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Ms. Federica Mogherini,
High Representative of the Union for Foreign Affairs and Security Policy / Vice-President of
the Commission

Ms. Věra Jourová,
Commissioner for Justice, Consumers and Gender Equality

Mr. Julian King,
Commissioner for Security Union

Brussels, 28th February 2019

Dear High-Representative Mogherini,

Dear Commissioner Jourová,

Dear Commissioner King,

We were disturbed to learn the reports about the attempts of some Member States, notably the United Kingdom, to remove Saudi Arabia from the European Commission-proposed updated list of countries posing high risk to the EU financial system due to their strategic deficiencies in combating money laundering and terrorism financing.

We laud the Commission for responding to the call from the European Parliament to conduct a thorough, independent, evidence-based assessment of high-risk third countries, based on new requirements of the Anti-Money Laundering Directive. The identification of these countries and the due diligence requirements to the EU obliged entities stemming from it are the necessary steps to protect the integrity of the Union's financial system. This should also be applicable to the case of Saudi Arabia, given the depth of the identified deficiencies and the country's strong economic ties with the EU.



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Therefore, we strongly oppose any kind of political interference in the process of identification of high-risk countries. Making the final list subject to political lobbying from the Member States, depending on their bilateral relations with the countries concerned, would seriously damage the credibility of the EU, hamper the effective implementation of the EU legal instruments on anti-money laundering and counter-terrorist financing and endanger the integrity of the EU financial system. It would also deal a severe blow to the EU overall counter-terrorism efforts, and will make our Union and its citizens less secure and less safe.

We encourage the Commission to stand its ground firmly on the proposed list, and to resist any political pressures from member states to modify it according to their political preferences.

Moreover, we call on you to exercise leadership within the Financial Action Task Force (FATF) to ensure that Saudi Arabia is not admitted to the FATF as a full member, which is its professed aim, as long as the serious deficiencies identified by the Commission are not effectively addressed.

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