Anti-money laundering and counter-terrorist financing measures

Burkina Faso

6th Enhanced Follow-up Report & Technical Compliance Re-Rating

Follow-up Report



May 2025

The Inter-Governmental Action Group against Money Laundering (GIABA) is a specialized institution of ECOWAS and a FATF Style Regional Body that promotes policies to protect member State's financial systems against money laundering, terrorist financing, and the financing of the proliferation of weapons of mass destruction. The FATF Recommendations are recognised as the global anti-money laundering (AML) and counter terrorist financing (CTF) standard.

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6th Enhanced Follow-up Report of Burkina Faso

I.INTRODUCTION

1. The Mutual Evaluation Report (MER) of Burkina Faso was adopted in May 2019. Based on the results of the MER, Burkina Faso was placed into the Enhanced Follow-up process. The 1st and 4th Enhanced Follow-up Report (FUR) of Burkina Faso with technical compliance re-ratings were adopted in April 2021 and May 2023 respectively and, based on the results, Burkina Faso was maintained into Enhanced Follow-up . The second, third and fifth FURs were adopted for information purposes only, in May 2021, 2022 and 2024 respectively.

2. This 6th enhanced FUR analyses Burkina Faso's progress in in addressing some of the technical compliance deficiencies identified in its MER, 4th FUR. Re-ratings are made where progress has been made.

3. The expectation is that countries will have addressed most if not all technical compliance deficiencies by the end of the third year from the adoption of their MER. This report does not address the progress Burkina Faso has made to improve its effectiveness.

4. The following experts assessed Burkina Faso's request for technical compliance re-rating: . Mr KOFFI Goua (Côte d'Ivoire) and Ms.Edwige Fifame Aklou Tangni (Benin). The experts were supported by Mr. Karnon LOFIGUE and M. Franklin Campbel from the GIABA Secretariat.

5. Section 4 of this report summarizes Burkina Faso's progress in improving technical compliance. Section 5 sets out the conclusion and includes a table showing Burkina Faso's MER rating and updated rating based on this and previous FUR.

II.MER's, 1st and 4th follow up report Results

6. MER ratings and the evolution of the technical compliance ratings, following the adoption of the 1st and 4th FUR are as follows:

Table1: Technical Compliance Rating1, May 2023

R.1-	R.2	R.3	R.4	R.5	R.6	R.7	R.8	R.9	R.10
LC	PC(LC)	C	LC(LC)	PC (C)	PC (PC)	PC(PC)	PC	C	LC
R.11	**R.12**	**R.13**	**R.14**	**R.15**	**R.16**	**R.17**	**R.18**	**R.19**	**R.20**
LC	LC	LC	PC	C(PC)	LC	LC	LC	PC	LC
R.21	**R.22**	**R.23**	**R.24**	**R.25**	**R.26**	**R.27**	**R.28**	**R.29**	**R.30**
C	PC(PC)	LC	PC(PC)	PC(PC)	PC(PC)	C	NC(PC)	C	C
R.31	**R.32**	**R.33**	**R.34**	**R.35**	**R.36**	**R.37**	**R.38**	**R.39**	**R.40**
C	PC	LC	PC(LC)	LC	C	LC	LC	LC	LC

Note: There are four possible levels of technical conformity: compliant (C), largely compliant (LC), Partially Compliant (PC) and non-compliant (NC).

III. OVERVIEW OF PROGRESS TO IMPROVE TECHNICAL COMPLIANCE

7. In accordance with the GIABA Mutual Evaluation Processes and Procedures, this FUR considers progress made up to 22 November 2024. In accordance with the ME procedure and FATF Mutual Evaluation Methodology, the experts' analysis considered progress to address the deficiencies identified in the MER, the 1st and 4th FUR and the entirety (all criteria) of each Recommendation under review, noting that this is not detailed where the legal, institutional or operational framework is unchanged since the MER, the 1st and 4th FUR.

[1]The new ratings following the adoption of the 1st and 4th FUR are put in parentheses

8. This section 2 summarizes the progress made by Burkina Faso to improve its Technical Compliance by addressing the Technical Compliance deficiencies identified in the MER, the 1st and 4th FUR.

4.1. Progress made by addressing Technical Compliance deficiencies identified in the MER

9. Burkina Faso has made progress in addressing the Technical Compliance deficiencies identified in the MER regarding R.8, R32, R24 and R25. In light of this progress, the ratings given to Burkina Faso under these Recommendations have been re-rated .

10. GIABA welcomes the progress achieved by Burkina Faso in order to improve its technical compliance with R.6, R.7, and R.28. However, insufficient progress has been made to justify upgrades of the ratings of these Recommendations at this stage.

Recommendation 6

	Year	Rating
MER	**[2019]**	[PC]
FUR1	**[2021]**	[PC (not re-assessed)]
FUR2	**[2022]**	[PC (not re-assessed)]
FUR3	**[2022]**	[PC (not re-assessed)]
FUR4	**[2023]**	[PC]
FUR5	**[2024]**	[PC (not re-assessed)]

11. In its 2nd MER (2019), Burkina Faso was rated PC on Rec.6. The analysis of the 4th FUR (2023) concluded that the country should remain Partly Compliant. The following shortcomings were noted: (i) the absence of specific provisions requiring the provision of information and supporting evidence to foreign competent authorities when Burkina Faso requests another country to give effect to freezing actions initiated at the national level, the same also applies to requests for inclusion on UN lists. (ii) the inability of Burkina Faso to implement without delay the targeted financial sanctions under the United Nations sanctions regimes 1267/1989 (Al Qaeda) and 1988. (iii) the scope of the funds to be frozen is limited to all funds or other assets owned or controlled by the designated person or entity and does not cover all other types of funds or assets listed in sub-criterion 6.5.b (paragraphs ii, ii, and iv), (iv) the absence of a specific procedure for requests for delisting to the 1988 Committee and for contacting the office of the Ombudsperson directly by the designated person or entity

12. Since the adoption of its 4th FUR in 2023, Burkina Faso has circulated the memo n°2024-01320/MEFP/SG/DGTCP/DAMOF of May 7, 2024, in line with the immediate implementation of targeted financial sanctions by all taxable persons. The country indicates that a draft decree on the immediate implementation of targeted financial sanctions by taxable persons has been drawn up and is in the process of being adopted by the Council of Ministers. According to the country, this decree should strengthen the country's capacity to implement targeted financial sanctions without delay.

13. Criterion 6.1 [Mostly Met].

a),b),c),d [Met]. The analysis of MER 2019 and 4th FUR remain relevant

e) [Partly **Met]**. The deficiency identified in the 4th FUR was that the country's mechanism does not require that a detailed statement of reasons for designation be provided. The country has not provided an update on this criterion. The deficiency is not addressed and is considered moderate in light of the country's context and risk profile.

14. Criterion 6.2 [Mostly Met].

a) b),d)[Met] the analyses of the 4th FUR (2023) remain relevant

c) ,e) [**Partly Met**] The deficiencies identified in the 4th FUR (2023) remain

15. **Criterion 6.3 [Met].**No failures were observed in the 4th FUR (2023), and the situation remains unchanged.

16. Criterion 6.4 [Partly Met]].

[2]The FATF Recommendations have not been amended since the adoption of the 3rd MR in May 2023.

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17. since the plenary session of May 2023, the Minister of Finance of Burkina Faso has released the Memo No. 2024-01320/MEFP/SG/DGTCP/DAMOF of May 7, 2024 cited in order to invite the taxable persons to take the necessary steps to regularly consult the sanctions lists on the UNSC website or on the CENTIF website, with a view to their implementation without delay and to inform the competent authority of the measures taken in this regard, within three (03) working days from the date of implementation. Overall, it appears that the issue raised both in the 2019 MER and in the 4th Follow-up Report adopted in May 2023 relating to the fact that several actions must be taken by the country in order to make the TFSs emanating from the UNSC enforceable, namely receipt of the lists by the Ministry of Foreign Affairs and then transmission to the Minister responsible for finance for decision-making is still not addressed. This approach is more relevant for criterion 6.5 and does not guarantee the timely implementation of TFSs.

18. The country indicates in its submission that a draft decree on the immediate implementation of targeted financial sanctions by taxable persons has been prepared and is in the process of being adopted by the Council of Ministers. This decree should, according to the country, strengthen the country's capacity to implement targeted financial sanctions without delay.

19. The deficiencies identified in the MER (2019) and the 4th FUR remain and have not been corrected since the 2023 plenary. The analyses of the 4th FUR (2023) remain relevant because the country is still not in a position to implement without delay the targeted financial sanctions under the United Nations sanctions regimes 1267/1989 and 1988, i.e. within 24 hours of any new designation and/or each update of the lists.

20. Indeed, as indicated in its 2019 MER, UNSCR 1267/1989 and 1988 are not directly and immediately applicable in Burkina Faso. Each new designation and each modification made must be internalized at the national level to be enforceable (see 4th FUR).

21. This criterion has a relative importance in the overall assessment of recommendation 6. Failure to implement TFS (1267) without delay will have a strong impact on the rating of Rec.6.

For UNSCR 1373,

22. The analyses of the 4th FUR (2023) remain relevant. The TFS (UNSCR 1373) are implemented without delay in Burkina Faso.

23. Criterion 6.5 [Partly Met].

a),c),d),e),f) [Met]_ **the** analyses of the MER (2019) and the 4th FUR (2023) are still relevant. Also,

b. [Partly Met]. No new element has been provided by the country since the adoption of the 4th FUR adopted in May 2023. The shortcomings noted in the 4th follow-up report still remain: the scope of the funds to be frozen is limited to all funds or other assets held or controlled by the designated person or entity and did not cover all other types of funds or assets cited in this sub-criteria (bullet ii, ii, and iv).

24. Criterion 6.6 [Partly Met]: The manual of procedures cited by the country had already been analyzed in the 4th follow up report adopted in 2023. No new elements have been provided by the country since the adoption of the 4th FUR. The deficiencies noted in the 4th follow-up report still remain.

a. **[Partly Met]** The deficiencies identified in the 4th FUR (2023) remain

b. and (c) [**Met]** - No failures had been noted in the MER (2019), and the situation remains unchanged

d. **[Not Met]-**With respect to designations made under UNSCR 1988, there are no procedures in place to facilitate review by the 1988 Committee in accordance with all applicable guidelines or procedures adopted by the 1988 Committee, including those relating to the Focal Point mechanism established by UNSCR 1730. The findings of the MER remain.

e. **[Mostly Met] –**The deficiencies identified in the 4th FUR 2023) remains: the country does not have specific procedures to inform designated individuals and entities that the Office of the United Nations Ombudsperson may receive requests for delisting in accordance with Resolutions 1904, 1989 and 2083.

f. **[Met]**_. No failures had been noted in the MER (2019), and the situation remains unchanged

g. **[Met] –** the analyses of the MER (2019) and the 4th FUR (2023) are still relevant

25. Criterion 6.7 [Met] - the analysis of the 4th FUR (2023) is still relevant. Ref. 4th FUR (2023)

Weighting and conclusion

26. Since the adoption of the 4th Follow up report, we note the adoption of circular n°2024-01320/MEFP/SG/DGTCP/DAMOF of May 7, 2024.

27. Overall, the moderate shortcomings noted in the 4th FUR remains, namely the absence of specific provisions requiring the provision of information and supporting evidence to the competent foreign authorities when Burkina Faso requests another country to give effect to freezing actions initiated at the national level, the same is also true for requests for inclusion on the UN lists. More particularly, it is noted that Burkina Faso is unable to implement without delay the targeted financial sanctions under the United Nations sanctions regimes 1267/1989 (Al Qaeda) and 1988. The scope of the funds to be frozen is limited to all funds or other assets held or controlled by the designated person or entity and does not cover all other types of funds or assets cited in this sub-criterion (bullet ii, ii, and iv). Finally, it is noted that there is no specific procedure for requests for de-listing from the 1988 Committee and for contacting the Ombudsman's office directly by the designated person or entity.

28. Due to the country risk and context and the relatively high weight of criterion 6.4, Burkina Faso has moderate deficiencies in Recommendation 6.

29. **Burkina Faso remains rated Partially Compliant [PC] for recommendation 6.**

Recommendation 7

	Year	Rating
MER	**[2019]**	[PC]
FUR1	**[2021]**	[PC (not re-assessed)]
FUR2	**[2022]**	[PC (not re-assessed)]
FUR3	**[2022]**	[PC (not re-assessed)]
FUR4	**[2023]**	[PC]
FUR5	**[2024]**	[PC (not re-assessed)]

30. In its 2nd MER (2019), Burkina Faso was rated PC on Rec. 7. The following shortcomings were noted:; the scope of funds to be frozen is limited; the mechanism in place for the application of targeted financial sanctions only targets TF and not FP.

31. Since the adoption of its MER in 2019, Burkina Faso has issued Decree No. 2021-1378/ PRES/ PM/ MAAC/ MATDS/ MAECBE/ MEFP/ MJDHPC/ MDICAPM designating the competent authority for targeted financial sanctions and creating the Consultative Commission on Administrative Freezing (CCGA) as well as Order No. 2022-0125/MDAC/MATDS/MAECRBE/MJDHRI/MEFP/MDICAPM of April 29, 2022 on the attributions, composition and functioning of the Consultative Commission on Administrative Freezing (CCGA) and procedures applicable before the competent authority for targeted financial sanctions. The CCGA is now operational.

32. Criterion 7.1. [Partly Met]. The mechanism for implementing the TFSs relating to the fight against the financing of the proliferation of weapons of mass destruction (FPWMD) is identical to that provided for the implementation of the TFSs relating to the CTF. On this basis, the deficiencies noted in the analysis of 6.4 (RCNU 1267) apply here and do not allow Burkina Faso to implement without delay the TFS relating to the fight against FPWMD. This criterion is given high weight in this recommendation.

33. **Criterion 7.2. [Mostly Met]**

34. The Minister responsible for finance is the authority responsible for implementing measures to freeze assets linked to proliferation (Art 2.b, decree no. 2022-0125).

a. **[Met]** the analysis of the MER (2019) and the 4th FUR (2023) remains relevant.

b. **[Partly Met**] - the deficiency noted in the MER remains. Cf. MER (2019 and 4th FUR (2023) _

c. **), d), e) f) [Met]**: The analyses of the MER (2019) and the 4th FUR (2023) remain relevant.

35. Criterion 7.3. [Met]. The analysis of the 4th FUR (2023) remains relevant. Since the 2023 plenary session, Burkina Faso has adopted Decree No. 2023-1308/PRES-TRANS/PM/MEFP/MATDS/MJDHRI on the designation and attributions of the supervisory and control authorities of the persons subject to the non-financial sector in the fight against money laundering and the financing of terrorism and the proliferation of weapons of mass destruction, creation of a National Authority for Sanctions and Applicable Sanctions. The provisions of Articles 27, 28, 30, 31 of said decree make it possible to correct the deficiency that had been noted in the 4th FUR (2023). A range of sanctions is defined for all supervisory authorities of DNFBPs in the event of non-compliance by DNFBPs with their obligations, including those relating to Rec. 7.

36. Criterion 7.4 [**Mostly Met**]

a) [**Partly Met**]: the deficiency noted in the 4th FUR remains: the Burkina Faso system does not provide for a procedure which includes the possibility for listed individuals and entities to address their request for delisting to the Focal Point established in accordance with UNSCR 1730 or informing designated individuals and entities that they may address the Focal Point directly. However, the Minister responsible for Finance is competent to receive and transmit appeals against sanctions linked to these UNSCRs (Order No. 2022-0125, art. 35, para. 4 and 5).

b) [Met]-. The analysis of the 4th FUR (2023) remains relevant

c) [Met], The analysis of the 4th FUR (2023) remains relevant

d) [Met], see the analysis made in C 6.6.g

37. Criterion 7.5 [**Mostly Met**]

a. **[Met]-**The analysis of the 4th FUR (2023) remains relevant

b. [Partly Met]. No new elements have been provided by the country since the adoption of the 4th FUR adopted in May 2023. The deficiency noted in the 4th follow-up report has not been corrected. See 4th FUR (2023).

Weighting and conclusion

38. Since the adoption of the 4th FUR in May 2023, we note the adoption of Circular No. 2024-01320 / MEFP / SG / DGTCP / DAMOF of May 7, 2024 and Decree No. 2023-1308 / PRES-TRANS / PM / MEFP / MATDS / MJDHRI designating and attributing the supervisory and control authorities of persons subject to the non-financial sector in the fight against money laundering and the financing of terrorism and the proliferation of weapons of mass destruction, creation of a National Authority for Sanctions and Applicable Sanctions, which made it possible to correct the deficiency in connection with criterion 7.3. The other deficiencies noted in the 4th FUR remain, namely the extent of the funds to be frozen (C.7.2.b). In particular, Burkina Faso's inability to implement without delay the targeted financial sanctions under the United Nations sanctions regimes relating to the prevention, suppression and interruption of the proliferation of weapons of mass destruction and its financing (C.7.1) constitutes a significant deficiency in the country's implementation of R.7. Finally, the conditions for drawing from accounts frozen under contracts, agreements or obligations concluded or arising prior to the entry into force of the freezing decision are not specified(C.7.5.b).

39. Due to the relatively high weight of criterion 7.1 for which Burkina Faso has moderate deficiencies.

40. Recommendation 7 rating is maintained as Partly Compliant [PC].

Recommendation 8-

	Year	Rating
MER	**[2019]**	[PC]
FUR1	**[2021]**	[PC (not re-assessed)]
FUR2	**[2022]**	[PC (not re-assessed)]
FUR3	**[2022]**	[PC (not re-assessed)]
FUR4	**[2023]**	[PC (not re-assessed)]
FUR5	**[2023]**	[PC (not re-assessed)]

41. In its 2nd MER (2019), Burkina Faso was rated PC on Rec. 8. The following deficiencies were noted: There is no comprehensive assessment of the characteristics and types of Non-Profit Organizations (NPOs) that may be at risk of misuse for terrorist financing purposes, nor of the nature of the threats that terrorist entities pose to these NPOs, no mechanism in place to conduct periodic assessments of the sector. • There are no risk-based control/monitoring measures; no appropriate focal point designated to respond to international requests for information on NPOs suspected of terrorist financing or other forms of support for terrorism. Also, Burkina has not demonstrated that it is working with NPOs to develop good practices to address the risk of terrorist financing. There are no measures to encourage NPOs to conduct transactions through regulated financial channels.

42. Criterion 8.1 [**Met**] _

a) **[Met]**_the country carried out the TF risk assessment in the NPO sector. The report of said assessment was adopted in 2023. As part of this assessment, the country identified which subsets of organizations fall within the definition adopted by the FATF. These are essentially associations (including NPOs and foundations), all of which must be registered/requested for approval. Thus, a list of 11,608 NPOs falling within the FATF definition and which are likely to be exploited for the purposes of financing terrorism have been identified by the country.

b) **[Met]**_The 2023 TF risk assessment of NPOs made it possible, on the one hand, to identify the categories of non-profit organizations (NPOs) most at risk and, on the other hand, to characterize the level of risk of each of the categories in the sector. The area's most at risk identified by the country are health, education, the social and humanitarian sector, the environment, religion and culture, art, tourism, sports and leisure. In terms of threat, the high level of risk of voluntary or forced embezzlement of funds for the supply of terrorist groups was noted, particularly in the field of education, the social and humanitarian sector.

c) **[Met]**_No failures were observed in the 2019 MER, and the situation remains unchanged.

d) **[Met]** Since the 2018 NRA , as indicated in C.8.1.b, Burkina Faso has reassessed the NPO sector in 2022/2023, by examining new information relating to its potential vulnerabilities to terrorist activities, in order to ensure effective implementation of measures; Also, Article 21 of Decree No. 2023-1308/PRES-TRANS/PM/MEFP/MATDS/MJDHRI of October 5, 2023, makes it mandatory to carry out the sector assessment at least once every three years.

43. Criterion 8.2 [**Mostly Met**] _

a) **[Met]**_No failures were observed in the 2019 MER, and the situation remains unchanged.

b) **[Met]**_No failures were observed in the 2019 MER, and the situation remains unchanged.

c) **[Met]** _The monitoring framework is a space for consultation between the authorities and NPOs. The decree provides for the dissemination of directives and recommendations, as well as awareness-raising actions (art. 5). NPOs also participate directly in the governance of the monitoring framework. (Articles 7 and 8). It is provided that the actions of the monitoring framework must neither limit the legitimate activities of NPOs nor harm their reputation (art. 4). The monitoring framework focuses only on entities identified as vulnerable by the risk assessment. It should also be noted that supervision is prioritized according to risk rating, location and other relevant criteria. Operationalized during an initial contact meeting on March 1, 2024, the monitoring framework has adopted an annual program for supervising NPOs at the rate of one mission per quarter. The first supervision missions took place from April 22 to June 28, 2024 and focused on NPOs in the fields of religion and education,

considered high by the country. At the end of these missions, the NPO monitoring framework following the risk-based approach (CSOSABR) made a presentation of the supervision report in order to discuss with stakeholders the vulnerabilities/gaps noted and make recommendations.

d) **[Not Met]** _ Cash transactions are recorded in the NPO register held by the General Directorate of Territorial Administration. The CENTIF is also informed with regard to a threshold established by the regulations when the transaction is in cash. This mechanism for keeping a register for cash transactions cannot be considered as a means of encouraging NPOs to carry out their transactions through regulated financial channels whenever they can. The deficiency remains.

44. Criterion 8.3 [**Met**] _. Burkina Faso conducted a formal assessment of the risks related to TF in the NPO sector and subsequently issued Order No. 2023-1007/MATDS/SG/DGAT/DSOSOC of September 7, 2023, establishing a framework for monitoring NPOs following the risk-based approach; this structure is created within the NPO Supervisory and Control Authority and its main mission is to "contribute to the monitoring of the activities of NPOs following the risk-based approach. It bases its action on the report of the assessment of the risks of terrorist financing in the NPO sector. (Article 5 paragraph 2). Operationalized during an initial contact meeting on March 1, 2024, the monitoring framework has been equipped with an annual program for supervising NPOs at the rate of one mission per quarter. The NPOs to be monitored as a priority are those identified as being at risk based on the rating mentioned in the report. The final choices of NPOs to be monitored are made by the umbrella organizations, taking into account criteria such as proximity to a terrorist hotbed or the number of risk areas in which an NPO operates, or any other criterion deemed relevant. The measures, laws and regulations for supervising the non-profit sector are subject to constant evaluations and updates.

45. Criterion **8.4** [**Met**]

a) **[Met]**_ the country has designated the General Directorate of Territorial Administration (DGAT) as the authority in charge of monitoring NPOs in the fight against TF _Art 4_ DECREE No. 2023- 1 3 0 8. As provided for by decree No. 2023-1007 / MATDS / SG / DGAT / DSOSOC of September 7, 2023, the DGAT relies on the monitoring framework to ensure monitoring of vulnerable NPOs based on a graduated approach based on risks. Its main mission is to "contribute to the monitoring of the activities of NPOs following the risk-based approach" (article 5 paragraph 1); the CSA bases its action on the report of the assessment of the risks of financing of terrorism in the NPO sector. Operationalized during an initial contact meeting on March 1, 2024, the monitoring framework has been equipped with an annual program for supervising NPOs at the rate of one mission per quarter. The NPOs to be monitored as a priority are those identified as being at risk based on the rating mentioned in the report. The final choices of NPOs to be monitored have been finalized by the umbrella organizations, taking into account criteria such as proximity to a terrorist hotbed or the number of risk areas in which an NPO operates, or any other criterion deemed relevant. The first supervision missions took place from April 22 to June 28, 2024 and focused on NPOs in the areas of religion and education, considered highly by the country.

b) **[Met]**_No failures were observed in the 2019 MER, and the situation remains unchanged.

46. **Criterion 8.5 [Met**] _ No failures were observed in the 2019 MER, and the situation remains unchanged.

47. **Criterion 8.6 [Met**] _ The DGAT and the National Financial Information Processing Unit are the designated focal points to respond to foreign requests relating to a suspicious NPO. Article 4. Order No. 2020-265/MATDC/SG/DGLPAP/DOASOC of September 2, 2020, on the implementing procedures for Decree No. 2017-0015/PRES/PM/MATDSI/MINEFID of January 23, 2017 establishing a national register of NPOs in Burkina Faso. International cooperation is carried out both formally (mutual legal assistance through diplomatic channels) and informally via cooperation between counterpart authorities. The Criterion is met.

Weighting and conclusion

48. Burkina Faso has taken various measures to improve its anti-TF system in relation to the NPO sector, including the identification of subsets of organizations that fall within the definition adopted by the FATF, the identification of the categories of non-profit organizations (NPOs) most at risk, and the characterization of the risk level of each category in the sector. Also, a monitoring framework (space for consultation between the authorities

and NPOs) has been set up to address and mitigate identified and emerging TF risks. The country has designated the General Directorate of Territorial Administration (DGAT) as the authority responsible for monitoring NPOs in the fight against TF, which, alongside the CENTIF, plays the role of competent authorities for communicating information on NPOs within the framework of international cooperation. Awareness-raising and educational activities have been carried out to inform NPOs about their vulnerabilities to exploitation for TF purposes. However, the country has not taken any specific measures to encourage NPOs to carry out their operations through regulated financial channels whenever possible. Also, the analysis gives preponderant weight to criterion 8.1 in the analysis of this recommendation.

49. Burkina Faso is now largely compliant (LC) with R.8.

Recommendation 24 [originally graded PC]

	Year	Rating
MER	**[2019]**	[PC]
FUR1	**[2021]**	[PC (not re-assessed)]
FUR2	**[2022]**	[PC (not re-assessed)]
FUR3	**[2022]**	[PC (not re-assessed)]
FUR4	**[2023]**	[PC)]
FUR5	**[2024]**	[PC (not re-assessed)]

50. In its 2nd MER (2019) and 4th FUR (2023), Burkina Faso was rated PC on Rec.24. The following deficiencies were noted: Burkina Faso has not assessed the ML/TF risks associated with all types of legal persons, The failure to keep information and documents remains. The country does not explicitly demonstrate the existence of a mechanism to ensure that nominee shareholding is not used for ML/TF purposes. There is also a lack of obligation to control the quality of assistance received from other countries in response to requests for basic information and BO or requests for assistance in locating BOs residing abroad.

51. Criterion **24.1 [Met]** _ The analyses of the MER (2019) and the 4th FUR (2023) remain relevant

52. Criterion **24.2 [Met]** _ Burkina Faso adopted in 2023 the report of the sectoral assessment of the risks of legal persons and legal arrangements created in the country. Also the country has developed an action plan to mitigate the risks of money laundering (ML) and terrorist financing (TF) of legal persons (LP) and legal arrangements (LA) in Burkina Faso 2023-2027. This criterion has relatively high weight in the assessment of this recommendation.

53. Criterion **24.3 to 5 [Met]** _ the analyses of MER 2019 and the 4th FUR (2023) remain relevant.

54. Criterion **24.6 [Met]** _ The analysis of the 4th FUR (2023) remains relevant.

55. Criterion **24.7 [Met]** _ The analysis of the 4th FUR (2023) remains relevant.

56. Criterion **24.8 [Partly Met]** _. The deficiencies identified in the MER (2019) and 4th FUR remain. There is no legal basis ensuring that commercial companies must cooperate with competent authorities to determine who the beneficial owners are.

57. Criterion **24.9 [Partly Met]** _ The deficiencies identified in the MER (2019) remain.

58. Criterion **24.10 [Met]** _ The analyses of the MER (2019) and the 4th FUR (2023) remain relevant

59. Criterion **24.11 [Met]** _ No failures were noted in the MER (2019), and the situation remains unchanged.

60. Criterion **24.12- [Not Met]** _ The information provided by the country has already been analyzed during the adoption of the 4th FUR in May 2023. No new corrective measures are provided by the country. The deficiency identified in the MER (2019) remains.

61. Criterion **24.13- [Mostly Met]** _ The minor deficiency identified in the 4th FUR (2023) remains: Failure to retain information and documents after dissolution (C24.9), is not covered by the range of sanctions.

62. **Criterion 24.14-[Met]** _ the analyses of the MER (2019) and the 4th FUR (2023) are still relevant

63. Criterion **24.15 [Not Met]** _ The information provided by the country has already been analyzed during the adoption of the 4th FUR in May 2023. No new corrective measures are provided by the country. The deficiency remains.

Weighting and conclusion

64. Burkina Faso has taken measures to strengthen its AML/CTF system in terms of transparency and beneficial ownership of legal entities, in particular by identifying the risks to which the various legal entities created in the country are exposed during the sectoral assessment of ML/TF risks posed by legal entities (report adopted in 2023). Subsequently, the country developed a plan to mitigate the risks identified. Considerable weight is given to correcting this deficiency in the analysis of this criterion. However, some deficiencies remain, namely the failure to keep information and documents, the absence of a mechanism to ensure that nominee shareholding is not used for ML/TF purposes. There is no legal basis ensuring that commercial companies must cooperate with competent authorities to determine who the beneficial owners are. There is also an absence of obligation to control the quality of assistance received from other countries in response to requests for basic information and BO or requests for assistance in locating BOs residing abroad.

65. Burkina Faso's rating is reassessed to Largely Compliant (LC) for recommendation 24.

Recommendation 25

	Year	Rating
MER	**[2019]**	[PC]
FUR1	**[2021]**	[PC (not re-assessed)]
FUR2	**[2022]**	[PC (not re-assessed)]
FUR3	**[2022]**	[PC (not re-assessed)]
FUR4	**[2023]**	[PC)]
FUR5	**[2024]**	[PC (not re-assessed)]

66. In its 2nd MER (2019) and 4th FUR, Burkina Faso was rated PC for Rec. 25. The following deficiencies were noted: the obligation to update information on trusts is limited to basic information on the client and the BO. Also, there is no provision requiring trustees to declare their status to FIs and DNFBPs when they establish a business relationship or carry out an occasional transaction of an amount above the threshold. The sanctions for non-compliance with the obligations of R. 25 do not cover the failure to communicate the information provided for in criterion 25.1 and 2 other than that of the BO, and when a trustee does not expressly mention the fact that he is acting on behalf of a trust.

67. C.25.1 [Mostly Met]

68. It is not possible to establish trusts or other similar legal arrangements under the Burkinabe regime. However, nothing prevents foreign legal arrangements from operating or being administered in Burkina Faso. Decree No. 2022-0234/PRES-TRANS/PM/MATDS/MJDHRI/MEFP of 31 May 2022 requiring the declaration and maintenance of the register of beneficial owners of legal persons and legal arrangements allows Burkina Faso to comply with certain relevant obligations imposed on trusts, under recommendation 25. The Finance Law (96.3) specifies that these obligations apply both to foreign trusts that have assets in Burkina Faso and to those that are governed under a foreign regime from Burkina Faso.

a- [Not Applicable]

b- [Not Applicable]

c- **[Mostly Met]** _. Some DNFBPs, including members of independent legal professions who administer assets under the same conditions as trusts, as well as trustees and professional service providers are required to identify and verify the identity of certain actors involved in the transaction, namely the client and the beneficial owner of the business relationship. They must also keep this collected information up to date for at least 10 years (Articles 5, 6, 18, 19 and 36 of Law No. 016-2016 / AN) -Cf. MER (2019). Also, according to the provision of the Finance Act, administrators or managers of trusts or similar legal arrangements are required to declare to the relevant tax service, within thirty (30) days following their appointment, the following information: the existence, terms and assets of the legal arrangements that they manage or administer, a copy of the constitutive act of the legal arrangement, the identity of the persons party to the legal arrangement, and the identity of the beneficial owners. According to the provisions of the Finance Act, in legal arrangements, the term beneficial owner includes: the settlor of the legal arrangement, the trustee(s), administrator, manager, protector (if applicable), the beneficiaries or category of beneficiaries; and any other natural person ultimately exercising effective control over the legal structure, including through a chain of control/ownership, within the meaning of Law No. 016-2016/AN of May 3, 2016 relating to the fight against money laundering and the financing of terrorism in Burkina Faso. Art 96-3-Finance Law.

Administrators or managers are required to retain the information referred to in c.25.1-a for a minimum period of ten years after the cessation of their involvement in the trust or similar legal arrangement. Art 96-4-Finance Law

However, Burkina Faso does not require administrators or managers of trusts or similar legal arrangements to keep the other information listed in C.25.1- (b).

69. **C.25.2 [mostly Met]** _The analyses of the MER (2019) and the 4th FUR (2023) are still relevant. Indeed, it had been noted that Burkina Faso's system did not cover all the requirements of the criterion, in particular all the other information to be held, in accordance with Recommendation 25.1. The analysis of Burkina Faso's submission makes it possible to Partly correct this shortcoming. The Finance Law requires that any change in the allocation of profits, assets, rights or interests placed in the legal structure, any change relating to the persons party to the legal structure or to its beneficial owners and any transfer of ownership be declared to the tax authorities within 15 days. Art 96.3-5- Finance Law. The shortcoming noted in C.25.1 impacts the rating of this criterion (See analysis of criterion 25.1.).

70. **C.25.3 [Not Met]** _There is no provision in the Decree requiring trusts to declare their status to FIs and DNFBPs when they establish a business relationship or carry out an occasional transaction of an amount above the threshold. The deficiency identified in the MER (2019) and FUR (2023) remains.

71. C.25.4 [**Met**] _No failures had been noted in the MER (2019), and the situation Remain s unchanged.

72. C.25.5 [**Met**] _No failures were found in the FUR (2023), and the situation Remain s unchanged.

73. C.25.6 [**Met**] _No failures were found in the FUR (2023), and the situation Remain s unchanged.

74. **C.25.7 [Mostly Met]** _The analyses of the MER (2019) and the 4th FUR (2023) are still relevant. The deficiencies that remain ed to be corrected concerned the fact that there were no sanctions on the one hand for failure to communicate/update the information provided for in criterion 25.1 and 2 other than that of the BO, and on the other hand when a trustee does not expressly mention its status to FIs and DNFBPs when establishing a business relationship or carrying out an occasional transaction of an amount higher than the threshold. Also, it had been noted that all the supervisory authorities of DNFBPs had not yet defined the range of sanctions applicable for non-compliance with the obligations relating to R.25.

75. Burkina has largely corrected these shortcomings. Indeed, administrative sanctions (warning, reprimand, ban, withdrawal of approval) and financial sanctions are now defined and applicable to all DNFBPs for non-compliance with their obligations - Art 5 5 of Decree 2023-1308 / PRES-TRANS / PM / MEFP / MATDS / MJDHRI of October 6, 2023 designating and assigning the supervisory and control authorities of persons subject to the non-financial sector in the fight against money laundering and the financing of terrorism and the proliferation of weapons of mass destruction, creation of a National Authority for Sanctions and Applicable Sanctions. (cf. R28.3).

76. Article 753 of the General Tax Code provides for tax penalties for trustees for failure to communicate any information (including that relating to criteria 25.1 and 2) to the tax authorities. The article stipulates that any failure to comply with one of the obligations provided for in Articles 96.2, 96.3, 96.4, 96.5 and 561.4 above, including an insufficient declaration or a false declaration, is punishable by a fine of five million (5,000,000) CFA francs. These fines are doubled when the violations noted are not regularized within thirty (30) days following receipt of a formal notice. However. The shortcoming noted in C.25.1 is reflected here (Cf. analysis criterion 25.2.). Also, no penalty is provided for non-compliance with the obligation relating to the criterion relating to C.25.3.

77. **C.25.8 [Mostly Met]** _the competent authorities have unrestricted and timely access to information on legal arrangements. The analysis made at 25.1 and 7 apply here. Where the information is not made available to the authorities in time, the judge appointed to supervise the Register of BOs of legal persons and legal arrangements may order, subject to a penalty payment and within the period that he sets, the manager of any subject entity to declare the beneficial owners of the legal arrangements to which it is required

Weighting and conclusion

78. Burkina Faso has taken measures to strengthen its AML/CTF system in terms of transparency and beneficial owners of legal arrangements through, on the one hand, the Finance Law which specifies the obligations and sanctions that apply to both foreign trusts that have assets in Burkina Faso and those that are governed under a foreign regime from Burkina Faso and, on the other hand, Decree 2023-1308/PRES-TRANS/PM/MEFP/MATDS/MJDHRI of October 6, 2023 designating and assigning the supervisory and control authorities of taxable persons in the non-financial sector in the fight against money laundering and the financing of terrorism and the proliferation of weapons of mass destruction, creating a National Authority for Sanctions and Applicable Sanctions which defines the sanctions applicable to DNFBPs in the event of non-compliance with their AML/CTF obligations. However, there are some deficiencies due to the fact that there is no provision requiring trustees to declare their status to FIs and DNFBPs when they establish a business relationship or carry out an occasional transaction of an amount above the threshold. Also, Burkina Faso does not require administrators or managers of trusts or similar legal arrangements to keep the other information listed in C.25.1- (b). In view of the risk and context of Burkina Faso, these deficiencies are considered minor.

79. Burkina Faso's rating is reassessed as Largely Compliant (LC) for recommendation 25.

Recommendation 28 [Initially Rated NC]

	Year	Rating
MER	**[2019]**	[PC]
FUR1	**[2021]**	[PC (not re-assessed)]
FUR2	**[2022]**	[PC (not re-assessed)]
FUR3	**[2022]**	[PC (not re-assessed)]
FUR4	**[2023]**	[PC)]
FUR5	**[2024]**	[PC (not re-assessed)]

80. In its 2nd MER (2019), Burkina Faso was rated NC in its 2nd MER (2019) and PC in its 4th FUR on Rec.28. The following shortcomings remained: The absence of an AML/CTF supervisory and control authority for Chartered Accountants and Chartered Accountants, the absence of measures to prevent criminals or their accomplices from accessing the status of licensed professional, or from holding a significant or controlling interest, from becoming the beneficial owners of such an interest, or from occupying a management position in the real estate sector. Also, the range of administrative and disciplinary sanctions in the event of non-compliance with AML/CTF obligations, to be defined by the respective supervisory authorities, is not available. Finally, it was noted that the application of the risk-based approach by all supervisory authorities in terms of AML/CTF control and supervision has not been formalized.

81. C.28.1 [Mostly Met] _

a. [**Met**]. No failures had been noted in the MER (2019), and the situation remains unchanged.

b. [**Partly Met**] The deficiencies noted in the 4th FUR remain: the casino approval procedure does not explicitly provide for control/verification measures on the BOs before the approval is granted and during the post-approval phase. There is therefore no measure concerning the verification of the honorability of the BOs of the casinos. Also, before the renewal of the operating license (every 5 years), no provision provides that the members of the casino management, namely the Director, the Authorized Representative and the Technical Director must maintain their honorability in order to remain in office.

c. [**Met**] Since 2019, the General Directorate of the Treasury and Public Accounting (DGTCP) has been the regulatory and supervisory authority for casinos, games of chance including LONAB in matters of AML/CTF&P. Art.4 of Decree No. 2023-1308/PRES-TRANS/PM/MEFP/MATDS/ MJDHRI du 06 octobre 2023. It has equipped itself with an AML/CTF supervision manual which allows it to be operational. During the period under review, the DGTCP carried out the AML/CFT supervision of 14 gambling establishments including two (02).casinos.

82. C.28.2 **[Met]** _Article 4 of Decree 2023-1308/PRES-TRANS/PM/MEFP/MATDS/MJDHRI of October 6, 2023 designating and attributing the supervisory and control authorities of taxable persons in the non-financial sector in the fight against money laundering and the financing of terrorism and the proliferation of weapons of mass destruction, creation of a National Authority for Sanctions and Applicable Sanctions fills the minor deficiency identified in previous report. The General Directorate of Taxation is designated as the authority responsible for supervising Chartered Accountants in AML/CTF matters. All categories of DNFBPs have a designated AML/CTF regulatory and supervisory authority (see Table 3). They are responsible for monitoring and ensuring compliance with AML/CTF obligations by DNFBPs.

83. Criterion C.28.3 [**Met**] _All categories of DNFBPs are subject to AML/CTF supervision arrangements. During the period under review, AML/CTF supervision of DNFBPs other than casinos effectively began. The Supervisory and Control Authorities respectively carried out control missions. Among the taxable persons controlled during the period under review, there were 43 taxable persons including lawyers, notaries and bailiffs, approximately 10 chartered accountants, 15 real estate companies and 06 from the precious metals sector. These controls covered both high-risk and low-risk sectors.

84. Criterion 28.4. [**Mostly met**]

a- [**Met**] _ All designated supervisory and control authorities have adequate powers to carry out their functions, including the power to monitor compliance. A*rt 5-Decree 2023-1308/PRES-TRANS/PM/MEFP/MATDS/ MJDHRI of October 6, 2023 designating and assigning the supervisory and control authorities of persons subject to the non-financial sector in the fight against money laundering and the financing of terrorism and the proliferation of weapons of mass destruction, creation of a National Sanctions Authority and applicable sanctions.*

b- [**Partly Met**] _ The analyses of the MER (2019) and the 4th FUR (2023) are still relevant. Unlike all other DNFBPs, real estate agents deemed high risk in the ENR are not subject to conditions of access to the profession, appointment or approval that imply not having been convicted of a criminal offence or not having been the author of acts contrary to honorability and probity.

The provisions of Decree No. 2022-0234/PRES-TRANS/PM/MATDS/ MJDHRI/ MEFP of May 31, 2022, requiring the declaration and maintenance of the register of beneficial owners of legal persons and legal arrangements supplement the provisions analyzed in the 2019 MER and allow for control over BOs by OARs, the competent authorities in matters of approvals or registration. However, no provision provides for the obligation for the competent authorities or OARs to verify the honorability/probity of BOs before approval is granted and following the issue of approval.

[Met] _A range of administrative and disciplinary sanctions has been defined in the event of non-compliance with AML/CTF obligations for all DNFBPs. In addition to the disciplinary and criminal sanctions applicable to individuals and legal entities who fail to comply with the AML/CFT obligations set out in Burkina Faso's AML/CFT law (Art. 112 to 117), Decree 2023-1308 (Art 27&28) provides for administrative sanctions. These are warnings ; a reprimand; a temporary ban on exercising the activity for a period not exceeding five (05) years; a ban for a period not exceeding

five (05) years, for any person exercising managerial responsibilities within a reporting entity or any other natural person held responsible for the offence, from exercising managerial functions in reporting entities; and the withdrawal or suspension of the title allowing the reporting entity to exercise its activity..

These sanctions may be accumulated, without prejudice to the criminal sanctions provided for by current legislation. Also, if within five (05) years of the sanction being pronounced, the sanctioned person commits another offence leading to the pronouncement of a new sanction, this will result in the revocation of the suspended sentence, unless a substantiated decision is taken.

The shortcoming noted on R.35 (MER 2019) are related to the lack of a supervisor for all DNFBPs. This deficiency has been fully corrected. There is therefore no cascading effect of R.35 on this criterion.

85. Criterion C28.5.a and b. [Partly Met].

a. **[Met]** Supervisory and control authorities are required, based on their understanding of ML/TF risks, to carry out risk-based supervision of DNFBPs, in particular by determining the frequency and intensity of on-site and off-site supervision, Art 9_Decree No. 2022-0234/PRES-TRANS/PM/MATDS/ MJDHRI/ MEFP of May 31, 2022. All DNFBP supervisory authorities have adopted a methodological guide for supervision and control in AML/CTF matters. In all cases, at least one inspection is required once every two (02) years.

b. **[Not Met]** the requirement of this sub-criterion is not met. It is not clearly stated that supervisory authorities should assess the adequacy of the internal controls, AML/CTF policies and procedures of designated non-financial businesses and professions based on their understanding of the risk profile of the entity to be supervised.

Weighting and conclusion

86. The country has taken steps to strengthen its AML/CTF regime in the regulation and supervision of designated non-financial businesses and professions, through the designation of AML/CTF supervisory and control authorities. These supervisory authorities are provided with adequate powers to carry out their functions, including the power to monitor the AML/CTF compliance of DNFBPs. A range of administrative and disciplinary sanctions have been defined in the event of non-compliance with AML/CTF obligations for all DNFBPs. AML/CFT risk based Supervision missions of (gaming establishments, lawyers, notaries, accountants and bailiffs) have been carried out However, deficiencies remain, including the absence of measures to prevent criminals or their accomplices from accessing the status of licensed professional, or from holding a significant or controlling interest, from becoming the beneficial owners of such an interest, or from occupying a managerial position in the real estate sector and in casinos. It is not clearly stated that supervisory authorities should assess the adequacy of the AML/CTF internal controls, policies and procedures of designated non-financial businesses and professions based on their understanding of the risk profile of the entity to be supervised. These deficiencies are considered moderate.

87. **Burkina Faso is rated Partly Compliant [PC] for Rec.28.**

Recommendation 32

	Year	Rating
MER	**[2019]**	[PC]
FUR1	**[2021]**	[PC (not re-assessed)]
FUR2	**[2022]**	[PC (not re-assessed)]
FUR3	**[2022]**	[PC (not re-assessed)]
FUR4	**[2023]**	[PC (not re-assessed)]
FUR5	**[2024]**	[PC (not re-assessed)]

88. In its 2nd MER, Burkina Faso was rated PC on R.32. The technical deficiencies concerned the fact that the system for declaring cash and INPs with a value equal to or greater than 5 million FCFA only applies to persons entering or leaving the territory of UEMOA but does not apply to those moving between the 8 countries of the

Union. Also, the coordination mechanism of the various immigration, customs and other administrations is not clearly described.

89. Criterion **32.1 (Met)** _ The analysis of the MER (2019) is still relevant. The deficiency that remained to be corrected concerned the fact that the system for declaring cash and INPs whose value is equal to or greater than 5 million FCFA only applies to persons entering or leaving the territory of the UMOA but does not apply to those who travel between the 8 countries of the Union. The service Note from the Directorate General of Customs of February 6, 2024, corrects this deficiency by imposing a declaration obligation for cross-border movements of cash or INPs within the zone. It sets declaration thresholds at 10 million FCFA for travelers to or from the Member States of the UMOA.

90. Criterion **32.3 (Not Applicable**) _ the criterion was noted as not Applicable in the MER (2019), and the situation Remain s unchanged.

91. Criterion **32.4 (Met**) _No failures were found in the FUR (2023), and the situation remains unchanged.

92. Criterion **32.5 (Met)** _No failures were found in the FUR (2023), and the situation remains unchanged.

93. Criterion **32.6 (Met)** _No failures were found in the FUR (2023), and the situation remains unchanged.

94. Criterion **32.7 (Met)** _ The analysis of the MER (2019) is still relevant. The deficiency noted was that the coordination mechanism between the authorities concerned is not clearly described in its operational aspect. The following clarifications are provided by Burkina Faso:

95. At Ouagadougou International Airport, the police records passenger declarations in a register. If the regulatory threshold is exceeded, police officers transfer the person concerned to customs services for further action. On a weekly basis, the information collected following travelers' declarations by customs services is consolidated for communication to CENTIF. A similar collaboration mechanism exists at the level of other entry or exit points (land routes, other airports, border posts). Also, in accordance with Burkina Faso's national strategy for the fight against money laundering and the financing of terrorism, the National Committee for the Coordination of Activities to Combat BC/TF (CNCA-LBC/TF) was established, which is composed of, among others, Customs, the police, CENTIF, the General Directorate of Taxes, the Ministry in charge of trade, the Ministry of Justice, and the Ministry of Foreign Affairs. The CNCA-LBC/TF meets regularly to discuss and share strategies or ideas and to help stakeholders implement their respective obligations. The secretariat of the CNCA-LBC/TF is provided by the CENTIF.

96. Criterion **32.8 (Met**) _ No failures were found in the FUR (2023), and the situation remains unchanged.

97. Criterion **32.9 (Met**) _No failures were found in the FUR (2023), and the situation remains unchanged.

98. Criterion **32.10 (Met)** _No failures were found in the FUR (2023), and the situation remains unchanged.

99. Criterion **32.11 (Met)** _No failures were found in the FUR (2023), and the situation remains unchanged.

Weighting and conclusion

100. **Burkina Faso's rating is considered Compliant (C) for recommendation 32.**

IV. CONCLUSION

101. Overall, Burkina Faso has made efforts to address some of the technical compliance deficiencies identified in its MER and has seen an upgrade in its rating on Recommendations R.8, R24, R25 and R.32. Recommendations R6. R7, and R28 are maintained at [PC].

102. The table below presents Burkina FASO's MER ratings and reflects the progress it has made, and any rating reassessment based on the current and previous FUR:

Table2-Technical Compliance Rating, November 2024[3]

R.1	R.2	R.3	R.4	R.5
LC	***LC (FUR of 2023)*** *PC (2021 FUR)* PC	C	LC (FUR of 2021) LC	*C (2021 FUR)* PC
R.6	**R.7**	**R.8**	**R.9**	**R.10**
PC (FUR of 2023) PC (FUR of 2023) PC	PC (FUR of 2023) PC (FUR of 2023) PC	**LC (FUR of 2025)** LC PC	C	LC
R.11	**R.12**	**R.13**	**R.14**	**R.15**
LC	LC	LC	PC	PC (2021 FUR) C
R.16	**R.17**	**R.18**	**R.19**	**R.20**
LC	LC	LC	PC	LC
R.21	**R.22**	**R.23**	**R.24**	**R.25**
C	**PC (FUR of 2023** PC (2021 FUR) PC	LC	**LC (FUR of 2025)** PC (FUR of 2023) PC	**LC (FUR of 2025)** PC (FUR of 2023 PC
R.26	**R.27**	**R.28**	**R.29**	**R.30**
PC (FUR of 2023) PC	C	**PC (FUR of 2025)** PC (FUR of 2023) NC (2021 FUR) NC	C	C
R.31	**R.32**	**R.33**	**R.34**	**R.35**
C	C (FUR of 2025) PC	LC	**LC (FUR of 2023)** PC (2021 FUR) (PC)	LC
R.36	**R.37**	**R.38**	**R.39**	**R.40**
C	LC	LC	LC	LC

103. Burkina Faso has 08 Recommendations rated NC/PC. Burkina Faso exited the Enhanced Follow-up regime in February 2025. The country will provide updates to the Plenary regarding its preparations towards its 3rd round mutual evaluation.

[3] Paragraph 7, 6th Enhanced FUR of Burkina Faso.

Table3- Supervisory and control authorities for non-financial Entities

N° d'ordre	Reporting Entities	Line Ministers	Public Supervisory Authorities
1	Lawyers	Ministry of Jutice	General Division of Judicial Administration (DGA) / Directorate for the Supervision and Management of Judicial Public Officers (DCGOFJ)
2	Notaries		
3	Bailiffs		
4	Auctionners		
5	Administrators and lagal representatives+		
6	Company and trust service providers		
7	Real estate agencies and property developers	Ministry of Town Planning	National Office for land management supervision and constructions (ONC-AC)
	Companies and Planning departments operating in the real estate sector		
8	Estate agents including letting agents	Ministry of Finance	Revenue/Tax Authorities (DGI)
9	Casinos, including Internet casinos, gaming establishments, in particular the national lottery, as well as the owners, directors and managers of these structures		Treasury and Public Accounting Department (DGTCP)Research and financial legislation Department(DELF)
10	External auditors		Revenue/Tax Authorities (DGI)
11	Chartered accountants, approved accountants and employees authorised to practise as chartered accountants, in application of the law		
12	Tax advisers		
13	Approved customs broker		Customs Authorities (DGD)
14	Revenue or Taxation Authorities		Inspectorate General of Finance (IGF)
15	Customs Authorities		Inspectorate General of Finance (IGF)
16	National anti fraud coordination	Ministry of Finance	Inspectorate General of Finance (IGF)

N° d'ordre	Reporting Entities	Line Ministers	Public Supervisory Authorities
17	Travel and Tourism operators	Ministry of Culture and Tourism	General Division for Tourism (DGT)
18	Host and hostesses agencies		General Division for Tourism (DGT)
19	Tourist and Leisure facilities		General Division for Tourism (DGT)
20	Touriist accommodation facilities		General Division for Tourism (DGT)
21 Établissements touristiques d'hébergement	Restaurants		General Division for Tourism (DGT)
22	Cultural event promoters and agencies		(General Division for performing Arts and Culture DASPA)
23	Antiques and Art dealers	Ministry of Culture and Tourism	General Division for performing Arts and Culture (DGCAA) / General Directorate for cultural Heritage (DPC)
24	Passenger transport companies and freight transport companies	Ministry of Transportation	General Division for Land and Martime Transport (DGTTM)
25	Car dealers and vehicle rental companies		
26	Public Works Companies (TP)	Ministry of Infrastructures	Technical Services Supervision (ITS) of the Ministry of Infrastructure (ITS)
27	Non Profit Organizations (NPOs)	Ministry of Land Administration	General Division of Land Administration (DGAT)
28	Precious stone and metal trading	Ministry of Mines	National Brigade on Gold Anti Fraud (BNAF)
29	Agents and Promoters of Sport Agents	Ministry of Sports	General Division of Sports of Sports(DGS)
30	Professional sports clubs, sports federations, sports agents and sports event promoters		
31	Cash Courriers	Ministry of Security	National Police General Division (DGPN) / Public Security Division (DSP)
32	Security Firms and Investigation Companies		
33	Arms and Ammunition dealers		
34	Schools and training centers for security and investigation		
35	Petroleum and lubricants companies	Ministry of Trade	Mobile Brigade for economic supervision

N° d'ordre	Reporting Entities	Line Ministers	Public Supervisory Authorities
36	Burkina Faso's national hydrocarbons company (SONABHY)		and anti fraud(BMCERF)



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Anti-money laundering and counter-terrorist financing measures in Burkina Faso

Follow-up Report & Technical Compliance Re-Rating

The report also looks at whether Burkina Faso measures meet the requirements of FATF Recommendations that have changed since their Mutual Evaluation in 2019.

Follow-up Report