

Pakistan's Compliance with FATF Recommendations

Technical compliance ratings (C – compliant, LC – largely compliant, PC – partially compliant, NC – non-compliant)

Recommendation	Rating	Factor underlying the rating
31. Powers of law enforcement and investigative authorities	PC	<ul style="list-style-type: none"> Federal Board of Revenue-customs, FIA, and provincial police (including Counter-Terrorism Departments) cannot ask for all information held by Financial Monitoring Unit of Pakistan (FMU). Law Enforcement Agencies (LEAs) mechanisms to identify natural/legal persons that hold or control accounts are not timely and it is unclear if these mechanisms operate without prior notification to the owner. There are gaps in relation to the limited investigative powers, undercover operations, accessing computers, controlled delivery for purposes of timely investigations.
32. Cash couriers	PC	<ul style="list-style-type: none"> It is unclear to what extent agencies work closely together to coordinate efforts to detect the illegal movement of cash across the border. Absence of dissuasive, proportionate sanctions/fines on making false declarations. · No clear provision for declaration information to be retained by FBR-customs.
33. Statistics	PC	<ul style="list-style-type: none"> Not all statistics provided were comprehensive and could not be broken down further into meaningful and relevant information when requested. Pakistan provided inconsistent statistics on the same issues throughout the assessment process in a number of areas.
34. Guidance and feedback	PC	<ul style="list-style-type: none"> Feedback outside formal consultation mechanisms and feedback to all DNFBPs is lacking. · Pakistan Post and CDNS have not received AML/CFT guidance to date.
35. Sanctions	PC	<ul style="list-style-type: none"> Sanctions outside the banking sector relating to AML/CFT requirements are limited. · Overall TFS sanction are sanctions are not dissuasive. No AML/CFT-related sanction powers for NPOs or DNFBPs in relation to preventative measures.
36. International instruments	LC	<ul style="list-style-type: none"> Pakistan is a party to the four conventions, but there are some minor shortcomings
37. Mutual legal assistance	PC	<ul style="list-style-type: none"> Pakistan is unable to provide MLA to foreign countries in the absence of a treaty for ML offences. · Lack of legal basis to provide MLA in terrorism, TF cases and in -most predicate offence cases. LEAs lack powers in to execute MLA requests.
38. Mutual legal assistance: freezing and confiscation	NC	<ul style="list-style-type: none"> Lack of legal arrangements to provide Mutual Legal Assistance (MLA) in terrorism matters, TF and most predicate offences. Requirement for a bilateral treaty or other arrangement to meet foreign MLA requests concerning ML. · Lack of a general legal framework for assistance in relation to predicate offences with no link to ML.
39. Extradition	LC	<ul style="list-style-type: none"> Lack of a case management system and simplified procedures.
40. Other forms of international cooperation	PC	<ul style="list-style-type: none"> There are mechanisms for incoming requests which provide different powers to different authorities who will provide support. There is little information on how such matters are coordinated nationally by region or LEAs. Different states appear to operate in silos. · MOUs with different countries provide information on the various agreements with other countries.