

A meeting took place on 26.9.2017 between Director-General Tiina Astola and the Maltese Minister Owen Bonnici to discuss the Maltese citizenship by Investment Scheme. This meeting at political level was preceded by a so-called technical meeting between officials from DG JUST and with Maltese officials and their advisers.

At political level, the Maltese Minister underlined the stringent due diligence tests applied to applications for citizenship in Malta, the high level of refusals and the supervision by an independent regulator. The Maltese inquired about the report on citizenship investor schemes announced by the Commission in its 2017 Citizenship Report. Director-General Tiina Astola underlined the report would be based on a fact-finding study, the chosen contractor was a specialist in the field, the research would be approached sensitively and the study would cover all countries. The Maltese invited the contractor to interview officials at Identity Malta (the agency in charge of the citizenship investor programme) for the study.

At the technical meeting, [REDACTED] from Identify Malta explained the process of applying for citizenship in Malta. The process is handled by 150 accredited agents, who make the application on their clients' behalf to Identity Malta. A customised agreement is made with each applicant as to how they establish their effective residence in Malta, referred to as "how to create a link with the island". It was clear that physical presence in Malta is not a key requirement of this and that two visits may be sufficient. The Maltese officials put a great deal of emphasis on the stringent due diligence and other checks they undertake on the applicants and their family members. They stated that certain decisions not to award Maltese citizenship were under challenge in the Maltese courts.

*For Malta: Minister Owen Bonnici, Ambassador Emma Bonnici, [REDACTED] (Identity Malta), Peter Grech (Attorney-General), - AG, [REDACTED], [REDACTED].*

*For the DG JUST: Director-General Tiina Astola, [REDACTED], [REDACTED], [REDACTED].*