

## **Analysis of The Impact Financial Action Task Force On Money Laundering and Terrorism Financing (FATF) On The Supervision of Money Laundering and Terrorism Financing Crimes In Indonesia**

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### **KEYWORDS**

strategic intelligence;  
customs and excise;  
money laundering;  
terrorism financing; FATF

### **ABSTRACT**

This research is based on the fact of Indonesia's great efforts in combating money laundering and terrorism financing practices that brought Indonesia to be recognized as the 40th member of the FATF. The purpose of this study is to analyze the threats, vulnerabilities and risks of money laundering and terrorism financing crimes and describe the potential impact of Indonesia's involvement as a member of the FATF on the prevention, supervision and enforcement of these crimes. Using a descriptive qualitative approach, this study uses secondary data from related institution documents and a number of previous research journals as a basis for analyzing the problem under study. The results showed that money laundering and terrorism financing crimes are very high when viewed from the trend in the number of crackdowns in recent years. In addition, the vulnerability related to several problems that are still faced such as weak declarations on carrying cash, large objects of supervision, problems with data input in the system, not standardized supervisory infrastructure, limited authority of the DGT and not integrated reporting applications among related institutions. The potential impact of Indonesia's involvement as a member of the FATF on the prevention, supervision and enforcement of crimes is to increase the credibility of the country's economic management as the main investment attraction. Safeguarding Indonesia's international political interests in influencing international policy in accordance with Indonesia's national interests. And become a catalyst that encourages or "forces" Indonesia to focus on strengthening supervision and law enforcement through various efforts and strategies.

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## Introduction

Money laundering related to terrorism financing is one of the major global threats because of its negative impact on the global economy. The International Monetary Fund (IMF) estimates money laundering rates to range between 2% and 5% of global Gross Domestic Product (GDP), involving an estimated \$1.6 trillion to \$4 trillion per year (Weeks-Brown, 2018; Zolkafilil et al., 2023). Due to the magnitude of the threat and the impact of money laundering globally, various efforts were made by many countries, one of which resulted in the Financial Action Task Force (FATF). The FATF is a "policy-making" body to combat terrorist financing and money laundering crimes in order to bring about legislative and regulatory reforms (Kemal, 2014). The FATF has a set of regulations to combat money laundering, and they were enacted in 1990; And with changes in the financial system and the nature of crime, the regulations were updated in 1996 and 2003 to remain effective and efficient (Yeoh, 2014).

These recommendations are accepted globally and collaborate with other law-making and law enforcement agencies internationally to better address these crimes. The FATF had 40 recommendations from 1990 to 2001 compared to eight in 2001 and in 2004 one new recommendation was added, which now totals 49. The FATF in 2014 already had 36 members. However, there are still many countries in the world that have not been incorporated in the FATF which will certainly have a positive impact on the implementation of anti-money laundering (AML) efforts in a country.

Based on an official release from the Ministry of Finance (Kemenkeu) of the Republic of Indonesia, on October 25, 2023, Indonesia officially became a full member of the 40th Financial Action Task Force (FATF). Indonesia's membership was conveyed by the President of the FATF at the closing of the FATF plenary meeting in Paris, France. The FATF is an international organization focused on global efforts in combating money laundering, terrorism financing, and financing the proliferation of weapons of mass destruction. Indonesia's entry into the FATF membership is considered a strategic step by the Indonesian government and related institutions to become a global part and strengthen the commitment to actively engage in combating criminal acts and transnational crimes (TNOG), especially money laundering, terrorism financing, and funding for the proliferation of weapons of mass destruction (Kemenkeu, 2023).

Various opinions certainly adorn this Indonesian step. There have been many positive responses to this action where experts see this as the impact of strengthening Indonesia's strategy in preventing, monitoring and cracking down on related crimes. Meanwhile, from the perspective of the Minister of Finance, Indonesia's membership in the FATF will have a positive impact on the country's economic credibility, namely increasing positive perceptions of the Indonesian financial system which will have an impact on rapid economic growth through investment both at home and abroad. For the Directorate General of Customs and Excise (DJBC), Indonesia's involvement in the FATF is certainly also expected to have a positive impact on the function of the institution, especially in the aspects of Revenue Collection and Community Protection. This means that the FATF and all kinds of its implementation in the field will make supervision and enforcement even better in the future.

But in practice, becoming a member of the FATF is certainly not the end of Indonesia's struggle in combating money laundering, especially those related to terrorism financing. In practice, threat detection and criminal acts of money laundering, terrorism financing, and financing the proliferation of weapons of mass destruction have long been challenges for the DGCA and other relevant institutions in recent years. Since the birth

of Law Number 8 of 2010 concerning Money Laundering, Indonesia with related institutions has certainly made all integrated efforts in this crime threat. However, whether the threat will shift or decrease in number with the joining of Indonesia with the FATF certainly requires a comprehensive study.

Then the DGT as border guards and filters at the forefront requires strong cooperation with all parties providing these services to create an effective and efficient supervision mechanism. Whether the function of the DGCA, especially related to revenue collection and community protection, will be stronger with the joining of Indonesia with the FATF is certainly a question that will always be present. Therefore, according to the background of the problem and problems, the objectives of the study are expected: first, analyze the threats, vulnerabilities and risks of money laundering and terrorism financing crimes. Second, describe the potential impact of Indonesia's involvement as a member of the FATF on the prevention, supervision and enforcement of money laundering and terrorism financing crimes from the point of view of Strategic Intelligence.

### **Theoretical Review**

#### ***Strategic Intelligence: Threats, Vulnerabilities and Risks***

Strategic intelligence is considered a form of higher intelligence analytical approach; the strategic intelligence approach provides a comprehensive view of a target or activity; make comments on possible future or identify potential problems; provide more comprehensive advice on threats, risks and vulnerabilities; provide options for policy planning and development; assist in allocating resources; and requires extensive knowledge of targets or areas of activity (Hanita, 2019; McDowell, 2008; PPATK, 2023; Prunckun, 2010).

Therefore, mapping or understanding how threats, vulnerabilities and risks occur problems or crimes is vital in strategic intelligence analysis. Threat analysis is the first of three integrated phases in developing intelligence, strategic intelligence and counterterrorism analysis plans. The next two phases are vulnerability analysis and risk analysis. The results of these three analytical efforts form the basis for policy formulation that addresses prevention, preparation, response, and recovery (Prunckun, 2010). Threat can be interpreted as the existence of a person's determination to hurt others. While vulnerability or vulnerability can mean the weakness of an asset that can be exploited by threat agents/actors. And risk according to (Prunckun, 2010) functions of possibility and consequences.

#### ***Money Laundering***

Money laundering is a form of criminal activity that seeks to conceal the legitimacy of the proceeds of crime by disguising them as lawful income. The overall process consists of a placement stage, a layering stage, and an integration stage (Gilmore, 1999; He, 2010; Zolkafilil et al., 2023). Money laundering is a complex activity, where the source and nature of dirty money are disguised so that the money looks legitimate and then usable, transferable, and negotiable (Hobson, 2008; Rider, 2008; Ryder, 2012). Due to its complexity, money laundering methods vary in terms of form such as cash smuggling, money laundering through banking institutions, through insurance institutions, through real estate businesses or lotteries, through underground banks, based on international trade, through shell companies or front companies, through overseas companies or overseas financial centers, through professionals such as lawyers or accountants, through electronic money and the internet (He, 2010).

## Research Methods

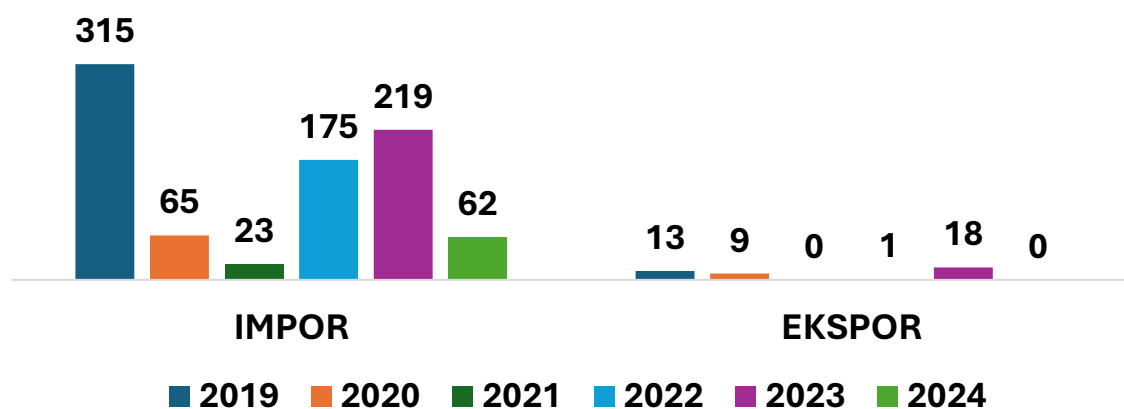
This article is a descriptive qualitative research by relying on secondary data in the form of documents from related agencies and other related institutions as well as previous research studies in the form of research journals related to the problem on dialysis. The data used is related to the description of predictions and shifts in threats, vulnerabilities and risks from the Money Laundering and Terrorism Financing mode as a result of Indonesia's joining the FATF. Meanwhile, the analysis technique used is descriptive analysis by describing the urgency of Indonesia joining the FATF which is assumed to have a positive impact on the prevention and enforcement of money laundering crimes. The research focuses on strategic intelligence analysis in assessing the impact that Indonesia can have when it becomes part of the FATF.

## Results and Discussions

### Threats, vulnerabilities and risks of money laundering and terrorism financing.

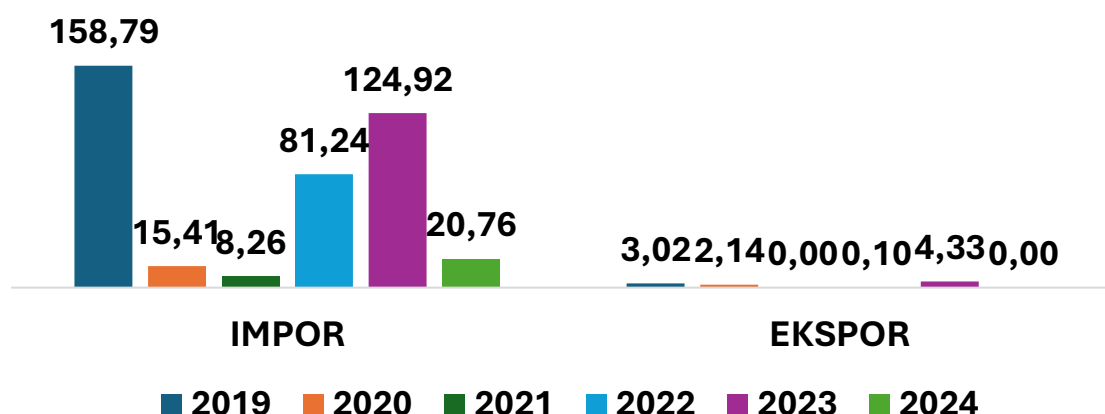
Money laundering activities generally operate on a global scale and exploit differences between countries in very diverse factors. Measures to prevent, detect and eradicate money laundering activities have been initiated by international, regional and specialized bodies. However, the focus of threats, vulnerabilities and risks to a country tends to vary depending on the country's situation. In Indonesia, the threat of money laundering can be said to be quite fluctuating in the last five years (2019-2024) both in terms of enforcement carried out by the DGCA and in terms of the value of large-value goods from enforcement (BHP).

Based on data submitted by the DGCA in 2024, the enforcement of violations of carrying tunia money tends to be very large in import activities, with the highest total enforcement occurring in 2019 followed by 2023. The following is the complete result of the data on the enforcement of cash carrying violations allegedly related to money laundering practices:



**Figure 1. Total Enforcement of Cash Carrying Violations 2019-2024 (DGCA, 2024)**

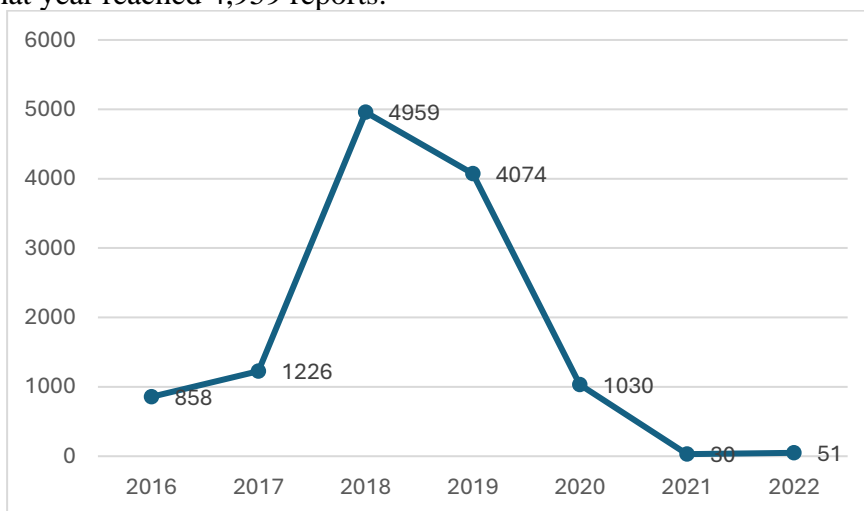
Still in the data submitted by the (DJBC, 2024) in the last five years, including 2024 which has only run for half a year, the total estimate of BHP as a result of the enforcement carried out by the DJBC reached IDR 418.98 billion. In 2019, the value of enforcement is estimated to reach IDR 161.81 billion, and in 2023 it will reach IDR 129.25 billion.



**Figure 2. Estimated Value of BHP Enforcement of Cash Carrying Violations 2019-2024 in Billion Rupiah (DJBC, 2024)**

Based on these data, only in terms of the mode of carrying cash violations that are large enough to show a considerable threat to the Indonesian economy in the context of alleged money laundering cases. Then in a broader context, namely related to threats, vulnerabilities and broader risks in money laundering practices in the form of carrying cash, the DGCA (2022) issued an analytical study to illustrate the problem.

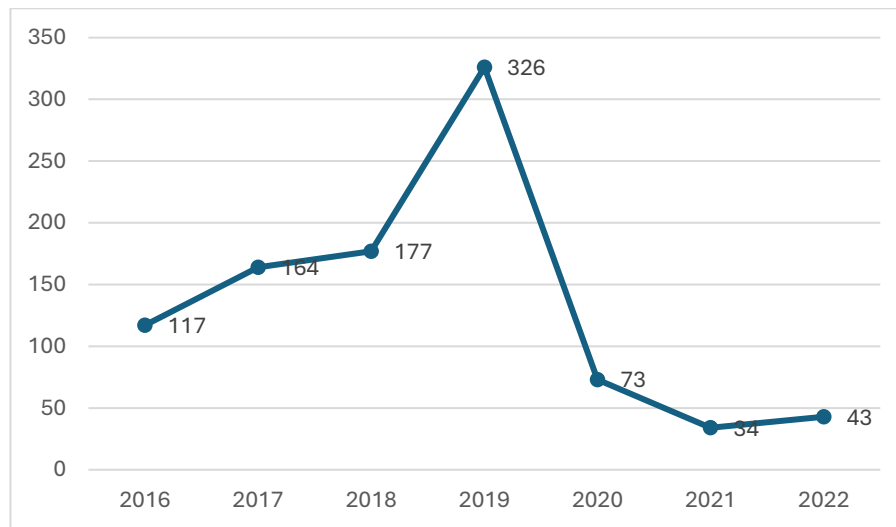
1. For the period 2016-2022, the DGCA found and reported 12,228 cases of cross-border cash carrying (LPUTLB) to PPATK. Data collected by the DGCA (2022) also shows that in the 2019-2022 period, the DGCA also supervised 2,228 Goods Import Notifications (PIB) and cash Goods Export Notifications (PEB). From that period, 2018 was the highest LPUTLB conducted by the DJBC to PPATK which in that year reached 4,959 reports.



**Figure 3. Cross Border Cash Carrying/LPUTLB Report (DJBC, 2022)**

Based on the figure, although there is a downward trend in LPUTLB from the DGCA to PPATK, overall threats and vulnerabilities still cannot be said to have decreased. Based on data on the number of enforcement of PUTLB violations from 2020 and three years of the pandemic, the enforcement carried out is a constant reality that illustrates that violations still occur when restrictions on activities at the border are imposed. Based on the DGCA, the most enforcement was carried out in 2019 which reached 326 cases.

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**Figure 4. Number of Cross-Border Cash Carrying/PUTLB Enforcement (DJBC, 2022)**

2. The assessment of the risk level of PUTLB based on currency type shows that there are around 70 currencies that cross the Indonesian Customs area. Based on the analysis of the (DJBC, 2022), the potential risk of money laundering or TPPU places two main currencies, namely the Singapore dollar (SGD) and the United States dollar (USD) as high-risk currencies brought into the Indonesian Customs area.
3. The assessment of the risk level of PUTLB for theoretic funding in Indonesian territory shows that there is a high risk that PUTLB that occurs in Indonesian territory is for terrorism financing. Based on the DGCA (2022), the main high-risk means of carrying cash for terrorism financing are through airports, ports, land borders and through commercial cargo. Based on the measurement of the level of risk carried out, the mode of air transportation has a high risk that is used by perpetrators as a PUTLB medium.
4. The assessment of the PUTLB risk level for theoretic funding in Indonesian territory based on the country of origin places Singapore as the country of origin with the highest risk of doing PUTLB. Meanwhile, Malaysia, Hong Kong, Thailand and China are designated as countries of origin for PUTLB perpetrators with a relatively moderate risk. Based on the analysis of the (DJBC, 2022), Singapore is the country with the highest risk because of the large number of Indonesian entrances that are directly related to the territory of Singapore, plus the fact that Singapore is a tourist destination for Indonesian citizens, and the high frequency of flights to and from Singapore.
5. Then, the assessment of the PUTLB risk level for theorizing funding in the territory of Indonesia based on the destination country again places Singapore as the country of origin with the highest risk of becoming the destination country of PUTLB. Meanwhile, Malaysia is designated as the destination country for PUTLB actors with a relatively moderate risk.
6. The assessment of the PUTLB risk level assessment for theoretic funding in the territory of Indonesia based on the profile of the perpetrators places money changer employees and money changer corporations with the highest level of risk. Then entrepreneurs/self-employed, private corporate employees/banks with a moderate

risk profile. Based on the DGCA (2022), PUTLB enforcement places money changer couriers as the profile of the perpetrators who are most often acted upon.

7. The assessment of the PUTLB risk level assessment for theorists in Indonesian territory based on the enforcement area places Soekarno-Hatta airport, Batam and Ngurah Rai airport as the highest risk areas in the PUTLB. Then other entrances such as Kuala Namu airport and Juanda airport with moderate risk.

In addition, based on the DGCA (2022), the enforcement of cases of carrying cash that have been carried out so far has high potential and risk where the money is part of terrorism financing efforts. Given this potential risk, the DGCA in carrying out terrorism-related cash control tasks collaborates with other related institutions such as Special Detachment 88 AT Polri, National Agency for Countering Terrorism (BNPT) and Immigration in an effort to jointly analyze and exchange data and information on terrorism suspects and terrorist organizations.

Some of the vulnerabilities in the dynamics of prevention and supervision of money laundering and terrorism financing are the various forms or types of crime modes committed by perpetrators. As equated by (He, 2010) in his research that money laundering methods vary in terms of forms such as cash smuggling, through international trade-based, through shell companies or front companies, and many other modes (He, 2010). For example, related to this mode, the DGCA as a related institution, found several cases related to money laundering crimes. Two of them are prosecutions of cases brought as examples of Indonesia's commitment to fighting money laundering with the results of the FATF recognizing Indonesia officially as a member.

In the case study found, the DGCA in 2020 succeeded in uncovering the smuggling of illegally imported cigarettes (plain / not with excise bands) from abroad (Vietnam and Singapore) for a period of time around August 2019 to October 22, 2020 with the mother vessel mode carrying illegal cigarettes from abroad after arriving around the waters of Berakit, Riau Islands carried out unloading (ship to ship) into high-speed speedboats (High Speed Craft / HSC) next The cargo was taken to the eastern coastal area of Sumatra island (Tembilahan, Guntung Island, Jambi etc.) carried out by a network of smugglers a.n. La Hardi alias Ardi, and his accomplices.

The disclosure of this case began with the enforcement of the integrated sea patrol activities of the Wallacea Net DJBC on Thursday, October 22, 2020. After an inspection of the cargo on KLM Pratama, illegal cigarette cargo was found and the ship's crew was enforced, and then taken to the Regional Office of the DJBC Special Type of Riau Islands, in Karimun for further handling processes. After an investigation of the perpetrators, the DJBC through the Regional Office of the DJBC Special Type of the Riau Islands and the TPPU Task Force at the Directorate of Enforcement and Investigation of the DJBC found suspected violations of Customs crimes by smuggling by unloading imported goods outside the Customs Area or other places without the permission of the head of the customs office and the existence of money laundering (TPPU) with the main suspect La Hardi alias Ardi as Director of PT. Son of Bontong Island, and owner of KLM. Primary.

The trafficking file alleged against the suspect in August 2022 was declared complete (P-21) by the Attorney General's Office according to letter number: B-49/F.3/Ft.1/08/2022. Then in September 2022, the handover of the suspect La Hardi alias Ardi and Evidence (Phase II Submission) from the Dit P2 DJBC Investigator to the Public Prosecutor at the Jampidsus Kecom RI at the Batam State Prosecutor's Office, Batam City, for further proceedings. In this case study, it can be seen that, in many crimes or enforcement of Customs violations, there are vulnerabilities that can result in the entry of

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trafficking threats into Indonesian territory. Based on the DGCA (2022), the vulnerability that occurs in this TPPU practice occurs because:

1. Declarations of cross-border cash carrying tend to go unreported or reported but do not match the amount carried.
2. The large potential of people crossing the border with the potential to carry cash makes it difficult for risk management from the DGCA.
3. The object of DGCA supervision at the border is very broad with many criminal threats, including crimes such as smuggling goods accompanied by trafficking as in the illegal cigarette smuggling case previously mentioned.
4. Difficulties in inputting data on the List of Suspected Terrorists and Terrorist Organizations (DTTOT) on the DGCA cross-border supervisory application due to the presence of DTTOT that does not meet cross-border person reporting standards.
5. There is no standardization of surveillance infrastructure at Indonesian entrances such as airports, ports and land borders.
6. Limited authority of the DGCA in enforcing cross-border money carrying outside of violations or criminal acts involving customs cases.
7. Limitations of information networks in the field on supervisory officers, especially in classifying suspicious cash carrying.
8. There is no integration of the cross-border cash carrying reporting application owned by the DJBC, so that the integration of LPUTLB reporting from the DJBC to PPATK cannot be done through the system.
9. There is no mechanism or forum for exchanging information between institutions.
10. There is still a low level of detection, so feedback on CBCC reports is suspicious.
11. There is still low feedback on the results of LPUTLB analysis from PPATK back to the DJBC.

### **Description of the potential impact of Indonesia's involvement as a member of the FATF on the prevention, supervision and enforcement of *money laundering and terrorism financing crimes*.**

As explained earlier, the *Financial Action Task Force* or FATF is a "policy-making" body to combat terrorist financing and money laundering crimes in order to realize legislative and regulatory reforms (Kemal, 2014). The FATF has set international standards, developed and promoted policies to combat money laundering activities and terrorism financing. The FATF introduced a series of recommendations (40 recommendations) in 2012 to guide the fight against money laundering and counter-terrorism financing (AML/CFT). The FATF has conducted periodic assessments involving two main criteria, namely technical compliance and its effectiveness in monitoring the compliance of member states (Zolkafilil et al., 2023).

As is known, Indonesia based on an official release from the Ministry of Finance of the Republic of Indonesia, dated October 25, 2023, has officially become a full member of the 40th FATF. This means that Indonesia has directly become part of the assessment and has been recognized by the FATF in the country's capability or ability to fight against money laundering and counter-terrorism financing. So the acceptance of Indonesia as the 40th member of the FATF can be said to be a form of world recognition of the effectiveness of regulation, coordination, and implementation of the anti-money laundering regime, prevention of terrorism financing, and proliferation of weapons of mass destruction in Indonesia. Then what is the impact on Indonesia as a country that is also very concerned with the existing threats related to money laundering for terrorism financing.



Based on the conditions of threats and vulnerabilities and risks owned by Indonesia in various acts of money laundering and terrorism financing. At least with the incorporation of Indonesia as a member of the FATF, Indonesia has an official forum or organization that provides supervision over how Indonesia manages money laundering and terrorism financing. So that in terms of aspects of Indonesia's membership in the FATF can have a direct impact on factors such as economy, politics to cross-border crime supervision which are important in supporting Indonesia's economic security and national security.

First, FATF membership can provide increased credibility in the country's economic management as the main investment attraction. Indonesia's membership in the FATF will increase the credibility of the national economy and a positive perception of the Indonesian financial system which will then have an impact on rapid economic growth through investment both at home and abroad. With the increasing credibility of Indonesia in the eyes of the world, it will increase investor confidence in the government as a result of the emergence of confidence that the money they invest in Indonesia is safe and at low risk of money laundering and terrorism financing.

Second, Indonesia's international political interest in influencing international policy in accordance with Indonesia's national interest. In addition, with its status as a full member of the FATF, Indonesia can contribute to coloring global strategic policies related to AML-CFT in accordance with Indonesia's perspective and interests. One of the important values of joining an international forum is how a country includes its national interests in every agenda held in the forum. Including the FATF as a major forum of world countries in combating money laundering and terrorism financing.

Third, Indonesia's membership in the FATF can be a catalyst that encourages or "forces" Indonesia to focus on strengthening supervision and law enforcement through various efforts. FATF membership could open the door for Indonesia to carry out a lot of international cooperation in combating money laundering and terrorism financing. Regarding law enforcement, Indonesia can increase the effectiveness of international cooperation through strong support from FATF member country networks to uncover trafficking and trafficking cases across countries/jurisdictions, including asset recovery.

Indonesia's membership in the FATF can be a first step as well as a catalyst in encouraging relevant parties in Indonesia to improve the framework for prevention, supervision and enforcement of money laundering and terrorism financing activities. One of them is to encourage the Ministry of Finance to further strengthen the budget to provide support to improve work effectiveness, strengthen supervisory and supervisory human resources, and carry out mutual legal assistance in criminal matters or Mutual Legal Assistance (MLA) between Indonesia and other countries, as well as increase the number and quality of assessors and reviewers from Indonesia to enter and play an active role in the FATF MER team (Ministry of Finance, 2023).

According to the DGCA (2022), one of the short-term focuses or recommendations carried out in strengthening the performance of trafficking supervision and prevention is increasing human resource competence accompanied by appropriate placement based on mapping and risk management applied. Strengthening human resource capacity is needed to have a positive impact on manual analysis and field observation of suspicious matters. So that sufficient budget is needed in providing training and learning for human resources to increase their quality and capacity in the types of trafficking crimes and terrorism financing.

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In addition to the budget's focus on human resource development, sufficient budget is also very vital in developing or perfecting supervisory applications such as passenger risk management (PRM) that are already owned by the DGCA, applications must also be supported and integrated with the development of passenger/border crossing service applications. So in this case, FATF membership for Indonesia can "encourage" policymakers on the budget to provide more allocation to efforts to improve the quality of human resources and supervisory facilities.

Then, still related to improving the supervisory performance of Indonesia's membership in the FATF can also be a driver of synergy between related institutions in combating money laundering and funding theorists. With Indonesia joining the FATF, there are many impacts felt, the commitment to join Indonesia as part of the FATF has proven that many government institutions have synergized to reveal various cases regarding money laundering, terrorism financing, to proliferation financing (Rahayuningsih, 2023). Furthermore, according to (Rahayuningsih, 2023) that money laundering is actually a follow-up crime, which means that money laundering will not arise if there is no initial crime. He gave an example that when there is corruption, the emergence of money laundering is likely to occur. This means that cooperation or synergy between or across institutions is vital in combating this crime. So that Indonesia as a member of the FATF will "urge" related institutions to synergize and put aside sectoral egos for one purpose to ensure Indonesia's credibility in the eyes of international forums.

Then Indonesia's membership in the FATF forum can have an impact on related institutions, especially the DJBC, to seek several improvements in the supervision of *money laundering* and *terrorism financing*, such as the imposition of customs criminal sanctions and violations of cross-border cash carrying provisions that have been constrained by the authority of the DGCA. In addition, DGCA and other related institutions can also be encouraged by FATF membership to create performance in the management and supervision of money laundering and terrorism financing crimes through the creation of integrated data and information systems between institutions, and the establishment of joint supervisory forums and integrated communication systems among all relevant parties.

For now, the supervisory system used as a result of joint development is the existence of an integrated information management system regarding suspected Terrorism Financing and an information exchange mechanism between PPATK, Stakeholders, and CHDs electronically through an application called SIPENDAR. SIPENDAR is a system or medium for exchanging and managing information regarding suspected Terrorism Financing between PPATK, Stakeholders, and/or CHDs to optimize efforts to prevent and eradicate Criminal Acts of Terrorism Financing. In this system, many parties are integrated such as BIN, BNPT, DJBC, Immigration and Banking, Densus 88, PPATK and possibly other ministries or institutions that are still related.

### **Conclusion**

Based on the analysis conducted threats, the vulnerability and risk of money laundering and terrorism financing crimes are very high when viewed from the trend in the number of enforcement in recent years. In addition, the risk of this crime is also quite high from the aspect of the currencies used, namely the Singapore dollar (SGD) and the United States dollar (USD), the main means through airports, ports, land borders and through commercial cargo, where the country of origin and destination places Singapore as the country with the highest risk, the profile of high-risk actors is employees of money

changers and money changer corporations and the enforcement area places Soekarno-Hatta airport, Batam and Ngurah Rai airport as high-risk areas. In addition, the vulnerability is related to several problems that are still faced which include the weak declaration of carrying cash, the size of the supervisory object, data input problems in the system, the lack of standardized supervisory infrastructure, the limited authority of the DGT and the lack of integration of reporting applications among related institutions.

Then the potential impact of Indonesia's involvement as a member of the FATF on the prevention, supervision and enforcement of money laundering and terrorism financing crimes from the point of view of Strategic Intelligence is to increase the credibility of the country's economic management as the main investment attraction. Safeguarding Indonesia's international political interests in influencing international policy in accordance with Indonesia's national interests. And Indonesia's membership in the FATF can be a catalyst that encourages or "forces" Indonesia to focus on strengthening supervision and law enforcement through various efforts and strategies.

## References

- DJBC. (2022). *Penilaian Risiko Pencucian Uang dan Pendanaan Terorisme Melalui Pembawaan Uang Tunai Lintas Batas*. Jakarta: Direktorat Jenderal Bea dan Cukai.
- DJBC. (2024). *Data Penindakan Uang Tunai 2019-2024*. Jakarta: Direktorat Jenderal Bea dan Cukai.
- Gilmore, W. C. (1999). *Dirty money: The evolution of money laundering counter-measures* (Vol 2). Council of Europe Publishing Strasbourg.
- Hanita, M. (2019). *Pemikiran-pemikiran strategik intelijen*. UI Publishing.
- He, P. (2010). A typological study on money laundering. *Journal of Money Laundering Control*, 13(1), 15–32.
- Hobson, F. (2008). *Introduction: banks and money laundering*”, in Blair, W. and Brent, R. (Eds), *Banks and Financial Crime*. Oxford & New York: Oxford University Press.
- Kemal, M. U. (2014). Anti-money laundering regulations and its effectiveness. *Journal of Money Laundering Control*, 17(4), 416–427.
- Kemenkeu. (2023). *Indonesia Menjadi Anggota Penuh Financial Action Task Force (FATF) ke-40*. fiskal.kemenkeu.go.id: <https://fiskal.kemenkeu.go.id/publikasi/siaran-pers-detil/538>
- McDowell, D. (2008). *Strategic intelligence: a handbook for practitioners, managers, and users*. Scarecrow Press.
- PPATK. (2023). *Keanggotaan Penuh FATF : Bekal Penting Menuju Indonesia Emas 2045* . Jakarta: Pusat Pelaporan dan Analisis Transaksi Keuangan.
- Prunckun, H. (2010). *Handbook of scientific methods of inquiry for intelligence analysis* (Vol 11). Scarecrow Press.
- Rahayuningsih, T. (2023). *Bergabungnya Indonesia Menjadi Anggota FATF, Begini Respon Pakar Hukum UNAIR*. fh.unair.ac.id: <https://fh.unair.ac.id/bergabungnya-indonesia-menjadi-anggota-fatf-begini-respon-pakar-hukum-unair/>
- Rider, B. (2008). Editorial: an insider paradox. *Company Lawyer*, 29(1), 1.
- Ryder, N. (2012). *Money Laundering-an Endless Cycle?: A Comparative Analysis of the Anti-money Laundering Policies in the United States of America, the United Kingdom, Australia and Canada*. Routledge.
- Weeks-Brown, R. (2018). Cleaning up: countries are advancing efforts to stop criminals from laundering their trillions. *Finance & Development*, 55, 44–45.
- Yeoh, P. (2014). Enhancing effectiveness of anti-money laundering laws through whistleblowing. *Journal of Money Laundering Control*, 17(3), 327–342.
- Zolkafil, S., Syed Mustapha Nazri, S. N. F., & Omar, N. (2023). Asset recovery practices in combating money laundering: evidence from FATF mutual evaluation report of FATF member countries of Asia pacific region. *Journal of Money Laundering Control*, 26(1), 24–34.