

SUPERVISION OF THE IMPLEMENTATION OF THE SecFin Africa ACTION PLAN IN SUPPORT OF NIGERIA'S AML/CFT/FP NATIONAL SYSTEM - SUPPORT FOR THE WEST AFRICA HUB OF THE SECFIN AFRICA PROJECT.

Terms of reference

- RECRUITMENT OF A SHORT TERM EXPERT

SEPTEMBER 2025

1. General Background

illicit financial flows (IFFs) derived from Transnational Organised Crime (TOC) and terrorist financing fuel insecurity, endanger economic stability and financial integrity as well as compromise the rule of law and governance of countries. West Africa's countries and the wider region are affected by these challenges. Although countries of the region have made significant progress in building anti-money laundering (AML) and counter terrorist financing (CFT) frameworks, the sub-Sahara region lacks the required capability to effectively address IFFs and proceeds of TOC in the fight against these serious criminal and security threats.

The European Union (EU) successfully financed the OCWAR-M project which greatly contributed to building the AML / CFT capacity of professionals in targeted West African countries. Following the training of trainers, at least one national trainer was identified in each country. The EU is strongly committed to continue supporting West African countries in the fight against money laundering and terrorist financing. In line with this commitment, the EU has now financed a new phase of its initiative under a continental project named SecFin Africa (hereafter referred to as "the Project") which aims to support Sub-Saharan African countries to prevent and combat illicit financial flows (IFFs) linked to transnational organized crime, by strengthening anti-money laundering and countering the financing of terrorism (AML/CFT) efforts, in line with international standards.

One objective of the project is to strengthen AML/CFT compliance and effectiveness by providing tailored, demand-driven technical assistance and training covering the entire process—from detection, assessment, investigation, asset recovery, prosecution and drafting of the judgement—through a multiagency approach, ensuring alignment with Financial Action Task Force (FATF) standards.

The Western Africa hub covers all GIABA member states (including Comoros and Sao-Tome-e-Principe) and Mauritania. **Given Nigeria's status as the region's most significant economy, the country will receive particular attention from the SecFin Africa project.** Africa's most populous country and not only an economic powerhouse of the region but the entire continent, Nigeria is, according to the IMF part of the group of oil-exporting countries, the group of middle-income countries, and the group of countries affected by conflict (terrorism). If its growth rate remains stable in 2024, the IMF forecasts a decline in 2025 and 2026. Finally, its public debt has increased, reaching 52.9% in 2024 compared to 48.7% in 2023.

Given the deficiencies identified in its AML/CFT regime following its 2021 mutual evaluation, the FATF placed Nigeria on its grey list in February 2023. Since then, the country has been subject to the ICRG process and significant efforts are being made to ensure its removal from the list by October 2025. However, these efforts and progress will need to be monitored in view of the third-cycle mutual evaluation scheduled for the end of 2027. Technical assistance from the SecFin Africa project is part of the preparation schedule for this upcoming process.

A scoping mission was organized in Abuja, from April 27 to 30, 2025, to meet with all stakeholders involved in AML/CFT, assess their needs, and work with the NFIU to develop a two-year action plan, the main objective of which being the preparation for the third-round mutual evaluation.

The following action plan has been approved by the SecFin Africa project steering committee and is to be submitted for approval by the Inter-Ministerial AML/CFT committee (IMC) on September 30, 2025.

2. GOALS / DESCRIPTION OF THE SERVICE

In order to support the SecFin Africa project under the national AML/CFT framework, it is necessary to draw on qualified Nigerian expertise with in-depth knowledge of the sector's stakeholders in order to steer the project's activities in the right direction, and support the preparation and follow-up of the activities defined in the action plan.

3. DETAILED DESCRIPTION OF THE ACTIVITY

Objectives:

- Support the organisation of all activities included in the action plan validated by IMC
- Contribute to drafting the terms of reference for activities, ensuring that they are complete and relevant.
- Negotiate with partners on the organization of activities if necessary.
- Attend key moments during activities and ensure the quality of expertise
- validate short-term expert reports and verify their accuracy in relation to the activities organized
- Support the SecFin team in finding qualified short-term Nigerian expertise
- Contribute to the monitoring, evaluation, and capitalization of the implementation of the action plan
- Support the SecFin Africa team in overcoming any obstacles that may hinder the implementation of the action plan by helping to identify solutions.

All these objectives are part of the close partnership between SecFin Africa and the NFIU, which must be involved at every stage of implementation.

Expected results:

- All activities included in the action plan are organized
- The quality of the technical assistance provided is recognized by the IMC, the NFIU and all institutional partners involved.
- The NFIU considers that the technical assistance provided by SecFin Africa actively contributed to preparing the country for its third mutual evaluation.

4. METHODOLOGY, CALENDAR AND DELIVERABLES

- Three days per month for 24 months are dedicated to implementing the action plan. These days can be distributed according to the actual activity schedule (72 days)
- 3 days for drafting an interim report after one year of implementing the action plan, useful for the monitoring process
- 5 days for drafting final report, useful for capitalization process

TOTAL: 80 days

5. REQUIRED EXPERTISE:

Nigerian AML/CFT expert, with deep knowledge of the following areas:

- Nigerian AML/CFT system
- Nigerian involved stakeholders in AML/CFT
- Nigerian financial intelligence unit
- Mutual evaluation and ICRG process
- GIABA expectations from their member states
- FATF standards

6. LOCATION OF THE ACTIVITY

Abuja, Nigeria

7. ESTIMATED BUDGET:

Taken in charge by SecFin project: expert fees: 80 expert days X 650 € = 52000 euros all expenses included (gas, meals) **except in the case of a mission outside Abuja** (expenses reimbursed on the basis of the European scale, i.e., transportation + €235 per day for full accommodation)