

# Botswana



**Ofentse Gojamang**

**Registrar of Societies**

Ministry of Labour and Home Affairs

As of January 2024, there are around 9,874 Non-Profit Organisations (NPOs) registered in Botswana. They contribute to a wide range of sectors, reflecting the diversity of the civil society.

## **What is the situation of Botswana on FATF Recommendation 8?**

In 2020, we conducted our initial NPO sector risk assessment in a very short period of time -three months- as a formality to 'tick the box'. But we quickly realised that much more effort was needed. We ended up with a non-compliant rating, prompting us to reevaluate our approach. **Now, our primary concern is not the timeline anymore; but it is about 'doing it right'.** Even if it takes a year, we are committed to getting it right.

For this, we need to comprehend the current anti-money laundering (ML) and counter-terrorist financing (TF) standards

landscape. **Understanding the FATF's requirements against TF is paramount;** we want to shape our efforts based on this understanding before proceeding with implementation. It is one thing to conduct a comprehensive risk assessment and produce a thorough report, but it is equally vital to follow through with recommended actions.

**9874** NPOs registered in Botswana

## **What challenges do you face in implementing the risk assessment methodology?**

One major challenge is **identifying which NPOs fall under the FATF definition.** We have a large number of registered NPOs, and selecting a suitable sample size for risk assessment is a concern. We need guidance on how to approach this issue effectively.

The EU Global Facility helped us to engage all parties including NPOs. and we have formed a 12-member working group dedicated to the assessment.

Another critical challenges is the **transition from manual registration and monitoring to modernised processes and tools.** With the support of the EU Global Facility, we

**" We know the heavy price of being on the FATF Grey List [after being recently delisted]. We count on the EU Global Facility's support to help us stay out of this list."**

# Q&A

are determined to make this transition successfully. We intend to leverage the expertise of these experts to streamline our registration and monitoring processes, implement advanced technologies, and establish efficient data management systems.

While the transition may require time and resources, it is essential for enhancing our capacity to regulate and supervise NPOs effectively and in accordance with international standards

system and international reputation.

Therefore, our primary goal is to ensure full compliance with FATF recommendations. This includes understanding and implementing the requirements effectively, conducting risk assessments meticulously, and adhering to the standards to maintain the integrity of our financial system and protect against money laundering and terrorist financing risks.

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One of our challenges is to determine what constitutes an NPO according to the FATF definition... and to transition from manual to modernised processes.”

**What is the main goal of your efforts to improve compliance with FATF standards?**

Our primary objective in striving for compliance with FATF standards, especially FATF Recommendation 8, is to **avoid being placed on the FATF's Grey List again** [Botswana was officially delisted in October 2021]. We have been under the FATF's International Co-operation Review Group (ICRG) review process.

We felt what it meant to be on this Grey List and we know the very harsh consequences for the country's financial

**What do you expect from the EU Global Facility's information visit?**

Being together with partners from Zambia and Malawi will help us benchmark our work with what the EU Global Facility has done with Zambia but also other countries which have been more successful than us in complying with Rec 8 like Mauritius.

Botswana is very **keen on partnering with countries which are both currently conducting the RA and those compliant with Recommendation 8.**



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