# MONEY LAUNDERING IN EUROPE

Measuring money laundering at continental level:
The first steps towards a European ambition

# EXECUTIVE SUMMARY

# LIST OF ACRONYMS

*For definitions, please refer to the Working paper.*

EU: European Union

FIU: Financial Intelligence Unit

MS: Member States

SAR: Suspicious Activity Report

STR: Suspicious Transaction Report

UTR: Unusual Transaction Report

# MONEY LAUNDERING IN EUROPE

## EXECUTIVE SUMMARY

This summary comprises of 5 tables and one chart accompanied with observations and conclusions. They aim to summarize the Working paper "*Money laundering in Europe*" published by the European Commission[1]. When possible and relevant, a particular focus on trends at EU level is included.

The data should be interpreted with caution and in consultation of the associated metadata. The reader is therefore invited to refer to explanatory comments on pages 13 to 15 of the Working paper and to additional information provided for each indicator.

## 1. THE NEED

Fighting money laundering has been given priority at European Union level.

An appropriate strategy for this fight requires a better understanding of this criminal threat, based on comparable data at EU level, as agreed in the 2006-2010 EU Action Plan to measure crime and criminal justice.

It is within this framework that the Working paper "*Money laundering in Europe*" has been designed. Published in November 2010, this working paper, the first of its kind, represents the outcome of two data collections carried out in 2008 and 2009 covering, when relevant, as much as 6 years of activities. It involved the Commission (DG Home Affairs and Eurostat), the Member States (MS) and associated countries.

This publication has four aims:

- clearly identify obstacles to comparing data between MS;
- bring clarity and transparency to a complex issue;
- encourage MS to improve their statistical expertise by collecting data more rigorously, in particular in the judicial phase of money laundering cases and
- encourage MS to develop a cost/benefit analysis of their anti-money laundering schemes.

***This executive summary aims to complement the Working paper with a particular focus on trends at EU level***.

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[1] See *Money laundering in Europe – Report of work carried out by Eurostat and Dg Home Affairs*, Nov 2010, http://epp.eurostat.ec.europa.eu/cache/ITY_OFFPUB/KS-RA-10-003/EN/KS-RA-10-003-EN.PDF

## 2. THE RESULTS

Though the limitations on the comparability of data must not be forgotten, a number of broad observations are nonetheless apparent. 8 key facts are observed.

1. At EU level, for those MS that provided data[2], there has been an increase in the number of Suspicious Transaction Reports (STRs) - from 67 419 in 2007 to 83 887 in 2008; a 13,2 % growth. BE is not included in the calculations because it only provides data for 2008.

2. A similar trend is observed for Suspicious Activity Reports (SARs), a different counting unit used only by CY, FI and UK. UK data is not included in the calculations as it was provided only for 2008.

3. Based on the results of this statistical analysis, it can be assumed that reporting entities are providing more disclosures. Whether these disclosures correspond to a growing money laundering phenomenon cannot, however, be effectively assessed, given the preventive nature of the anti-money laundering regime (suspicions-based).

4. At EU level, credit institutions are by far the main providers of disclosures, albeit surprising differences emerge between MS. According to the data provided, credit institutions only represent 2 % of Unusual Transaction Reports (UTRs) received by NL, 0.1 % of SARs received in UK and 26 % of STRs received in BE; whereas they represent 94 % of STRs in AT and 98 % each in PL and SI in 2008.

5. At EU level, the number of cases sent to law enforcement authorities appears to have decreased slightly from 2007 to 2008. Although a linear interpretation of data would be misleading, this could nevertheless, given the rising number of disclosures, suggest a trend of over-reporting.

6. At EU level, following the trend noticed in the number of cases sent to law enforcement authorities, the number of cases initiated by law enforcement agencies on the basis of STRs sent by the Financial Intelligence Units (FIUs) appears to have decreased slightly from 2007 to 2008.

7. At EU level, the insufficient data quality on prosecution of money laundering cases does not allow for qualitative and meaningful assessment.

8. At EU level, the insufficient data quality on convictions (final court decision) of money laundering cases does not allow for qualitative and meaningful assessment.

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[2] IE and FR did not provide STR data. BE provided the data for 2008 only.

## I. Number of disclosures made to Financial Intelligence Units

The anti-money laundering regime, following an overall preventive logic, is primarily built on the obligation for so-called reporting entities (banks, notaries, casinos…) to disclose any money laundering suspicions.

That is why the indicator of the number of disclosures made to FIUs is considered a key indicator in assessing MS and reporting entities, and hence a key indicator of the overall anti-money laundering regime and its efficiency. Reporting entities comply with their obligation through the disclosure of various reports, mainly Suspicious Transaction Reports (STRs). Some MS prefer the use of the wider concept of Suspicious Activity Reports (SARs), while NL uses yet another approach – the Unusual Transaction Report (UTR).

Since these counting units do not cover the same ground they cannot be compared. They are therefore presented in separate tables below. The choice of counting unit reflects the various strategic approaches to the fight against money laundering adopted by different MS. Indeed, the third anti-money laundering Directive, the principal legal instrument of the EU, only provides for minimum harmonisation. Based on its Art. 5, MS are free to adopt or retain stricter provisions.

| Table 1  Number of Suspicious Transaction Reports (STRs) filed by the obligated entities | | | | | |
|---|---|---|---|---|---|
| | | **2007** | | **2008** | |
| **Country** | **Reporting Unit** | **From credit institutions** | **TOTAL** | **From credit institutions** | **TOTAL** |
| *Member States reporting Suspicious Transaction Reports (STRs)* | | | | | |
| Austria | STR | 96% | 1085 | 94% | 1059 |
| Belgium | STR | : | : | 26% | 15554 |
| Bulgaria | STR | 86% | 398 | 87% | 566 |
| Czech Republic | STR | 92% | 2048 | 90% | 2320 |
| Denmark | STR | 52% | 1349 | 35% | 1553 |
| Estonia | STR | 42% | 5272 | 37% | 8278 |
| Germany | STR | 80% | 9080 | 86% | 7349 |
| Greece | STR | 70% | 1179 | 62% | 2224 |
| Hungary | STR | 8% | 13 | : | 62 |
| Italy | STR | 89% | 12503 | 87% | 12894 |
| Latvia | STR | 91% | 18812 | 89% | 23963 |
| Lithuania | STR | 66% | 148 | 66% | 192 |
| Luxembourg | STR | 82% | 552 | 85% | 752 |
| Malta | STR | 62% | 63 | 64% | 69 |
| Poland | STR | 98% | 1244 | 98% | 1290 |
| Portugal | STR | 89% | 662 | 91% | 559 |
| Romania | STR | 89% | 2096 | 66% | 2338 |
| Slovenia | STR | 98% | 162 | 98% | 192 |
| Slovakia | STR | : | 1943 | 85% | 2275 |
| Spain | STR | 71% | 2783 | 74% | 2904 |
| Sweden | STR | 22% | 6040 | 55% | 13048 |
| **TOTAL STR** | | | 67432 | | 99441 |
| *Member States reporting Suspicious Activity Reports (SARs)* | | | | | |
| Cyprus | SAR | 86% | 199 | 89% | 244 |
| Finland | SAR | 4% | 17433 | 4% | 22752 |
| United Kingdom | SAR | : | : | 0.1% | 221466 |
| **TOTAL SAR** | | | 17632 | | 244462 |
| *Member States reporting Unusual Transaction Reports (UTRs)* | | | | | |
| Netherlands | UTR | 7% | 80047 | 2% | 295464 |
| *Member States unable to provide data* | | | | | |
| Ireland | : | | : | | : |
| France | : | | : | | : |
| *EU Candidate countries* | | | | | |
| Croatia | STR | 89% | 2858 | 90% | 2153 |
| the former Yugoslav Republic of Macedonia | STR | 47% | 49 | | : |
| Turkey | SAR | 99% | 2946 | 99% | 4924 |
| *EU Potential Candidate countries* | | | | | |
| Serbia | : | | : | | : |
| *EFTA/EEA countries* | | | | | |
| Iceland | STR | 99% | 496 | | : |
| Liechtenstein | STR | 63% | 205 | 63% | 189 |
| Switzerland | SAR | | 795 | | 851 |

: Data not available or concept does not apply          Source:Eurostat

0 = zero (no cases) in that year.

**A. OBSERVATIONS ON TABLE 1: Number of Suspicious Transaction Reports (STRs) filed by the obligated entities**

Hungarian figures should be verified and interpreted with care. The Latvian case is of particular interest, as the country reports the largest number of STRs (more than Germany and Italy), the majority of which come from credit institutions.

Most MS show an increase in the number of reports filed by the obligated entities, regardless of the reporting unit they use. The largest increases are noted in the Netherlands and Sweden. There are only three MS - Austria, Germany and Portugal – where in 2008 the reported STRs filed by the obligated entities were less than in 2007. Similarly, in States which are not members of the EU, Croatia and Liechtenstein show a decrease whereas Turkey and Switzerland show an increase.

It should, however, be noted that the real increase in the total number of STRs filed in 2008 is less than it appears in the table (by 15 554 STRs), due to the fact that Belgium provided data only for 2008. The same applies for the SARs where UK provided data only for 2008.

Credit Institutions[3] (banks) are the principal source of STRs. The following table gives the distribution of the percentages of STRs, SARs or UTRs that came from Credit Institutions. For example, in more than half of the MS which provided data, STRs from Credit Institutions represent more than 75% of the total number of STRs filed by the obligated entities. The MS with the lowest percentages are Finland, the Netherlands and the United Kingdom for 2008.

|  | 2007 | 2008 |
|---|---|---|
| **less than 25%** | 18% | 9% |
| **25% - 50%** | 5% | 13% |
| **51% - 75%** | 23% | 26% |
| **more than 75%** | 55% | 52% |
|  | 100% | 100% |

**B. CONCLUSION**

A clear increase in STR, SAR and UTR disclosure is observed at EU level from 2007 to 2008.

This increase could be a sign of a substantive progress if disclosures were indeed related to money laundering. However, this increase could alternatively be a product of over-reporting whereby only a small proportion of these reports are deemed by law enforcement as worthwhile of investigation. This could only truly be assessed in a longer time frame depending on judicial follow-up[4] (and reliable corresponding collection of data).

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[3] As defined in Article 1 of Directive 2000/12/EC as "*an undertaking whose business is to receive deposits or other repayable funds from the public and to grant credits for its own account*".
[4] The anti-money laundering regime being primarily based on the disclosure of suspicions, these reports can only be considered as a perception by reporting entities. A higher disclosure rate could also be the possible consequence of an over-reporting phenomenon (disclosure of suspicions which appear after analysis by the FIU perfectly legitimate, thus they logically should not have been reported hence the "over-reporting" concept).

## II. Number of disclosures submitted to law enforcement authorities

The role of the Financial Intelligence Units (FIUs) in all MS is to analyse the disclosures received, i.e. to make use of this information so as to develop financial intelligence, notably through domestic and international cooperation. Once a case is built, it is transferred to law enforcement services for further action.

From a statistical point of view, there is a break in the chain as FIUs tend to disseminate a case, not STRs, SARs and UTRs as such. Therefore the counting unit changes, passing from STR, SAR, UTR received to cases. Yet, in order to gain an insight into the efficiency of the operational chain it was deemed relevant to identify the number of STRs, SARs, UTRs used.

| Table 5  Number of disclosures (STRs, SARs, UTRs) submitted to law enforcement authorities | | | | | | |
|---|---|---|---|---|---|---|
| Country | Reporting Unit | FIU Type | 2007 | % of total number of STRs in 2007 | 2008 | % of total number of STRs in 2008 |
| *Member States reporting Suspicious Transaction Reports (STRs)* | | | | | | |
| Belgium | STR | administrative | 1,166 | | 937 | 6% |
| Bulgaria | STR | administrative | 5 | 1% | 0 | 0% |
| Czech Republic | STR | administrative | 102 | 5% | 71 | 3% |
| Estonia | STR | police | 397 | 8% | 282 | 3% |
| Germany | STR | police | 9,080 | 100% | 7,349 | 100% |
| Latvia | STR | administrative | 2,996 | 16% | 3,612 | 15% |
| Lithuania | STR | police | 59 | 40% | 59 | 31% |
| Luxembourg | STR | judicial | 33 | 6% | 104 | 14% |
| Malta | STR | administrative | 24 | 38% | 41 | 59% |
| Poland | STR | administrative | 1,168 | 94% | 996 | 77% |
| Portugal | STR | administrative | 378 | 57% | 300 | 54% |
| Romania | STR | administrative | 660 | 31% | 796 | 34% |
| Slovenia | STR | administrative | 69 | 43% | 63 | 33% |
| Slovakia | STR | police | 420 | 22% | 503 | 22% |
| Spain | STR | administrative | 569 | 20% | 686 | 24% |
| Sweden | STR | police | 462 | 8% | : | : |
| **TOTAL** | | | **17,588** | **34%** | **15,799** | **23%** |
| *Member States reporting Suspicious Activity Reports (SARs)* | | | | | | |
| Finland | SAR | police | 2,548 | 15% | 1,700 | 7% |
| *Member States reporting Unusual Transaction Reports (UTRs)* | | | | | | |
| Netherlands | UTR | hybrid | 45,656 | 57% | 54,605 | 18% |
| *Member States unable to provide data* | | | | | | |
| Denmark | STR | hybrid | : | : | : | : |
| Ireland | : | police | : | : | : | : |
| Greece | STR | administrative | : | : | : | : |
| France | : | administrative | : | : | : | : |
| Italy | STR | administrative | : | : | : | : |
| Cyprus | SAR | judicial | : | : | : | : |
| Hungary | STR | police | : | : | : | : |
| Austria | STR | police | : | : | : | : |
| United Kingdom | SAR | police | : | : | : | : |
| *EU Candidate countries* | | | | | | |
| Croatia | STR | administrative | 91 | 3% | 103 | 5% |
| the former Yugoslav Republic of Macedonia | STR | | 10 | 20% | : | : |
| Turkey | SAR | administrative | : | | : | : |
| *EU Potential Candidate countries* | | | | | | |
| Serbia | : | | : | | : | : |
| *EFTA/EEA countries* | | | | | | |
| Iceland | STR | hybrid | 27 | 5% | : | : |
| Liechtenstein | STR | | 141 | 69% | 161 | 85% |
| Switzerland | SAR | administrative | 166 | 21% | 164 | 19% |

: Data not available                                    *Source: Eurostat*

0 = zero (no cases) in that year.

**A. OBSERVATIONS ON TABLE 5: Number of disclosures (STRs, SARs, UTRs) submitted to law enforcement authorities**

The number of STRs submitted to law enforcement authorities, as compared to the total number of STRs filed by the obligated entities, is usually small. The distribution of the percentages of the total STRs submitted to the law enforcement authorities for 2007 and 2008 is given below. The data reveals that more than half of MS (53% and 59%) submit to the law enforcement authorities less than 25% of the STRs, SARs or UTRs filed by the obligated entities.

|  | 2007 | 2008 |
|---|---|---|
| less than 25% | 53% | 59% |
| 25% - 50% | 24% | 18% |
| 51% - 75% | 12% | 12% |
| more than 75% | 12% | 12% |
|  | 100% | 100% |

In 2008, a significant decrease in the number of STRs / UTRs submitted to law enforcement authorities has been noted in Poland (from 94% to 77%) and in the Netherlands (from 57% to 18%).

**B. CONCLUSION**

This table is to be interpreted with caution, as there is no direct and linear correlation between STRs, SARs, UTRs filed in any given year and the number of cases sent to law enforcement services.

A case can be built over the course of several years and comprise of hundreds if not thousands of STRs, which in turn can contain anything between one and several thousand transactions.

Moreover, counting units retained by MS varies. Some MS may retain as a counting unit the first STR opening the case, while others may count them all, which affects the results and reduces comparability.

Finally, some FIUs make full use of extensive powers at their disposal while other FIUs have more restricted possibilities. Hence, the former type of FIUs tend to deliver more complete cases, which take more time to process, further disconnecting the linear and annual approach of this statistical analysis. This table is therefore to be interpreted within this context.

In spite of these limitations, this table shows a downward trend from 2007 to 2008 in the number of cases forwarded to law enforcement agencies. This could possibly indicate, when considered in conjunction with the conclusions on table 1, an over-reporting phenomenon: many disclosures offering no value, thus indicating that more is not always better.

## III. Number of cases initiated by law enforcement authorities on the basis of disclosures sent

The purpose of this table is to further indicate whether the law enforcement agencies have used the cases they received from the FIUs at the investigation stage of the anti-money laundering operational chain. It can therefore provide information on the nature of domestic cooperation.

| Table 7 Number of cases initiated by law enforcement agencies on the basis of disclosures (STRs, SARs, UTRs) sent by the FIUs | | | | | |
|---|---|---|---|---|---|
| | | **2007** | | **2008** | |
| **Country** | **Reporting Unit** | | % of STRs sent to law enforcement | | % of STRs sent to law enforcement |
| *Member States reporting Suspicious Transaction Reports (STRs)* | | | | | |
| Belgium | STR | 252 | 22% | 132 | 14% |
| Bulgaria | STR | 369 | 7380% | 719 | |
| Czech Republic | STR | 7 | 7% | 3 | 4% |
| Estonia | STR | 13 | 3% | 6 | 2% |
| Germany | STR | 9,080 | 100% | 7,349 | 100% |
| Spain | STR | 53 | 9% | 66 | 10% |
| Latvia | STR | 146 | 5% | 91 | 3% |
| Lithuania | STR | 10 | 17% | 15 | 25% |
| Luxembourg | STR | 33 | 100% | 104 | 100% |
| Hungary | STR | 13 | | 62 | |
| Malta | STR | 21 | 88% | 41 | 100% |
| Poland | STR | 176 | 15% | 197 | 20% |
| Portugal | STR | 1,067 | 282% | 906 | 302% |
| Romania | STR | : | | 719 | 90% |
| Slovenia | STR | 2 | 3% | 8 | 13% |
| Slovakia | STR | 9 | 2% | 3 | 1% |
| **TOTAL** | | 11,251 | | 10,421 | |
| *Member States reporting Unusual Transaction Reports (UTRs)* | | | | | |
| Netherlands | UTR | 35,259 | 77% | : | |
| *Member States unable to provide data* | | | | | |
| Denmark | STR | : | | : | |
| Ireland | : | : | | : | |
| Greece | STR | : | | : | |
| France | : | : | | : | |
| Italy | STR | : | | : | |
| Cyprus | SAR | : | | : | |
| Austria | STR | : | | : | |
| Finland | SAR | : | | : | |
| Sweden | STR | : | | : | |
| United Kingdom | SAR | : | | : | |
| *EU Candidate countries* | | | | | |
| Croatia | STR | 120 | 132% | 103 | 100% |
| the former Yugoslav Republic of Macedonia | STR | 8 | 80% | : | |
| Turkey | SAR | : | | : | |
| *EU Potential Candidate countries* | | | | | |
| Serbia | STR | : | | : | |
| *EFTA/EEA countries* | | | | | |
| Iceland | STR | 2 | 7% | : | |
| Liechtenstein | STR | : | | : | |
| Switzerland | SAR | 629 | 379% | 687 | 419% |

: Data not available.                                    *Source: Eurostat*

0 = zero (no cases) in that year.

**A. OBSERVATIONS ON TABLE 7: Number of cases initiated by law enforcement agencies on the basis of STRs sent by the FIUs**

In theory the number of cases initiated by law enforcement agencies on the basis of STRs sent by FIUs should not exceed the number of STRs sent to law enforcement. It seems that this rule does not apply in two cases, i.e. Bulgaria and Portugal.

**B. CONCLUSION**

As with the previous table, Table 7 should be interpreted with caution (see comments under table 5).

Depending on MS legal systems, the cases sent may be investigated on a systematic basis (e.g. DE, hence the 100 % ratio) or subject to a material review, to which other type of information and intelligence is to be added by law enforcement agencies.

Though a linear and annual interpretation of this table would be misleading, the trend appears to be a slight decrease, as previously in Table 5. MS policies and approaches towards the fight against money laundering could shed some light in this regard.

## IV. Number of cases brought to prosecution

After a case has been further built at the investigation phase it may be prosecuted. This is the third phase of the anti-money laundering chain. The intended goal of this analysis was to better identify the role played by the prudential regime (i.e. disclosure of suspicions) in comparison with other types of intelligence brought at the investigation phase. MS were largely unable to provide such information as the prosecution process is often presented as the result of an overall assessment, thereby preventing such a disaggregation of data.
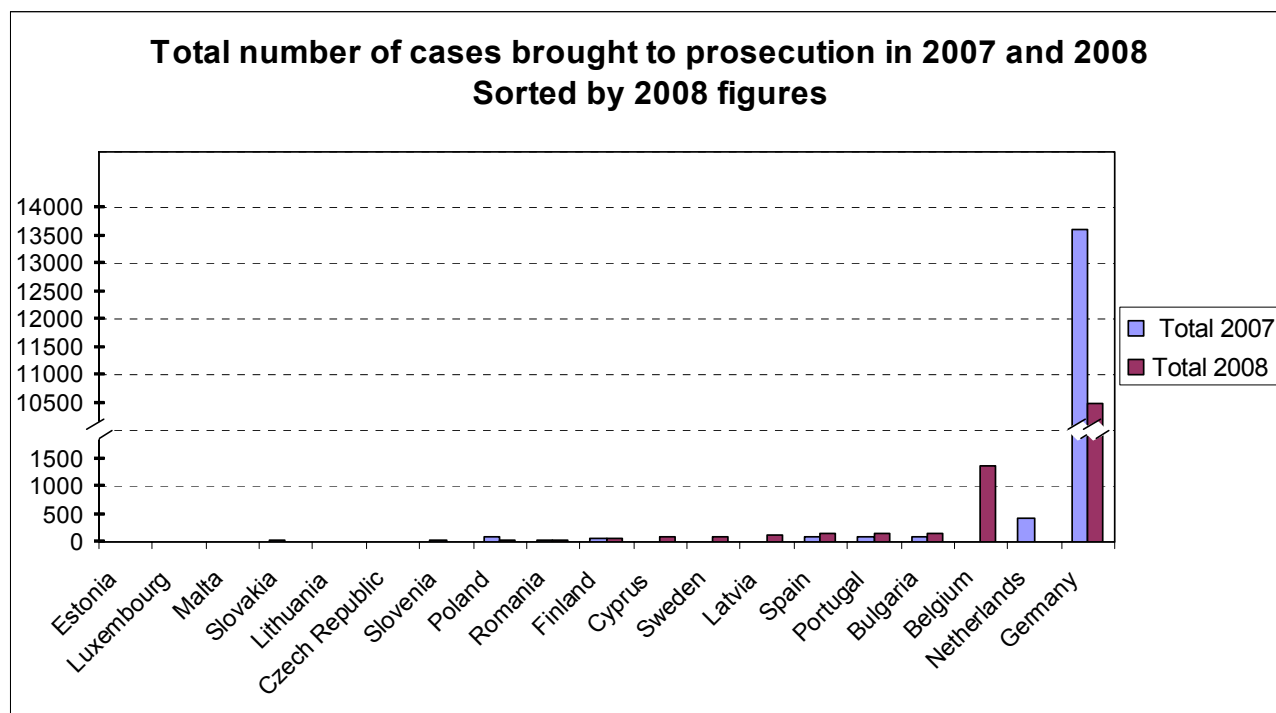
**Total number of cases brought to prosecution in 2007 and 2008 Sorted by 2008 figures**

| | | 2007 | | | | 2008 | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | origination from: | | | | origination from: | | | |
| Country | Reporting unit | STR, SAR, UTR | CTR | independent law enforcement investigation | TOTAL | STR, SAR, UTR | CTR | independent law enforcement investigation | TOTAL |
| Belgium | STR | : | : | : | : | 856 | : | 518 | 1,374 |
| Bulgaria | STR | : | : | : | 91 | : | : | : | 142 |
| Czech Republic | STR | 0 | : | 4 | 4 | 0 | : | 11 | 11 |
| Denmark | STR | : | : | : | : | : | : | : | : |
| Estonia | STR | 1 | : | : | 1 | 1 | : | : | 1 |
| Germany | STR | : | : | : | 13,593 | : | : | : | 10,478 |
| Latvia | STR | 3 | : | 6 | 9 | 91 | : | 24 | 115 |
| Lithuania | STR | 2 | : | 4 | 6 | 5 | : | 5 | 10 |
| Luxembourg | STR | 2 | : | 3 | 5 | 2 | : | 2 | 4 |
| Malta | STR | 4 | : | 9 | 13 | : | : | : | 4 |
| Poland | STR | 82 | : | : | 82 | 23 | : | : | 23 |
| Portugal | STR | : | : | : | 95 | : | : | : | 141 |
| Romania | STR | 21 | : | : | 21 | 36 | : | : | 36 |
| Slovenia | STR | 10 | 8 | 1 | 19 | 6 | 0 | 5 | 11 |
| Slovakia | STR | : | : | : | 18 | : | : | : | 7 |
| Spain | STR | 37 | : | 56 | 93 | 31 | : | 107 | 138 |
| Sweden | STR | : | : | : | : | : | : | : | 94 |
| Netherlands | UTR | : | : | : | 427 | : | : | : | : |
| Cyprus | SAR | 4 | : | : | 4 | 5 | : | 72 | 77 |
| Finland | SAR | : | : | : | 61 | : | : | : | 66 |
| **TOTAL** | | **166** | **8** | **83** | **14,542** | **1,056** | **0** | **744** | **12,732** |
| *Member States unable to provide data* | | | | | | | | | |
| Ireland | : | : | : | : | : | : | : | : | : |
| Greece | STR | : | : | : | : | : | : | : | : |
| France | : | : | : | : | : | : | : | : | : |
| Italy | STR | : | : | : | : | : | : | : | : |
| Hungary | STR | : | : | : | : | : | : | : | : |
| Austria | STR | : | : | : | : | : | : | : | : |
| United Kingdom | SAR | : | : | : | : | : | : | : | : |
| *EU Candidate countries* | | | | | | | | | |
| Croatia | STR | : | : | : | : | : | : | : | : |
| the former Yugoslav Republic of Macedonia | STR | 2 | : | 4 | 6 | : | : | : | : |
| Turkey | SAR | 5 | : | 0 | 5 | 7 | : | 0 | 7 |
| *EU Potential Candidate countries* | | | | | | | | | |
| Serbia | : | : | : | : | : | : | : | : | : |
| *EFTA/EEA countries* | | | | | | | | | |
| Iceland | STR | : | : | : | : | : | : | : | : |
| Liechtenstein | STR | : | : | : | : | : | : | : | : |
| Switzerland | SAR | : | : | : | : | : | : | : | : |

**Table 8  Number of cases brought to prosecution: originating from STRs, CTRs and independent law enforcement investigation**

: Data not available

0 = zero (no cases) in that year

*Source: Eurostat*

**A. OBSERVATIONS ON TABLE 8: Number of cases brought to prosecution originating from STRs, CTRs and independent law enforcement investigation**

93% of the money laundering cases brought to prosecution at EU level in 2007 come from Germany. For 2008 Germany's contribution to the total is 83%.

Comparisons of the total number of cases brought to prosecution between 2007 and 2008 should be avoided because neither all nor the same MS provide data for both years. It can roughly be said that there is a decrease in the number of cases brought to prosecution in 2008 mainly due to the situation in Germany where, from one year to the next, there is a drop of approximately 3000 cases.

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**B. CONCLUSION**

The judicial phase of the money laundering proved to be the least reliable and least exhaustive part of money laundering data collection. Some MS were incapable of providing requested data in despite their obligations under Art. 33(2) of the anti-money laundering Directive.

## V. Number of persons/legal entities convicted for money laundering offences

Should a person or a legal entity be found guilty, the end result of the prosecution phase will be a final conviction.

| Table 9 Number of persons / legal entities convicted for money laundering offences | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| | **2007** | | | | **2008** | | | |
| **Country** | **3rd party** | **self-laundering** | **unable to distinguish** | **TOTAL** | **3rd party** | **self-laundering** | **unable to distinguish** | **TOTAL** |
| Belgium | : | : | : | : | : | : | : | : |
| Bulgaria | : | : | 8 | 8 | 1 | 24 | 0 | 25 |
| Czech Republic | 636 | 24 | 0 | 660 | : | : | : | : |
| Denmark | : | : | : | : | : | : | : | : |
| Germany | 603 | 0 | 0 | 603 | 608 | 0 | 0 | 608 |
| Estonia | 0 | 11 | 0 | 11 | 0 | 11 | 0 | 11 |
| Ireland | : | : | : | : | : | : | : | : |
| Greece | : | : | : | : | : | : | : | : |
| Spain | : | : | : | : | : | : | : | : |
| France | : | : | 215 | 215 | : | : | : | : |
| Italy | : | : | : | : | : | : | : | : |
| Cyprus | 0 | 13 | 0 | 13 | 1 | 21 | 0 | 22 |
| Latvia | 0 | 13 | 0 | 13 | 0 | 16 | 0 | 16 |
| Lithuania | 0 | 4 | 0 | 4 | 1 | 0 | 0 | 1 |
| Luxembourg | 0 | 3 | 0 | 3 | 0 | 2 | 0 | 2 |
| Hungary | : | : | 8 | 8 | : | : | 6 | 6 |
| Malta | 1 | 0 | 0 | 1 | 1 | 1 | 0 | 2 |
| Netherlands | : | : | : | : | : | : | : | : |
| Austria | 18 | 0 | 0 | 18 | 20 | 0 | 0 | 20 |
| Poland | : | : | : | : | : | : | 53 | 53 |
| Portugal | : | : | 6 | 6 | : | : | 10 | 10 |
| Romania | 0 | 7 | 0 | 7 | 0 | 4 | 0 | 4 |
| Slovenia | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 1 |
| Slovakia | : | : | : | : | : | : | : | : |
| Finland | 15 | 0 | 0 | 15 | 28 | 0 | 0 | 28 |
| Sweden | 19 | 0 | 0 | 19 | 97 | 0 | 0 | 97 |
| UK: England & Wales | : | : | : | : | : | : | : | : |
| **TOTAL** | **1,292** | **75** | **237** | **1,604** | **758** | **79** | **69** | **906** |
| *EU Candidate countries* | | | | | | | | |
| Croatia | : | : | 4 | 4 | : | : | 5 | 5 |
| the former Yugoslav Republic of Macedonia | : | : | : | : | : | : | : | : |
| Turkey | : | : | 43 | 43 | : | : | : | : |
| *EU Potential Candidate countries* | | | | | | | | |
| Serbia | : | : | : | : | : | : | : | : |
| *EFTA/EEA countries* | | | | | | | | |
| Iceland | 1 | 0 | 0 | 1 | : | : | : | : |
| Liechtenstein | : | : | : | : | : | : | : | : |
| Switzerland | : | : | 156 | 156 | : | : | 157 | 157 |

: Data not available.  *Source: Eurostat*

0 = zero (no cases) in that year.

**A. OBSERVATIONS ON TABLE 9: Number of persons/legal entities convicted for money laundering offences**

Given the time lag between the different steps of the anti-money laundering chain (reporting- investigation-prosecution), it is not possible to directly correlate convictions with the number of cases presented in the preceding tables. It can only be said that in 2007 Czech Republic had the largest number of convictions followed by Germany and France. The three together count for 92.4% of the total cases reported in this exercise. For 2008, Germany represented 67% of the reported cases.

**B. CONCLUSION**

Many MS were unable to provide the requested data despite their obligations under Art. 33(2) of the anti-money-laundering Directive, thus hampering the quality of the data collection.

Given the fact that final prosecution on a money laundering case may take 3 to 5 years from the time when an STR may have triggered investigation and prosecution, the decrease in the 2008 figures compared to 2007, seems logical (as many cases may be pending). Therefore it is advised to avoid comparisons between the years.