if necessary - insufficient co-financing by the Romanian authorities
Inputs	Indicators of Achievement	How, When and by Whom Indicators will be Measured	Assumption and Risks
13	14	15	16
<ul style="list-style-type: none"> - Staff from the NOPCLM - Pre-accession advisor and Short term experts from EU member states - equipment 	<ul style="list-style-type: none"> - No. of persons involved in the program - No. of documents provided - Equipment 	<ul style="list-style-type: none"> - Annual Report of Activity of NOPCML submitted to the Government - Progress reports of the experts 	The NOPCLM will provide the necessary human resources for the implementation of technical assistance and it will co-finance the office equipment

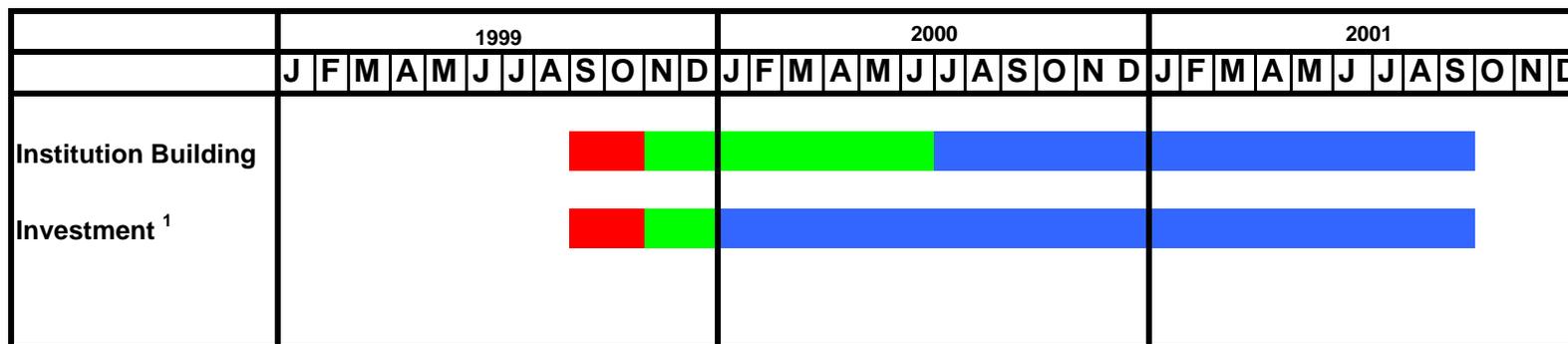
Strengthening the Capacity of the Romanian Institutions for the Prevention and Control of Money Laundering										
CUMULATIVE CONTRACTING SCHEDULE (MEUR 0.5)										
Date:	30/09/99	31/12/99	31/03/00	30/06/00	30/09/00	31/12/00	31/03/01	30/06/01	30/09/01	31/12/01
Institutional Development Long-tem Advisor Short-term Expertise Study Visits Documentation		275.000	325.000	375.000	375.000	375.000	375.000	375.000	375.000	375.000
Infrastructure and Equipment Computer hardware and software Office equipment		125.000	125.000	125.000	125.000	125.000	125.000	125.000	125.000	125.000
TOTAL		400.000	450.000	500.000						
<i>NB: all contracting should normally be completed within 6-12 months and must be completed within 24 months of signature of the FM</i>										

Strengthening the Capacity of the Romanian Institutions for the Prevention and Control of Money Laundering										
CUMULATIVE CONTRACTING SCHEDULE (MEUR 0.5)										
Date:	30/06/00	30/09/00	31/12/00	31/03/01	30/06/01	30/09/01	31/12/01	31/03/02	30/06/02	30/09/02
Institutional Development Long-tem Advisor Short-term Expertise Study Visits Documentation				70.000	165.000	285.000	375.000	375.000	375.000	375.000
Infrastructure and Equipment Computer hardware and software Office equipment				125.000	125.000	125.000	125.000	125.000	125.000	125.000
TOTAL				195.000	290.000	410.000	500.000	500.000	500.000	500.000
<i>NB: all disbursements must be completed within 36 months of signature of the FM</i>										

Strengthening the Capacity of the Romanian Institutions for the Prevention and Control of Money Laundering										
CUMULATIVE CONTRACTING SCHEDULE (MEUR 0.5)										
Date:	31/12/99	31/03/00	30/06/00	30/09/00	31/12/00	31/03/01	30/06/01	30/09/01	31/12/01	31/03/02
Contracted	400.000	450.000	500.000	500.000	500.000	500.000	500.000	500.000	500.000	
Disbursed		195.000	290.000	410.000	500.000	500.000	500.000	500.000	500.000	500.000
<i>NB: all contracting should normally be completed within 6-12 months and must be completed within 24 months of signature of the FM all disbursements must be completed within 36 months of signature of the FM</i>										

Time Implementation Chart for Project Number RO-9907-04

Strengthening the capacity of the Romanian institutions for the Prevention and Control of Money Laundering



¹ Frontloading during September-December 1999, in order to help the start-up of the Office.

- = design
- = contracting
- = implementation

**Strengthening the capacity of the Romanian institutions for the Prevention and
 and Control of Money Laundering**

	Investment	Institution building	Total Phare	Recipient (*)	IFI (*)	Total
Long term assignment		150.000	150.000			150.000
Short term assignment		100.000	100.000			100.000
Study visits		50.000	50.000			50.000
Documents, databases,...	75.000		75.000			75.000
Computers, office equipment	125.000		125.000			125.000
Total	200.000	300.000	500.000			500.000

(*) in case of co-financing

Annex 2

Strengthening the capacity of the Romanian institutions for the Prevention and Control of Money Laundering

Project Number: RO-9903-03

CUMULATIVE CONTRACTING and DISBURSEMENT SCHEDULE (million)

	Date							
	30/09/1999	31/12/1999	31/03/2000	30/06/2000	30/09/2000		31/12/2000	31/03/2001
Contracted	125000	275000	331250	387500	443750		500000	
Disbursed		125000	155000	241250	327500		413750	500000

NB: 1. *all contracting should normally be completed within 6-12 months and **must** be completed within 24 months of signature of FM*
2. *all disbursements **must** be completed within 36 months of signature of the FM*

ANNEX 4

RELATION OF THE PROJECT WITH PREVIOUS PHARE ACTIVITIES AND WITH ONGOING PROJECTS FINANCED FROM OTHER SOURCES (INCLUDING GOVERNMENT BUDGET).

The Romanian Government benefited from the support of the horizontal Phare programme on Money Laundering, number ZZ. 97.26

This Programme was launched the 1st September 1998 and last for 14 months. It aims at:

- development of awareness of the international problem of money laundering
- development of the legal framework
- establish a Financial Information Unit
- promote the enforcement of law

A number of seminars and study visits have been organised, the agenda's of the international institutions dealing with the fight against money laundering has been linked, an extensive legal database was established, a banking course has been organised, draft national working plans were distributed and discussed.

Further details can be found in the Progress Reports of this Horizontal Programme

ANNEX 5
REFERENCE TO FEASIBILITY/ PRE-FEASIBILITY STUDIES

Not applicable

ANNEX 5
REFERENCE TO FEASIBILITY/ PRE-FEASIBILITY STUDIES

Not applicable

ANNEX 6

REFERENCE TO LEGISLATION

1. Relevant Community laws and regulations

- The Maastricht Treaty on European Union, introducing as of 1 January 1994 a prohibition of restrictions on the movement of capital and payments between member countries themselves and between member countries and third countries (Article 73b), with a reservation of interim restrictions, measures and procedures as defined in Articles 73c to 73h of the Treaty, which may be adopted with respect to third countries and to control the movement of capital. This is practically the only law which regulates the movement of capital in the EU, however, due to its laconic provisions which refer to the movement of all capital in general, analyses and comparisons were based on the Directives which are no longer in effect but which were used as a guideline as far as liberalisation of the capital movement is concerned. In particular, Attachment No. 1 to the last Directive is important as it contains a classification of capital movement to which the European Commission refers in the White Paper and the Questionnaire.
- Council Directives (88/361/EEC) of 24 June 1988 for the implementation of Article 67 of the Treaty, derogating from the First Directive.
- Council Directive 91/308/EEC of 10 June 1991 on the prevention of the use of the financial system for the purpose of money laundering, Official Journal L 166 of 28/06/1991, pp. 77-82

2. Relevant Conventions and recommendations

- The 1988 United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (the Vienna Convention).
- Convention of the Council of Europe on laundering, tracing, seizure and confiscation of proceeds of crime, opened for signature on 8 November in Strasbourg.
- The 40 Recommendations on Money laundering of the Financial Action Task Force of the OECD.
- The Declaration of Principles adopted in December 1988 in Basle by the banking supervisory authorities of the Group of Ten.

3. Current state of the Romanian law

- Law on the prevention and punishment of laundering money, published in the Monitorul Oficial of 21st January 1999

ANNEX 7

REFERENCE TO RELEVANT STRATEGIC PLANS AND STUDIES

- Progress Reports of the Horizontal Phare programme on Money Laundering, number ZZ. 97.26
- Evaluation Report of the Council of Europe, to be released in September 1999

