Rialtas na hÉireann
Government of Ireland

National Anti-Money Laundering, Countering the Financing of Terrorism and Countering Proliferation Financing Strategy
2026

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Contents

1. Executive Summary

Money laundering, terrorist financing and proliferation financing have the potential to undermine societal cohesion, degrade the integrity of Ireland's financial system and in turn pose spillover risks to national and international security. Accordingly, the Irish authorities take these threats seriously and continue to strengthen the State's Anti-Money Laundering, Countering the Financing of Terrorism and Countering Proliferation Financing (AML/CFT/CPF) frameworks in response to such evolving and dynamic risks.

Ireland is an open economy, with a substantial export-orientated financial services sector. It is the third largest exporter of financial services in the European Union 'EU' and the eight largest globally with measured assets exceeding €8.1 trillion in 2023. Enjoying a highly internationalized labour market, it is closely integrated into EU markets with tariff-free movement of goods, freedom to provide services and free movement of capital. Various sectors serving this buoyant economy include legal and professional services, trust company and business services, property and real estate providers, high value and cash-intensive businesses. Accordingly, these, along with the forementioned financial services sector are in scope of AML/CFT/CPF legislation and/or requirements.

Given this backdrop, combatting money laundering (ML), terrorist financing (TF) and proliferation financing (PF) is a collaborative, cross-government priority involving efforts across multiple stakeholders. Accordingly, the Anti-Money Laundering Steering Committee (AMLSC), chaired by the Department of Finance, provides national level oversight and ensures policy alignment across departments and agencies. Standing members include the Department of Justice, Home Affairs and Migration, An Garda Síochána, FIU Ireland, the Anti-Money Laundering Compliance Unit (Department of Justice, Home Affairs and Migration), the Criminal Assets Bureau, the Central Bank of Ireland, the Defence Forces, and the Corporate Enforcement Authority, among others[1].

Ireland's domestic AML/CFT framework is primarily underpinned by the Criminal Justice (Act 2010[2], which transposes multiple EU Anti-Money Laundering Directives into Irish law, which in turn are anchored to international standards set by the Financial Action Task Force (FATF). This legislation establishes the responsibilities of designated persons, competent authorities, and law enforcement agencies while ensuring compliance with EU law, Irish constitutional requirements, and data-protection standards.

The strategic level of ambition for Ireland's AML/CFT/CPF framework is to ensure the safety and security of our citizens. In addition, we also seek to protect the integrity and stability of our financial system. To deliver this, Ireland has developed and maintains a robust AML/CFT/CPF

[1] see Annex 1 for a full list of members of the AMLSC
[2] 2010 Money Laundering and Terrorist Financing Act (as amended)

framework, which meets our international obligations and where resources are allocated to where risks are greatest, in line with international best practice.

This National Anti-Money Laundering, Countering the Financing of Terrorism and Countering Proliferation Financing Strategy (the Strategy), takes account of the National Risk Assessment published in 2026. This in turn follows extensive consultation with private and public sector stakeholders and provides a strengthened baseline which appraises AML/CFT/CPF across a range of sectors. Central to this Strategy is a whole-of-government approach, as is evidenced by the actions which will be implemented.

Overarching this specific Strategy, the Department of Justice, Home Affairs and Migration (DJHM) has produced the Economic Crime & Corruption Strategy, which similarly takes a cross-government, whole-of-society approach. Economic crime and corruption are complex, adaptive, and often transnational in nature. It is a significant step forward in strengthening Ireland's capacity to prevent, detect, investigate, and prosecute economic crime and corruption. Similar to this document, the Economic Crime & Corruption Strategy sets out a clear and structured 'macro-level' framework built around five strategic objectives. These will also be supported by an action plan to drive delivery and accountability. Accordingly, this AML/CFT/CPF publication takes a more focused approach on the response to the specific issues highlighted.

By strengthening our collective response, and through implementation of these interlinked strategies, Ireland will tackle financial crime and corruption, ensure the safety and security of our citizens, uphold the highest standards of integrity, and protect the integrity and stability of our financial system.

2. Ireland’s National AML/CFT/CPF Framework

Overall goal of the Framework

To ensure the safety and security of our citizens in addition to protecting the integrity and stability of our financial system.

The Framework

Context

Money laundering, terrorist financing and proliferation financing potentially pose serious threats to the safety and security of citizens, as well as to the integrity and stability of our financial system. Accordingly, Ireland’s AML/CFT/CPF framework plays a key role in protecting the financial system by deterring illicit financial activity, while strengthening national safety and security through the delivery of financial intelligence that supports operational authorities in countering organised crime and terrorist threats.

This publication sets out the Government of Ireland’s strategic approach to addressing money laundering, terrorist financing, and proliferation financing over the 2026–2030 period. In parallel, the overarching Economic Crime and Corruption Strategy prepared by the Department of Justice, Home Affairs and Migration significantly strengthens Ireland’s end-to-end response to economic crime and corruption.

Specifically, Ireland’s AML/CFT/CPF framework is founded on a holistic, risk-based assessment of the system and its evolving operating environment, ensuring that State responses are targeted, proportionate, and focused on areas of greatest risk, in line with national and EU obligations. Central to this approach is effective coordination across all competent authorities, to deliver a coherent, resilient, and future-ready AML/CFT/CPF framework that remains fit for purpose.

The overarching Goal underpinning this Strategy is to ensure the safety and security of our citizens while protecting the integrity and stability of our financial system. Underpinning this, we seek to ensure that Ireland maintains a robust AML/CFT/CPF framework, that our domestic framework does not become a weak link in the interconnected international financial system, with resources allocated where risks are greatest.

This publication sets out the current threat landscape in Ireland and presents the Government’s Strategic Goals, along with actions to strengthen the performance of the

AML/CFT/CPF framework under each of those elements. These in turn reflect findings from recent assessments, including Ireland's National Risk Assessment and reviews of supervisory, intelligence, and enforcement functions.

Implementation

While this Strategy focuses primarily on the roles of Government departments and national competent authorities, successful implementation relies on strong cooperation across a wide range of partners. These include:

- **National partners** such as An Garda Síochána, FIU Ireland, the Criminal Assets Bureau, the Central Bank of Ireland, the Revenue Commissioners, and various regulatory and enforcement bodies.
- **Private-sector reporting entities**—including financial institutions and designated non-financial businesses and professions (DNFBPs)—which are on the front line of detecting and preventing suspicious financial activity under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended).
- **Private Sector Consultative Forum (PSCF)** this forum facilitates discussion and the dissemination of information on, AML/CFT/CPF matters between the Irish public sector (including the Departments of Finance; Justice and Equality; the Central Bank of Ireland), law enforcement via the FIU, Revenue Commissioners and Private Sector representatives (within the financial and non-financial services sectors).
- **International partners**, including global intelligence and supervisory networks, reflecting the transnational nature of money laundering, terrorist financing and proliferation financing.

Through coordinated national action, enhanced supervisory oversight, strengthened cross-agency intelligence sharing, and continued alignment with EU and FATF standards, Ireland remains committed to protecting the safety and security of our citizens across the State by ensuring the integrity and stability of its financial system.

3. The Three Pillars of Ireland's Framework

Money Laundering is the process of disguising the origins of criminal proceeds to make them appear legitimate, while Terrorist Financing involves providing or collecting funds, directly or indirectly, with the intention or knowledge that they will be used to carry out a terrorist act. Proliferation Financing is the provision or movement of funds or assets to support the proliferation of Weapons of Mass Destruction ("WMD"), including related materials and delivery systems.

The overarching goal for the National AML/CFT/CPF Strategy is to enhance safety and security of citizens in Ireland and the integrity and stability of the financial system. Accordingly, our framework is underpinned by three interconnected pillars which support its operation:

(i) Policy and oversight: assessing money laundering, terrorist financing and proliferation risks; developing domestic and EU-aligned policy; and ensuring strategic oversight and coordination across Government and competent authorities.

(ii) Safeguarding and monitoring: safeguarding, promoting, supervising, and monitoring AML/CFT/CPF compliance; and collecting, analysing, and disseminating financial and related intelligence.

(iii) Investigation and enforcement: identifying, investigating, prosecuting, enforcing and sanctioning money laundering, terrorist financing and proliferation financing offences.

Ireland's National AML/CFT/CPF Framework

Acting in unison, these three interlocking pillars strengthen Ireland’s capacity to combat terrorism and serious and organised criminal activities such as corruption, cybercrime, tax evasion, drug trafficking, and fraud. The purpose of Ireland’s AML/CFT/CPF framework is to protect citizens, national security and preserve the integrity and stability of the Irish financial system.

Ireland’s domestic AML/CFT/CPF framework is primarily underpinned by the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010. This transposes multiple EU Anti-Money Laundering Directives into Irish law, and in turn defines the roles and responsibilities of competent authorities and identifies the designated persons/business sectors subject to AML/CFT/CPF obligations. This is further reinforced by regulations and guidance issued by the Central Bank of Ireland and other supervisory authorities, as well as by EU directives that have evolved into a Single Rulebook, strengthening and harmonising regulatory requirements across Member States.

This is also underpinned by international standards and conventions, including Ireland’s commitments under the Financial Action Task Force (FATF) Recommendations and United Nations instruments aimed at combating money laundering, terrorist financing, and the proliferation of weapons of mass destruction.

For AML/CFT efforts to be effective, it is imperative that designated persons meet their obligations and recognize their role as the ‘front line’ in detecting and preventing money laundering and terrorist financing. At the same time, it is important that these obligations are consistent, predictable and proportionate to avoid unnecessary regulatory burden. Applying a risk-based approach, consistent with EU law and FATF standards, is central to maximising the effectiveness of the framework while helping minimise any unnecessary burden.

A key driver of Ireland’s AML/CFT/CPF framework effectiveness is the strong collection and use of financial intelligence, including information sharing among relevant stakeholders. Financial intelligence underpins all three pillars. A comprehensive legislative framework, diligent and well-informed compliance by designated persons ensure that high-quality information is reported to FIU Ireland and Revenue. This supports efforts to prevent criminals and terrorist financiers from exploiting the financial system. The intelligence received enables law enforcement and the Defence Forces to generate actionable insights, refine investigative priorities, identify new targets, and trace assets for freezing, seizure, and confiscation. Financial intelligence also plays a central role in uncovering predicate offences and mapping criminal and terrorist networks—an important element of the Irish AML/CFT/CPF framework.

An effective AML/CFT/CPF framework must remain capable of adapting to new threats and evolving risks. This requires close coordination between public and private-sector partners; sufficiently resourced law-enforcement bodies with the tools, expertise, and specialist capabilities to investigate complex financial crime; and a legal system that provides clear deterrents to money laundering, terrorist financing and proliferation financing and robust supervision that ensures effective compliance of designated persons with their obligations under the relevant AML/CFT/CPF rules.

While the Irish system can benefit from relatively short lines of communication, strengthening these components will ensure that the Irish AML/CFT/CPF framework continues to prevent, detect, and disrupt illicit financial activity. A robust AML/CFT/CPF system also supports Ireland’s national security and contributes to the resilience of the broader EU financial framework, helping protect citizens from threats both domestically and internationally.

4. Money Laundering and Terrorist Financing Threats

Ireland's money laundering and terrorist financing threat environment is dynamic and continually evolving, as criminals and terrorist actors adapt their methods and exploit new vulnerabilities including across the financial system. To remain effective, national partners—including FIU Ireland, the Garda National Economic Crime Bureau (GNECB), the Criminal Assets Bureau (CAB), the Revenue Commissioners, and relevant Government Departments—conduct ongoing assessments and produce strategic intelligence to support national understanding of emerging threats.

FIU Ireland and other State bodies routinely disseminate intelligence products, risk indicators, and sector-specific typologies to enhance the awareness of obliged entities and the wider public. These assessments and intelligence insights often focus on the misuse of digital financial services, organised crime group (OCG) laundering methodologies, cross-border cash and commodity flows, corruption-linked money laundering, and emerging terrorist financing techniques.

During the COVID-19 period, for example, Irish authorities produced guidance and intelligence highlighting increased risks relating to pandemic-related fraud, online scams, fraudulent payment claims, and the misuse of digital platforms for laundering criminal proceeds. Similar strategic outputs have addressed areas such as the laundering of proceeds from romance fraud, human trafficking, drug trafficking, cyber-enabled fraud, and the exploitation of money mules, particularly among young people. Recent national risk assessments have shown that Ireland faces a broad spectrum of profit-motivated criminality, generating substantial illicit proceeds each year. Key sources include organised drug trafficking, international VAT, excise fraud and cybercrime. Organised crime groups active in Ireland are increasingly transnational, technologically sophisticated, and capable of exploiting international financial channels, virtual assets, and complex corporate structures.

Ireland's terrorism financing landscape, while lower in scale than the ML threat, is similarly complex, fluid, and influenced by global geopolitical trends. Threats stem from a range of ideologies and actors, including dissident republican groups, international terrorism networks, individuals inspired by extremist content online, and small self-directed actors. In line with international patterns, recent years have seen TF methods evolve toward lower-cost, smaller-scale activity, often involving modest sums that can be raised and moved through everyday financial services or online platforms with relative ease. These developments highlight the importance of maintaining an agile, intelligence-led national AML/CFT/CPF response grounded in strong cooperation between Irish authorities, EU partners, and international bodies. By understanding existing and emerging risks and adapting to the evolving ML/TF/PF threat landscape, Ireland can continue to protect the integrity of its financial system and national security.

5. National Risk Assessment

This Strategy is anchored to the findings of Ireland's most recent National Risk Assessment (NRA)[3]. The purpose of the NRA is to systematically identify, assess, and develop a shared understanding of Ireland's ML, TF and PF risks. Doing so is an essential component in ensuring that this jurisdiction implements effective and proportionate AML/CFT/CPF legal, regulatory and enforcement frameworks. This delivers alignment with global standards, which in turn support the integrity of the national and international financial system. Furthermore, a comprehensive NRA also provides valuable information to those working in domestic sectors exposed to these risks.

The NRA is designed to provide a reliable foundation for policy and decision-making, by describing and analysing the nature and scale of ML, TF, and PF in Ireland. It aims to inform the development of legislative frameworks, enhance risk-based supervision, facilitate effective law enforcement activity, inform those operating in relevant sectors to refine their controls, and enable the efficient allocation of resources to areas of greatest risk. The NRA also seeks to enhance the capacity of both public authorities and private sector entities to manage and mitigate risks, while ensuring Ireland meets its European and international obligations. Ultimately, the NRA supports continuous organic improvement in the national framework for combating financial crime, fostering resilience and adaptability in the face of evolving threats

The NRA received input from a vast array of stakeholders from both the private and public sectors. A broad range of public sector agencies engaged, not just those with representation on the AMLSC.

Key Findings from the National Risk Assessment 2026

The NRA uses a four-tier risk rating scale: Low, Moderate, Significant and Very Significant.

Money-Laundering Threats

The overall money laundering threat is rated Moderate. The highest threats are generated by drug offences and fraud, followed by theft and burglary, illicit trade and smuggling, human trafficking/exploitation and tax crime. While sanctions evasion has been assessed as low, continuing vigilance is warranted. Criminal networks are increasingly combining traditional cash-based methods with digital innovations such as crypto-assets, money mule networks, and complex layering techniques, making detection and disruption more challenging.

[3] https://assets.gov.ie/static/documents/07bf6929/National_Risk_Assessment_Ireland_2026.pdf

Terrorist Financing Threats

The TF threat is assessed as low, with risks arising from both domestic paramilitary groups and international terrorist networks. Notwithstanding this, the risk of TF activity - particularly small-scale, self-funded operations and the use of digital platforms - requires ongoing vigilance. The threat landscape is further complicated by the convergence of organised crime and terrorism, the emergence of right-wing extremism, and the growing use of online radicalisation and crypto-assets for fundraising and logistical support.

Proliferation Financing Threats

The proliferation financing threat is assessed as Low. This reflects Ireland's limited direct exposure to jurisdictions of PF concern. However, PF-related sanctions evasion requires continued vigilance. Despite low, indirect exposure to jurisdictions of concern through complex financial flows and dual-use goods, it does represent a risk. Ireland's status as an open economy means that vigilance is required to prevent the misuse of financial channels and trade structures for PF

More information about the findings from Ireland's NRA can be found at the following location:

https://assets.gov.ie/static/documents/07bf6929/National_Risk_Assessment_Ireland_2026.pdf

Arising from Ireland's NRA 2026 is the Priority Action Plan, which translates areas for improvement from the NRA into a focused programme of 30 actions designed to strengthen our defences, enhance coordination across the public and private sectors, and ensure that Ireland remains resilient in the face of evolving threats. Collectively they represent an applied package of reforms, when delivered, will offer practical, impactful improvements to Ireland's AML/CFT/PF regime. The Priority Action Plan can be found at the following:

https://assets.gov.ie/static/documents/56624b8e/Priority_Actions_Implementation_Plan_2026.pdf

6. Ireland's AML/CFT/CPF Stakeholders

Ireland's AML/CFT/CPF Framework Partners

Ireland's Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Financing of Proliferation (AML/CFT/CPF) framework is a comprehensive, cross-government system including central government departments, State agencies, supervisory authorities, An Garda Síochána, and private-sector obliged entities operating under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended).

All national partners have a role to play in achieving the outcomes set out in Ireland's AML/CFT/CPF strategy supported by risk-based policy development and operational cooperation. Governance is coordinated through the AMLSC for ML/TF/PF issues, overseen by the Department of Finance. Separately for sanctions, the Cross Departmental International Sanctions Committee (CDISC), is overseen by the Department of Foreign Affairs and Trade. Collectively these bodies work to maintain an effective national framework informed by shared intelligence on ML/TF/PF trends, criminal networks, and emerging threats across the Irish and EU financial system.

The framework also draws on the expertise of State and other bodies as required. Coordination with An Garda Síochána, sectoral supervisors, and EU-level bodies is essential to ensure a robust response across all levels of governance. While AML/CFT/CPF legislation is primarily an area of national and European Union competence, several relevant responsibilities—such as company formation, beneficial ownership transparency, the oversight of credit unions, legal and accountancy professions and land registration—are managed by a combination of State agencies and self-regulating bodies.

Operationally, An Garda Síochána, including the Garda National Economic Crime Bureau (GNECB), works closely with regional Garda divisions and specialised units on money laundering investigations, terrorist financing cases, asset freezing, and the application of civil forfeiture powers which are primarily exercised through the Criminal Assets Bureau (CAB).

Key National AML/CFT/CPF Partners in Ireland

The following national partners are included within the core of Ireland's AML/CFT/CPF framework:

- Department of Finance
- Department of Justice, Home Affairs and Migration
- An Garda Síochána, including GNECB
- Criminal Assets Bureau (CAB)

- Revenue Commissioners (including Customs) and the Central Register of Beneficial Ownership of Trusts (CRBOT)
- Central Bank of Ireland (CBI) and Beneficial Ownership Register of Certain Financial Vehicles (BOR), and Ireland Safe Deposit Box, Bank and Payments Accounts Register (ISBAR)
- Financial Intelligence Unit (FIU Ireland)
- Defence Forces
- Companies Registration Office (CRO) and Register of Beneficial Ownership (RBO)
- Office of the Director of Public Prosecutions (DPP)
- Charities Regulator
- Gambling Regulatory Authority of Ireland

6.1 THE ROLE OF THE PRIVATE SECTOR

Thousands of Irish regulated financial firms and designated non-financial businesses and professions (DNFBPs) are subject to AML/CFT/CPF obligations under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended). These obliged entities—including banks, credit unions, payment institutions, crypto asset service providers (CASPs), investment firms, funds, fund service providers accountants, solicitors, estate agents, gambling service providers, and trust/company service providers—act as the first line of defence against money laundering, terrorist financing and proliferation financing.

Feedback from industry is vital to assessing the effectiveness of the national framework. State authorities engage with the private sector through:

- The Anti-Money Laundering Steering Committee
- The Self-Regulating Bodies Subgroup of the Anti-Money Laundering Steering Committee
- The Private Sector Consultative Forum
- Public consultations led by the Department of Finance and Department of Justice, Home and Affairs and Migration
- Regulatory engagement by the Central Bank of Ireland

In order to enable enhanced information sharing, Ireland has also increasingly adopted public-private partnership models, aligned with international best practice. An example includes Ireland’s Joint Intelligence Group (or “JIG”) which is an effective mechanism for sharing information between financial institutions and law enforcement agencies.

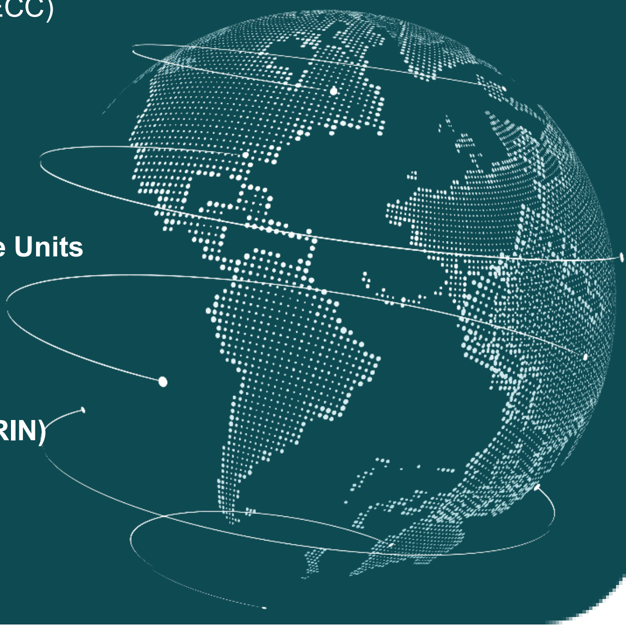
Furthermore, FIU Ireland participates in other public-private partnerships including with international banks, accountancy bodies, and FinTech entities. Such initiatives are comparable to the UK-style JMLIT and Canada's Project Protect models, with ongoing work to expand formal and informal collaboration between supervisors, law enforcement, and private sector representatives.

7. International Context

Money laundering, terrorist financing and proliferation financing are inherently cross-border challenges, meaning Ireland's efforts are informed bilateral and multilateral engagement through formal and informal channels. Ireland works closely with a wide range of European and global partner bodies to identify emerging trends, share intelligence, and develop best practices. These partnerships strengthen Ireland's domestic framework and enhance the country's capacity to disrupt transnational financial crime.

Key international and EU organisations Ireland engages with includes:

- **Financial Action Task Force (FATF)**
- **EU AML/CFT Framework**, including:
    - EU Anti-Money Laundering Authority (AMLA))
    - Europol and the European Financial and Economic Crime Centre (EFECC)
- **Eurojust Interpol**
- **Egmont Group of Financial Intelligence Units**
  – FIU Ireland is a member since 1998
- **Camden Asset Recovery Network (CARIN)**
- **IMF AML/CFT Thematic Fund**



As a small country with a high degree of international connectedness, Ireland is inherently disposed to positive engagement through multilateral and bilateral channels. Specifically in the AML/CFT/CPF area, this approach is anchored in a clear recognition that the challenges are cross-border in nature and can only be resolved through constructive and open cooperation with our international partners.

8. Strategic Goals

Ireland will take substantive and coordinated actions to achieve measurable improvements in the prevention, detection, and disruption of money laundering, terrorist financing, and proliferation financing. These priority actions contained under five key Strategic Goals are designed to address gaps identified through national performance assessments, recent reviews of the Irish AML/CFT/CPF framework, and findings from Ireland's National Risk Assessments. They also respond to the most significant ML/TF/PF risks present in the Irish context and Ireland's EU obligations

They focus on areas expected to deliver the greatest operational and strategic impact, ensuring that Ireland strengthens the effectiveness of its national framework and enhances compliance with evolving EU and international standards.

The Strategy's five strategic goals are under the following headings:

Strategic Goal 1
National Coordination

Goal – Ensure an effective and efficient national coordination mechanism for the implementation of the Strategy and provide a national, cross-sectoral forum for the oversight and active engagement on Ireland's anti-money laundering, counter terrorism financing and counter proliferation financing (AML/CTF/CPF) framework

The AMLSC chaired by the Department of Finance, is responsible for overseeing and coordinating implementation of the national AML/CFT/CPF Strategy. AMLSC membership, drawn from across all sectors, comprises either Standing or Associate membership[4].

The AMLSC, which is supported by a permanent secretariat, delivers several important functions:

- Coordination role: As the national steering body, facilitate coordination and collaboration between domestic stakeholders to ensure delivery of an effective, robust AML/CFT/CPF framework in this jurisdiction. This includes sharing information and developing common positions on issues of interest and identifying matters which require action.

- Implementation and oversight role: Coordinate and monitor the implementation of the National AML/CFT/CPF Strategy and other actions identified as necessary.

- Administrative and operational role: Reporting on the work of the AMLSC including the preparation of the annual report of the AMSLC and operation of subgroups on particular topics related to Ireland's AML/CTF/CPF framework.

Currently the AMLSC plays a central role in helping coordinate the preparations for Ireland's next FATF Mutual Evaluation (ME). The FATF peer reviews of its member countries occur over a seven-year cycle where each Member undergoes an in-depth examination of its AML/CFT/CPF framework, with a particular focus on its effectiveness.

In addition to the activities of the AMLSC outlined above, the following priority actions supportive of Strategic Goal 1 will also be implemented:

[4] Standing members attend each AMLSC meeting, while Associates attend relevant meetings depending on the issue. See Appendix 1 for the full list of AMLSC members.

- Regarding terrorist financing and proliferation financing, a Countering Terrorist Financing/Countering Proliferation Financing AMLSC Subgroup has been established, consisting of Defence Forces, An Garda Síochána, the Terrorist Financial Intelligence Unit (TFIU), Charities Regulator, the Corporate Enforcement Authority, Revenue, DFA, DoJHM and the Central Bank to assess the latest threats, vulnerabilities and landscape of terrorist financing and proliferation financing in Ireland.

- Enhanced utilization of the AMLSC for discussion and planning of new or revised domestic and European legislation. Advanced and early identification of departments impacted and the cooperation between departments and/or state bodies required to ensure resource, operational and effective work planning.

- The Charities Regulator will engage with other bodies such as AGS and Dept of Education with a view to signing Memoranda of Understanding in respect of information sharing.

- Enhanced arrangements between supervisory bodies and law enforcement bodies will be established to better facilitate the sharing of information on ML/TF and sanctions evasion risk and the quality of controls.

Strategic Goal 2

Risk Assessment and Understanding

Goal – Identify emerging risks and challenges through increased state agency collaboration and with civil society, to enhance understanding of the *modus operandi* of criminals and to support analysis

This will include multiple government agencies, including law enforcement, supervisors, and legal entities, working together to identify and combat money laundering threats including the production of strategic analysis. This collaboration ensures that all relevant parties share information, understand their roles, and align on strategies to effectively manage and mitigate the risks identified within the Irish ML/TF/PF landscape.

Priority actions under this theme supportive of Strategic Goal 2 include:

- Enhance data collection and analysis of ML/TF/PF threats and vulnerabilities sourced from suspicious transaction reports (STRs), investigations, prosecutions, convictions, and asset seizures. The enhanced data collection and analysis will build on improved cooperation and allow for timely collation and dissemination to/between law enforcement, supervisors and private sector firms. This will include enhancements to FIU Ireland's STR collection toolkit which will allow for improved analytical capabilities (including strategic and operational analysis) and an enhanced ML/TF analytical capacity for the ODPP

- The Department of Finance will lead discussions to consider the feasibility of introducing a mandatory registration requirement with FIU Ireland for persons with reporting obligations.

- In the financial services sector, the Central Bank should enhance data collection on ML/TF, financial sanctions evasion risk and quality of AML/CFT controls via the rollout of its updated Risk Evaluation Questionnaire (REQ) on a sector-by-sector basis.

- In addition, the Central Bank should undertake targeted analysis of sectors and products, including cross-border financial flows, to identify vulnerabilities and areas where the threat from predicate offences (including fraud) is greatest.

Strategic Goal 3
Regulatory framework
(including preventative Measures)

Goal – Provide an effective framework of AML/CFT/CPF measures which are informed and justified by data and findings evidence and from the NRA.

Basing policies, allocation of resources, and implementation of new, risk-based measures on a comprehensive understanding of their specific ML/TF/PF threats and vulnerabilities. Ireland will ensure that its AML/CFT/CPF legal, regulatory, and operational framework is proportionate, coherent, and fit for purpose. Key actions underpinning Strategic Goal 3 include:

Implementing the new EU AML framework

- Ensuring transposition of the EU 6th Anti Money Laundering Directive (6AMLD) is implemented efficiently and effectively. Work on the necessary transposing legislation is proceeding across a number of government departments. Much of this will involve amendments to the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended), along with a number of Statutory Instruments.

- A cross-departmental transposition working group was established in 2024 with the Department of Finance and the Department of Justice, Home Affairs and Migration as standing members. Key stakeholders have been consulted to ensure that Ireland not only meets the legal requirements of the EU AML package, but also that the measures put in place will contribute towards a more effective framework for combating money laundering and terrorist financing.

- National Competent Authorities are also examining the framework for designated non-financial businesses and professions (DNFBPs) and the impact the new EU AML package might have on their respective sectors.

- As part of the ongoing work on transposition, close consideration is being given to the impact of the new single rulebook on Ireland's national framework for AML/CFT, as well as the necessary changes to supervisors' and FIUs' existing roles to support their cooperation with the new EU Anti-Money Laundering Authority.

Beneficial Ownership

- Increasing transparency and expanding the scope to beneficial ownership information as well as strengthening the powers of the Beneficial Ownership Registers are core features of the 6AMLD and the Anti Money Laundering Regulation (AMLR), agreed in 2024.

- Elements of the Directive in relation to Beneficial Ownership of legal entities and legal arrangements are currently being transposed by the Department of Finance by way of secondary legislation, on a sequential basis as transposition deadlines fall due. Current legislation will be amended in relation to the establishment of the three Registers of Beneficial Ownership information, namely:

    I. *Register of Beneficial Ownership of Companies and Industrial and Provident Societies* (based within the Companies Registration Office);

    II. *Central Register of Beneficial Ownerships of Trusts* (based within Revenue);

    III. *Beneficial Ownership Register of Certain Financial Vehicles* (based within the Central Bank).

- The Department of Finance will seek to introduce mandatory disclosure of the ultimate beneficial owners and controllers of all Limited Partnerships.

- Furthermore, the Department is progressing amendments to the secondary legislation governing the Ireland Safe Deposit Box Bank and Payment Accounts register (ISBAR) to align with the 6AMLD, including an expanded scope, access for AMLA, and the interconnection of bank account registers to the Bank Account Registers Interconnection System (BARIS).

- The Department will also engage with the relevant stakeholders in relation to the establishment of a single point of access to real estate information as per Article 18 of 6AMLD and relevant parts of the AMLR which must be in place by July 2029 to ensure transposition compliance.

Transfer of funds regulation

- The EU's Markets in Crypto-Assets Regulation (MiCAR) introduced Crypto-Asset Service Providers (CASPs) as a new regulated entity subject to EU and national AML/CFT requirements. The Transfer of Funds Regulation (TFR) extends AML/CFT obligations to crypto-asset transfers and implements the FATF 'Travel Rule', requiring information on the originator and beneficiary to accompany transfers. This promotes greater transparency and traceability of transactions, helping to combat money laundering and terrorist financing across the EU.

- Legislation to deliver transposition of this is well advanced.

Special Purpose Entities

- The Department of Finance will introduce legislation to enable the Revenue Commissioners to publish a list of SPEs availing of the Section 110 regime of the Taxes Consolidated Act 1997.

- The Department of Finance will seek to implement a requirement for a Legal Entity Identifier on entities availing of the Section 110 designation.

Law Enforcement

- The Department of Finance will lead discussions around the development of a framework to support the parallel investigation of money laundering and associated tax or excise offences.

Changing Financial Landscape

In the context of a changing financial services landscape, and new technologies and innovations presenting significant opportunities but also attendant risks, the following actions will be taken to ensure the framework remains fit for purpose:

- Regulated financial firms should ensure their AML/CFT frameworks keep pace with emerging threats and vulnerabilities linked to new technologies and innovation, applying the necessary measures to prevent, detect and report ML/TF, financial sanctions evasion, and associated predicate offences (e.g. fraud).

- The Central Bank should continue to make full use of its entire regulatory and supervisory toolkit to ensure that the financial services sector has identified and mitigated ML/TF and financial sanctions evasion risks and associated criminal threats. It should in particular:

  - Develop systematic understanding of how emerging technologies (including Artificial Intelligence (AI) create both vulnerabilities and present opportunities for improved AML/CFT systems and controls and share this understanding with regulated firms.

  - Set out its expectations to firms regarding their AML/CFT governance, risk management, and wider control frameworks to keep pace with the criminal deployment of new technologies

  - Ensure that greater use of technology is integrated into regulatory and supervisory activity.

Gambling Sector

- Casino clubs operating machine-based gambling will be brought under a more robust regulatory framework, with stricter enforcement of license conditions and anti-money laundering obligations.

- An industry standard will be established relating to the acceptance of crypto-related activities as a source of funds to ensure appropriate due diligence is performed and the legitimacy of the funds are verified.

- Gambling service providers will be required to adopt a 'closed loop' system, whereby payments to customers are made using the same payment account used for depositing funds

Sanctions

- The Department of Finance will seek to introduce a potential mechanism to allow for the implementation of United Nations Security Council Resolutions without delay.

- The Department of Finance will establish a listing proposal form to be used by National Competent Authorities when submitting proposed designations of persons to the EU or the UN Security Council.

- CDISC will put in place enhanced arrangements between supervisory bodies and law enforcement bodies for the sharing of information on sanctions evasion risk and the quality of controls.

Strategic Goal 4
Capacity Building and Outreach

Goal - Strengthening the AML/CFT/CPF capacity of law enforcement authorities (LEAs), prosecutors, FIU, supervisors and reporting institutions through training and workshops.

The focus will be centered on deepening the understanding of emerging risks and *the modus operandi* of ML/TF and PF. In addition, Ireland will deepen its partnership with the private sector to leverage frontline insights, improve intelligence flows, and create a more collaborative national AML/CFT/CPF environment and framework.

Ireland will improve AML/CFT/CPF knowledge, skills, and awareness across all sectors, from State agencies to the general public. Accordingly, priority actions supportive of Strategic Goal 4 include:

- The Charities Regulator will provide targeted awareness raising and links to guidance to NPOs with a heightened TF risk exposure (e.g. charities operating in high-risk countries).

- The Charities Regulator to continue publishing research on TF related issues concerning Irish charities e.g. International Transfers of Funds.

- Competent authorities to implement a formalised mechanism to conduct an annual review of their risk-based AML/CFT/CPF supervisory approach, to ensure that supervisory priorities, resourcing and intensity remain aligned with current and emerging money laundering, terrorist financing and proliferation financing threats and EU/international commitments

- Designated Accountancy Bodies should put in place a register of all Trust or Company Service Provider's (TCSPs) under their supervision, with arrangements for external access. Additionally, it should be explored if it is feasible to create one centralised TCSP register for all TCSP's registered in Ireland.

- The AMLCU will conduct additional awareness raising for the High Value Goods Sector to enhance compliance and AML/CFT risk management practices, including delivering speeches at industry conferences, supplementing existing guidelines for designated persons supervised by the AMLCU and identifying linked transactions (in line with AMLA's Regulatory Technical Standards).

- In the financial sector, the Central Bank should provide periodic, structured feedback to sectors and firms on ML/TF and financial sanctions evasion risks and associated AML/CFT obligations (in line with 6AMLD and AMLR requirements), building on enhanced REQ data and supervisory engagement with firms. Firms should incorporate this feedback into their AML/CFT/CPF business-wide risk assessments and AML/CFT/CPF systems and controls.

- Private-sector partnership is critical to the early detection of suspicious activity and emerging threat patterns. This partnership will be continued and strengthened through the following fora:

    - Private Sector Consultative Forum
    - The three Public Private Partnership Groups that FIU Ireland is part of as well as the European PPP (EFIPPP) and the Joint Practices Group (FIU and accountancy bodies).
    - The financial services sector engagement with the Central Bank of Ireland on several different private sector initiatives.

Strategic Goal 5

International Cooperation

Goal - Ireland will continue to support and influence international efforts to prevent and disrupt money laundering, terrorist financing, and proliferation financing.

Ireland will continue to play its part at international fora to advocate for and ensure best standards, practices and legislation (where appropriate) are developed, and advanced so AML/CFT/CPF frameworks are fit for purpose in this changing and evolving landscape.

These activities supportive of Strategic Goal 5 include:

- **Active participation in EU-level AML/CFT/CPF structures,** including close engagement with AMLA, Europol, Eurojust and ECB supervisory frameworks.
- **Strengthening Ireland's role in the Egmont Group,** Egmont enables FIUs worldwide to securely collaborate, communicate and share sensitive financial information as well as providing training and capacity building for FIUs
- **Maintaining compliance with UN and EU sanctions,** including strengthened capacity to detect and prevent sanctions evasion.
- **Engaging fully with FATF processes**, including preparing for Ireland's upcoming Mutual Evaluation in 2028 and contributing to global standards-setting.
- **Supporting capacity building in partner countries,** particularly through EU programmes related to law enforcement, governance, and financial system resilience.
- **IMF AML/CFT Thematic Fund –** Ireland has joined the IMF AML/CFT Thematic Fund. This supports global capacity development in anti-money laundering and countering the financing of terrorism, consistent with FATF standards and with Ireland's domestic and international policy commitments on financial system integrity.

9. Conclusion

- The actions identified in this Strategy – set out in detail in the previous sections of this document, along with the separately published NRA Priority Action Plan, are the required measures to deliver the overall goal of this Strategy.
- Over the period 2026–2030, this Strategy will guide the Government's efforts to deliver improved outcomes, safety and security of our citizens. In conjunction, this Strategy will seek to protect the integrity and stability of our financial system.
- Key stakeholders have been identified for the delivery of these measures. The measures outlined are designed to move the system from understanding to execution. They bring clarity to the roles and responsibilities of government departments, law enforcement agencies and regulators. While individual actions are assigned to designated responsible bodies, the delivery of these will be driven through a collegial and coordinated approach across all involved agencies.
- Ireland AML/CFT/PF framework is undergoing significant change and reform across multiple entities. Over the medium term, in a spirit of continuous improvement, consideration will be given to how greater strategic coherence, and synergies can be applied to enhance this regime.

Annex 1

Membership of the National Anti-Money Laundering Steering Committee (AMLSC)

STANDING MEMBERS

An Garda Síochána

Financial Intelligence Unit (FIU Ireland)

Central Bank of Ireland

Criminal Assets Bureau

Defence Forces

Department of Finance

Department of Justice, Home Affairs and Migration

Corporate Enforcement Authority

Office of the Director of Public Prosecutions

Gambling Regulatory Authority of Ireland

ASSOCIATE MEMBERS

Department of Rural and Community Development and the Gaeltacht

Office of the Revenue Commissioners

Department of Enterprise, Tourism and Employment

Charities Regulator

Legal Services Regulatory Authority

Property Services Regulatory Authority

Private Sector Consultative Forum

Law Society of Ireland

Association of Chartered Certified Accountants

Association of International Accountants

Chartered Accountants Ireland

Chartered Institute of Management Accountants

Chartered Institute of Public Finance and Accountancy

Annex 2

Abbreviations

AGS	An Garda Síochána
AML	Anti Money Laundering
AMLD6	The Sixth Anti Money Laundering Directive
AMLCU	The Anti Money Laundering Compliance Unit
CAB	The Criminal Assets Bureau
CDISC	Cross Departmental International Sanctions Committee
CEA	Corporate Enforcement Authority
CFT	Countering the Financing of Terrorism
CPF	Counter Proliferation Financing
CRAI	The Charities Regulatory Authority of Ireland
DETE	The Department of Enterprise Trade and Employment
DFA	Department of Foreign Affairs
DoJHM	Department of Justice, Home Affairs and Migration
DRCDG	Department of Rural and Community Development and the Gaeltacht
DSP	Department of Social Protection
FATF	The Financial Actions Task Force
FIU	Financial Intelligence Unit
GRAI	The Gambling Regulatory Authority of Ireland
IO	Immediate Outcome
LSI	The Law Society of Ireland
ME	Mutual Evaluation
ML	Money Laundering

NPO	Non-Profit Organisation
ODPP	The Office of the Director Public Prosecution
PMC	Private Members Club
SPE	Special Purpose Entity
STR	Suspicious Transaction Report
TCSP	Trust & Company Service Providers
TF	Terrorist Financing

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