

Deputy Moz Scott
Chair
Economic and International Affairs Scrutiny Panel
Scrutiny Office
Morier House
St. Helier
JE1 1DD

By email only: P.Lamy@gov.je

30 June 2023

Dear Deputy Scott,

P.36/2023 Draft EU Legislation (Information Accompanying Transfers of Funds) (Amendment) (Jersey) Regulations 202-

Thank you for your letter dated 28 June 2023 addressed to Joe Moynihan, who is currently on leave.

I would respond to your numbered questions as follows:

1. The Government consultation regarding the draft Regulations was brought to our attention by Bastian Hertstein of the Government's Financial Crime Strategy Team just before its publication on 17 April 2023 and we publicised the consultation in our Industry Insight newsletter and on our website, as well as mentioning it in trade body meetings.
2. The consultation required any comments to be sent directly to Dr Hertstein rather than via Jersey Finance and accordingly we have no general awareness of industry reaction. We are aware, however, that the draft Regulations were considered by the Jersey Funds Association and that a JFA representative was to liaise with Dr Hertstein on some drafting points. It was noted by the JFA that there are a few tech solutions on the market to allow Virtual Asset Service Providers (VASPs) to satisfy the Financial Action Task Force's Recommendation 16, commonly known as the Travel Rule.
3. We are not in a position to express a view on the impact on the financial services industry of the draft Regulations. We are, however, aware of the need to bring VASPs and Money or Value Transfer Services (MVTs) within the scope of the EU Legislation (Information Accompanying Transfers of Funds) (Jersey) Regulations 2017 in order to comply with the Travel Rule.



I hope this is of assistance to the Panel.

Yours sincerely,

A handwritten signature in black ink, which appears to read "Amy Bryant". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Amy Bryant
Deputy Chief Executive
Jersey Finance