



Vice-President Valdis Dombrovskis  
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## **Follow-up Letter on situation of the German FIU and money laundering threats with additional information**

Dear Commission Executive Vice-President, dear Mr. Dombrovskis,

Let me first of all congratulate you on your nomination as Commissioner for Trade. I wish you all the best for your new challenges and I'm glad to look back to many years of respectful and good cooperation with you in the field of financial services.

Further to my letter from August 19 on the situation of the German FIU, I would like to point you to additional alarming information that was recently published by the German Court of Auditors. While the report is confidential, it was extensively quoted in an article by Bavarian public media.

The German auditors have assessed to which databases the FIU has access and on this basis, how effectively they can fulfill their tasks. They see substantial room for improvement ("erheblichen Verbesserungsbedarf"). The FIU lacks sufficient access rights to relevant police and tax databases of the federal and regional authorities. The auditors draw the conclusion that the German FIU cannot assess suspicious transaction reports in a qualitative and reliable manner and therefore cannot sufficiently fulfill the expectations placed on it. As a consequence, according to the auditors, there is a danger that the FIU does not recognize or cannot recognize facts relating to money laundering or terrorist financing and consequently does not forward them to the law enforcement agency.

Due to these worrying revelations, I would like to repeat my demands from the last letter: In the interest of European and German security I urge you to reconsider the case and open an infringement procedure against Germany as a priority, because of the lack of a correct implementation of AMLD. Since 2007 a well resourced FIU is a binding obligation for all EU member states according to the AMLD III. Germany continues to be a weak spot in anti-money laundering enforcement and poses significant security risks for the EU as a whole. Please, avoid any impression of negligence on the side of the European Commission in this regard.

In cooperation,

Sven Giegold

**Link to the Article by Bayerischer Rundfunk:** <https://www.br.de/nachrichten/wirtschaft/anti-geldwaesche-einheit-pruefer-fordern-mehr-zugriffsrechte,SAaZyUU>