Explanatory note for revised R.16

1. Background of R.16 revision

1. The objective of revising FATF Recommendation 16 (R.16) is to adapt the FATF Standards to changes in payment domain in the past decades, including variety of different products and services, types of market participants, business models, technologies and messaging standards, as well as to the evolving risks and vulnerabilities that emanate from those. The FATF strives to keep the Standards technology-neutral and to follow the principle of 'same activity, same risk, same rules'. This update is also a part of the G20 Priority Action Plan on making cross-border payments faster, cheaper, more transparent and more inclusive, while maintaining their safety and security.

2. As payment chains have grown more fragmented with the arrival of new players, and new technologies, it has often become more difficult for financial institutions to have sufficient information to identify suspicious activity and comply with sanctions and for law enforcement authorities to access relevant information. The nature of illicit finance threats has also evolved, with fraud now constituting a major predicate crime for money laundering.

3. The updated R.16 addresses these issues by clarifying the roles and responsibilities of different players involved in the payment chain and improving the content and quality of basic originator and beneficiary information in payment messages. This will help achieve greater transparency and more efficient and effective AML/CFT controls by financial institutions and authorities fighting financial crime.

4. Throughout the process, the FATF has considered implications that the revision of R.16 could have on various policy objectives, such as financial inclusion, data protection and privacy, and speed/cost of payments. In this context, the FATF has sought to build on the feedback received from stakeholders to strike a balance between different policy objectives while maximising the effectiveness and proportionality of new obligations under R.16. Key examples of this effort include:

- revised information requirements, which include the use of year of birth as a fallback option in absence of a full date of birth; and targeted address requirement for beneficiaries: only country and town name;
- flexible alignment check obligations, which include clearer responsibilities for beneficiary FIs and the possibility of checking alignment via pre-validation checks, post-validation checks, or holistic monitoring; and
- a targeted regime for cross-border cash withdrawals, that focuses on increasing transparency on cardholders while minimising the disruption and data protection and privacy risks.

5. Considering the importance and potential impact of the new obligations, the FATF will continue to engage with stakeholders to promote the implementation of the revised R.16 through a number of initiatives, including by setting up a public-private advisory group (the Payment Advisory Group), coordination with other standard-setters and global organisations, and the development of a guidance paper on payment

transparency that will seek to facilitate consistent implementation (e.g., expected for publication in late 2026).

2. Second public consultation

6. The FATF conducted a second public consultation on proposed revisions to R.16 in February - April 2025[1]. The FATF received significant number of responses to the public consultation. The FATF is highly grateful to those who commented and engaged in discussions through formal and informal outreaches - your technical expertise and willingness to engage has been invaluable in refining and improving FATF's proposals, and it demonstrates the value of the partnership between public and private sectors on AML/CFT.

7. Following the public consultation, the FATF has worked through the main issues in a dedicated Policy Development Group meeting in May 2025. These discussions have produced an updated R.16 revision that takes into account the issues raised and strikes a better balance between key policy objectives to make payments faster, cheaper, and more accessible, as well as safer and more secure.

8. This note outlines the main issues in the revised R.16 and its Interpretive Note (INR.16), including how the FATF has reflected the feedback received through the consultation. The final text reflects the feedback received through the two public consultations. It also provides more information on questions of policy intent. This note does not constitute a binding part of the FATF Standards or formal guidance on their application.

3.Key Issues addressed in the adopted text

Structural changes

9. FATF members have sought to make structure changes to the Interpretive Note to R.16 (INR.16) with the aim of better articulating the interaction between different overlapping provisions. The new structure differentiates the responsibilities and obligations for different types of payments or value transfers and simplifies interaction of rules, exceptions, and alternative measures (see INR.16 Section C. Information requirements). The revised R.16/INR.16 also differentiates the requirements based on the types of activities rather than types of entities. A majority of respondents to the second public consultation welcomed the clarity brought by the new structure.

Updates to objectives section

10. The objective section was updated to better reflect the full scope of R.16's purpose and goals. Due to its original historical context, the Recommendation includes an emphasis on terrorism financing. The section has been further enriched to also include a direct reference to United Nations Security Council Resolutions (UNSCRs) relating to the prevention, suppression, and disruption of proliferation financing and to combatting fraud. Furthermore, members also agreed to explicatively state in the objective section (paragraph 2 of INR.16) that it is not the FATF's intention of requiring R.16 to negatively affect financial inclusion. Respondents viewed these changes positively, especially the recognition of fraud as a key target predicate offence to combat.

[1] A First public consultation was undertaken in February-May 2024.

11. The updated INR.16 includes a new footnote seeking to enhance clarity and assist financial institutions in reducing one of the key sources of friction in payments cited in consultation responses, real-time sanctions screening, especially in what regards instant payment systems. The new footnote (footnote 49 of paragraph 1(c), INR.16) in the Objective section, clarifies that R.16 does not itself require real-time sanctions screening. This footnote should be understood as a clarification of R.16 obligations that does not change the scope of existing targeted financial sanctions (TFS) requirements under the FATF Standards. Under the FATF Standards and UNSCRs, core responsibilities of private entities in the implementation of TFS are to freeze without delay the funds or other assets of, and to ensure that no funds or other assets are made available to designated persons or entities. The modality of TFS screening to be conducted by private sector entities is not set out in the FATF Standards but rather in national regulation or industry best practices.

12. Respondents to the second consultation feedback noted that while the new footnote provides helpful clarity, its impact could be limited by national TFS regimes that require in practice the real-time screening of TFS-relevant information in payment messages (e.g., name). The FATF will consider this feedback in upcoming FATF Guidance paper and other relevant work with a view to minimise disruptive impacts on payment systems.

Information requirements for Cross-border payments or value transfers (above the de minimis threshold)

13. The FATF has identified the need to restore transparency as it has been eroded by the fast pace of change in the payments sector. Closer alignment in the information requirements for both originator and beneficiary seek to foster symmetry in payments, enable more efficient compliance by financial institutions as well as timely access to information needed by FIUs/Law enforcement authorities (LEAs).

14. Paragraph 9 of INR.16 prescribes the core information requirements, the required originator and beneficiary information, that should accompany a cross-border payment or value transfer above applicable de minimis thresholds. During the second public consultation, respondents asked for more clarity on verification requirements. The FATF notes that on the data points under paragraph 9 of INR.16, ordering financial institutions need to send originator information that has been verified for accuracy. However, ordering financial institutions are not required to verify the accuracy of the beneficiary information, but merely include the information that was provided by the originator or was otherwise conveyed to the ordering financial institutions (e.g., "pull payments", verification of payee schemes, etc). Then, as required under paragraph 29 of INR.16, if the identity has not been previously verified, beneficiary financial institutions should verify the beneficiary's identity in cases where the transfers are above the de minimis threshold.

15. Respondents to the public consultations also raised issues concerning each data point. Further details will be explained in the upcoming Guidance paper.

Address

- The FATF has taken into account public consultation comments stating that requiring unverified beneficiary's full address information would cause frictions and raise data protection and privacy concerns, without a sufficient material benefit. Accordingly, the FATF has decided to require only the country and town name for beneficiary, not the full address.
- Regarding the address information of the originator, as proposed in the second public consultation, full address information is the default requirement while country and town name will suffice in the absence of standardised postal address

information. Upcoming guidance will seek to provide further clarification to address concerns related to financial inclusion (e.g., rural/remote areas, or regions without standardised addresses).

Date of birth

- Date of Birth (DoB) information is required only with regard to an originator which is an individual (not for legal entities). In light of consultation feedback on the potential impact on financial inclusion, the standards have been amended to clarify that when a full DoB is not available, the year of birth only will suffice. Upcoming guidance will provide further guidance on those cases where no DoB information is available or cannot be verified (e.g., unregistered births) and on how to duly handle it (e.g., not making this information available to the final beneficiary).

Connected BIC/LEI/unique official identifier

- Some public consultation respondents suggested that INR.16 should refer to 'published BICs' rather than 'connected BICs', noting that identifiers in payments should be publicly available regardless of connectivity status. However, the FATF members have assessed the differences in validation and due diligence processes for obtaining and maintaining connected and non-connected BICs, ultimately deciding to maintain 'connected BICs' given the former's more robust framework.

Domestic payment and value transfers

16. No changes have been made to the minimal requirements under the current R.16 that are applicable to domestic transfers, i.e., If the originator information can be made available by other means within three business days upon request from the beneficiary FI or the appropriate authority, only the originator's account number or a transaction reference number need to accompany the payment message (paragraphs 10-12 of INR.16). Upcoming FATF guidance will seek to provide a clearer expectation on the requirements applicable to domestic transfers.

Virtual account numbers

17. The use of virtual account numbers can obscure the true location of a customer's account preventing financial institutions and authorities from identifying the true nature of a transaction (e.g., its cross-border nature). Building on the feedback received in public consultations, the FATF has decided to further strengthen the general principle[2] that was proposed for the second public consultation by:

- Further aligning the language with the ISO standard on IBAN, by emphasising the country where the financial institution that services the account resides; and
- Complementing the general principle with a positive requirement recalling that payment messages should enable all relevant institutions and authorities to identify the respective servicing financial institutions and their countries of location.

18. As this principle ultimately relates to the transparency of payment messages, the wording has been moved to the section on information requirements as a new paragraph

[2] The draft proposal for the second public consultation as paragraph 20 of INR.16 was: '*Financial institutions should ensure that account numbers should not be used for obscuring the identification of the country where the accounts holding the originator and beneficiary's funds are located.'*

7 of INR.16. It is important to note that it is not the FATF's intention to impose the inclusion of country information in all types of account numbers (e.g., those that do not include a country code) nor to ban the legitimate use of virtual account numbers (such as virtual IBANs).

Cross-border Cash Withdrawals

19. With respect to cross-border cash withdrawals, the lack of systematic and efficient access to cardholder information poses challenges for the financial institutions and the jurisdictions concerned. Furthermore, international cooperation usually occurs where an inquiry or investigation is already underway and after the nexus to a foreign jurisdiction is known, while the availability of information to reporting entities enables the initial detection of suspicious activity – which may therefore go undetected if the information is not available under R.16. Gaps in the coverage of payment transparency rules may soon come to be exploited more systematically. FATF therefore does consider it necessary to address this issue with a targeted requirement for cross-border cash withdrawals.

20. These deficiencies include competent authorities facing challenges when compelling the production of the relevant information across borders. Authorities would need to make multiple requests to foreign counterpart authorities to identify the parties and the financial flows involved, in order to reach the threshold where a formal investigation can be initiated. This situation can obstruct in investigative and prosecution processes, making them at worst impossible, and at best, much slower than they would be if basic information on the cardholder existed in both jurisdictions.

21. Building on feedback from the second public consultation, FATF members have agreed to introduce a further targeted framework for cross-border cash withdrawals, focusing new obligations on the requirement to send cardholder's name to the acquiring financial institution upon request, within three business days of receiving the request. This targeted framework will allow the FATF to avoid excessive disruption and to ensure proportionality while still tackling the prevailing opacity in cross-border cash withdrawals today and the typologies shared in the second public consultations as below. Other purposes include financial intelligence, investigation or prosecution in the jurisdiction of the suspected cross-border cash withdrawal, as FIU/LEAs need to be able to request additional information, such as cardholder name, rather than only transaction records and card numbers.

Example of using cross-border cash withdrawals to conceal suspicious activity

- Person X, who is normally resident in country A, opens one or more accounts in countries B and C, deposits funds, and is issued payment card(s).
- Person X returns to their home country A.
- Person X uses their payment card(s) (issued in countries B and C) to make frequent or large cash withdrawals at ATMs in their home country A.
- Under current R.16 rules, no information on the identity of the cardholder is available to financial institutions in country A. Cardholder information is available only to the issuing financial institutions in countries B and C and information about person X's activity is fragmented, preventing the detection of suspicious activity. Person X could therefore circumvent domestic AML/CFT controls by financial institutions and authorities in country A.

The lack of transparency in these activities hinders the identification and reporting of suspicious activity and prevents law enforcement from accessing information as described above.

22. Additionally, the FATF received responses asking about how the information could be used or what acquiring financial institutions are expected to do with the information that would be transmitted by card issuers. As explained in footnote 59, the responsibilities under the 'Section D- Responsibilities of ordering, intermediary, and beneficiary financial institutions' are not applicable to the transactions of cash withdrawals. Nevertheless, the information of cardholder name would be a useful source to support the detection of structuring or other suspicious activity through ongoing monitoring. Once an acquiring financial institution detects suspicious transactions through their monitoring systems, the institution can request the cardholder name for enriched suspicious transaction reporting. FATF will clarify further in upcoming FATF Guidance what acquiring financial institutions could do with the information that would be transmitted by card issuers.

23. With this decision, FATF members have sought to align themselves with the feedback received from a high number of respondents warning that the more extensive requirements previously proposed under the former 19 (c) could have led to significant unintended consequences on cash access as well as on data protection and privacy.

24. Lastly, as per the payment chain definition (see below for further detail), it is clarified that the 'beneficiary FI' in cash withdrawals should be understood as the FI servicing or sponsoring the ATM where cash is withdrawn (Under the FATF standards a FI needs to be responsible for servicing or sponsoring the operation of an ATM, but an ATM operator which is not a FI would not be required to receive cardholder information).

Exemption for card payments for purchase of goods or services

25. As a condition for the exemption for the purchase of goods or services using a payment card,[3] it was proposed in February 2024 that additional information, '*the name and location of the issuing and acquiring financial institutions*', should accompany the transfer in addition to the card number. In the February 2024 proposal, it was also proposed to clarify that the card exemption only applies to purchases of goods or services "*from merchants*", and does not apply to person-to-person transfers made using payment cards. These proposals reflected concerns that the use of the card exemption had gone beyond its original intended scope and was enabling uncontrolled cross-border transfers, circumventing the travel rule requirements. In addition, the inclusion of issuer and acquirer information sought to unambiguously identify the specific FIs that have customer relationships with the cardholder and merchant in a given purchase, to facilitate the process of obtaining further details by FIUs/LEAs when necessary.

26. Building on feedback received in the first public consultation and engagement with card networks, the FATF has agreed to ensure access to information on the issuer's and acquirer's name and location by leveraging existing information directory systems developed or to be developed by card networks. FIs' access to this information will enable FIUs and Law Enforcement Authorities to access this information through them and upon request. By not requiring this information to be included in card payment messages, the FATF seeks to ensure the proportionality of the new requirement given the very high cost the inclusion of this information in card payment messages would have (e.g., having to change the standard or develop parallel mechanisms).

27. The FATF has sought also, in lieu of a definition, to clarify the scope of the exemption for goods or services by adding a footnote (footnote 54 for paragraph 16 of INR.16) that expands on what is meant by 'purchase of goods or services'. This text delineates the scope of the card exemption, without providing excessive details in the

3 Credit or debit or prepaid cards.

standards. In this context, it is important to note that, as in the current R.16, the exemption will apply to card-based purchases of goods and services.[4] In cases where cards are used to fund other types of payment or value transfer (e.g. a person-to-person transfer), the relevant payment or value transfer information requirements will apply. FATF will clarify in the upcoming Guidance what could be included in other types of payment or value transfer beyond a person-to-person transfer.

28. Respondents to the second public consultation broadly welcomed the updated text, the removal of the term 'merchant', and the proportionality of leveraging directory services instead of requiring this data to be in payment messages (which would be very costly) or in parallel mechanisms requiring creating new channels. It is important to note that most respondents highlighted that the future cooperation of card networks will be crucial for the implementation of this new requirement. It should be noted that the decision to drop the term 'merchant' relates to the feedback received in the first public consultation and which warned that no definition could be sufficiently comprehensive—and that introducing one risked causing unintended consequences for acquiring financial institutions' existing merchant due-diligence practices.

Application of R.16 to instant payments

29. The FATF has also examined the possibility of extending the exemption to purchases of goods or services using instant payments, but decided not to proceed with such an extension. This decision reflects the fact that payments mechanisms, including instant payments, are still evolving and innovating rapidly in many regions worldwide and do not represent a single stable model, with a degree of variability in the risk factors and control mechanisms (e.g., the different use cases, transaction amounts, reversibility).

30. The FATF underlines that the current standards already allow instant payments for goods and services to benefit from the more lenient regimes for domestic payments and for cross-border payments below a de-minimis threshold. A large majority of transactions on instant payment systems benefit from lighter requirements under one or both of these regimes. The FATF will support the implementation of de minimis thresholds as part of its upcoming guidance work, with a goal of promoting financial inclusion.

31. Nevertheless, the FATF would like to highlight the importance of fostering responsible innovation, including by ensuring that instant payment systems foresee sufficient transparency and robust AML/CFT/CPF controls (e.g., leveraging modern analytics and richer data flows supported by ISO 20022).

32. Building on the above, and recognising the fast pace of evolution in the payment sector, and the feedback received on the increasingly important role of instant payments, the FATF will continue to closely monitor developments across the sector, and more generally in the payments domain. The FATF will, as a priority, conduct further work on the risks and controls applicable to different payment mechanisms, in order to more closely align the requirements of Recommendation 16 applicable to purchases of goods or services using different payment mechanisms, including instant payments. Future work on this topic will take into account the evolving risk landscape, the effectiveness of AML/CFT and fraud controls in different channels, and the goal of promoting responsible innovation, a level playing field, and safe and inclusive payments.

De minimis threshold

[4] Domestic and cross-border.

33. FATF members have agreed to better delineate the scope of the de minimis threshold in paragraph 8 (cross-border transfers) and 10 (domestic transfers) of INR.16, further clarifying its applicability to both cross-border and domestic transfers (but not to the targeted requirement applied to cross-border cash withdrawals). Countries will continue to be able to impose lower, risk-based requirements for domestic payments and cross-border payments no higher than USD/EUR 1,000. See above (paragraph 11) for further detail on the requirements applicable in domestic payments.

34. Respondents to the second public consultation called for additional clarity on how the de minimis thresholds relate to other thresholds, such as those on occasional transactions or what actions jurisdictions could take to minimise financial exclusion risks. The FATF will seek to address these concerns in upcoming guidance work.

Verification of alignment of information

35. The FATF has decided to introduce alignment checks obligations by listing a number of options for FIs to implement alignment checks, namely post-validation checks, holistic ongoing monitoring, and pre-validation checks (such as Confirmation of Payee-systems). It is worth noting that FIs' pre or post-validation checks are intended to take place for each transaction while holistic monitoring should be ongoing. The addition of this last option reflects private sector feedback highlighting the effectiveness of holistic monitoring frameworks seeking to detect anomalous accounts, transactions and activity leveraging a number of data points and factors, including misaligned beneficiary information. Overall, the outcome of these checks should inform the need for any follow-up action by the beneficiary FI.

36. FATF has also sought to clarify the notion of alignment by refining what "alignment" means, in order to be clear that it is a flexible and graduated concept, sensitive to risk and context, and is not limited to exact name-matching. Lastly, these new obligations have been included as a continuation of the current section on obligations for beneficiary FIs, with detecting misdirected payments also added to the chapeau in paragraph 30 of INR.16.

37. Second public consultation responses were mixed with many respondents misunderstanding the proposed framework on pre-validation checks, Confirmation of Payee / Verification of Payee (CoP/VoP), as mandating CoP/VoP for all ordering FIs always. This was in contrast with FATF's actual intent of introducing a flexible requirement that could be met through either pre or post-validation checks. In addition, respondents noted that while CoP held considerable promise in domestic contexts, it had limited availability yet for cross-border transactions. This contrasted with responses to the first public consultation, which strongly advocated for aligning FATF's first to ongoing efforts to expand pre-validation schemes. Considering this, many private sector stakeholders proposed the introduction of a third option to check alignment in the form of holistic ongoing monitoring as existing frameworks are already effectively leveraging misalignment of information, amongst other factors. The revised text reflects this advice, while the modifications which were first introduced in the second public consultation and warmly welcomed by respondents, (such as a targeted scope for alignment (name and account number) and the ability to leverage pre-validation solutions where available) have been retained.[5]

38. Implementing this duty on a cross-border basis will most notably help respond to the serious and growing threat from fraud. The number and value of fraud cases has grown significantly in recent years, and fraud is now the dominant type of proceeds-

[5] The use of pre-validation checks is allowed in cases where the ordering and beneficiary FIs both participate in a pre-validation mechanism that enables them to check for each transaction that the name and account number of the beneficiary in the payment message.

generating crime globally, as set out in recent FATF reports, such as Illicit Financial Flows from Cyber-Enabled Fraud (2023).[6] This flexible requirement would align with the growing body of positive experiences with implementing holistic monitoring frameworks and CoP/VoP at, and also help reduce errors and mis-directed payments, a major source of friction. The proposal's emphasis on flexibility also reflects the importance of ensuring that FIs and jurisdictions which are not able to implement one of the options for alignment checks do not suffer any loss of access to payment systems as a result.

Definition of the payment chain

39. The February 2024 consultation proposal contained two options: The payment chain should be considered to begin with the financial institution which receives an instruction from the customer (instruction route); or with the financial institution from which, the customer's funds are provided (funding route). Public consultation feedback pointed out that the funding route would make implementation significantly more complicated and was ill-suited for increasingly complex and hybrid payment chains. Respondents also noted the instruction route would be better positioned to clarify responsibilities in modern payment chains, as well as being a flexible approach in a rapidly evolving market. Based on this feedback, FATF has agreed that the payment chain begins with the financial institution which receives an instruction from the customer (in paragraph 6 of INR.16), and ends with the financial institution that services the account of the beneficiary or provides cash to the beneficiary[7].

40. A majority of respondents to the second public consultation welcomed FATF's clarification on the instruction route. Nonetheless, many called for additional guidance on how the new definition would apply to various scenarios. For example, one respondent considered the diagram that was included in the Explanatory Memorandum (see below) and questioned what would be the end of the payment chain in cases where both MVTS G and Bank E have account relationships with Customer Y, claiming that MVTS G should be the end point of the payment chain as it services an account of the beneficiary.

41. On this point, it is noteworthy that an important element of the R.16 is that the required information must be included in a payment instruction, and must flow from the start to the end of the payment or value transfer. MVTS providers are increasingly collecting and disbursing funds through electronic means. The start and end points may therefore not be traditional bank accounts, but could also include such as payment accounts and electronic money wallets. It is important to ensure that the required originator and beneficiary information can travel the whole length of a cross-border payment chain, rather than being fragmented among a series of discrete payments. Otherwise, cross-border payment chains are often, in effect, broken into two or more domestic transfers, with the result that the financial institutions involved may not have the full information required on the ultimate originator and / or beneficiary. It has become common for MVTS or other service providers to send transfers to other financial institutions without specifying the name of the ultimate originator, and customers may send transfers to these providers without specifying the ultimate beneficiary. In practice, this may also result in obscuring the ultimate jurisdiction of origin or destination, thereby impeding screening and monitoring, as well as supervisory and law enforcement actions. When referring to the financial institution that services the

6 https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Illicit-financial-flows-cyber-enabled-fraud.pdf.coredownload.inline.pdf

7 R.16 requires that a payment instruction for cross-border transfers includes the information of account number of the beneficiary, or in the absence of an account, a unique transaction reference number should be included.

account of the beneficiary, it is intended to be the account which settles the payment or value transfer with the beneficiary.

42. FATF will seek to provide additional clarity in the upcoming guidance also on other cases involving complicated or hybrid payment chains (e.g., involving virtual assets and fiat currency), and which were raised by respondents to the consultation.

Origin of funds

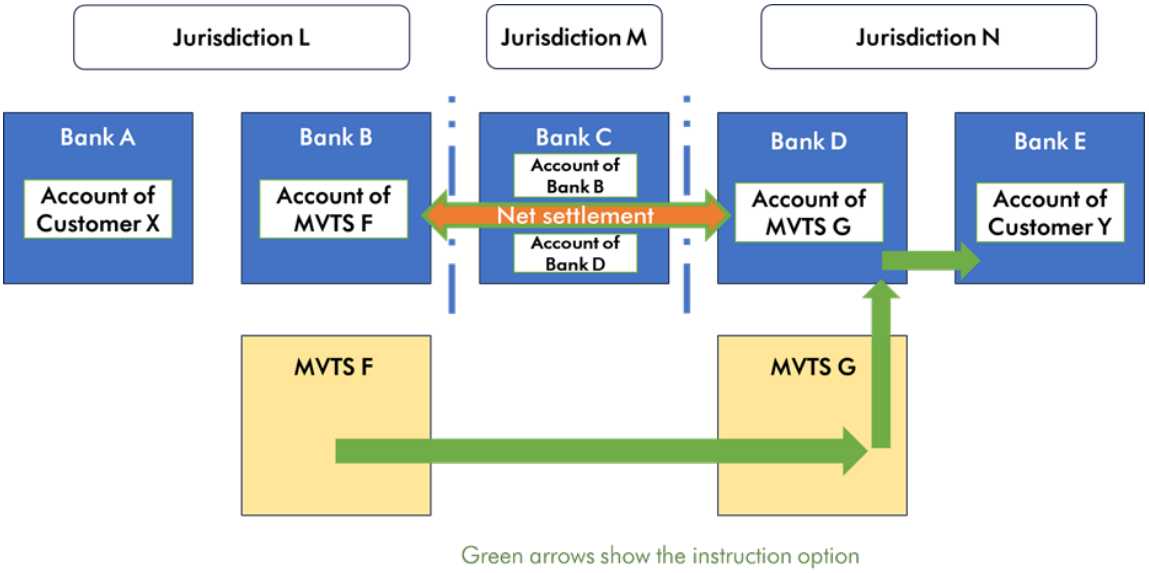
43. Following the adoption of the instruction route as the start of the payment chain, FATF members have agreed on a footnote to ensure that information on the origin of a transaction's funds be included in payment messages.

44. The policy objective of the proposed footnotes is to address a specific typology where a payment is sent through a financial institution with which the customer does not maintain an account with the funds to be sent, and therefore the transaction is funded ad-hoc from an account with a different FI. In this situation the account which is the true origin of the funds would not be indicated in the payment message, and this could enable evasion of risk-based controls. In such cases, footnote 50 for paragraph 8 (b) and footnote 51 for paragraph 9 (b) of INR.16 will ensure that information on the account (i.e., account number and the name of FI) which is the ultimate origin of the funds is included in the payment information, to ensure the FI which does have an ongoing account-based relationship with the customer, and from which the funds for the specific transaction were drawn, can always be identified.

Clarification of net settlement & bundled transactions

45. The FATF members have agreed to confirming that no unbundling by intermediary FIs is required, further clarifying that even if unbundling and screening by intermediary FIs is not required, the underlying payments or value transfers are still subject to the requirements of Recommendation 16, along their respective payment chains. FATF's proposal was warmly welcomed by respondents to the second public consultation as striking a balance between clarifying the requirements applicable to underlying transactions without imposing new costly requirements for intermediary FIs participating in net settlements.

46. The rule can be explained further, building on the diagrams included in the February 2024 consultation:



47. The payment chain will be defined along the instruction route in green. Start point is MVTS F, which receives the payment instruction from customer X. All required information should be carried in the payment chain from MVTS F ⇒ MVTS G⇒ Bank D ⇒ Bank E. Bank C will have no obligations under Recommendation 16 regarding the net settlement it conducts on behalf of Banks B and D, as these will be FI-to-FI transfers covered under the revised net settlement conditions.

48. Regarding the underlying transactions bundled in the aggregated transfer, Bank A, MVTS F, MVTS G and Bank E will continue to be bound by their CDD duties, as applicable.

Refinement of Glossary definitions

49. The February 2024 proposal introduced a number of new specific terms. Most of these terms sought to either add clarity to existing obligations or to support new additions to the INR.16. A non-exhaustive list of examples included BIC; LEI; Unique Official Identifiers, MVTS network; and updates to the notions of Ordering and Beneficiary FIs. Respondents to the public consultation asked for additional granularity to be included, e.g., on what is meant by "FI", "merchant", "transfer" and "address". Others sought to ensure alignment with existing industry standards, such as with SWIFT's definitions of cover payments.

50. FATF members agreed to minimal further changes to the proposed glossary definitions and only when required by decisions set out in this explanatory Note. These include the removal of the definition of "merchant", originally proposed in February 2024; and better targeting the definition of ordering FI to reflect the chosen definition of payment chain (instruction route). Members also agreed on including cash withdrawals in the definition of Payment or Value Transfers, further developing the applicable information requirements in the sub-section for *Exceptions and Differentiated Requirements*. No additional changes have been introduced to those already included in the second public consultation.

51. The revised body of INR 16 will already provide additional clarity and granularity on many of the areas requested by respondents in 2024 and 2025. However, others, such as card payments, cash withdrawals and/or information requirements (e.g. address) could be addressed in more detail in upcoming FATF guidance.

Scope issues (payment market infrastructures (PMIs); virtual assets (VAs); and FinTechs)

52. The revised R.16 does not directly apply AML/CFT regulation to PMIs. FATF members deemed such an extension of the FATF's standards to be outside of the current R.16 scope. Furthermore, it was also considered that such a measure could be disruptive in a moment where many PMIs worldwide are already overstretched over the demands of ISO 20022 transition. Members noted that many PMIs are already accountable to FIs as both owners and customers as well as to existing systems of supervision and oversight by national authorities.

53. Respondents to the second public consultation highlighted the importance of ensuring that PMIs have the capacity to enable payment messages to carry the required information requirements along payment chains. Amongst others, these concerns related to the limitations that may emerge in cross-border payments leveraging domestic PMIs for the last mile of a payment chain. Consultation responses noted also that some PMIs lack sufficient capacity to support end-to-end payment transparency, especially in the case of some domestic PMIs where respondents asked from the FATF further clarity on regulatory expectations. Considering this background, FATF will support the role of PMIs in enabling R.16 implementation through upcoming guidance and through engagement and coordination with payment regulators through the Committee on Payments and Market Infrastructures (CPMI).

54. Consistent with the feedback received in both public consultations, FATF has agreed not to bring VASPs directly into the scope of R.16 but to apply the updated requirements indirectly through R.15, and to continue working on travel rule implementation through the existing framework, including through the tailored framework of R.15 and the support of the FATF's Virtual Asset Contact Group (VACG). Overall, while VASPs will have to comply with the new requirements imposed by the revised R.16, they will continue to be the target of substantial FATF support. INR.15 will be updated, if necessary, to ensure the reference to R.16's information requirements remains up-to-date.

55. Respondents to the second public consultations welcomed FATF's decision to keep the tailored framework under R.15 as it helps translate R.16 requirements to the particularities of the VA sector. VASP responses echoed that they already have the technology required for some of new duties (e.g., seeking to identify mis-directed payments, for example, by using pre-validation checks) and called for the FATF to include in upcoming guidance further granularity on how the recommendation will apply to the sector.

56. One of the main drivers behind the revision of recommendation 16 was to ensure a level playing field between FIs and other payment service providers, reflecting the role played by emerging payment actors, including amongst others fintech companies. Respondents to the public consultation called on the FATF to enshrine a better adapted "*same activity, same risk, same rules"* principle in order to avoid over-reliance on increasingly outdated definitions of payment chains, and to clarify that R.16 obligations are not limited only to banks. This approach would help ensure the standard remains future-proof ahead of ongoing developments in financial services.

57. FATF members echoed these views and moved to align R.16's structure with *same activity, same risk same rules principles* as well as to adopt the instruction route definition of the payment chain. A focus on activity types over entity types will better capture the role of all relevant payment actors.

4.Timeline, implementation and transition issues

58. Consistent implementation across jurisdictions is essential for the implementation of R.16 especially given the applications of requirements to cross-border transfers. A pre-requisite for the implementation of the revised recommendation is that same information requirements are in place in both the origin and destination countries involved in a payment or value transfer, and that the technical systems of all involved parties will support such information requirements.

59. Normal practice of FATF is that amendments take effect immediately. However, FATF recognises the need for transitional arrangements to enable private sector partners and payment market infrastructures to be adapted and made ready to implement the new requirements in an orderly way, as well as the need to provide further clarifications through upcoming FATF Guidance. Acknowledging that some of the new R.16 requirements would require time before they can be realistically implemented by jurisdictions and the private sector, the FATF has considered the need for a transition period before achieving implementation of R.16. Based on the feedback received during the second consultation, a majority of respondents agreed with the end of 2030, which has been identified as a as a realistic deadline for implementation. The FATF will expect that most, or all of the new requirements are in effect by that date.

60. However, and noting that respondents warned that some of the proposed changes may require a longer time (e.g., cash withdrawals and updates on domestic PMIs to implement the new definition of the payment chain) over the changes required to national laws, industry rules, national infrastructure and IT systems. The FATF will leverage on the creation of a public-private payment advisory group (PAG) that will assist with the development of guidance and monitor, track, and report on R.16's implementation, including identifying the need for tailored deadlines in response to industry challenges where required (e.g., to allow sufficient time to avoid disruption).This work will also include further analysis of the different risks, use cases and features of different payment mechanisms (see paragraph 27). FATF will continue to engage with stakeholders including at PAG, to ensure effective and harmonised implementation of the revised R.16.

Annex. Revised Recommendation 16 and its Interpretive Note

Amendments to the current R.16/INR.16 are highlighted: Red and deletions in ~~strikethrough~~ – reflected the changes to the current R.16/INR.16

Recommendation 16. ~~Wire transfers~~ Payment transparency*

Countries should ensure that financial institutions include required and accurate originator information, and required beneficiary information, on ~~wire~~ payments or value transfers and related messages. This information should be structured to the extent possible and should ~~that the information~~ remain~~s~~ with ~~the wire~~ such payment or value transfer or related message throughout the payment chain.

Countries should ensure that financial institutions monitor ~~wire~~ payments or value transfers for the purpose of detecting those which lack required originator and/or beneficiary information~~,~~ and take appropriate measures.

Countries should ensure that, in the context of processing ~~wire~~ payments or value transfers, financial institutions take freezing action and should prohibit conducting transactions with designated persons and entities, as per the obligations set out in the relevant United Nations Security Council resolutions, such as resolution 1267 (1999) and its successor resolutions, and resolution 1373(2001), relating to the prevention and suppression of terrorism and terrorist financing, and resolutions relating to the prevention, suppression and disruption of proliferation of weapons of mass destruction and its financing.

Interpretive Note to Recommendation 16
(~~Wire transfers~~ Payment transparency)

A. OBJECTIVE

1. Recommendation 16 has ~~was developed with~~ the objective of preventing terrorists, perpetrators of money laundering and associated predicate offences (e.g., fraud), and other criminals from having unfettered access to ~~wire~~ payments or value transfers for moving their funds, and for detecting such misuse when it occurs. Specifically, it aims to ensure that basic information on the originator and beneficiary[48] of ~~wire~~ payments or value transfers is immediately available:
   (a) to appropriate law enforcement and/or prosecutorial authorities to assist them in detecting, investigating, and prosecuting terrorists, and other criminals, and tracing their assets;
   (b) to financial intelligence units for analysing suspicious or unusual activity, and disseminating it as necessary, and
   (c) to ordering, intermediary and beneficiary financial institutions to facilitate the identification and reporting of suspicious transactions, and to implement the requirements to take freezing action and comply with prohibitions from conducting transactions with designated persons and entities, as per the obligations set out in the relevant United Nations Security Council resolutions, such as resolution 1267 (1999) and its successor resolutions, and resolution 1373 (2001) relating to the prevention and suppression of terrorism and terrorist financing, and resolutions relating to the prevention, suppression and disruption of proliferation of weapons of mass destruction and its financing.[49]
2. To accomplish these objectives, countries should have the ability to trace all ~~wire~~ payments or value transfers. Due to the potential terrorist financing threat posed by small ~~wire~~ payments or value transfers, countries should minimise thresholds, while taking into account the risk of driving transactions underground and the importance of financial inclusion. It is not the intention of the FATF to impose rigid standards or to mandate a single operating process that would negatively affect the payment system or financial inclusion.

B. SCOPE

3. Recommendation 16 applies to cross-border and domestic ~~wire~~ payments or value transfers ~~and domestic wire transfers~~, including serial payments~~,~~ and cover payments. Differentiated obligations apply to different types of transactions, as set out in Section C.
4. Information accompanying cross-border and domestic payments or value transfers should be structured, to the extent possible, in accordance with the established standards of the system used such as ISO 20022, and should be sufficiently detailed to enable identification of the originator and beneficiary.

[48] The terms "originator" and "beneficiary" are used in Recommendation 16 and its Interpretive Note. These terms are interchangeable with the terms "debtor" and "creditor" respectively, which are used in certain messaging standards such as ISO 20022.
[49] Recommendation 16 does not specify whether or how the information transmitted should be screened against sanction lists, given that various mechanisms may ensure compliance with applicable targeted financial sanctions.

C. INFORMATION REQUIREMENTS ~~CROSS-BORDER QUALIFYING WIRE TRANSFERS~~

5. This section sets out the applicable information requirements for domestic and cross-border transfers including differentiated requirements for certain categories of payments or value transfers. ~~Recommendation 16 is not intended to cover the following types of payments:~~

6. For purposes of implementation of Recommendation 16, the payment chain starts at the financial institution that receives the instructions from the originator for transfer of funds to the beneficiary. The end point of the payment chain is the financial institution that services the account of the beneficiary or provides cash to the beneficiary.

7. Information in the payment message should make it possible for all institutions and authorities referred to in paragraph 1 to identify which financial institution is servicing the account of the originator and beneficiary respectively and in which countries these institutions are located. Financial institutions should ensure that account numbers should not be used to disguise the identification of the country where the financial institution that services the account resides.

Cross-border ~~qualifying wire~~ payments and value transfers

De-minimis threshold for cross-border ~~wire~~ payments and value transfers

8. Countries may adopt a de minimis threshold (no higher than USD/EUR 1,000) for cross-border ~~wire~~ payments or value transfers (other than cash withdrawals)~~.~~. B~~b~~elow this threshold, ~~which the following requirements should apply~~ countries should ensure that financial institutions include with such transfers:

   (a) ~~(i)~~ the name of the originator and beneficiary; ~~(ii) the name of the beneficiary;~~ and

   (b) ~~(iii)~~ ~~an~~ the account number ~~for each~~ of the originator and beneficiary, ~~or a unique transaction reference number.~~ where such an account is used to process the transaction.[50] In the absence of an account, a unique transaction reference number should be included, which permits traceability of the transaction.

   Such information need not be verified for accuracy, unless there is a suspicion of money laundering or terrorist financing, in which case, the financial institution should verify the information pertaining to its customer.

   ~~(b) Countries may, nevertheless, require that incoming cross-border wire transfers below the threshold contain required and accurate originator information.~~

Payments and value transfers above the de minimis threshold

9. Information accompanying all ~~qualifying~~ cross-border ~~wire~~ payments or value transfers above the applicable threshold should always contain:

   (a) the name of the originator and beneficiary;

   (b) the ~~originator~~ account number of the originator and beneficiary where such an account is used to process the transaction.[51] In the absence of an account, a unique transaction reference number should be included, which permits traceability of the transaction;

   (c) the ~~originator's~~ address of the originator[52] and the country and town name (or the nearest alternative) of the beneficiary~~, or national identity number, or customer identification number~~[44]~~, or date and place of birth~~;

[50] In cases where the funds are drawn from a financial institution other than the ordering financial institution, the account number and the name of financial institution from where the funds are drawn should be included.
[51] In cases where the funds are drawn from a financial institution other than the ordering financial institution, the account number and the name of financial institution from where the funds are drawn should be included.
[52] In the absence of standardised postal address information for the originator, the country and town name (or the nearest alternative) suffice.

(d) ~~or~~ where the originator is a natural person, ~~national identity number, or customer identification number~~[48]~~, or~~ the date ~~and place~~ of birth of the originator[53]; and

(e) where the originator and/or beneficiary is a legal person, the following information, where this exists: (i) the connected business identifier code (BIC), or (ii) the Legal Entity Identifier (LEI), or (iii) the unique official identifier of the originator and/or beneficiary.

Domestic ~~wire~~ payments and value transfers

De-minimis threshold for domestic payments or value transfers

10. Countries may also adopt a de minimis threshold (no higher than USD/EUR 1,000), for domestic payments or value transfers. Below this threshold, countries should ensure that financial institutions include with such transfers:

    (a) the name of the originator; and

    (b) the account number of the originator, or a unique transaction reference number which will permit the transaction to be traced back to the originator or the beneficiary.

    Such information need not be verified for accuracy, unless there is a suspicion of money laundering or terrorist financing, in which case, the financial institution should verify the information pertaining to its customer.

Payments or value transfers above the de-minimis threshold

11. Information accompanying domestic ~~wire~~ payments or value transfers should ~~also~~ include originator information as indicated in paragraph 9 for cross-border ~~wire~~ payments or value transfers (or in paragraph 10 above for payments and value transfers below the threshold), unless this information can be made available to the beneficiary financial institution and appropriate authorities by other means. In this latter case, the ordering financial institution need only include the account number or a unique transaction reference number, provided that this number or identifier will permit the transaction to be traced back to the originator or the beneficiary.

12. The information should be made available by the ordering financial institution within three business days of receiving the request either from the beneficiary or intermediary financial institution or from appropriate competent authorities. Law enforcement authorities should be able to compel immediate production of such information.

Exceptions and Differentiated Requirements

Financial institution-to-financial institution transfers, net settlements and batch transactions

13. No information is required to accompany ~~F~~financial institution-to-financial institution transfers and settlements, where both the originator ~~person~~ and the beneficiary ~~person~~ are financial institutions acting on their own behalf.

14. The settlement of payment or value transfers may happen under a net settlement arrangement. Where any net settlement results from payments or value transfers transactions carried out on behalf of customers, information about the underlying transactions is not required to accompany the net settlement. Nevertheless, the relevant requirements of Recommendation 16 do apply to the

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[48] ~~The customer identification number refers to a number which uniquely identifies the originator to the originating financial institution and is a different number from the unique transaction reference number referred to in paragraph 7. The customer identification number must refer to a record held by the originating financial institution which contains at least one of the following: the customer address, a national identity number, or a date and place of birth.~~

[53] When full information of the date of birth is not available, only the year of birth is required.

underlying transactions themselves.

15. Where several individual cross-border ~~wire~~ payments or value transfers from a single originator are bundled in a batch file for transmission to beneficiaries they may be exempted from the requirements of paragraphs ~~6~~ 8 and 9 in respect of originator information, provided that they include the originator's account number or unique transaction reference number (as described in paragraph ~~7 above~~ 9(b)), and the batch file contains required and accurate originator information, and full beneficiary information, that is fully traceable within the beneficiary country.

Card payments

16. With respect to ~~A~~any transfers that flow~~s~~ from a transaction carried out using a credit or debit or prepaid card for the purchase of goods or services,[54] ~~so long as~~ the credit or debit or prepaid card number should accompany~~ies~~ all transfers flowing from the transaction and the name and location of the card issuing and merchant acquiring financial institutions[55] should be made available upon request.[56]

17. ~~However,~~ ~~w~~When a credit or debit or prepaid card is used ~~as a payment system~~ to effect ~~a person-to-person~~ ~~wire~~ other types of payment or value transfer (e.g., a person-to-person transfer), the transaction is ~~covered by Recommendation 16, and the necessary information should be included in the message~~ subject to the applicable requirements above for domestic or cross-border payments or value transfers.

Cash withdrawals

18. No information beyond the account number or card number is required to accompany domestic cash withdrawals.

19. With respect to cross-border cash withdrawals (using a credit or debit or prepaid card through a different financial institution)[57] the following requirements apply:

    (a) The card number should accompany cash withdrawal

    (b) The name of the cardholder should be sent to the acquiring financial institution upon request, within three business days of receiving the request.

[54] The purchase of goods or services refers to purchases from individuals/entities who are onboarded by the relevant financial institution to accept card payments following the required CDD in respect of such activity.
[55] Card issuer and merchant acquirer information should make it possible for all institutions and authorities referred to in paragraph 1 to identify which financial institutions are in possession of the full cardholder and merchant information, and in which countries these institutions are located.
[56] Information should be made available (e.g., with the direct or indirect assistance of the relevant card network) to all other financial institutions in the payment chain and through them to competent authorities. Information should be available in a timely manner.
[57] These requirements do not apply to withdrawals from ATMs operated by the same institution where the account is held, provided the information required in paragraph 19 is available under other means under Recommendation 18.

D. RESPONSIBILITIES OF ORDERING, INTERMEDIARY AND BENEFICIARY FINANCIAL INSTITUTIONS[58] INCLUDING MVTS[59]

Ordering (debtor) financial institution

20. The ordering financial institution should ensure that ~~qualifying wire~~ cross-border payments or value transfers above the de minimis threshold contain required and accurate originator information, and required beneficiary information.

21. The ordering financial institution should ensure that cross-border ~~wire~~ payments or value transfers below the de minimis threshold ~~any applicable threshold~~ contain the name of the originator and ~~the name of~~ the beneficiary and an account number for each, or a unique transaction reference number.

22. The ordering financial institution should maintain all originator and beneficiary information collected, in accordance with Recommendation 11.

23. The ordering financial institution should not be allowed to execute the ~~wire~~ payments or value transfer if it does not comply with the requirements specified above.

Intermediary financial institution

24. For all cross-border ~~wire~~ payments or value transfers, financial institutions processing an intermediary element of such chains of ~~wire transfers~~ transfers should ensure that all originator and beneficiary information that accompanies a ~~wire~~ payment or value transfer is retained with it.

25. Where technical limitations prevent the required ~~originator or beneficiary~~ information accompanying a cross-border ~~wire~~ payment or value transfer from remaining with a related domestic ~~wire~~ payment or value transfer, a record should be kept, for at least five years, by the receiving intermediary financial institution of all the information received from the ordering financial institution or another intermediary financial institution.

26. An intermediary financial institution should take reasonable measures to identify cross-border ~~wire~~ payments or value transfers that lack required ~~originator information or required beneficiary~~ information. Such measures should be consistent with straight-through processing.

27. An intermediary financial institution should have effective risk-based policies and procedures for determining: (i) when to execute, reject, or suspend a ~~wire~~ payment or value transfer lacking required originator or required beneficiary information; and (ii) the appropriate follow-up action.

Beneficiary (creditor) financial institution

28. A beneficiary financial institution should take reasonable measures to identify cross-border ~~wire~~ payments or value transfers that lack required originator or required beneficiary information. Such measures may include post-event monitoring or real-time monitoring where feasible.

29. For ~~qualifying~~ ~~wire~~ cross- border payments or value transfers above the de minimis threshold, a beneficiary financial institution should verify the identity of the beneficiary, if the identity has not been previously verified, and maintain this information in accordance with Recommendation 11.

30. For cross-border payments or value transfers above the de minimis threshold, information received on the intended beneficiary should inform beneficiary financial institution's monitoring, with the objective of detecting misdirected payments (e.g. due to possible money laundering, fraud, or error). Beneficiary financial institutions should take measures to mitigate the risk of transfers being made to an unintended beneficiary. Such measures should include at least one of the following (a), (b), or (c):

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[58] The terms "ordering financial institution (s)" and "beneficiary financial institution (s)" are used in Recommendation 16 and its Interpretive Note. These terms are interchangeable with terms “debtor agent” and “creditor agent” respectively, which are the terms used in certain messaging standards such as ISO 20022.

[59] The responsibilities set out in this section do not apply to cash withdrawals and card payments for purchase of goods or services.

(a) the beneficiary financial institution should, for each transaction, check the extent to which the name and account number of the beneficiary in the payment message aligns[60] with the information held by the beneficiary financial institution; or

(b) the beneficiary financial institution should conduct holistic ongoing monitoring to identify anomalous accounts, transactions, and activity, including misaligned beneficiary information, following a risk-based approach; or

(c) If the beneficiary and ordering financial institutions both participate in a pre-validation mechanism such as confirmation/verification of payee to check, for each transaction, that the name and account number of the beneficiary in the payment message aligns with the information held by the beneficiary financial institution, then this pre-validation may be used instead of (a) or (b) above.

31. A beneficiary financial institution should have effective risk-based policies and procedures for determining: (i) when to execute, reject, or suspend a ~~wire~~ payment or value transfer lacking required originator or required beneficiary information or when they identify potentially misdirected payments in the implementation of the requirements under paragraph 30; and (ii) the appropriate follow-up action.

Money or value transfer service operators

32. Money or value transfer service (MVTS) providers should be required to comply with all of the relevant requirements of Recommendation 16 in the countries in which they operate, directly or through their agents. In the case of a MVTS provider that controls, or is part of a MVTS network controlling both the ordering and the beneficiary side of a ~~wire~~ payment or value transfer, the MVTS provider:

(a) should take into account all the information from both the ordering and beneficiary sides in order to determine whether an STR has to be filed; and

(b) should file an STR in any country affected by the suspicious ~~wire~~ payments or value transfer, and make relevant transaction information available to the Financial Intelligence Unit.

[60] Alignment does not imply that there must be an exact match. The expected degree of alignment may vary based on the risk and context.

Glossary of specific terms used in this Recommendation

Accurate	is used to describe information that has been verified for accuracy.
Address	refers to the physical location of a residence or business.
Batch transfer	is a transfer comprised of a number of individual ~~wire~~ payments or value transfers that are being sent to the same financial institutions, but may/may not be ultimately intended for different persons.
Beneficiary	refers to the natural or legal person or legal arrangement who is identified by the originator as the receiver of the requested ~~wire~~ payments or value transfer in a chain of payments or value transfers.
Beneficiary Financial Institution	refers to the financial institution that services the account of the beneficiary or remits cash to the beneficiary. The beneficiary financial institution is the end point in a payment chain. ~~which receives the wire transfer from the ordering financial institution directly or through an intermediary financial institution and makes the funds available to the beneficiary.~~
Connected Business Identifier Code	BIC refers to a universal business identifier code based on the ISO 9362 standard assigned to financial and non-financial institutions. Connected BICs are those used by financial institutions, for instance to access the SWIFT network.
Cover Payment	refers to a ~~wire~~ payment or value transfer that combines a payment message sent directly by the ordering financial institution to the beneficiary financial institution with the routing of the funding instruction (the cover) from the ordering financial institution to the beneficiary financial institution through one or more intermediary financial institutions.
Cross-border ~~wire~~ payment or value transfer	refers to any *~~wire~~ payment or value transfer* where the ordering financial institution and beneficiary financial institution are located in different countries. This term also refers to any chain of *~~wire transfer~~ payments or value transfers* in which at least one of the financial institutions involved is located in a different country.
Domestic ~~wire~~ payment or value transfers	refers to any *~~wire~~ payment or value transfer* where the ordering financial institution and beneficiary financial institution are located in the same country. This term therefore refers to any chain of *~~wire transfer~~ payments or value transfers* that takes place entirely within the borders of a single country, even though the system used to transfer the payment message may be located in another country. The term also refers to any chain of *~~wire transfer~~ payments or value transfers* that takes place entirely within the borders of the European Economic Area (EEA)[61].
Intermediary financial institution	refers to a financial institution in a ~~serial or cover~~ payment chain that receives and transmits a ~~wire~~ payment or value transfer on behalf of the ordering financial institution and the beneficiary financial institution, or another intermediary financial institution.
Legal Entity Identifier	refers to a unique alphanumeric reference code based on the ISO 17442 standard assigned to an entity by the Global LEI System.
MVTS network	refers to any or a combination of the two following elements: (i) an MVTS and its agents, or (ii) two or more MVTS bound by one or several agreements to proceed to payments or value transfers, including but not limited to the net settlement of those transfers.
Ordering financial institution	refers to the financial institution that receives the instructions from the originator for transfer of funds to the beneficiary. The ordering financial institution is the start point of the payment chain. ~~the financial institution which initiates the wire transfer and~~

[61] An entity may petition the FATF to be designated as a supra-national jurisdiction for the purposes of and limited to an assessment of Recommendation 16 compliance.

	~~transfers the funds upon receiving the request for a wire transfer on behalf of the originator.~~
Originator	refers to the account holder who ~~allows~~ requests the ~~wire~~ payment or value transfer from that account, or where there is no account, the natural or legal person that places the order with the ordering financial institution to perform the ~~wire~~ payment or value transfer.
~~**Qualifying wire transfers**~~	~~means a cross-border wire transfer above any applicable threshold as described in paragraph 5 14 of the Interpretive Note to Recommendation 16.~~
~~**Required originator and/or beneficiary information**~~	~~is used to describe a situation in which all elements of required information are present. Subparagraphs 6(a), 6(b) and 6(c) set out the *required originator information*. Subparagraphs 6(d) and 6(e) set out the *required beneficiary information*.~~
Serial Payment	refers to a direct sequential chain of payment where the ~~wire~~ payments or value transfer and accompanying payment message travel together from the ordering financial institution to the beneficiary financial institution directly or through one or more intermediary financial institutions (e.g., correspondent banks).
Straight-through processing	refers to payment transactions that are conducted electronically without the need for manual intervention.
Unique official identifier	refers to an identification scheme that is issued by the public sector in the relevant jurisdiction and that ensures that a given identifier refers to a unique person, entity or legal arrangement, and that a given person, entity or legal arrangement only has one identifier in that scheme.
Unique transaction reference number	refers to a combination of letters, numbers or symbols, determined by the payment service provider, in accordance with the protocols of the payment and settlement system or messaging system used for the ~~wire~~ payments or value transfer.
~~**Wire** **Payment(s) or value** **transfer**~~	refers to any transaction carried out on behalf of an originator through an ordering financial institution by electronic means with a view to making an amount of funds available to a beneficiary ~~person~~ at a beneficiary financial institution, irrespective of whether the originator and the beneficiary are the same ~~person~~.[46] This includes cash withdrawals.

[46] ~~It is understood that the settlement of wire transfers may happen under a net settlement arrangement. This interpretive note refers to information which must be included in instructions sent from an originating financial institution to a beneficiary financial institution, including through any intermediary financial institution, to enable disbursement of the funds to the recipient. Any net settlement between the financial institutions may be exempt under paragraph 4(b).~~