



BANK OF PAPUA NEW GUINEA

FINANCIAL ANALYSIS AND SUPERVISION UNIT

Strategic Plan 2023-2027

Table of Contents

PART 1: THE STRATEGY	7
EXECUTIVE SUMMARY	8
OVERVIEW OF BPNG-FASU STRATEGIES	9
FASU STRATEGY IN DETAIL	10
Strategy 1: Coordination of the National Coordination Committee (NCC) on AML/CTF	10
Strategy 2: Building the capacity of the BPNG FASU Officers	12
Strategy 3: Expansion of BPNG-FASU operations in a pro-active, intelligence-led, evidence-based manner to detect, disrupt and deter financially motivated crime in PNG	14
Strategy 4: Raising awareness on AML/CTF and the consequences of non-compliance to international AML/CTF Standards	15
Strategy 5: Regulation and Supervision	16
Strategy 6: Assist peer regulators efforts in ensuring the shared supervision objectives are pursued and met.	18
Strategy 7: Development of adequate policies, procedures, compliance rules and guidelines for reporting entities, assist other peers supervisors and counterpart agencies domestic or international to develop and implement	19
Strategy 8: Expansion of BPNG-FASU operations through legislative amendments to include the prosecution of offences committed against the AML/CTF Act; restraint of proceeds of crime and other disruption activities targeting the most significant offences, offenders and facilitators.	20
PART II – THE ACTION PLAN	21

Foreword

I am pleased to present the five year Strategic Plan for the Financial Analysis and Supervision Unit (FASU) for 2023 – 2027. The strategic plan will reflect the FASU's action items specified in the Anti-Money Laundering and Counter Terrorist Financing (AML/CTF) National Strategic Plan (NSP) 2023 – 2027. It reflects the functions and responsibilities of FASU specified in the AML/CTF Act 2015 (the Act).

The main objective of FASU is to ensure that PNG's AML/CTF regime is strengthened to be at par with international standards and best practices. FASU has a duty to actively detect, deter, disrupt and prevent money laundering, terrorist financing and proliferation financing (ML/TF/PF) activities, thus protecting the integrity of PNG's financial system and create an enabling environment for investment, trade and business development.

Confidence in the financial system is of paramount importance for investors and corresponding banking relationships. It is evident that investors or corresponding banks require countries to demonstrate an effective AML/CTF regime and control before venturing into such decisions. FASU is PNG's Financial Intelligence Unit (FIU) and supervisor for AML/CTF purposes, therefore needs to ensure its presence is recognised from domestic and international fronts.

FASU also performs the secretariat roles to the National Coordinating Committee (NCC) on AML/CTF given that the Governor, Bank of Papua New Guinea (the Bank) is the Co-Chair to the committee. Hence, reliance on partner agencies within the NCC members including the law enforcement, regulatory and international counterpart agencies reporting entities in the private sector continues to be critical in detecting, deterring, disrupting and preventing ML/TF/PF related activities.

I acknowledge the Bank; Board, Governor and the Executive Management for the continuous support and funding to ensure FASU continues to perform its roles and responsibilities independently. I also acknowledge the Co-chairs and members of the NCC on AML/CTF for the tremendous support and FASU looks forward to working with you all through the Mutual Evaluation in 2023 and beyond.

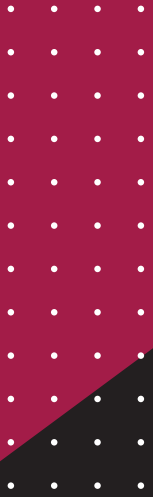
Mr. Benny B M Popoitai, MBE

Director – Financial Analysis and Supervision Unit (FASU)

List of Acronyms

AML/CTF	Anti -Money Laundering and Counter Terrorism Financing
AML/CTF Act	Anti-Money Laundering and Counter Terrorist Financing Act 2015
APG	Asia/Pacific Group on Money Laundering
BPNG	Bank of Papua New Guinea (also referred to as the Central Bank)
CDD	Customer Due Diligence
DJAG	Department of Justice and Attorney General
DNFBP	Designated Non-Financial Businesses and Professions
FASU	Financial Analysis and Supervision Unit
FATF	Financial Action Task Force
FI	Financial Institution(s)
FIU	Financial Intelligence Unit
GST	Goods and Services Tax
IEFTR	International Electronic Fund Transfer Report
IPA	Investment Promotion Authority
IRC	Internal Revenue Commission
LEA	Law Enforcement Agency
MER	Mutual Evaluation Review
ML/TF/PF	Money Laundering and Terrorist Financing and Proliferation Financing
MOU	Memorandum of Understanding
NAMLTF	National Assessment of Money Laundering and Terrorist Financing
NCC	National Coordinating Committee on AML/CTF
NFA	National Fisheries Authority
NFACD	National Fraud and Anti-Corruption Directorate
NPO	Non-profit organization
NRA	National Risk Assessment
OPP	Office of the Public Prosecutor
OSCA	Office of Security Coordination and Assessment
PEP	Politically Exposed Person
PFIC	Pacific Financial Intelligence Community

PM&NEC	Department of the Prime Minister and National Executive Council
PNGFA	Papua New Guinea Forest Authority
POCA	Proceeds of Crime Act (Amendment) 2015
RE's	Reporting Entities
RPNGC	Royal Papua New Guinea Constabulary
SMR	Suspicious Matter Report
SOP	Standard Operating Procedure
TTR	Threshold Transaction Report
TWG	Technical Working Group
UNSCR	United Nations Security Council Resolution



PART ONE:
THE STRATEGY

EXECUTIVE SUMMARY

The role of the Financial Analysis Supervision Unit (FASU) is to protect Papua New Guinea from money laundering and financing of terrorism. The FASU ensures the safety of PNG's financial system from illicit use and combats money laundering and the financing of terrorism. It promotes national security through the collection, profiling and analysis, and dissemination of financial intelligence and strategic use of compliance authorities.

The FASU undertakes its role by receiving and maintaining financial transactions data using secure online IT platform, analysing and disseminating intelligence for law enforcement purposes, and building global cooperation with counterpart FIUs in other countries and with various international bodies.

The FASU also exercises regulatory functions and has powers to issue AML policies, directives and instruction notices requiring banks and other financial institutions to take precautions against financial crime, establish AML programs, the reporting of transactions and information suspected to be linked to criminal, tax evasion, corruption, and other fraud and regulatory investigations and proceedings, and certain counter-terrorism related intelligence and matters.

The FASU has the authority to implement, administer, and enforce compliance with the *Anti-Money Laundering and Counter Terrorist Financing (AML/CTF) Act 2015*, regulations and associated guidelines and directives.

The FASU also contributes towards the Bank of Papua New Guinea's overall strategic objectives as well as one of Government's key objectives of improving livelihood and creating an enabling environment that is conducive for investment and trade.

OVERVIEW OF BPNG-FASU STRATEGIES

This Strategic Plan uses the National Strategic Plan on AML/CTF as the framework for FASU's strategic direction. It has ten key facets:

1. Coordination of the National Coordination Committee (NCC) on AML/CTF
2. Building the capacity of the BPNG FASU Officers to ensure staff develop adequate skills and knowledge to ensure effective implementation of AML/CTF/CPF preventive measures.
3. Expansion of FASU operations in a pro-active, intelligence-led, evidence-based manner, ensuring that activities drive and support national and international counterpart agencies to detect, disrupt and deter financially motivated crime in PNG
4. Raising awareness on AML/CTF and the consequences of non-compliance to international AML/CTF Standards
5. Regulation and Supervision of reporting entities specified under the AML/CTF Act 2015
6. Assist peer regulators efforts in ensuring the shared supervision objectives are pursued and met.
7. Development of adequate policies, procedures, compliance rules and guidelines for reporting entities, assist other peers supervisors and counterpart agencies domestic or international to develop and implement
8. Expansion of FASU operations through legislative amendments to include the prosecution of offences committed against the AML/CTF Act; restraint of proceeds of crime and other disruption activities targeting the most significant offences, offenders and facilitators.

FASU STRATEGY IN DETAIL

Strategy 1: Coordination of the National Coordination Committee (NCC) on AML/CTF

1.1 Strategic Challenges

International experience has demonstrated that the effective implementation of a national AML/CTF framework requires the presence of an overall coordination and cooperation mechanism incorporating all principal stakeholders in a whole-of-government approach. A centrally dedicated mechanism will also allow the implementation of national AML/CTF policies to be aligned with regional and worldwide initiatives thereby simultaneously fulfilling international obligations.

As co-chair to the NCC, BPNG is charged with added secretariat responsibilities.

1.2 Strategic Objectives

The effective coordination of the NCC will serve to:

- Bring together all relevant government stakeholders within the AML/CTF regime. These stakeholders must formally recognize their roles and be bound by the need to mobilize resources within their remit to effectively implement AML/CTF requirements.
- Overcome challenges identified in the process for formulating and implementing AML/CTF laws and regulations (e.g. coordination and cooperation in information sharing, instituting corrective actions and enforcement initiatives).
- Establish comprehensive strategies, taking into account PNG's vulnerabilities in implementing international Financial Action Task Force (FATF) recommendations.
- Coordinate and assist where necessary in the building of domestic capacities for sustaining an effective AML/CTF supervision regime, particularly amongst its peer regulators.
- Increase joint agency collaboration and enforcement activities related to AML/CTF

1.3 Strategic Measures

A sub-decree on the establishment of the NCC was bestowed by a National Executive Council decision of December 2012 to:

- enhance operational cooperation and policy coordination among competent authorities
- operate the NCC by agreeing on a schedule of meetings to set an annual and medium-term work program, with milestones on outputs, to achieve the overall objective of the National AML/CTF Strategy
- Complete the Strategic Implementation Plan (SIP) and monitor execution to ensure

that each stakeholder comply with the action steps within the action plan for implementation of the National AML/CTF Strategy

- Work with and support the Department of Justice & Attorney General (DJAG) towards agreement on required changes to the suits of AML/CTF legislations and other regulatory instruments to enhance provisions for allowing the freezing of assets, confiscation, extradition, mutual legal assistance, information sharing, in line with the international FATF standards and UNSCR requirements.
- Confirm and establish roles of supervisory authorities in oversight of reporting entities in the financial sector and of DNFBPs.
- Assist in the development of with the peer supervisory authorities on assessment modules for reporting entities compliance with AML/CTF requirements. Work to integrate assessment of compliance with AML/CTF requirement within the regular inspection/evaluation regimes of the respective regulators.
- Establish sanctions, enforcement regimes and mechanisms for monitoring the implementation of mandatory corrective actions required of reporting entities.
- Ensure there are sufficient resources for the BPNG-FASU and its peer supervisory authorities, to allow effective implementation of AML/CTF preventive measures.
- Monitor the implementation of the National Strategies and take corrective actions to adjust for deviations or unanticipated developments.
- Monitor the effectiveness of AML/CTF measures that have been implemented. Prepare periodic reports on the status of BPNG's AML/CTF supervisory framework and progress in implementation of AML/CTF requirements for the financial system.

1.4 Stakeholders/Institutions involved

National Coordinating Committee on AML/CTF consists of 21 member agencies. These agencies includes;

1	Department of Justice and Attorney General (<i>Co-chair</i>);	12	Investment Promotion Authority;
2	Bank of Papua New Guinea (<i>Co-chair</i>);	13	Securities Commission;
3	Department of Prime Minister and National Executive Council;	14	Office of the Insurance Commissioner
4	Department of Foreign Affairs and Trade;	15	Immigration and Citizenship Services Authority
5	Department of Finance;	16	PNG Forest Authority
6	Department of Treasury;	17	National Fisheries Authority
7	National Gaming & Control Board;	18	National Maritime Safety Authority
8	Royal Papua New Guinea Constabulary;	19	Ombudsman Commission
9	Office of the Public Prosecutor	20	National Narcotics Bureau; and
10	PNG Customs Service;	21	National Intelligence Organisation
11	Internal Revenue Commission;		

Strategy 2: Building the capacity of the BPNG FASU Officers

2.1 Strategic Challenges

- The functionality and operational capability of the BPNG-FASU must be developed to ensure effectiveness in the implementation of AML/CTF preventive measures. Adequate budgetary and staff resources should be allocated to BPNG-FASU to build up a functional structure which is consistent with international best practice in AML/CTF supervision. The principal functionality of BPNG-FASU would be in:
 - a) The domestic and international coordination and cooperation at the policy and operational levels in the implementation of international acclaimed FATF 40 recommendations and in particular, FATF's regional review group action items, and
 - b) Developing its capabilities to implement the APG's Mutual Evaluation Review (MER) and adequately address the findings of the report relating to FIU, regulation and supervision.
 - c) Developing technical knowledge and understanding with the assistance from donor and partners to review the National Risk Assessment (NRA), and develop Sector Risk Assessments (SRA) reflecting the risks identified in the NRA of 2017.
 - d) Developing and utilising strategic intelligence as effective and efficient methods in accurately identifying and addressing financially motivated crime in PNG
- Recruit adequate personnel, followed by an extensive roll out of training programs to increase technical capabilities of personnel in AML/CTF risk supervision of the financial system. BPNG-FASU would be better equipped to provide adequate guidance and training to its peer supervisory authorities and REs on effective implementation of AML/CTF preventive measures.
- Seeking Technical Assistance (TA) for technical advisors to be working with the BPNG FASU officers to enable hands on training and mentoring onsite while assisting to put together working tools to combat AML/CTF issues while complying with the FATF recommendations and meeting international obligations.
- More importantly, better-enhanced modules would be designed to continuously raise the awareness on AML/CTF obligations among stakeholders, including regulatory authorities, reporting entities, civil society groups and the public at large.

2.2 Strategic Objectives

BPNG-FASU will have the capability to undertake its principal functions and coordinate efficiently with all stakeholders. This would:

- Ensure BPNG-FASU is adequately staffed and resourced with the capability to fulfil its duties effectively in response to ML/TF/PF/ threats and risks within the financial system.
- Extend and complete the setting up of on-site and off-site oversight, ensuring that reporting entities get better insights into the sources and impacts of ML and TF and participating in the prevention of the crime of ML, TF and PF.

- Enhance staff training for BPNG-FASU, supervisory authorities (peer regulators), other government entities, and reporting entities.
- Have BPNG-FASU devote special attention to improving and generating the range of statistics to reflect an effective implementation of the AML/CTF requirements.
- Raise public participation through a focussed campaign to support the implementation of the AML/CTF regime and help to increase awareness and knowledge to develop a preventive culture against ML and TF crimes in society.

2.3 Strategic Measures

Actions should focus initially on the governance, structure, and organizational set up of BPNG-FASU. Thereafter, measures to build up BPNG-FASU functionality should be progressively addressed:

- The strategic direction for the BPNG-FASU which should include formulation of a clear plan as to the resources, structure and information technology requirements. The governance and organizational structure of BPNG-FASU should be well established so that its role within the AML/CTF regime is well defined.
- A code of conduct and a set of regulations, procedures, and guidelines for the staff of BPNG-FASU will be established.
- Recruit staff for the BPNG-FASU and provide training opportunities for them to achieve skills and gain insight into the techniques of managing, analysing and supervising AML/CTF risks within the financial system.
- Framework for reporting entities.
- Provide guidance to REs on the AML/CTF requirements. Jointly develop with the relevant regulators and REs training programs to strengthen their capability to implement preventive measures and to improve the detection as well as the quality of reports on potential suspicious ML or FT activities.
- Have a continuous program to raise public awareness of PNG's AML/CTF efforts to meet international obligations and safeguard the integrity and stability of the financial system in support of sustained economic growth to raise national income levels.
- Develop protocols and interfaces with domestic supervisory authorities and law enforcement bodies to allow spontaneous and more collaborated efforts on AML/CTF risk management. These arrangements should also allow properly formed requests to be submitted to such supervisory authorities and law enforcement bodies for providing additional information to strengthen and broaden BPNG-FASU's supervision abilities.
- Develop protocols and interfaces to allow information held by reporting entities (in addition to SMR/TTR/IEFTR reports) and government agencies to be accessed and protected for the purpose of performing legitimate BPNG-FASU functions.

2.4 Stakeholders/Institutions involved

- All NCC member state agencies,
- other local competent authorities,
- universities, schools,
- media and the public.
- Multi-national and international organisations such as: ADB, World Bank, IMF, UNODC, APG, FATF, UNDP and other foreign supervisory authorities.

Strategy 3: Expansion of BPNG-FASU operations in a pro-active, intelligence-led, evidence-based manner to detect, disrupt and deter financially motivated crime in PNG

3.1 Strategic Challenges

The reactive nature of the work BPNG-FASU does will sometimes see funds moved through the financial system without even being stopped. Criminals or perpetrators move funds quickly with the aim of disguising the original of funds, which are sometimes converted to cash in a matter of hours or days. It is important for BPNG-FASU to be proactive in disrupting, detecting or deterring those occurrences to avoid the financial system being used or abused in such manner. The BPNG-FASU should continue to perform proactive, intelligence led, evidenced based detection, disruption or deterrence to safeguard the financial systems to ensure;

- SMRs are submitted with supporting documents to BPNG-FASU to reduce time and improve timely dissemination to appropriate LEA
- Regular or targeted onsite or offsite supervision of RE's are required to target specific customers or sectors to ensure the RE's increase their CDD obligations
- Regulatory or supervisory actions are imposed on RE's for non-compliance to AML/CTF requirements or international standards

3.2 Strategic Objectives

To be proactive in detecting, deterring and disrupting financially motivated crime through intelligence led and evidenced based manner.

3.3 Strategic Measures

The following strategic measures are planned and are in motion, which are undertaken either sequentially or simultaneously depending on the availability of resources and the degree of coordination and cooperation required from all stakeholders:

- Improve coordination with intelligence agencies domestically to work with competent authorities to safeguard the financial system
- Improve coordination with international counterpart agencies and international bodies or affiliates such as Egmont Group, PFIC and other similar bodies to detect, deter and disrupt financially motivated crime

- Improve reporting requirements by RE's especially on the SMRs so that source documents are also attached to the SMR when submitted for ease of profiling and dissemination to competent authorities
- Supervision and regulation or enforcement action of RE's should be informed by intelligence to ensure RE's continue to maintain or uphold high standard of CDD requirements
- Develop guidance for RE's to follow when reporting SMRs to implement the evidence based reporting requirements

3.4 Stakeholders/Institutions involved

Active participation required from:

- All NCC member state agencies,
- other local competent authorities,
- universities, schools,
- media and the public.
- Multi-national and international organisations such as: INTERPOL, Egmont, PFIC, UNODC, APG, FATF and other foreign intelligence and supervisory authorities.

Strategy 4: Raising awareness on AML/CTF and the consequences of non-compliance to international AML/CTF Standards

4.1 Strategic Challenges

Whilst the POCA came into existence in 2005, most reporting entities under the AML/CTF regime are not very well informed about their obligations. With the passing of five suits of AML/CTF legislations in 2015, removal of PNG from FATF grey-listing in 2016 and other subsequent publications including enforcement actions and list of reporting entities annually, the public are beginning to understand the existence of BPNG-FASU and the work it does. Given the geographical landscape of PNG and its diversity, it's often a challenge for people to be informed of the AML/CTF awareness and its consequences of non-compliance to international standards. A continuous program is needed to raise the awareness of all stakeholders, particularly REs, on what these AML/CTF obligations are and on the negative implications for the economy of non-compliance with these requirements. This awareness should also extend to the NCC agencies, politicians, business communities, students, civil societies and the public at large.

4.2 Strategic Objectives

Ensure all relevant stakeholders in the government, the private sector and the public at large are aware of international AML/CTF obligations and their roles in meeting these requirements. They should also be informed of the consequences of non-compliance and the adverse implications it will have on the country.

4.3 Strategic Measures

Awareness raising has to be carried out progressively starting from the top of the pyramid with the politicians and NCC and moving down the chain eventually to the general public, civil society and citizens:

- BPNG-FASU to organize outreach and awareness raising seminars for the NCC and other government agencies with roles in the AML/CTF framework. This may include key Ministries, legislative entities, LEAs, prosecution authorities, customs departments and other related agencies.
- Extend AML/CTF awareness programs to peer supervisory and regulatory staff, other government supervisory authorities, and self-supervisory authorities of reporting entities (if any).
- Awareness raising must reach out to reporting entities, including financial institutions & DNFBNs.
- Target awareness programs for the general public, other civil society stakeholders and the media press releases and advertorials, posters and pamphlets among others.
- Awareness raising is not a one-off event and must be maintained with a sustained schedule to update and disseminate information, and obtain feedback from stakeholders.
- Develop website and linked in page to populate and disseminate information relevant for public consumption relating to AML/CTF related activities

4.4 Stakeholders/Institutions involved

- Politicians
- NCC government agencies
- Civil Societies
- Media
- Reporting Entities
- General public

Strategy 5: Regulation and Supervision

5.1 Strategic Challenges

Increased and enhanced cooperation, coordination and collaboration are critical among government stakeholders, and particularly within the AML/CTF regulation and supervision regime, for effective implementation of preventive measures to detect, deter and disrupt ML, TF and PF activities within the financial system.

5.2 Strategic Objectives

- To detect and deter money laundering and terrorist financing
- To contribute to public confidence in the financial system

- To facilitate co-operation amongst reporting entities, supervisors and various government agencies.

5.3 Strategic Measures

- Develop off and onsite supervision AML/CTF tools
- Increase AML/CTF supervision and regulatory oversight of reporting entities with the various financial sectors
- Develop and foster a more coordinated and collaborated supervision regime with peer regulators to ensure AML/CTF compliance
- Design supervisory oversight for AML/CTF compliance:
 - Risk of money-laundering and terrorist financing to the financial sector
 - Role of supervisory oversight for AML/CTF compliance.
- Develop an effective supervisory oversight for AML/CTF compliance:
 - off-site monitoring and on-site inspections at point of licensing.
- Develop planning and designing off-site and on-site AML/CTF surveillance tools by regulators/supervisors
- Develop supervisory procedures and manuals for AML/CTF compliance supervision for the sectors supervised.
- Implement supervisory framework for AML/CTF compliance.
- Develop and ensure the role of financial supervisors in building partnership with financial institutions, peer regulators and relevant competent authorities for AML/CTF is fostered
- Consultation in developing supervisory rules and guidelines
- Dissemination of information to the financial sector
- Role of industry associations for AML/CTF (hold regular meetings with industry, etc)
 - Participate in case studies on AML/CTF, meet domestic, regional and international AML/CTF reporting obligations.
- Typologies of ML/TF/PF through Viper database
- Internal control for AML/CTF at financial institutions
- Compliance function for AML/CTF
- Role of internal audit and external audit function for AML/CTF
- Prepare and participate in meeting reporting obligations.
- Registration of RE's and maintaining a register all RE's

5.4 Stakeholders/Institutions involved

Active participation required from:

- All NCC member state agencies, particularly the AML/CTF supervisors of the financial system
- Other local competent authorities
- International partner

Strategy 6: Assist peer regulators efforts in ensuring the shared supervision objectives are pursued and met.

6.1 Strategic Challenges

Responsibility for AML/CTF regulation is assigned to several government agencies, including the Bank of Papua New Guinea, the Office of Insurance Commissioner and the Securities Commission. BPNG-FASU has the regulatory oversight of AML/CTF reporting of SMR by RE's. This structure provides the benefits of the regulator having established relationships with RE's, and a deep understanding of how they do business and their internal processes and challenges. At the same time, the structure also poses the challenge of having a coordinated and consistent approach to AML/CTF supervision across all industry sectors, as well as that of sharing information between agencies.

6.2 Strategic Objectives

As part of the overarching goal to strengthen PNG's capacity to supervise AML reporting entities, coordination between BPNG-FASU as the FIU and supervisor for AML/CTF purposes and peer regulators should be increased to ensure a coordinated and consistent approach by all regulators to AML/CTF supervision in PNG.

A consistent approach should be applied, across all industry sectors, addressing:

- training of regulatory staff
- supervision processes
- guidance materials provided to reporting entities
- compliance and enforcement procedures and tools.

6.3 Strategic Measures

- An effective NCC which meets regularly to address coordination issues at a high level.
- MOU between agencies where appropriate to provide a framework for working together and sharing information.
- Joint onsite supervision with peer regulators in country and within the region to share experiences and understand ML, TF and PF risks from a different context
- Liaison between agencies at a technical level on a regular basis.

6.4 Stakeholders/Institutions involved

- NCC
- Bank of Papua New Guinea
- Insurance Commission
- Securities Commission
- FIU.

Strategy 7: Development of adequate policies, procedures, compliance rules and guidelines for reporting entities, assist other peers supervisors and counterpart agencies domestic or international to develop and implement

7.1 Strategic Challenges

Adequate policies, procedures and guidelines are required to ensure RE's are able to implement and mitigate the risks of ML, TF and PF. Compliance rules should also be developed and issued to the RE's to ensure compliance with relevant rules and regulations. Peer supervisors will have difficulties understanding and implementing AML/CTF measures therefore will require assistance from BPNG-FASU to ensure effective supervision of AML/CTF within their sector. The supervision on AML/CTF should be shared with BPNG-FASU given the limitations other supervisory authorities will encounter until such time they are able to manage, especially when conducting onsite supervision.

7.2 Strategic Objectives

Peer supervisors should consider working with BPNG-FASU on matters that will involve AML/CTF supervision in areas such as;

- Developing onsite and offsite SOP
- Joint onsite supervision through MOU arrangements
- Sharing of guidance materials compliance and enforcement procedures and tools.

7.3 Strategic Measures

- Joint meeting or regular peer supervisors forum to address coordination issues or cross cutting risks
- Sharing and developing guidelines, policies, SOPs, manuals, compliance rules within respective sectors and jurisdictions to address ML/TF/PF related issues
- MOU between agencies where appropriate to provide a framework for working together and sharing information.

7.4 Stakeholders/Institutions involved

- NCC
- Bank of Papua New Guinea
- Insurance Commission
- Securities Commission
- FIU.
- International counterpart AML/CTF supervisors

Strategy 8: Expansion of BPNG-FASU operations through legislative amendments to include the prosecution of offences committed against the AML/CTF Act; restraint of proceeds of crime and other disruption activities targeting the most significant offences, offenders and facilitators.

8.1 Strategic Challenges

BPNG-FASU has been in operations since the enactment and certification of the suites of AML/CTF legislations in 2016 however; there remains the challenge of LEAs using BPNG-FASU disseminations to progress investigations and prosecutions ML/TF/PF cases leading to asset forfeitures. In recent times, few of the cases have been progressed, however the role BPNG-FASU performs need to be clearly understood by LEAs and other counterpart agencies to ensure cases progressed to investigations and prosecutions.

Initially when the FIU was within Police, it performs investigative functions. However, when the FIU functions were transferred to the BPNG, Police retain investigations and restraining powers while intelligence function was transferred to the BPNG. There is need for the review of the AML/CTF Act to ensure BPNG-FASU is given the powers to investigate, prosecute and restrain proceeds of crime to improve the AML/CTF regime in PNG.

8.2 Strategic Objectives

Review of AML/CTF Act to ensure BPNG-FASU have the powers to investigate, prosecute and restrain or forfeit to the state proceeds of crime. This can be achieved through the following;

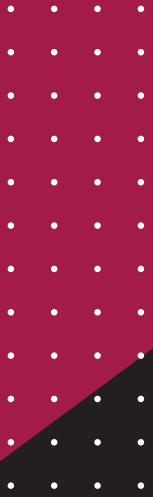
- Amendment to the AML/CTF Act 2015
- Consequential amendments to the Proceeds of Crime Act (Amendment) 2015 and other relevant legislations

8.3 Strategic Measures

- Increased investigation and prosecutions of ML/TF/PF cases generated from BPNG-FASU intelligence reports
- Increased restraining and forfeitures of proceeds of crime related to ML/TF/PF cases
- Increased involvement of LEAs seconded to BPNG-FASU
- Increase joint agency collaboration and cooperation

8.4 Stakeholders/Institutions involved

- NCC
- LEA
- DJAG



PART TWO: **THE ACTION PLAN**

No	Division Responsible	Action Items	Timeframe	Other Agencies
1	IMD	<p>Continuous Evidence-Based National Assessment of Money Laundering and Terrorist Financing (NAMLTF)</p> <p>Implement and maintain a continuous, evidence-based process, to determine (on a quarterly basis) the most significant predicate offences; the most significant methods of committing offences and laundering the proceeds; the most significant entities involved; and, the root causes of the reasons why money laundering and terrorist financing occurs as it does.</p> <p>Explain why ML and TF occur in the manner in which they occur; and, develop and deploy disruption strategies to address ML and TF identified.</p> <p>The continuous, evidence-based NAMLTF will consist of the following components drawn from the NRA Methodology for Pacific Island Countries published by the UNDP:</p> <ul style="list-style-type: none"> • Events Analysis – examining the most significant ML&TF events that have occurred over the past three years; • Systems Testing – using a ‘mystery shopper’ process to test the key components of the AML/CTF System; • Scenario Testing – using a ‘war-gaming’ process to assess the potential response of the AML/CTF System to various scenarios • Surveys and Interviews of experts – to determine root causes as to why ML&TF are occurring in the ways identified, and to support the development of methods to disrupt the most significant ML&TF that is occurring. • Deploy disruption strategies to address, on a continuous basis, the most significant methods of money laundering and terrorist financing identified each quarter. • Monitoring and Evaluation – to determine the effectiveness of the disruption strategies deployed. 	<p>Events Analysis -December 2023</p> <p>Systems Testing – Feb 2023</p> <p>Scenario Testing – March 2023</p> <p>Surveys and Interviews of experts – April 2023</p> <p>Deploy disruption strategies – May 2023</p> <p>Monitoring and Evaluation – June 2023</p>	

No	Division Responsible	Action Items	Timeframe	Other Agencies
		<p>The continuous, evidence-based assessment will identify and rank:</p> <ul style="list-style-type: none"> • Facilitators of ML/TF • predicate offences; • offenders • methods of ML&TF; • assets; • products and services; • foreign jurisdictions; • geographic locations; • entities and • victims 		
2	IMD	<p>1.2 Assessment of the circumvention of AML/CTF Controls Recommended by the FATF</p> <p>Undertake Scenario Testing to identify and assess those ML/TF methods that have been developed to circumvent controls recommended by the FATF:</p> <ul style="list-style-type: none"> • legal persons and entities created in high-risk jurisdictions (tax/money-laundering havens); • debit and credit cards; • trade-based money laundering (particularly bartering and triangular trade); • Cash-intensive businesses • Domestic electronic funds transfers <p>2.1 Foreign Tax Information</p> <p>Expand the coordination mechanism to support the collection by FASU of foreign taxation information (on PNG PEPs and High-Risk customers) obtained under the Common Reporting Standard</p> <p>2.2 Training on Disruption</p> <p>Training for agencies on disruption of financially-motivated crime using the ML offence and the AML/CTF Act, Criminal Code; immigration and taxation legislation; provisions under UNCAC and any other legislation or conventions that may assist.</p>		

No	Division Responsible	Action Items	Timeframe	Other Agencies
3	IMD	<p>Monitoring and Evaluation will take the lead in the development, deployment and Monitoring and Evaluation of disruption strategies that have been deployed to address the most significant financially-motivated offences and facilitators identified using the Continuous Evidence-based National Risk Assessment</p> <p>Legislative Amendments Use the Evidence-based Money Laundering and Terrorist Financing Assessment (NAMLTF) as the key source of legislative amendment for the AML/CTF Act; Criminal Code; Taxation Act and other legislation relevant to the detection and disruption of financially-motivated crime.</p>	June 2024	DJAG
4	IMD SCD PDCD	<p>Intelligence collection and management Expand and improve the Taipan database to include:</p> <ul style="list-style-type: none"> • Automated link diagrams; • ingestion and analysis of IPA data; • ingestion and analysis of tax data; • Investigation Case Management module and workflow processes. <p>Reduce Selective and Defensive Reporting of SMRs and Improve the Rejection of Transactions Enhance reporting from Financial Institutions (FI) and Designated Non-Financial Business Professions (DNFBPs) to reduce the incidence of selective reporting of SMRs; reduce multiple/defensive reporting; and improve the ratio of rejected transactions to accepted transactions reported as SMRs</p> <p>Enhance the Use of Financial Intelligence Enhance the use of disseminated information and intelligence by law enforcement agencies and foreign counterparts for the disruption the most significant facilitators of predicate offending and money laundering</p>		DJAG DJAG IPA SCPNG NGCB Customs IRC ICA PM&NEC NIO RPNGC

No	Division Responsible	Action Items	Timeframe	Other Agencies
4.4		<p><u>Expand the Collection of Data and Intelligence</u> Using the Evidence-based NAMLTF, expand the collection of data and intelligence to include that required to detect:</p> <ul style="list-style-type: none"> • Trade-based money laundering – including bartering and triangle-trade; • The use of debit and credit cards for ML; • The use of products and services from money laundering haven jurisdictions; • The use of real estate and bank accounts in Australia for ML. 		
4.5		<p><u>Facilitate the Confiscation of Illicit Assets Located in Foreign Jurisdictions</u> Continue to expand the range of information sharing mechanism with other agencies and international authorities particularly with respect to the receipt of up-to-date intelligence from foreign FIUs to support the confiscation of illicit assets held in Australia (and other jurisdictions) that are the proceeds of offences committed in PNG.</p>		
4.6		<p><u>Facilitate the Detection and Confiscation of Smuggled Cash</u> work with foreign and domestic Customs agencies and FIUs to implement a mechanism for detection of bulk-cash smuggling; collection and analysis of Border Currency Reports; cash seizure and confiscation; and, Trade-based Money Laundering including bartering and triangular trade.</p>		
4.7		<p><u>Intelligence-led Expand Collection of Intelligence from Other PNG Authorities and Agencies</u> Use the NAMLTF and QSAR to determine intelligence-needs and expand the range of information collected from other respective agencies, DNFBPs, FIs and other key organisations and associations to improve detection of ML and develop and deploy effective methods of disruption.</p>		

No	Division Responsible	Action Items	Timeframe	Other Agencies
5		<p>4.8</p> <p><u>Quarterly Strategic Analysis Report</u> expand its Quarterly Strategic Analysis Report to include:</p> <ol style="list-style-type: none"> 1. Intelligence sourced from Human Sources; foreign FIUs; IPA; IRC; Ombudsman; RPNGC 2. Operational analysis (using information to continuously and accurately identify the most prolific facilitators of money laundering and determine effective methods of disruption); 3. Systems Testing/Mystery Shopping; 	On-going	DJAG IPA SCPNG NGCB OIC IRC PM&NEC DFAIT Customs ICA NFA PNGFA
		<p>4.9</p> <p><u>Collection of Human Source Intelligence</u> expand its intelligence-gathering to include Human Source intelligence pro-actively gathered from high-value sources.</p> <ul style="list-style-type: none"> • Obtain training on Human Source intelligence gathering and handling • Include Human Source intelligence in its QSAR • Develop methodology for sharing HUMINT with foreign and domestic counterparts 		
		<p>5.1</p> <p><u>International Engagement Strategy</u></p> <ul style="list-style-type: none"> • Develop and implement an International Engagement Strategy to ensure that the training attended by FASU staff is related to topics and areas identified in the Training Needs Analysis. Reject all other offers to attend training. • Provide assistance to other FIUs in the region on areas where FASU has expertise and experience; • Identify key jurisdictions (using the Evidence-based NAMLTF) and sign MoUs with them; 		

No	Division Responsible	Action Items	Timeframe	Other Agencies
	5.3	<p><u>Expansion of International Cooperation</u></p> <p>Expand cooperation with foreign counterparts for AML/CTF purposes including the provision of :</p> <ol style="list-style-type: none"> 1. AML/CTF information such as sharing of AML/CTF policies and procedures of FIs, customer due diligence (CDD) information, customer files, samples of accounts and transaction information with less developed FIUs. 2. Intelligence on offenders; facilitators; methodologies; and effective disruption strategies 		
6	6.1	<p><u>Supervision and Enforcement</u></p> <p>Continue engagement with FIs and DNFBPs to provide further guidance, develop AML/CTF compliance rules and provide feedback on reporting quality and other obligations under the AML/CTF Act 2015;</p> <p>Use intelligence developed through the NAMLTF and the Quarterly Strategic Analysis Report to direct supervision and compliance activities to the areas of highest risk.</p> <p>Improve off-site and on-site inspection processes to allow a greater number of inspections to be conducted on the most significant facilitators as identified through the NAMLTF and QSAR</p> <p>Exercise the Search Warrant powers provided under the AML/CTF Act sections 87-93 to more effectively enforce the AML/CTF Act against most significant facilitators as identified through the NAMLTF and QSAR</p> <p>Exercise the criminal penalty provisions provided under the AML/CTF Act to more effectively enforce the AML/CTF Act against the most significant facilitators as identified through the NAMLTF and QSAR</p> <p>develop and use disruption methodologies to apply supervision and enforcement in a manner that addresses the greatest volume of financially-motivated crime for the least output of resources.</p>	On-going	<p>DJAG BPNG IPA SCPNG OIC NGCB IRC</p>

No	Division Responsible	Action Items	Timeframe	Other Agencies
6.2		<p><u>Prevention of Undue Influence Over FIs and DNFBCs</u> Develop and implement measures to prevent criminals or malign foreign States or their associates or proxies from holding (or being the beneficial owner of) a significant or controlling interest in a FI and from holding a management function, in a FI in their sector.</p>		
6.6		<p>Develop training and public awareness programs outreaching to FIs and DNFBCs where intelligence and monitoring and evaluation indicate that this would be an effective use of resources to disrupt financially-motivated crime.</p>		
6.7		<p><u>Intelligence-led Supervision and Enforcement</u> expand the risk-based intelligence-led supervision and enforcement strategy for that prioritises supervision based on up-to-date intelligence gathered from the widest possible source (ie The NAMLTF). This will include:</p> <ol style="list-style-type: none"> 1. Maintaining an AML/CTF standard operating procedure (SOP) for on-site and off-site inspections of FIs., 2. Ensure that FIs and DNFBCs are implementing their ECDD obligations in accordance with the AML/CTF Act 2015; 3. Conducting investigations and initiating prosecutions for offences committed against the AML/CTF Act; 4. Exercising all enforcement options available under the Act in a manner that achieves desired disruption outcomes with the least possible expenditure of resources 		
6.8		<p>Continue to work with other agencies and authorities to enhance PNG's AML/CTF monitoring and supervision of FIs and DNFBCs, including at a minimum:</p> <ul style="list-style-type: none"> • Expanding the number and range of reporting guidelines; • Pro-actively and continuously identify the pathways of funds laundered from corruption offences and use the AML/CTF Act to disrupt such offending 		

No	Division Responsible	Action Items	Timeframe	Other Agencies
6.9		<p><u>Intelligence-led Disruption</u></p> <p>Work with agencies to facilitate a regular working group to:</p> <ol style="list-style-type: none"> 1. Assess AML/CTF intelligence; determine root causes for ML methods occurring; develop disruption methods; monitor and evaluate the effectiveness of disruption methods deployed; 2. Disruption opportunities using enforcement, licensing, policy, prosecutions and sanctions as they arise 3. Requirements for cooperation and information sharing to improve the effectiveness of disruption <p>Continue to utilise financial intelligence to pro-actively disrupt financially-motivated crime by:</p> <ul style="list-style-type: none"> • identifying unreported suspicious matters • identifying selective reporting • Identifying failures in AML/CTF Programs - such as failures to accurately identify PEPs and high-risk customers and failures to conduct effective ECDD 	June 2023	DJAG Sanc-tions Secre-tariat
6.10		<p><u>Terrorist Financing and Proliferation</u></p> <p>Establish procedures for the dissemination of targeted financial sanctions and proliferation of weapons of mass destruction related designation lists</p>		
6.11		<p><u>Typologies</u></p> <p>Publish Typologies drawn from the QSAR and the NAMLTF and other reliable sources</p>	Commencing December 2022	

No	Division Responsible	Action Items	Timeframe	Other Agencies
7	PDCD IMD SCD	<p data-bbox="272 656 320 1693"><u>Policy, guidance and legislative instruments</u></p> <p data-bbox="320 656 368 1693">Address legislative deficiencies in the AML/CTF Act including:</p> <ul data-bbox="368 656 911 1693" style="list-style-type: none"> • Correction of typographical errors in the Act • Provide FASU an explicit legislated mandate for investigating and prosecuting offences against the AML/CTF Act and exercising the criminal penalty provisions under the Act; • Provide an explicit requirement for financial institutions and DNFBS to establish a legitimate source of funds for PEPs and high-risk customers; • Provide the ability for FASU to obtain and exercise search warrants under the AML/CTF Act; • Provide the ability for FASU to initiate restraint action in relation to proceeds of crime located in bank accounts; • Provide the ability for FASU to investigate money laundering and terrorist financing offences committed by registered entities; • Require bank statements to include the payee (or the name of the person or entity that cashed the cheque) as well as the cheque number <p data-bbox="911 656 959 1693">Issue Guidance Notes on:</p> <ul data-bbox="959 656 1262 1693" style="list-style-type: none"> • Identification of low-risk customers; • Identification of linked transactions; • Identification of high-risk customers; • Identification of high-risk jurisdictions; • Conduct of ECDD; <ul data-bbox="1150 656 1262 1693" style="list-style-type: none"> - Requirement to obtain, and take reasonable steps to verify information related to a legitimate source of assets and wealth in conducting ECDD 	On-going	DJAG

No	Division Responsible	Action Items	Timeframe	Other Agencies
		<ul style="list-style-type: none"> Requirement to maintain lists on PEPs and High-risk customers; high-risk jurisdictions; high-risk business activities and circumstances where the risk of ML&TF is 'high'; Inclusion of the findings of the NRA in risk assessments conducted to comply with Section 6 of the Act; ECDD on government cheques and payments Trade-based money laundering Debit and credit cards The definition of 'risk' as it pertains to a 'risk-based' AML/CTF program and a 'risk assessment' 		
8	IMD SCD PDCD	<p>DNFBPs Develop and implement and intelligence-led, risk-based strategy to detect, disrupt and deter money laundering through DNFBPs.</p> <p>Continually Risk-Rank all Reporting Entities Use the Evidence-based NAMLTF to continually rank all reporting entities according to the scale, frequency and recency of their involvement in money laundering, terrorist financing and financially-motivated crime.</p>	On-going	DJAG
9	IMD SCD PDCD	<p>Risk Assessment and profiles Use the NAMLTF and QSAR to develop and maintain risk-profiles for FIs, DNFBPs, sectors, typologies and money laundering methodologies and utilise this information as the basis for Disruption Working Group to develop to deploy disruption strategies focussed on the most significant facilitators/elements.</p> <p>Share Strategic Intelligence Continue to share sanitised versions of the QSAR and NAMLTF with all stakeholders.</p>	On-going/Yearly	All
			On-going	All
			On-going	All

No	Division Responsible	Action Items	Timeframe	Other Agencies
10	IMD SCD PDCD	<p><u>Core Strategy and management</u></p> <p>Continue to maintain a strong organisational culture and capability through:</p> <ol style="list-style-type: none"> 1. Strategic planning, and prioritisation of an intelligence-led, risk-based approach to decision making; 2. Appropriate resourcing; 3. Continuing professional development of all staff based on a regular training needs assessment; 4. Development of a process to ensure that the only training that is undertaken or attended by staff is that which has been identified by the training needs analysis. 5. Development of a Code of Conduct consistent with international requirements relating to independence and integrity of FIU Officers, in recognition of the unique opportunity and mandate has to contribute to a reduction in financially motivated crime in PNG. 	On-going	All
11	SCD	<p><u>High-Risk Entity Supervision</u></p> <p>Undertake supervision of BSP Branches across the Pacific through on-site inspections conducted in collaboration with the FIUs/Regulators in each country.</p>	Commencing October 2023	

No	Division Responsible	Action Items	Timeframe	Other Agencies
12	SCD IMD	<p><u>Statistics on Disruption</u></p> <p><u>High-risk Customers</u> Gather statistics on the number of customers and clients (of each registered entity) identified as PEPs and high-risk customers - as per the definitions in Sections 5 and 26 of the Act;</p> <p><u>ECDD</u> Gather statistics on the conduct of Enhanced Due Diligence by FIs and DNFBPs;</p> <p><u>Business Terminations/Account Closures</u> Gather statistics on FIs and DNFBPs terminating business relationships under Section 19 for incomplete CDD and ECDD;</p> <p><u>Transaction Rejections</u> Gather statistics on the volume of transactions rejected by FIs and DNFBPs in circumstances where information on a legitimate source of assets or wealth could not be obtained or verified;</p> <p><u>Lists</u> Gather statistics on FIs and DNFBPs maintaining lists (– as required by Section 26 of the Act) of:</p> <ul style="list-style-type: none"> • PEPs and High-risk Customers; • High-Risk Jurisdictions; • High-Risk Business Activities; and, • Circumstances where the money laundering and terrorist financing risks are high. <p><u>Unreported SMRs</u> Gather statistics on unreported suspicious matters – the suspicion having been determined by 's strategic analysis and transaction monitoring processes;</p>	Ongoing	
	SCD	<p><u>Legal Persons and Arrangements – High-Risk Jurisdictions</u> Gather statistics on the number of customers/clients (of each registered entity) that are legal persons or arrangements; Gather statistics on the number of such customers/clients that are registered in high-risk jurisdictions</p>	2023 and ongoing	

No	Division Responsible	Action Items	Timeframe	Other Agencies
13	SCD	<p>Risk-Ranking Risk-rank individual FIs and DNFBPs and sectors, including an assessment of the risk of non-compliance based on the Evidence-based NAMLTF.</p>	2023 and ongoing	
14	IMD SCD PDCD	<p>Monitoring and Evaluation of the AML/CTF Act Conduct monitoring and evaluation to assess the effectiveness of AML/CTF Act and determine the level, nature and impact of unintended consequences.</p> <ul style="list-style-type: none"> Develop legislative amendments to address shortcomings in the Act that prevent its use in the detection, disruption and deterrence of financially-motivated crime. <p>Implementation of the Criminal Code (Money Laundering and Terrorist Financing) Amendment 2015</p> <p>Assist RPNGC to modify the processes to ensure the widest possible use of SMRs, QSAR, and NAMLTF for directing resources towards the areas where those efforts are most likely to result in the most significant disruption and reduction in financially motivated crime - for the least input of resources.</p>	2023 and ongoing	All
		<p>Training Delivered to Other Agencies</p> <ol style="list-style-type: none"> Conduct a training-needs analysis for each agency developing presentations, materials for participants (e.g. handouts, flowcharts etc.) and tools to support delivery of presentations. Monitor and evaluate the impact of the training delivered Report to the NCC at intervals of 3,6 and 12 months on the success or otherwise of the training delivered. 	Ongoing	RPNGC OPP PM&NEC Customs
		<p>Legislative Amendment Process</p> <ol style="list-style-type: none"> Drive the process of amendments to the AML/CTF Act to address deficiencies as identified by 's attempts at regulation of financial institutions and use the Act to detect, disrupt and deter financially-motivated crime; Drive efforts to address irregularities, typing errors and conflicts and inconsistencies in the current version of the AML/CTF Act 	2024-2025	RPNGC OPP Customs

No	Division Responsible	Action Items	Timeframe	Other Agencies
		<p>14.5 <u>Legislative Amendment Process</u> Work with DJAG to develop regulations, compliance rules and guidance notes as necessary to give effect to the Act.</p> <p>14.6 <u>Use of the Companies (Amendment) Act 2014 and the Investment Promotion Act 1992, to disrupt Financially-Motivated Crime</u> Work with the IPA to take action against individuals involved in financially-motivated crime using the de-registration of companies or other counter-measures</p> <p>14.7 <u>Terrorist Financing through NPOs</u> Based on the Risk Assessment on NPOs – and expending the absolute minimum resources required to achieve compliance with the FATF recommendations on NPOs - ensure that PNG will be assessed as compliant with respect to ensuring: <ol style="list-style-type: none"> 1. NPOs are not misused by terrorist organisations posing as legitimate entities; 2. NPOs are not used to exploit legitimate entities as conduits for TF, including for the purpose of escaping asset-freezing measures, and 3. NPOs are not used to conceal or obscure the clandestine diversion of funds intended for legitimate purposes to terrorist organisations. </p> <p>15.1 <u>Outreach to NPOs</u> Consistent with the findings of the Risk Assessment on Terrorist financing through NPOs, – and expending the absolute minimum resources required to achieve compliance with the FATF recommendations on NPOs - conduct outreach with NPO sector with a view to ensuring that PNG is assessed as compliant with respect to protecting the sector from abuse for criminal purposes.</p>	Ongoing	
15			2023 - 2024	

No	Division Responsible	Action Items	Timeframe	Other Agencies
16	IMD SCD PDCD	<p>16.1</p> <p><u>Sectoral and Thematic Risk Assessments</u></p> <p>Conduct and publish assessments of the money laundering through the following areas:</p> <ul style="list-style-type: none"> • Trade-based money laundering • Debit and credit cards; • Real estate; • High-risk jurisdictions; • Australia; • Travel agents; • Motor vehicle dealers; • Commercial banks; • Lawyers; • Accountants; • Tax evasion; • Illegal fishing; • Oil and Gas; • Drug trafficking; • Other areas as identified through the NMLTFA 	2023 and ongoing	
		<p>16.2</p> <p><u>Risk Assessment on Proliferation Financing</u></p> <p>Recognising that proliferation financing is an area of interest to the USA, and of little interest or relevance to many other countries. Recognising, as well, the extremely low risk of PF though PNG, and the limited resources available to address financially-motivated crime, conduct a Risk Assessment on Proliferation Financing.</p>	2023 - 2024	DJAG NMSA Sanctions Secretariat
	IMD SCD PDCD	<p>16.3</p> <p><u>Training Needs Analysis</u></p> <p>Conduct a training-needs analysis for frontline Customs officers.</p> <ul style="list-style-type: none"> i. the SOP, BCR reporting processes, restraint and confiscation of cash etc. ii. Roll-out awareness and training on the SOP for frontline Customs officers at airports, land border, sea ports, postal courier and other relevant agencies. 	Ongoing	

No	Division Responsible	Action Items	Timeframe	Other Agencies
17	IMD	<p><u>Taxation Offences</u> Commence collection of information from IRC including taxation information collected by IRC from foreign jurisdictions through the Common Reporting Standard process.</p>		DJAG Customs RPNCC NNB All
	IMD SCD	<p><u>Expert Opinion - Events Analysis and Scenario Testing</u> Obtain expert opinion from all agencies to interpret the intelligence produced by the Events Analysis and Scenario Testing modules of the Evidence-based NAMLTF – to explain why ML&TF are occurring as they are, and propose disruption strategies to address them</p>		
	IMD PDCD	<p><u>Confiscation of Proceeds of Crime</u> Commence a process to draft restraining orders on money held in bank accounts and drive the process of restraint and confiscation</p>		
	IMD SCD	<p><u>Use of Money Laundering Offences to Disrupt Financially-Motivated Crime</u> Assist RPNCC to use the ML offence, and confiscation of proceeds of crime and other offences to:</p> <ol style="list-style-type: none"> 1. Disrupt Financially-motivated offences 2. Develop and deploy disruption strategies to counter financially-motivated offending 3. Monitor and evaluate disruption strategies 4. Use cash seizures utilising powers under the POCA 5. Use coercive hearings and other relevant powers under the Act 6. Use mutual Legal Assistance or other international requests for cooperation made and received 7. Apply administrative sanctions against those who fail to comply with AML/CFI requirements 		

No	Division Responsible	Action Items	Timeframe	Other Agencies
18	IMD PDCD	<p><u>Intelligence-led disruption and coordination</u> Work with RPNCG to facilitate a regular working group to:</p> <ol style="list-style-type: none"> 1. Collection and sharing of information on financially-motivated offending for use in the Evidence-based NAMLTF 2. Share expert opinion on the output of the Events Analysis to explain why ML occurs in the way that it does; 3. Develop methods to disrupt financially-motivated offending using the AML/CTF Act, Criminal Code or any other legislation; 4. Monitor and evaluate the effectiveness of disruption strategies 5. Establishment and monitoring of taskforces to disrupt specific, strategic serious financially-motivated offences <p>The working group include RPNCG, Customs, OPP, NIO, PM&NEC, IRC, ICA & NFA. Each agency to nominate a standing member to the group.</p>		DJAG
19	IMD PDCD	<p><u>Share the Output of the Continuous Evidence-based National Assessment of Money Laundering</u> Expand cooperation on intelligence-led disruption of financially-motivated crime, through cooperation with Customs, IRC, OPP, RPNCG , BPNG, PM&NEC, and other relevant stakeholders domestically and internationally by making the National Money Laundering Assessment available to all agencies.</p>	2023 and onsoing	DJAG
	IMD PDCD	<p><u>Effectiveness and Efficiency</u> Use intelligence-led processes to disrupt financially-motivated crime in a manner that produces the greatest disruption for the least input of resources. Coordinate with the agencies listed above and other relevant agencies.</p>	ongoing	DJAG

No	Division Responsible	Action Items	Timeframe	Other Agencies
	19.3	<p><u>Policy-Drafting Assistance to RPNGC</u> Assist to draft a policy directive by Police Commissioner for RPNGC to conduct intelligence-led disruption of financially-motivated crime through the use of the most appropriate legislative process, based on the NAMLTF.</p> <p>Assist to draft a policy directive by Police Commissioner for RPNGC to monitor and evaluate the effectiveness of disruption activities and assess unintended consequences</p> <p>Assist to draft a policy directive by Police Commissioner for RPNGC to prioritise intelligence-led asset confiscation where such action is likely to have the desired disruptive impact.</p>	June 2023	DJAG

