



Asia/Pacific Group
ON MONEY LAUNDERING

ANNUAL REPORT

ASIA/PACIFIC GROUP ON MONEY LAUNDERING

2024-2025



The Asia/Pacific Group on Money Laundering (APG) is an inter-governmental organisation consisting of 41 active members in the Asia-Pacific region, as well as organisations and observers from within and outside the region. Under the APG Terms of Reference, membership in the APG is open to jurisdictions in the Asia-Pacific region.

The APG is a non-political, technical body, whose members are committed to the effective implementation and enforcement of the internationally accepted standards against money laundering, financing of terrorism and proliferation financing set by the Financial Action Task Force.

This document, any expression herein, and/or any map included herein, are without prejudice to the status of, or sovereignty over, any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area.

Cover image: 2025 APG Annual Meeting, Tokyo, Japan

For more information about the APG, please visit our [website](#).

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APG CO-CHAIRS' FOREWORD



Deputy Vice Minister of
Finance for International
Affairs
Mitsutoshi Kajikawa

In accordance with Section 5.5 of the APG Terms of Reference 2019, we submit the following report to the membership on the operations of the Asia/Pacific Group on Money Laundering (APG) for the period 1 July 2024 to 30 June 2025.

This report highlights the achievements of the APG over the reporting period against the goals and strategies contained in the APG Strategic Plan 2024-2028.

The APG continues to go from strength to strength. The outcomes achieved this year position the APG and the Asia/Pacific region to be more effective in tackling the threats posed by criminals and terrorists to subvert the integrity of the international financial system.

The successful 2025 APG Annual Meeting was hosted by Japan in Tokyo and included the adoption of the mutual evaluation reports for Niue and the Maldives. The 2025 APG Technical Assistance and Training Forum was held in parallel and continued the important technical assistance coordination work undertaken by the Secretariat and Donors and Providers Group.



Deputy Commissioner
Ian McCartney

This period marked the first year of Japan's 2024-2026 Co-Chair term. The Co-Chairs' Priorities for 2024-2026 focus on supporting members to prepare for and commence the Global 5th Round of mutual evaluations, strengthen AML/CFT regimes in the APG region and international cooperation, and monitor and respond to evolutions in finance.

The relocation of the APG Secretariat office this year marked a significant milestone in the APG's history. The new premises in Sydney will support even greater flexibility, collaboration and growth, but most importantly, the new office enables the engagement of staff from the region, including an active program of secondments. This is a critical aspect of APG Secretariat reforms as it brings in expertise from across our members, strengthen relationships and build capability for the future.

We would like to extend our thanks to all APG members and observers who made 2024-2025 a successful year for the APG.

Deputy Vice Minister of Finance for International Affairs
Mitsutoshi (Toshi) Kajikawa
APG Co-Chair
Japan
December 2025

Deputy Commissioner Ian McCartney
APG Co-Chair
Australia
December 2025

PART ONE

Overview and Summary

APG Organisational Structure 2024-2025

1. The APG has 41 active member jurisdictions¹ as follows:

Australia	Lao PDR	Philippines
Bangladesh	Macao, China	Samoa
Bhutan	Malaysia	Singapore
Brunei Darussalam	Maldives	Solomon Islands
Cambodia	Marshall Islands	Sri Lanka
Canada	Mongolia	Chinese Taipei
China	Myanmar	Thailand
Cook Islands	Nauru	Timor-Leste
Fiji	Nepal	Tonga
Hong Kong, China	New Zealand	Tuvalu
India	Niue	United States
Indonesia	Pakistan	Vanuatu
Japan	Palau	Vietnam
Korea	Papua New Guinea	

2. The APG has seven observer jurisdictions and 36 observer organisations (including FATF-style regional bodies, or 'FSRBs').

APG Observers			
Jurisdictions	Organisations		FSRBs
France	ADB/OECD Anti-Corruption Initiative	International Institute for Justice and the Rule of Law (IJJ)	CFATF
Germany	Alliance for Financial Inclusion (AFI)	Institute for Legal Support and Technical Assistance (ILSTA)	EAG
Kazakhstan	Asia-Pacific Economic Cooperation (APEC) Secretariat	International Monetary Fund (IMF)	ESAAMLG
Kiribati	Asian Development Bank (ADB)	Interpol	FATF
Federated States of Micronesia	Asset Recovery Interagency Network – Asia Pacific (ARIN-AP)	Islamic Development Bank (IsDB)	GABAC
Portugal	Association of Southeast Asian Nations (ASEAN) Secretariat	Oceania Customs Organisation (OCO)	GAFILAT
United Arab Emirates	Bay of Bengal Initiative for Multi-Sectoral Technical and Economic Cooperation (BIMSTEC) ²	Pacific Financial Technical Assistance Centre (PFTAC)	GIABA
United Kingdom	Commonwealth Secretariat	Pacific Islands Chiefs of Police (PICP)	MENAFATF
	Egmont Group of Financial Intelligence Units	Pacific Islands Forum Secretariat (PIFS)	MONEYVAL
	European Commission (EC)	Pacific Islands Legal Officers' Network (PILON)	
	Financial Services Volunteer Corps (FSVC)	United Nations (UN)	
	Global Center for Cooperative Security	United Nations Office on Drugs and Crime (UNODC)	
	Group of International Finance Centre Supervisors (GIFCS)	World Bank	
		World Customs Organisation (WCO)	

¹ Afghanistan's membership has been on inactive status since 2022

² Observer status granted in August 2025

APG Co-Chairs

3. The APG has two Co-Chairs: one Co-Chair is a permanent position, and the other rotates amongst APG members every two years. The Co-Chairs are responsible for chairing the plenary and Governance Committee meeting and providing strategic advice and direction to the membership.
4. **Co-Chair, Japan:** The rotating Co-Chair position is held by Japan from 2024-2026, represented by Mitsutoshi Kajikawa, the Deputy Vice Minister of Finance for International Affairs at Japan's Ministry of Finance. In this role, he oversees critical areas including anti-money laundering, counter-terrorism financing, and counter-proliferation financing, while leading Japan's delegation to the Financial Action Task Force. Deputy Vice Minister Kajikawa brings a wealth of expertise to his role in advancing the APG's mission, backed by an extensive career at the Ministry of Finance, where he has worked in areas such as financial regulation, fiscal analysis, budget management, and government reform. His recent efforts have focused on multilateral financial cooperation, including leading negotiations to strengthen a currency swap arrangement for liquidity support among ASEAN+3 nations.
5. **Co-Chair, Australia:** The permanent Co-Chair is held by Australia, represented by Deputy Commissioner Ian McCartney of the Australian Federal Police. Deputy Commissioner McCartney has significant experience in national and international economic and organised crime investigations. In 2014, Deputy Commissioner McCartney was awarded with the Australian Police Medal in recognition of his distinguished service, particularly in the areas of law enforcement liaison in Asia, and for his role in national investigations.

APG Co-Chairs' Priorities 2024 - 2026

6. At the 2024 Annual Meeting the APG membership endorsed the 2024-2026 APG Co-Chairs' Priorities which cover two years and are set out in the below table.

APG Co-Chairs Priorities 2024-2026
1. Preparation to ensure APG's successful start to the Global 5th Round of evaluations
2. Strengthening AML/CFT regimes in the APG region and international cooperation
3. Monitoring and responding to evolutions in Finance

Priority One - Preparation to ensure APG's successful start to the Global 5th Round of evaluations

To ensure that the APG is prepared and sufficiently resourced as the APG commences the Global 5th Round of Mutual Evaluations (MEs), noting that the next round will be more intensive than the current round.

Envisioned Deliverables

Contribute to increasing the number of quality assessors across the APG and support efforts to enhance awareness and understanding of the Global 5th Round ME processes and best practices for preparation and coordination.

Implementation Outcomes

Assessor Training Workshops:

APG significantly increased the pool of trained expert assessors through the delivery of three APG-only and one joint FATF/APG/EAG assessor training workshops during 2024-25. APG workshops were hosted by Japan, Macao, China and Chinese Taipei. India hosted a joint FATF/APG/EAG assessor training workshop in April 2025. All hosts generously provided venues and catering for the events. Both Japan and Chinese Taipei provided additional generous contributions to support travel of presenters and some participants. The New Zealand-funded Pacific AML/CFT Capacity Development (PACD) program sponsored the attendance of a representative from Papua New Guinea to attend the assessor training workshop in Japan.

Through the four in-person workshops, 134 APG assessors were trained for the Global 5th Round of MEs. APG Secretariat also trained 39 assessors in a virtual assessor refresher training workshop in June 2025.

Regional ME Preparation Workshop in Fiji

APG gave comprehensive longer-term support to members preparing to undergo a Global 5th Round ME. In April 2025, the APG delivered a regional ME preparation training workshop in Suva, Fiji attended by representatives from the coordination teams of 10 members (Australia; Bangladesh; Cambodia; Cook Islands; Fiji; Macao, China; Samoa; Solomon Islands; Sri Lanka and Vanuatu). The workshop focused on preparations for the Global 5th Round of MEs. The event was supported by the generous voluntary contribution from Japan which covered the venue and the travel of several presenters and delegates.

Priority Two - Strengthening AML/CFT regimes in the APG region and international cooperation

To strengthen members' AML/CFT/CPF regimes to better prevent, detect and deter serious financial crimes and enhance the development of financial systems and economies. Providing capacity building to strengthen AML/CFT/CPF regimes in the APG region.

Envisioned Deliverables

Conduct high-level visits to strengthen political will for AML/CFT reform, support capacity development for jurisdictions including Pacific Island countries and those with significant deficiencies and share knowledge and Japan's experiences in AML/CFT.

Implementation Outcomes

Vietnam - High-Level Implementation Support Visit

APG influenced strategic AML/CFT leaders and supported better targeted implementation planning and technical assistance to support Vietnam's efforts to meet its ICRG Action Plan. The APG high-level implementation support visit to Vietnam from 6-8 November 2024 focused on prioritising reforms and operational results to address action items in Vietnam's FATF ICRG action plan. The APG team was led by the APG Co-Chair Kajikawa and included the APG Secretariat, the IMF, World Bank, the UNODC and the Japanese Ministry of Finance.

The APG briefed the key ministers and heads of agencies including the Deputy Prime Minister and Deputy Minister of Public Security as well as leadership of the State Bank of Vietnam and National Security Council. The APG also held an implementation planning workshop with officials from all key agencies and ministries on prioritised planning to meet the ICRG action plan. The visit also included a briefing to the private sector and the diplomatic corps to reinforce messages of prioritisation and coordination.

Sri Lanka High-Level ME Preparation Support Visit

APG influenced strategic AML/CFT leaders and supported better targeted implementation planning and technical assistance to support Sri Lanka's efforts to prepare for its upcoming mutual evaluation. The APG high-level ME preparation support visit to Sri Lanka took place from 11-12 March 2025. The visit was coordinated by the Central Bank of Sri Lanka and focused on briefing Sri Lanka's strategic AML/CFT leadership on prioritising reforms and operational results to prepare for Sri Lanka's upcoming ME. The APG team was led by the APG Co-Chair Kajikawa and included representatives from the APG Secretariat and Japan Ministry of Finance.

The APG delegation briefed ministers, working level officials, and the private sector to ensure Sri Lanka gets the best possible result in its upcoming APG ME. A briefing to the diplomatic corps on the visit identified the critical areas where Sri Lanka requires support and technical assistance. Ministers, senior officials and the private sector all voiced their strong commitment to prioritise actions for necessary reforms and to implement the revised FATF standards. Areas of focus for the visit included, (i) the legislative reform program to address technical deficiencies identified by the FIU, (ii) the legislative framework on VA/VASPs, and (iii) the strengthening of judicial and law enforcement capacity with regards to ML/TF cases. The visit identified priority implementation strategies, actions and possible areas of technical assistance. Following the visit, the APG Secretariat Technical Assistance and Typologies Directorate worked with Sri Lanka on identifying priority areas for technical assistance, and successfully connected Sri Lanka with appropriate donors and providers, including through two Sri-Lanka focussed coordination calls.

Fiji High-Level ME Preparation Support Visit

APG influenced strategic AML/CFT leaders and supported better targeted implementation planning and technical assistance to support Fiji's efforts to prepare for its upcoming mutual evaluation. The APG high-level ME preparation support visit to Fiji took place from 9-11 April 2025. The APG team was led by APG Co- Chair Kajikawa and included representatives from the APG Secretariat and Japan Ministry of Finance. The visit was coordinated by Fiji's National AML Council supported an APG high-level visit to Suva, Fiji to brief Fiji's strategic AML/CFT leadership on strategic opportunities to harness the momentum of the upcoming APG ME process to deliver on Fiji's national interests.

During the visit the APG team also conducted coordination meetings and briefings to the Pacific Islands Forum Secretariat in Suva to discuss Pacific regional issues relating to priority AML/CFT implementation, including AML/CFT issues relating to correspondent banking.

Sharing of knowledge and Japan's experiences relating to AML/CFT/CPF including initiatives to support collaboration among FSRBs.

In May 2025, APG Co-Chair Kajikawa attended the MENAFATF Plenary in Jordan providing delegates with an update on APG's recent initiatives and emphasizing the importance of further collaboration between FSRBs, including MENAFATF and the APG Secretariats.

Priority Three - Monitoring and Responding to Evolutions in Finance

To monitor and respond to development in finance. As identified in the FATF's Strategic Priorities 2024-2026, financial markets are continuously evolving. These evolutions can pose new questions about the scope and interpretation of the FATF Standards and require them to be updated to be relevant and applicable to a new environment. The importance of monitoring and responding to development in finance and working with strategic public and private sector partners has rapidly grown to address emerging ML/TF risks.

Envisioned Deliverables

Deliver or support technical seminars, webinars, and outreach activities to enhance understanding of FATF standards on virtual assets and new technologies (e.g. Recommendation 15 and 16), and exchange views with members on emerging regional threats and risks (e.g. vulnerabilities from DeFi, P2P and CBDCs).

Implementation Outcomes

Deliver or support technical seminars, webinars and/or outreach activities on virtual assets

APG brought a wide range of stakeholders together to identify and respond to the financial crime environment in the Asia/Pacific region. APG delivered a workstream of the 2024 APG Annual Typologies Workshop focused on cyber enabled fraud and scams. The work stream included presentations and panel discussions on issues relating to evolving risks and typologies, cryptocurrencies and asset recovery, private sector collaboration and technology driven strategies to prevent fraud. The Typologies Workshop was attended by 152 delegates representing 32 APG members and seven observer organisations and 60 delegates from 41 private sector organisations.

Exchange views with members on new threats and risks in the region

Reflecting the Co-chairs' priorities and APG business plans, the APG ensured a wide cross-section of APG delegate received detailed information and experience on new and emerging threats and responses in the region.

Japan held a technical seminar on virtual assets (VA) and VA service providers (VASPs) as part of the 2025 Annual Meeting which included details of FATF standards, implementation support and jurisdiction experience.

Japan's voluntary contribution enabled an APG expert presenter and delegates from Bangladesh, Fiji and Sri Lanka to travel to Busan, Korea for an APG/World Bank Virtual Asset Investigation workshop in October 2024. The workshop developed delegates' capabilities and understanding of the cryptocurrency ecosystem, the FATF standards relating to VAs and VASPs, and effective strategies for investigating ML with a nexus to VAs.

In November 2024, the APG Co-Chair Kajikawa provided the opening address at the EAG/APG joint workshop on Innovations in Finance (hybrid) as part of the EAG plenary in India. Supporting the workshop theme of Monitoring and Responding to Emerging Technologies in Finance to Address ML/TF/PF Risks, the APG Secretariat presented to delegates on the Implementation of FATF Recommendation 15 in APG jurisdictions. Mr Takahiro Yamasaki at Japan's Ministry of Finance also delivered a presentation on central bank digital currencies and AML/CFT/CPF.

OFFICIAL

In March 2025 at the Global Finance & Technology Network Forum in Japan, APG Co-Chair Kajikawa delivered the opening address on Combating Financial Crime and Financial Inclusion in the Digital Era to policymakers, regulators, fintech innovators, and financial service providers from across the Asia-Pacific. The Forum focused on financial crime, including the emerging risks posed by fintech developments, and the ongoing efforts to align with FATF recommendations and the APG, the Co-Chairs' priorities including response to financial innovations, and the importance of collaboration among diverse stakeholders.

On behalf of APG Co-Chair, in May 2025, Mr Yamasaki at Japan's Ministry of Finance attended the FSB's Regional Consultative Group for Asia Meeting hosted by the Central Bank of Sri Lanka. The meeting was attended by representatives from Asian Central Banks and financial supervisors who discussed global and regional financial vulnerabilities; progress on the G20 Roadmap to enhance cross-border payments; and approaches to monitoring potential financial stability risks in non-bank financial intermediation. Mr Yamasaki encouraged participants to further exchange views on payment issues with other agencies, such as AML/CFT authorities in their jurisdictions.

PART TWO

Effective Governance

7. In accordance with the [APG Terms of Reference 2019 \(amended 2023\)](#), the APG membership is the ultimate decision-making body of the APG, although the Governance Committee may make decisions on behalf of the membership if delegated to do so. Decisions by the membership are made on a consensus basis. All organs of the APG including the Co-Chairs, Governance Committee and Secretariat are responsible and accountable to the APG membership.

2025 Annual Meeting and Technical Assistance (TA) Forum

8. The 2025 APG Annual Meeting and Technical Assistance (TA) Forum was hosted by Japan in Tokyo from 25 to 29 August 2025. The meeting was opened with remarks delivered by Katsunobu Kato, Minister of Finance, Japan. The FATF President, FATF Executive Secretary, EAG Executive Secretary, MENAFATF President and MENAFATF Executive Secretary were also in attendance and shared their leadership and experience with APG delegates.

9. Over 400 delegates attended the 2025 APG Annual Meeting and TA Forum. Several APG delegates received sponsorship funding to attend the meeting, generously provided by China, Japan, New Zealand, Chinese Taipei and the United Kingdom.

10. The membership decided on several important governance-related matters including:

- agreed to appoint Brunei Darussalam as rotating APG Co-Chair 2026-28
- welcomed the Bay of Bengal Initiative for Multi-Sectoral Technical and Economic Cooperation (BIMSTEC) as an Observer to the APG
- agreed to the proposals set forth by the findings of the ad hoc group on long-term resourcing to support the membership to increase resources needed for the APG to conduct the Global 5th Round of Evaluations
- adopted amended APG Global 5th Round Mutual Evaluation Schedule, Procedures and APG Global 4th Round Transitional Follow-Up procedures
- adopted APG Information and Communication Protocols 2025 to strengthen APG's credibility to govern how it manages and assesses the use of information and communication to achieve its business objectives
- adopted the APG Diversity and Inclusion Strategy
- adopted the APG Secondment Framework

11. The membership adopted the 2025-26 Business Plan and Budget were adopted at the 2025 APG Annual Meeting. Initiatives for the year FY 2025-26 are outlined in Part Five of this report. The core budget for FY 2025-26 was approved as AUD\$5,532,807 in income and AUD\$6,332,807 in expenses, with a net operating deficit of AUD\$800,000, to be drawn from accumulated equity.

12. The membership adopted the APG mutual evaluation (ME) reports of Niue and the Maldives. This now concludes the APG 3rd Round.

13. The Operations Committee endorsed the draft 2025 APG Typologies Report for discussion at the APG 2025 Typologies Workshop, to be held in Bangkok, Thailand in November 2025. The report will then be adopted by the membership and published in early 2026. The 2025 APG Typologies Report contains a synopsis of the typologies project undertaken in 2024-25 (cyber-enabled scams and human trafficking), recent trends in money laundering and terrorist financing, and several case studies.
14. The 2025 TA Forum was held concurrently with the 2025 APG Annual Meeting. The Forum was well-attended, with 24 APG members who are technical assistance recipients, and 15 governments or organisations from the APG Donor and Providers (DAP) Group. There were almost 30 meetings held throughout the TA&T Forum, where active and productive discussions focused on targeted and effective technical assistance for APG members.
15. The DAP Group met to discuss technical assistance coordination and cooperation across the region, as well as a strategic discussion of challenges and opportunities for longer-term funding aligned with global and regional priorities and opportunities to deepen collaboration. APG held three sub-regional meetings with the DAP Group and APG members, focused on the identification and discussion of sub-regional AML/CFT issues and needs for the Pacific, South-East Asia and South Asia respectively. In addition to the sub-regional discussions, the TA&T Forum held individual meetings for each of the 24 TA recipient APG members in attendance, providing them with an opportunity to engage with the influential DAP Group one-on-one, to identify key gaps and challenges and seek technical assistance. This event also provided an opportunity for DAPs to sequence the delivery of technical assistance in a prioritised and coordinated manner.

Governance Committee

16. The APG Governance Committee (GC) met five times during the year (including in person during the 2025 APG Annual Meeting). During the year the GC:
 - received regular updates on APG's budget preparation, management and financial reporting
 - considered and endorsed amendments to governance-related policies, including the APG Information and Communications Strategy
 - forward planning for selecting APG Co-Chairs and APG plenary meeting hosts
 - issues related to members' implementation of FATF standards
 - updating the APG ME Schedule
 - Secretariat reform and sustainability work
 - the progress made by the Ad Hoc Groups and the Diversity and Inclusion Network; and
 - observer applications.

Mutual Evaluation Committee

17. The APG ME Committee met once in person and four times via video conference, and was co-chaired by Macao, China and New Zealand. Key achievements of the MEC over the year included:
- consideration of twenty-three (23) FURs, including four (4) APG FURs with re-ratings, and five (5) joint FATF/APG FURs, from nine (9) reviewers across the APG membership and the Global Network. The MEC endorsed the FURs and recommended out-of-session adoption by the membership
 - consideration of four (4) MERs – Marshall Islands, Nauru, Papua New Guinea and Timor-Leste. The MEC endorsed the MERs and recommended adoption by the membership
 - discussion of amendments to the MEC Terms of Reference
 - discussion of amendments to the APG Global 5th Round ME Procedures and the APG Global 4th Round Transitional Follow-Up Procedures
 - discussion of ME guidance resources for the Global 5th Round of MEs
 - discussion of good practices to meet aspirational APG assessor contribution goals
 - continuing the APG process for identifying horizontal issues and complex quality & consistency (Q&C) issues in adopted APG assessments and coordinating with FATF and FSRB Secretariats
 - analysis of the treatment of specific topics of interest to our membership in MEs and FURs
 - discussion of the pilot regional ME preparation workshop for the Global 5th Round;
 - introduction of the APG MEC Co-Chair mentoring program
 - updates related to APG's ongoing assessor training program

Operations Committee

18. The APG Operations Committee (OC), co-chaired by India and Samoa, met once via video conference and once in person at the Annual Meeting in August 2025. The OC:
- supported implementation and typologies work, including oversight of the typologies project on cyber scam hubs and human trafficking
 - contributed to the planning of the APG Typologies Workshop
19. The 2024 Annual Typologies Report was endorsed by the OC out-of-session, and adopted by the membership in November 2024 at the 2024 Annual Typologies Workshop.
20. At the 2025 APG Annual Meeting the membership agreed to the dissolution of the OC. Going forward the decision-making authority in relation to typologies, implementation issues and technical assistance projects will rest with the GC.

APG Secretariat

21. During the year the APG Secretariat pursued a range of significant reforms, including a move in office premises and making further arrangements to enable seconded officers to work within the Secretariat.

22. The APG Secretariat undertook a planning retreat in March 2025 to more intensively consider improvements and reforms that build capability so the Secretariat can prepare for and deliver the APG Global 5th Round Mutual Evaluations. Outcomes from the retreat supported an internal restructure of the Secretariat and a decision on a statement of APG Secretariat Values.
23. The APG Secretariat welcomed a new Communications Specialist in late May, marking a significant step forward in strengthening the organisation's outreach and engagement. This development forms part of broader efforts to modernise the Secretariat's communications framework and support more consistent, timely engagement with members, observers and other stakeholders.
24. Australia assisted the Secretariat by providing two officers to backfill APG Secretariat vacancies related to the ME program and typologies work.

PART THREE

Performance Highlights

APG Strategic Priorities

25. The [Strategic Plan 2024-2028](#) contains the APG’s vision, mission and values. Informed by its vision and mission, the Strategic Plan sets out three goals for the APG underpinned by governance to guide its work over four years. These goals are supported by overarching strategies designed to give the goals effect. contains the APG’s vision, mission and values. Informed by its vision and mission, the Strategic plan sets out three goals for the APG underpinned by governance to guide its work over four years. These goals are supported by overarching strategies designed to give the goals effect.
26. Below is a summary of APG’s performance highlights for the 2024-25 financial year under each strategic goal.

STRATEGIC GOAL #1
THE APG ENGAGES WITHIN AND THROUGH ITS LARGE AND DIVERSE RANGE OF MEMBERS AND OBSERVERS TO SHAPE AND INFLUENCE AML/CFT/CPF POLICY AND IMPLEMENTATION

ENGAGEMENT WITH APG MEMBERS AND OBSERVERS

- The 2024 APG Annual Meeting and TA&T Forum was delivered in September 2024, generously hosted by the United Arab Emirates. Over 400 delegates attended the Annual Meeting and TA&T Forum.
- The significant redevelopment of the APG website commenced, with support from a voluntary contribution by Chinese Taipei. To be built with a more contemporary design and feature set, the new website aims to deliver modern platforms and tools that can enhance engagement with APG members and stakeholders, boost the accessibility and user-friendliness of key information, and can improve how we manage events. Work has progressed to early stages of content transition with the new website expected to be live in the first half of 2025-26.
- APG Co-Chair Kajikawa led three high-level visits, with support from the Secretariat and TA providers to Vietnam (November 2025 – ICRG support), Sri Lanka (March 2025 – ME preparation) and Fiji (April 2025 – ME preparation). The visits fostered strategic AML/CFT leadership and engagement and supported coordination and prioritisation of implementation efforts to improve compliance and effectiveness, as well as preparation for mutual evaluations. The Co-Chair’s high-level visits focused on members that are among the first to be assessed under the Global 5th Round or members in the FATF ICRG process.
 - The high-level visit to Vietnam in November 2024 enhanced support for Vietnam’s engagement with the FATF ICRG process. The visit focused on enhancing Vietnam’s strategic leadership for AML/CFT reforms, improved implementation and provided detailed strategic planning support and technical assistance coordination. The visit

included the UNODC and World Bank and involved ministerial briefings, joint-agency planning workshops and a briefing to the diplomatic corps in Vietnam to seek further cooperation and technical assistance

- The high-level visit to Sri Lanka in March 2025 engaged with the new AML/CFT leadership following the 2024 elections. The Visit sought to enhance mutual evaluation preparations, including priority legislative reform and implementation and technical assistance coordination. Thematic areas of focus included beneficial ownership, AML/CFT supervision and law enforcement efforts in anti-corruption. The visit was supported by the ADB, UNODC and World Bank and involved ministerial briefings, joint-agency planning workshops and a briefing to the diplomatic corps in Sri Lanka to seek further cooperation and technical assistance
- The high-level visit to Fiji in April 2024 enhanced support to Fiji for its mutual evaluation preparation. The visit focused on enhancing Fiji's strategic leadership for AML/CFT reforms, improved implementation and providing detailed strategic planning support and technical assistance coordination
- In 2024-25, the APG welcomed two new observer organisations, the International Institute for Justice and the Rule of Law (IJJ) and Luxembourg's Institute for Legal Support and Technical Assistance the (ILSTA).³ Both organisations are actively involved in the delivery of AML/CFT technical assistance in the region and have become active members of the APG DAP Group.
- The APG Secretariat continued liaison with the Federated States of Micronesia and Kiribati to encourage their possible APG membership.
- At the 2024 APG Annual Meeting members decided to remove one jurisdiction, the Democratic Peoples' Republic of North Korea, as an APG observer due to a lack of engagement over a six-year period.
- The APG continued regular and deep engagement with a range of observer organisations, particularly the FATF and FSRBs, but also a range of regional organisations including the Pacific Islands Forum on the topic of AML/CFT technical assistance coordination and correspondent banking and PILON on AML/CFT law and justice sector issues in the Pacific.
- The APG Diversity & Inclusion Network was Co-Chaired by Nauru and Pakistan, and supported by a committee of delegates from Australia, India, Nauru, Pakistan, Thailand and Vanuatu. The Network met on three occasions and the Network Committee met on a further three occasions during the year to share experiences and best practices, and to develop an APG Diversity & Inclusion Strategy. This Strategy sets out the specific goals for the APG to pursue to promote a diverse and inclusive environment for the work of the APG and across the AML/CFT workforce in the Asia/Pacific region.
- The APG established the Ad Hoc Group on Strategic AML/CFT Leadership to develop tools to better support APG members to enhance and sustain their own strategic leadership of AML/CFT implementation and reforms to maximise effectiveness and avoid the FATF's ICRG processes. The project is being conducted over two phases. Phase one involved research and gathering information to identify challenges and barriers associated with strategic leadership on AML/CFT; and good practices that have helped to foster and sustain strategic leadership on AML/CFT and implement meaningful change. Phase one has been completed, and the Ad Hoc Group will report

³ BIMSTEC joined as an Observer in August 2025

to the Plenary on outcomes at the 2025 Annual Meeting. The second phase involves developing tools to support the membership to enhance and sustain strategic leadership on AML/CFT.

- The APG Ad Hoc Group on Long Term Resourcing commenced in December 2024 with twelve member delegations taking part: Japan (representing the APG Co-Chair); Australia; Canada; China; India; Indonesia; Macao, China; Nauru; Pakistan; Thailand; the United States; and Vanuatu. The Ad Hoc Group met six times to consider a wide range of issues relating to APG resourcing. The Ad Hoc Group conducted rounds of consultation with members and reported to the 2025 Annual Meeting through the GC with a series of recommendations to address demand for resources and models to meet resource needs including secondments and increased staffing and budget to the Secretariat.
- The APG VA/VASP Network, under the stewardship of Indonesia, relaunched and convened on one occasion during the year.

ENGAGEMENT WITH THE GLOBAL NETWORK

- The APG contributed to FATF processes through written input, virtual and in-person attendance at meetings and input to project teams. A number of APG-only members and the APG Secretariat attended three FATF plenary meetings (October 2024, February 2025 and June 2025)
- The APG Secretariat:
 - attended three ICRG Asia-Pacific Joint Group meetings (see below for further detail)
 - attended the FATF Technical Assistance Peer Exchange Meeting (Strasbourg, June 2025)
 - contributed to FATF project teams (including the FATF Training Project Team; the Complex Proliferation Financing (PF) and Sanctions Evasion Schemes project; Online Child Sexual Exploitation project; the Low-Capacity Countries Project; Comprehensive Update on TF Risks project; and the Financial Exclusion and De-Risking: Potential revisions to R.1 project)
 - provided members' and Secretariat comments on FATF policy papers (contact groups, working groups and the plenary)
- The APG contributed as an observer to the FATF Virtual Asset Contact Group through its two representatives (Mongolia and Chinese Taipei) and the APG Secretariat, who attended two virtual VACG meetings and provided input into the 2025 Targeted Update.
- APG Co-Chair Kajikawa represented the APG at the EAG plenary in Indore in November 2024. In parallel to the EAG plenary, the APG delivered a joint workshop with the EAG on Virtual Assets, delivered both in-person and virtually. The Secretariat presented at this workshop virtually.
- APG Co-Chair Kajikawa, Samoa Central Bank Governor Atalina Ainuu-Enari and Deputy Governor Margaret Chan Cheuk-Tafunai, along with the Secretariat, represented the APG at the FATF's Private Sector Collaborative Forum in Mumbai in March 2025.
- APG Co-Chair Kajikawa attended the MENAFATF plenary in Amman in May 2025 and the APG Executive Secretary attended the MENAFATF plenary in Riyadh in November 2024.
- The APG Executive Secretary pursued wider and more regular engagement with FATF and FSRB Secretariats and found opportunities to more directly collaborate across the work of the Global Network. In addition to participating in a panel at the November MENAFATF Plenary, the APG

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Executive Secretary also attended an FSRB forum hosted by MONEYVAL and the German Government in Strasbourg in February 2025 to discuss the upcoming challenges for the Global Network. Expanding upon this initial discussion, all Secretariats from across the Global Network met in the United Arab Emirates for a comprehensive discussion to prepare for the start of the Global 5th round, share solutions, innovations and best practices.

STRATEGIC GOAL #2
THE APG USES ITS REGIONAL AND SUBJECT MATTER EXPERTISE TO DELIVER HIGH QUALITY ASSESSMENTS OF THE IMPLEMENTATION OF INTERNATIONAL STANDARDS.

MUTUAL EVALUATIONS

- The ME reports of India (joint APG/EAG/FATF), Marshall Islands, Nauru, Papua New Guinea and Timor-Leste were completed consistent with the APG ME Procedures and related quality and consistency requirements. Each of these reports was adopted by the APG in September 2024 and published following global quality and consistency reviews. The MEs were adequately staffed with expert assessors and reviewers from APG members and observers, supported by the APG Secretariat.
- The ME reports of the Maldives and Niue continued, with draft ME reports prepared for consideration at the 2025 APG Annual Meeting. The adoption of these ME reports will conclude the APG's MEs under the Global 4th Round. One assessor withdrew part-way through the ME process, however the Secretariat was able to obtain a replacement assessor with minimal impact to the ME assessment's progress. The APG Secretariat effectively supported all ME processes.
- The APG Global 5th Round of MEs commenced with joint APG/FATF mutual evaluations of Malaysia, Singapore and Canada. The Malaysia and Singapore ME reports will be adopted at the 2026 APG Annual Meeting and the Canada ME report will be adopted at the 2027 APG Annual Meeting.
- ME preparation support was provided in-country to Fiji, Solomon Islands, Sri Lanka and Vanuatu, whose MEs will commence in late 2025 and early 2026. Voluntary contributions from New Zealand and Japan supported the conduct of visits to these members. DAP Group members also supported the ME preparation visits.
- The APG continued to implement its expanded quality and consistency program for all APG ME reports.
- APG supported ten members preparing to undergo a mutual evaluation through a regional training targeted to those staff co-ordinating ME preparations. The APG delivered the Pilot Regional ME Preparation Workshop focused on supporting ME coordination staff in April 2025 in Nadi, Fiji through a voluntary contribution from Japan.

FOLLOW-UP PROCESSES

- All APG follow-up reports were subject to internal quality and consistency review and all follow-up reports with re-ratings were subject to global quality and consistency review in accordance with the FATF Universal Procedures.

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- From July 2024 to June 2025, the MEC endorsed and members adopted four (4) APG FURs with re-ratings (Brunei Darussalam, Myanmar, Nepal, and Samoa) five (5) joint FATF/APG FURs (Australia Japan, Korea, New Zealand and the United States), and 14 APG FURs without re-ratings (Bangladesh, Bhutan, Cambodia, Cook Islands, Lao PDR, Mongolia, Pakistan, Palau, Papua New Guinea, Samoa, Solomon Islands, Thailand, Tonga and Vanuatu).
- Seven (7) FUR teams were formed involving 26 reviewers from 15 members and one observer. The review teams re-assessed a total of 44 recommendations across these reports.
- The APG continued to implement its quality and consistency program for all FURs. The APG Secretariat implemented internal quality and consistency tools and processes to facilitate this.

PROVIDE ASSESSMENT EXPERTS, CONDUCT TRAINING AND IMPROVE ASSESSMENT PROCEDURES IN ORDER TO EFFECTIVELY DELIVER THE APG'S ASSESSMENT PROGRAM

- Members and observers provided assessors and reviewers across various stages of five APG mutual evaluations (two APG-only MEs and three FATF/APG MEs) in 2024-25.
- External review and Global Network quality and consistency (Q&C) processes were applied to all MERs and FURs adopted during the year.
- The APG delivered three assessor training workshops, in Chinese Taipei in October 2024, Japan in December 2024 and Macao, China in May 2025. 103 delegates from 30 APG members and observers were trained to serve as assessors. These workshops were supported by generous voluntary contributions from Japan; Macao, China; New Zealand and Chinese Taipei to fund travel for several participants and experts from across the APG membership. The workshops were supported by experts from Australia; Japan; New Zealand; Sri Lanka; Chinese Taipei; Macao, China; the MEC Co-Chairs; and the APG Secretariat.
- The APG supported a joint FATF/APG/EAG assessor training workshop in India in April 2025. Eleven delegates from 10 APG members and observers were trained. This workshop was supported by a voluntary contribution from Japan.
- The APG held a virtual update assessor training workshop in June 2025 for 39 delegates who had previously been trained as assessors in the Global 4th Round. The focus was on updates to the ME procedures, FATF Standards and Methodology in the Global 5th Round of MEs.
- Through the MEC, the APG prepared updated ME Procedures and commenced preparation of technical compliance templates and ME guidance for APG members to assist in ME preparation for the Global 5th Round.

SUPPORT FATF'S INTERNATIONAL CO-OPERATION REVIEW GROUP (ICRG) PROCESS AND APG MEMBERS IN THE ICRG PROCESS

- The APG actively participated in three Asia/Pacific-Joint Group (AP-JG) JG meetings (September 2024, January 2025 and April 2025)
 - The Philippines' ICRG exit on-site visit in January 2025
 - Three ICRG meetings (October 2024, February 2025 and June 2025)
- APG provided support to the Co-Chairs for the AP-JG for 2024-25 who were provided from Macao, China and New Zealand.

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- The APG Secretariat provided comments to the ICRG and advice to the AP-JG Co-Chairs and to members under ICRG review including on ICRG process, rules and practice including in relation to the FATF's project concerning unintended consequences under Recommendation 8;
 - general comments on legislative, regulatory and administrative measures to address ICRG concerns
 - technical assistance coordination
 - implementation planning
 - the impact of ICRG processes on APG membership status
- APG conducted a high-level visit to Vietnam to address strategic AML/CFT leadership challenges and technical assistance coordination in relation to the ICRG. The visit was supported by the APG Co-chair Kajikawa, the UNODC and the World Bank.
- APG Secretariat conducted ICRG preparation support visits to Papua New Guinea (November 2024 and June 2025), which included implementation planning support, technical coordination and briefings to the private sector
- APG Secretariat virtually joined FATF Secretariat ICRG preparation briefings to Papua New Guinea in January 2025.

STRATEGIC GOAL #3

THE APG SUPPORTS IMPLEMENTATION WITHIN ITS MEMBERS THROUGH THE DELIVERY OF TYPOLOGIES PRODUCTS AND THE COORDINATION AND DELIVERY OF TECHNICAL ASSISTANCE AND TRAINING

CONDUCT AND/OR SUPPORT RESEARCH ON EXISTING AND EMERGING AML/CFT RISKS AND CONTEXTUAL ISSUES

- The 2024 APG Typologies Workshop was hosted by Malaysia from 11-13 November 2024 and attended by over 150 delegates from 32 members, seven observer and over 60 private sector participants. The workshop focused on the abuse of legal persons and cyber-enabled fraud and included presentations and panel discussions with operational leaders and civil society, moderated by experts.
- The APG commenced preparations for the 2025 APG Typologies Workshop which will be hosted by Thailand in collaboration with the UNODC, in November 2025. The Workshop will consist of two streams: 1) cyber scam hubs and human trafficking and 2) online child sexual exploitation.
- APG adopted and published the 2024 APG Typologies Report in November 2024. The report included information submitted by 18 APG members, 11 APG observer organisations and four non-observer organisations (research centres) and included 138 case studies. The report also included a focus chapter on threats and trends related to the misuse of legal persons.
- The APG, with support from the UNODC, published a fact sheet on shipping registries and PF risks in March 2025. The factsheet included case studies which provide practical examples of PF risks and approaches to assessment that can inform members' understanding and response to PF risks associated with shipping registries.

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- The APG commenced a typologies project on cyber scam hubs and human trafficking in March 2025 with Indonesia and the UNODC as the co-leads of a project team of 24 members representing 10 members and two observers. The project will result in the publication of a report, following a roundtable discussion at the 2025 APG Annual Meeting and workshop stream at the 2025 APG Typologies Workshop.
- The APG Secretariat contributed to the FATF RTMG project teams for 1) online child sexual exploitation (OCSE) - report published March 2025; and 2) complex PF sanctions evasion schemes - report published June 2025. APG Secretariat contributed to the FATF launch event for the OCSE report and an awareness raising webinar for the complex PF sanctions evasion schemes report.

PROVIDE GUIDANCE, ADVICE, AND TECHNICAL ASSISTANCE ON IMPLEMENTATION OF THE FATF STANDARDS IN COLLABORATION WITH REGIONAL AND GLOBAL PARTNERS.

- The APG identified regional and domestic implementation issues through the APG's TA coordination processes, including through regular communication with TA recipient members and frequent liaison with members of the APG DAP Group. The APG supported and encouraged assistance from TA providers in response to identified needs. APG Secretariat delivered targeted TA coordination and assistance to in line with the identified TA priority needs. This particularly focused on members undergoing ICRG review, and supporting members preparing for the Global 5th Round of MEs as well as thematic areas including virtual assets, beneficial ownership, proliferation financing, asset recovery, etc.
- The APG provided post-ME strategic implementation planning (SIP) support with a particular focus on TA coordination. These visits included joint-agency implementation planning workshops and engagement with other stakeholders. All SIP visits this year were funded by the PACD program. SIP visits were conducted with Papua New Guinea (November 2024, with Australia, United States, ADB, UNDP and UNODC), Nauru (January 2025), Marshall Islands (February 2025) and Timor-Leste (June 2025, with Portugal and UNODC).
- The APG piloted the APG Global 5th Round Regional ME Preparation Workshop in Fiji, from 29 April – 1 May 2025. The workshop was supported by a voluntary contribution from Japan. Twenty-nine delegates from 10 APG members which will be assessed early in the Global 5th Round participated in this workshop.
- APG advocated for and received agreement from FATF for regional delivery by APG or the IMF/World Bank of FATF Standards Training Courses (STC).
- APG Secretariat coordinated the participation of APG delegates in FATF STC at the FATF Training Institute in Busan, Korea as follows:
 - four participants at the law enforcement-focused STC from 26-30 August 2024
 - 26 participants at the STC from 1-6 December 2024
 - three participants at the supervision-focused STC from 10-14 March 2025
 - 16 participants at the STC from 12-16 May 2025

SUPPORT THE COORDINATION OF TECHNICAL ASSISTANCE BETWEEN MEMBERS AND RELEVANT PROVIDERS OF ASSISTANCE.

- The 2024 TA Forum was held in September 2024 in Abu Dhabi. The 22nd TA Forum brought together 25 APG TA recipient members and 19 members of APG's DAP Group who all actively participated in 29 convened meetings including:
 - One DAP Group meeting to discuss the coordination of TA and three sub-regional meetings for members and the DAP Group: Pacific, South Asia and Southeast Asia
 - 25 individual team meetings between TA recipient members and the DAP Group
- The APG Secretariat distributed information on members' assistance needs and their ongoing TA activities to the DAP Group prior to the 2024 TA Forum. This included information received from members in addition to ME reports, ICRG action plans and follow-up reports. The Secretariat has also done this in preparation for the 2025 TA Forum to be held in August 2025.
- The APG Secretariat shared comprehensive TA needs information and donor activity with the DAP Group and held eight TA coordination virtual DAP Group meetings throughout the year where information on priorities, changing donor landscape and sequencing issues were discussed.
- The APG identified and enhanced TA coordination with relatively new regional donors (IIJ, ILTSA, the EU Global Facility) and continued to seek enhanced TA in cases where some members with TA needs lack offers of assistance.
- The APG provided support to members, including Lao PDR, Myanmar, Nepal, Papua New Guinea, Philippines and Vietnam in relation to the ICRG process and observation period. This included three specific TA coordination calls with the DAP Group to provide an update on progress against action plans and highlighted key areas for TA.
- The APG Secretariat's PACD program continued to support Pacific members and Timor-Leste through coordinated delivery of TA, through funding from the New Zealand Ministry of Foreign Affairs and Trade. in particular:
 - The APG further enhanced TA coordination and collaboration processes and the intensity of coordination calls and information sharing (both member-specific and regional) – this has greatly intensified as the number of donors in the Pacific has increased and the APG has more closely integrated with initiatives on correspondent banking relationships (CBR) and other shared regional priorities;
 - Member-specific TA related coordination calls have increased to seek updates from members on their progress the SIP and to confirm upcoming TA delivery and outstanding needs. Calls were conducted with Tonga, Samoa, Marshall Islands, Tuvalu, Palau, Cook Islands and Nauru.
 - Stakeholder engagement (members, regional partner organisations, Donors and Providers of technical assistance) increased in keeping with the changing regional context. Examples include high level briefings from the APG Co-chair to the Pacific Islands Forum;

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- Member-level strategic implementation planning support (before and after an ME) –post-ME strategic implementation planning support was provided to the Marshall Islands, Nauru, PNG and Timor-Leste. Strategic ME preparation support was provided to Fiji, Sri Lanka and Vanuatu.
- APG provided support to strategic AML/CFT leadership in the Pacific, including through engagement through Pacific Banking Forum, committees of the PIFS, the World Bank/PIFS CBR project, the PILON, the ARIN-AP, etc;
- APG provided support to Pacific members in relation to AML/CFT supervision, including enhanced regional cooperation on AML/CFT supervision through the Pacific Supervisors Forum and closer collaboration with the Pacific Financial Intelligence Community (PFIC); support to DNFBP and money transfer supervision.
- APG delivered technical assistance in cases where there are no other providers able to assist or there is a pressing strategic opportunity – asset confiscation support to Tonga; and NPO risk-based regulation to Fiji;
- APG contributed global and regional processes supporting the Pacific, for example various FATF projects (financial inclusion, PF, low-capacity countries), World Bank/PIFS CBR project, etc.
- APG supported assistance for the development and use of legislative packages suitable for Pacific members, including TFS legislative support (Palau) and a pilot model legal framework project for non-conviction-based forfeiture (initially with the Cook Islands);

PART FOUR

Management and Accountability

Summary of financial performance for 2024-25⁴

27. The overall financial results for the period 1 July 2024 to 30 June 2025 are as follows:

2024-25 FY (\$AUD)	Actual	Budget	Variance
Income	7,560,425	7,172,288	388,137
Expenses	7,302,264	7,612,773	310,509
Net Operating Position	258,161	-440,485	182,324

28. The APG membership agreed to a budgeted deficit of AUD\$440,485. Due to temporary staff vacancies and efficiencies found in travel, the APG ended the 2024-25 FY with a surplus of AUD\$258,161. The surplus will be retained in APG equity.

Core Funding 2024-25

29. Membership contributions form the core budget to undertake core APG business. The financial results from the core budget are as follows:

2024-25 FY (\$AUD)	Actual	Budget	Variance
Income	4,805,900	4,707,379	98,521
Expenses	4,641,110	5,147,864	506,754
Net Operating Position	164,790	-440,485	605,275

Voluntary financial support 2024–2025

30. The Co-Chairs and the Secretariat on behalf of all APG members thanked Australia, China, Japan, New Zealand, Chinese Taipei and the United Kingdom for their significant and ongoing financial support of APG activities in 2024–2025 through voluntary contributions. These have contributed to ensuring that the APG remains a high-performing FSRB.

31. The overall financial results for voluntary financial support are as follows:

2024-25 FY (\$AUD)	Revenue	Expense	Variance ⁵
In Kind Support - Australia	874,739	874,739	0
Voluntary Contribution - Australia	6,916	6,916	0
Project Contribution - China	64,768	60,367	4,401
Project contribution - Japan	331,654	341,034	-9,380
Project Contribution (PACD)– New Zealand Ministry of Foreign Affairs & Trade	1,226,192	1,181,806	44,386
Project Contribution – New Zealand MOJ	80,747	78,969	1,778
Project Contribution - Chinese Taipei	148,440	102,483	45,957

⁴ All figures in Australian Dollars (AUD)

⁵ The APG accounting policy is to recognise revenue when the expense has occurred. There are slight variances due to timing issues at the end of this FY and previous FYs.

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Project Contribution – United Kingdom	21,069	21,313	-244
Total	2,754,525	2,667,627	86,898

In-kind support

32. Australia provided on-going in-kind enabling services (accommodation, ICT services, finance, human resources, security, legal etc.) free of charge to the APG. The value of this in-kind support was estimated at AUD\$874,739.

Untied Funding

33. Australia paid a voluntary contribution of AUD\$6,916 that was not tied to a particular project.

Project Contributions

34. China provided a voluntary contribution which supported a Pacific assessor on a Mutual Evaluation and the attendance of Pacific delegates at the 2024 APG Annual Meeting and 2024 APG Typologies workshop.

35. Japan provided a voluntary contribution which supported the implementation of the Co-Chairs' priorities. In 2024-25, this included:

- high-level visits to Sri Lanka, Vietnam and Fiji
- hosting of assessor training in Japan and expert presenters, delegates to attend assessor training in Japan and Macao, China
- delegates and experts to attend the APG/World Bank Virtual Assets workshop
- hosting, expert presenters and priority delegates to attend the Regional Pre-ME Preparation workshop in Fiji
- FSRB collaboration with EAG and MENAFATF

36. New Zealand Ministry of Justice provided a voluntary contribution which supported experts travelling from New Zealand to APG events to benefit members.

37. Chinese Taipei provided a voluntary contribution which supported:

- attendance of Pacific delegates at the 2024 APG Annual Meeting and the 2024 APG Typologies workshop;
- APG members in the ICRG process; and
- APG website redevelopment.

PACD program funding

38. Funding from the New Zealand Ministry of Foreign Affairs and Trade supported the activities of the PACD Program. Since June 2023 the Ministry of Foreign Affairs and Trade has supported Phase II of the PACD program. Total value of the programme is NZD6,000,000 over five years (2023-2028). In 2023-2024, a total of AUD\$652,815 was spent on: (i) dedicated staff positions, (ii) delivery of technical assistance and training projects to APG Pacific Members, and (iii) administrative costs. Additional detail is outlined in the PACD Program 2024-2025 Annual Report (**Annex B**).

Budget for 2025–2026

39. The APG’s 2025-2026 budget and business plan was adopted at the 2024 Annual Meeting. The agreed budget was an 18% increase from 2024-25.

2025-26 FY (\$AUD)	Core	Non-Core	Total
Income	5,532,807	1,962,492	7,495,299
Expenses	6,322,807	1,962,492	8,285,299
Net Operating Position	-800,000	0	-800,000

40. The Special Purpose financial statements for the year ended 30 June 2025, including the independent auditor’s review report can be found at **Annex A**.

Annex A - Special Purpose Financial Statements

Asia/Pacific Group on Money Laundering
Special Purpose Financial Statements
for the year ended 30 June 2025

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Statement by the Executive Secretary

In my opinion:

1. The Asia/Pacific Group on Money Laundering (APG) is not a reporting entity and these special purpose financial statements and notes:

- are based on properly maintained financial records and prepared in accordance with the accounting policies outlined in the overview to the financial statements which are appropriate to meet the needs of users;
- present fairly the APG's financial position as at 30 June 2025 and its performance for the year ended on that date; and

2. At the date of this statement, there are reasonable grounds to believe that APG will be able to pay its debts as and when they become due and payable.



Chris Black
Executive Secretary, APG Secretariat

15 September 2025

Statement of comprehensive income

for the year ended 30 June 2025

	Notes	2025 \$	2024 \$
INCOME			
Contributions from members	1.1	4,805,900	4,253,619
Other contributions	1.2	1,879,786	955,476
Total revenue*		6,685,686	5,209,095
Gains			
Resources received free of charge from the AFP		874,739	828,137
Total gains		874,739	828,137
Total income		7,560,425	6,037,232
EXPENSES			
Employee benefits	2.1	4,280,504	3,544,694
Depreciation and amortisation		572	572
Supplier expenses	2.2	1,819,666	1,051,060
Travel expenses	2.3	1,201,522	955,887
Total expenses*		7,302,264	5,552,213
Surplus		258,161	485,019

The above statement should be read in conjunction with the accompanying notes.

*The increased activity reflected in revenue and expenses compared to the prior year relates to project activity funded by Japan and New Zealand MFAT.

Statement of financial position

as at 30 June 2025

	Notes	2025 \$	2024 \$
ASSETS			
Financial assets			
Cash and cash equivalents		5,415,546	6,091,597
Trade and other receivables	3	837,930	78,694
Total financial assets		6,253,476	6,170,291
Non-financial assets			
Property, plant and equipment		523	1,096
Intangibles		137,581	-
Prepayments		40,070	-
Total non-financial assets		178,174	1,096
Total assets		6,431,650	6,171,387
LIABILITIES			
Payables¹			
Supplier payables		338,381	125,289
Unearned income	4	1,470,795	2,235,865
Salaries and wages		125,364	76,648
Superannuation		20,305	12,377
FBT		3,009	2,337
Total payables		1,957,854	2,452,516
Provisions			
Leave provisions ²		1,432,883	936,119
Total provisions		1,432,883	936,119
Total liabilities		3,390,737	3,388,635
Net assets		3,040,913	2,782,752
EQUITY			
Retained surplus		3,040,913	2,782,752
Total equity		3,040,913	2,782,752

The above statement should be read in conjunction with the accompanying notes.

¹ All supplier payables are expected to be settled within 7 days (2024: 7 days). All other payables are expected to be settled within 12 months.

² Employee provisions which are expected to be settled beyond 12 months (commonly long service leave), are discounted to present value using market yields on the 10-year government bond rate.

Statement of changes in equity

for the year ended 30 June 2025

	2025	2024
	\$	\$
Retained surplus		
Opening balance	2,782,752	2,297,733
Comprehensive income		
Surplus for the period	258,161	485,019
Total comprehensive income	258,161	485,019
Closing balance	3,040,913	2,782,752

The above statement should be read in conjunction with the accompanying notes.

Cash flow statement

for the year ended 30 June 2025

	2025	2024
	\$	\$
Operating activities		
<i>Cash received:</i>		
Contributions and other receipts	5,161,379	5,925,102
Net GST received from ATO	49,992	12,319
Total cash received	5,211,371	5,937,421
<i>Cash used:</i>		
Employees	3,727,096	3,659,844
Suppliers and other payments	2,022,746	1,030,594
Total cash used	5,749,842	4,690,438
Net cash (used in) / generated from operating activities	(538,471)	1,246,983
Purchase of intangibles	137,580	-
Total cash used	137,580	-
Net cash used by investing activities	(137,580)	-
Net (decrease) / increase in cash held	(676,051)	1,246,983
Cash and cash equivalents at the beginning of the reporting period	6,091,597	4,844,614
Cash and cash equivalents at the end of the reporting period	5,415,546	6,091,597

The above statement should be read in conjunction with the accompanying notes.

Overview

Objectives of Asia/Pacific Group on Money Laundering

The purpose of the Asia/Pacific Group on Money Laundering (APG) is to facilitate the adoption, implementation and enforcement of internationally accepted standards against money laundering, terrorist financing and financing of the proliferation of weapons of mass destruction, in particular the Forty Recommendations of the Financial Action Task Force (FATF). The APG allows for regional factors to be taken into account in the implementation of anti-money laundering, anti-terrorist financing and anti-proliferation financing measures and provides for peer review by means of a mutual evaluation process.

Basis of preparation of the financial statements

The APG's accounts form part of the Australian Federal Police (AFP) special account, Services and Other Entities Trust Moneys Account.

The AFP continued to host the APG for the year ended 30 June 2025 and has prepared this special purpose financial report for the members of the APG. This special purpose financial report has been prepared for distribution to the members to fulfil the Executive Secretary's financial reporting requirements under the APG Terms of Reference.

The financial statements have been prepared on an accrual basis and in accordance with the historical cost convention.

The financial statements are presented in Australian dollars and values are rounded to the nearest dollar unless otherwise specified.

Unless alternative treatment is specifically required by an accounting standard, assets and liabilities are recognised in the statement of financial position when it is probable that future economic benefits will flow to the entity or future sacrifice of economic benefits will be required and the amounts of the assets or liabilities can be reliably measured. However, assets and liabilities arising under executor contracts are not recognised unless required by an Accounting Standard. Assets and liabilities that are unrecognised are reported as commitments. There is a capital commitment as at 30 June 2025 of \$50,446 (2024: nil).

Contingent liabilities and assets are not recognised in the statement of financial position but are reported in the notes. They may arise from uncertainty as to the existence of a liability or asset or represent an asset or liability in respect of which the amount cannot be reliably measured. Contingent assets are disclosed when settlement is probable but not virtually certain and contingent liabilities are disclosed when settlement is greater than remote. The APG does not have any contingencies as at 30 June 2025 (30 June 2024: nil).

Unless alternative treatment is specifically required by an accounting standard, income and expenses are recognised in the statement of comprehensive income when and only when the flow, consumption or loss of economic benefit has occurred and can be reliably measured.

Significant accounting judgements and estimates

In the process of applying the accounting policies listed in this note, the APG has made the following judgement that has the most significant impact on the amounts recorded in the financial statements:

- The liability for long service leave has been estimated using present value techniques. This takes into account expected salary growth through promotion, inflation, attrition and future discount rates.

No accounting assumptions or estimates have been identified that have a significant risk of causing a material adjustment to carrying amounts of assets and liabilities within the next accounting period.

New Australian Accounting Standards

Adoption of New Australian Accounting Standard Requirements

No new or revised standards and interpretations that were issued prior to the sign-off date and are applicable to the current reporting period had a material effect on the APG's financial statements.

Future Australian Accounting Standard Requirements

No accounting standard has been adopted earlier than the application date stated in the standard.

Gains

Resources received free of charge

Resources received free of charge are recognised as gains when and only when a fair value can be reliably determined and the services would have been purchased if they had not been donated. Use of those resources is recognised as an expense.

Financial instruments

The APG's financial instruments are measured at fair value. Interest-earning financial assets and liabilities are measured using the effective interest rate method. The carrying amount of all financial instruments in the Statement of financial position approximates fair value. Financial instruments held by the APG carry minimal credit, liquidity and market risk.

Taxation

The APG is exempt from all forms of taxation except Fringe Benefits Tax (FBT) and the Goods and Services Tax (GST).

Events after the reporting period

No significant events have occurred since the reporting date requiring disclosure in the financial statements.

Note 1: Income

	2025	2024
	\$	\$
Note 1.1: Contributions from members		
<i>Member contributions</i>		
Australia	263,084	248,967
Bangladesh	43,779	39,492
Bhutan	17,981	16,185
Brunei Darussalam	17,981	16,185
Cambodia	17,981	16,185
Canada	307,650	280,269
China	555,471	499,971
Chinese Taipei	128,819	114,354
Cook Islands	17,971	16,185
Fiji	17,981	16,185
Hong Kong, China	113,763	102,597
India	470,737	376,359
Indonesia	166,911	148,456
Japan	677,863	610,134
Korea	279,974	260,835
Lao PDR	17,981	16,185
Macau, China	17,981	16,185
Malaysia	62,995	60,036
Maldives	17,981	16,185
Marshall Islands	17,981	16,185
Mongolia	17,981	16,185
Myanmar	17,987	16,185
Nauru	24,852	17,981
Nepal	17,981	16,185
New Zealand	183,768	76,440
Niue	17,981	16,185
Pakistan	46,229	42,214
Palau	17,591	16,185
Papua New Guinea	4,190	29,977
Philippines	58,220	52,122
Samoa	17,981	16,185
Singapore	122,947	121,402
Solomon Islands	17,981	16,185
Sri Lanka	17,984	16,185
Thailand	82,340	77,544
Timor-Leste	17,981	16,185
Tonga	17,981	16,185
Tuvalu	17,981	16,185
United States	794,559	717,049
Vanuatu	17,981	16,185
Vietnam	40,539	37,535
Total contributions from members	4,805,900	4,253,619

Note 1: Income (cont.)

	2025	2024
Note 1.2: Other contributions	\$	\$
Voluntary Contribution - Australia	6,916	21,033
Project Contribution - China	64,768	128,659
Project Contribution - Chinese Taipei	148,440	81,950
Project Contribution - NZ Ministry of Foreign Affairs and Trade ¹	1,226,192	547,537
Project contribution - Japan ¹	331,654	64,288
Project Contribution - NZ MOJ Specific Travel	80,747	112,009
Project Contribution - UK	21,069	-
Total other contributions	1,879,786	955,476

Accounting Policy

Contributions

¹ Increase in Japan VC revenue(\$300k) and increase in MFAT Pacific funding (\$700k)

Contributions from members are annual contributions from APG members to fund the ongoing activities of the APG. They are recognised as income on receipt. This treatment of income is consistent with AASB 1058 *Income of Not-for-Profit Entities*.

Voluntary contributions are received from members in accordance with funding agreements which establish the purpose of the activities, proposed budgets, monitoring and evaluation plans. Revenue from voluntary contributions are recognised as revenue over time when performance obligations are met. This treatment of revenue is consistent with AASB 15 *Revenue from Contracts with Customers*.

Project contributions are additional allocations attributed to particular projects or activity as specified by the donor. Project contributions are recognised over time when performance obligations are met. This treatment of revenue is consistent with AASB 15 *Revenue from Contracts with Customers*.

Note 2: Expenses

	2025	2024
Note 2.1: Employee benefits	\$	\$
Wages and salaries	3,081,347	2,615,319
Superannuation:		
Defined contribution plans	393,215	336,907
Defined benefit plans	187,594	136,157
Leave and other entitlements	605,642	450,657
Other employee expenses	12,706	5,654
Total employee benefits	4,280,504	3,544,694

Accounting Policy

Liabilities for services rendered by employees are recognised at the reporting date to the extent they have not been settled.

Liabilities for 'short-term employee benefits' (as defined in AASB 119) and termination benefits due within twelve months of the end of the reporting period are measured at their nominal amounts. The nominal amount is calculated with regard to the rates expected to be paid on settlement of the liability.

All other employee benefit liabilities are measured as the present value of the estimated future cash outflows to be made in respect of services provided by employees up to the reporting date.

Note 2: Expenses (cont.)

Leave

The liability for employee benefits includes provision for annual leave and long service leave. No provision has been made for sick leave as all sick leave is non-vesting as the average sick leave taken in future years by employees of the APG is estimated to be less than the annual entitlement for sick leave.

The leave liabilities are calculated on the basis of employees' remuneration at the estimated salary rates at the time the leave is taken, including the APG's employer superannuation contribution rates to the extent the leave is likely to be taken during service rather than paid out on termination.

The liability for long service leave has been determined by reference to the work of an actuary as at 30 June 2025. Attrition rates and pay increases through promotion and inflation are taken into account in the estimate of the present value of the liability. A full review by an actuary is conducted every 3 years.

Superannuation

Staff of APG are members of the Commonwealth Superannuation Scheme (CSS), the Public Sector Superannuation Scheme (PSS) or the PSS accumulation plan (PSSap). The CSS and PSS are defined benefit schemes for the Commonwealth of Australia. The PSSap is an accumulation fund.

The liability for defined benefits is recognised in the financial statements of the Australian Government and is settled by the Australian Government in due course. This liability is reported in the Department of Finance's administered schedules and notes.

APG make employer contributions to their employee's superannuation scheme at rates determined by an actuary to be sufficient to meet the cost to the Government of the superannuation entitlements of the APG's employees. APG accounts for the contributions as if they were contributions to defined contribution plans.

Note 2.2: Supplier expenses

	2025	2024
Goods and services	\$	\$
Consultants and contractors ¹	779,730	295,529
Audit fees	12,000	11,500
Legal fees	105,287	36,387
Staff and recruitment	-	909
Conference costs	219,963	28,331
Communications and IT	10,859	9,917
General and office	16,007	10,386
Building and accommodation ¹	35,724	43,809
Office space ¹	552,524	529,933
Other expenses	36,896	30,405
Total goods and services	1,768,990	997,106
Other supplier expenses		
Workers compensation expenses	50,676	53,954
Total other supplier expenses	50,676	53,954
Total supplier expenses¹	1,819,666	1,051,060

¹ Supplier expenses include \$874,739 (2024:\$828,137) of resources received free of charge from the AFP comprising consultants and contractors \$286,491 (2024: \$254,481), building and accommodation \$35,724 (2024: \$43,723) and office space \$552,524 (2024: \$529,933).

Note 2.3: Travel expenses

Airfares	704,351	550,198
Accommodation	327,093	311,810
Other travel expenses	170,078	93,879
Total travel expenses	1,201,522	955,887

Note 2: Expenses (cont.)

Note 2.4: New Zealand Ministry of Foreign Affairs and Trade (MFAT) expenses*

	MFAT	All Other APG	Total
	\$	\$	\$
Breakdown of expenses			
Employee	735,399	3,545,105	4,280,504
Supplier	226,116	1,593,550	1,819,666
Travel	220,291	981,231	1,201,522
Total	1,181,806	6,119,886	7,301,692

* Note 2.4 does not include the depreciation expense.

In 2017, the New Zealand government provided voluntary funding over five years to support a programme of technical assistance and training in the Pacific. This includes the establishment of three additional staff (referred to as the "Pacific Cell") in the APG secretariat. A second phase of this funding was agreed to in 2023 for an additional five-year period covering 2023 to 2028. This funding forms part of the APG's accounts and is reflected in these financial statements. However, for accountability reasons, and to ensure that this funding does not affect other APG resourcing from member contributions, day to day management of this funding is kept separate from other APG funds. It is reported on separately here for transparency.

Note 3: Trade and other receivables

	2025	2024
	\$	\$
Member contributions and other receivables ¹	821,128	59,280
GST receivable from the Australian Taxation Office	2,517	2,399
Receivable from AFP	32,855	17,015
Total trade and other receivables	856,500	78,694
Less impairment loss allowance:		
Less: expected credit loss allowance	(18,570)	-
Total impairment loss allowance	(18,570)	-
Total trade and other receivables (net)	837,930	78,694

¹ Includes five membership contributions which are expected to be received, but not received in full as at 30 June 2025.

Accounting Policy

Not overdue	24,851	140
More than 90 days	796,277	59,140

Credit terms for goods and services are 30 days (2024: 30 days). Receivables are held for the purpose of collecting contractual cash flows and measured at amortised cost using the effective interest method adjusted for any loss allowance.

Financial assets are assessed for impairment at the end of each reporting period based on Expected Credit Losses, using the general approach which measures the loss allowance based on an amount equal to lifetime expected credit losses.

Note 4: Unearned income

	2025	2024
	\$	\$
Member and project contributions paid in advance		
Project contribution - US State Department	-	30,238
Project contribution - China	15,265	80,034
Project contribution - Chinese Taipei	58,641	207,080
Project contribution - NZ Ministry of Foreign Affairs and Trade	272,778	653,235
Project contribution - New Zealand	241,314	182,703
Project contribution - US State Department	-	1,618
Project contribution - Australian Department of Foreign Affairs and Trade	526,000	526,000
Project contribution - Japan	208,638	540,292
Project contribution - UK	148,159	14,665
Total unearned income	1,470,795	2,235,865



Asia/Pacific Group
ON MONEY LAUNDERING

Annex B - PACD Annual Report

September 2025

Pacific AML/CFT Capacity Development (PACD) Program

Phase II Annual Report
2024 – 2025

Policy Statement

The Asia/Pacific Group on Money Laundering (APG) aims to promote the effective implementation of international Financial Action Task Force (FATF) standards for anti-money laundering / counter terrorism financing / counter proliferation of weapons of mass destruction (AML/CFT/CPF) across the Asia/Pacific region. These standards target the criminal activities that undermine the legitimacy of financial systems and threaten the sound governance of economies, private sector investment and, operation of correspondent banking channels and ultimately, sustainable economic growth.

Criminal activities, including corruption, drug-trafficking and environmental crimes, are not merely threats to good governance; they also draw illicit funds out of jurisdictions and public resources. This strains already scarce resources and thereby impacts the prosperity and stability of economies. By working to enhance the capabilities of institutions to detect, investigate, prosecute and repatriate illicit funds, this manipulation of public funds and capital flight can be minimised.

A robust economy with an effective AML/CFT framework promotes inclusion in the broader international financial system and fosters private sector investment in trade, tourism and fisheries. Increased participation in the global economy encourages productivity, opportunities for trade and profitability leading to economic growth and development. Conversely, we have seen the severe repercussions on developing economies if they are excluded from global financial flows as a consequence of perceived risks of money laundering, terrorist financing or proliferation financing (ML/TF/PF).

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Abbreviations & Acronyms

ADB	Asian Development Bank
AFI	Alliance for Financial Inclusion
AFP	Australian Federal Police
AGD	[Australian] Attorney-General's Department
AML	Anti-Money Laundering
APEC	Asia-Pacific Economic Cooperation
APG	Asia/Pacific Group on Money Laundering
ARIN-AP	Asset Recovery Interagency Network – Asia Pacific
ASEAN	Association of Southeast Asian Nations
AUSTRAC	Australian Transaction Reports and Analysis Centre
CBR	Correspondent Banking Relationship
CFT	Countering Financing of Terrorism
CPF	Countering Proliferation Financing
D&I	Diversity and Inclusion
DAP	Donors and Providers
DIA	[New Zealand] Department of Internal Affairs
DJAG	[PNG] Department of Justice and Attorney General
DNFBPs	Designated Non-Financial Businesses and Professions
EMG	Executive Management Group
FASU	[Papua New Guinea] Financial Analysis & Supervision Unit
FATF	Financial Action Task Force
FIU	Financial Intelligence Unit
FSRB	FATF-Style Regional Body
FSVC	Financial Services Volunteer Corps
GIFCS	Group of International Finance Centre Supervisors
GIZ	Germany's Global Program Combating Illicit Financial Flows
ICAC	[PNG] Independent Commission Against Corruption
ICRG	International Co-operation Review Group
IDB	Inter-American Development Bank
IIJ	International Institute for Justice and the Rule of Law
ILSTA	Luxembourg's Institute for Legal Support and Technical Assistance
IMF	International Monetary Fund
ME	Mutual Evaluation
MER	Mutual Evaluation Report
MERL Framework	Monitoring, Evaluation, Research and Learning Framework
MFAT	[New Zealand] Ministry of Foreign Affairs and Trade
ML	Money Laundering
MTOs	Money Transfer Operators

NCBF	Non-Conviction Based Asset Forfeiture
NCC	[PNG] National Coordination Committee
NGO	Non-Governmental Organisation
NPOs	Non-Profit Organisations
OCO	Oceania Customs Organisation
OECD	Organisation for Economic Co-operation and Development
OPP	[PNG] Office of Public Prosecutor
PACD	Pacific AML/CFT Capacity Development
PDG	[Pacific Islands Forum] Pacific De-Risking Group
PF	Proliferation Financing
PFIC	Pacific Financial Intelligence Community
PFTAC	Pacific Financial Technical Assistance Centre
PICP	Pacific Islands Chiefs of Police
PIFS	Pacific Island Forum Secretariat
PILON	Pacific Island Law Officer's Network
PNG	Papua New Guinea
PSCF	Private Sector Consultative Forum
RPNGC	Royal Papua New Guinea Constabulary
SIP Workshop	Strategic Implementation Planning Workshop
SOP	Standard Operating Procedure
STC	[FATF] Standards Training Course
SWOT Analysis	Strengths, Weaknesses, Opportunities and Threats Analysis
TA	Technical Assistance
TA&T Forum	Technical Assistance and Training Forum
TF	Terrorism Financing
TFS	Targeted Financial Sanctions
TWG	[PNG] Technical Working Group
UN CTED	United Nations Counter-Terrorism Committee Executive Directorate
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime
VASPs	Virtual Asset Service Providers
VFIU	Vanuatu Financial Intelligence Unit
WCO	World Customs Organisation

Pacific AML/CFT Capacity Development (PACD) Program

Goal

To support economic stability, safety and security of Pacific Islands communities by strengthened and targeted efforts against financial crime

Objectives

Overarching Objective	Substantive actions to enhance risk-based AML/CFT systems by leadership and technical personnel of: <ul style="list-style-type: none"> • Pacific governments and private sectors • Regional multilaterals • Donors and providers
Contributing Objective 1	Increased awareness of, and demand for, support available from APG/PACD, including implementation planning, TA coordination, and other APG services, contributing to the Overarching Objective
Contributing Objective 2	Increased regional coordination to enhance risk-based AML/CFT systems by: <ul style="list-style-type: none"> • Pacific jurisdictions • Donors and providers
Contributing Objective 3	Increased capacity that enhances risk-based AML/CFT systems of selected stakeholders
Cross-cutting Contributing Objective	Enhanced benefits and roles for women in relation to AML/CFT activities in the Pacific

Stakeholders

APG Members and Observers Included in the PACD Program

- Cook Islands
- Fiji
- Republic of Marshall Islands
- Nauru
- Niue
- Palau
- Papua New Guinea
- Samoa
- Solomon Islands
- Timor-Leste
- Tonga
- Tuvalu
- Vanuatu
- Federated States of Micronesia (APG observer)
- Kiribati (APG observer)

APG Donors and Providers (DAP) Group

- Asian Development Bank (ADB)/ Organisation for Economic Co-operation and Development (OECD) Anti-Corruption Initiative for Asia-Pacific
- Alliance for Financial Inclusion (AFI)
- Asia-Pacific Economic Cooperation (APEC) secretariat
- Asset Recovery Interagency Network – Asia Pacific (ARIN-AP)
- Association of Southeast Asian Nations (ASEAN) secretariat
- Asian Development Bank (ADB)
- Australia
- Canada
- China
- Chinese Taipei

- Commonwealth secretariat
- Egmont Group of Financial Intelligence Units (FIUs)
- Financial Services Volunteer Corps (FSVC)
- France
- Germany
- Group of International Finance Centre Supervisors (GIFCS)
- International Monetary Fund (IMF)
- INTERPOL
- Inter-American Development Bank (IDB)
- Japan
- Korea
- Malaysia
- New Zealand
- Oceania Customs Organisation (OCO)
- Pacific Islands Chiefs of Police (PICP)
- Pacific Island Forum Secretariat (PIFS)
- Pacific Island Law Officer's Network (PILON)
- Pacific Financial Technical Assistance Centre (PFTAC)
- United Kingdom
- United Nations
- United Nations Counter-Terrorism Committee Executive Directorate (UN CTED)
- United Nations Office on Drugs and Crime (UNODC)
- United States
- World Bank
- World Customs Organisation (WCO)

Pacific AML/CFT Operating environment

Over the year there have been several important changes in the regional operating environment for anti-money laundering / countering financing of terrorism / countering proliferation financing (AML/CFT/CPF) technical assistance (TA). These include:

- The region has seen increasing numbers of TA providers (even more so than when the PACD program began).
- The APG Global 5th Round of Mutual Evaluations (MEs) has begun and all members from the Pacific are scheduled to be assessed by 2033.
- Papua New Guinea will enter the Financial Action Task Force (FATF) International Co-operation Review Group (ICRG) process in early 2026 – the first time a Pacific member has been in ICRG since 2018.
- The reduction or loss of critical correspondent banking relationships (CBRs) is worsening – CBR pressure is partly due to poor AML/CFT progress.
- More Pacific members are under pressure due to unmitigated money laundering (ML) risks from offshore centres and from new revenue schemes, e.g. citizenship by investment schemes.

Program Overview

The PACD Program's fundamental focus is on activities that help Pacific members to address the most pressing challenges to AML/CFT/CPF, and to make efficient progress with the effective operation of each member's risk-based AML/CFT/CPF systems. This is done through:

- Deepened TA coordination and collaboration (both member-specific and regional)

- Improved stakeholder engagement (members, regional partner organisations, TA donors and providers)
- Member-level strategic implementation planning support (before and after an ME and in case of ICRG listing)
- Support to strengthen strategic AML/CFT/CPF leadership
- Delivery of TA in situations where there are no other TA providers able to assist or there is a pressing strategic opportunity
- Contributing to global and regional processes supporting the Pacific, including projects related to financial inclusion, proliferation financing, support for low-capacity countries, and bank de-risking

The PACD Program has identified several areas for priority assistance in the design and delivery of activities in the previous financial year, which respond to the evolving regional operating environment. Priorities particularly relate to:

- Members with upcoming FATF ICRG grey listing (Papua New Guinea)
- Members with an upcoming ME (Fiji, Vanuatu, Samoa, Palau)
- Members under serious CBR pressure (Marshall Islands, Samoa, Tonga, Tuvalu, Vanuatu - Solomon Islands)
- Newer APG members or those who have received relatively little attention so far (Tuvalu)
- Members who recently completed an ME (Marshall Islands, PNG, Nauru, Timor Leste, Niue)

APG Secretariat Update

The Pacific directorate has been fully staffed during the reporting period with a Director, a Deputy Director, and two Policy Officers. In October 2024 there was a change in Director with David Shannon taking over from Suzie White. Caitlin Ryan, Susan Maggione and Bailey Reinke remained in the directorate.

In May 2025 the APG Secretariat completed a restructure and the organisation is now comprised of the following directorates:

- Pacific
- Training and Capability
- Mutual Evaluation Coordination
- Follow Up Processes
- Technical Assistance and Typologies
- Engagement and Secretariat Services
- Corporate and Enabling Services

The APG Secretariat also created an Executive Management Group (EMG). The EMG is the peak forum for internal decision making on issues affecting the APG Secretariat (including for the Pacific directorate). While the EMG does not change the ability of leadership in the APG Secretariat to make decisions as appropriate, it ensures that decision making on cross-cutting points is consultative, consistent and transparent. Membership includes the APG Secretariat Executive Secretary, the Deputy Executive Secretary, and all Directors (including the Pacific Director).

Program Design and MERL Framework

In keeping with the requirements of the New Zealand Ministry of Foreign Affairs and Trade (MFAT) as the donor of the PACD program, the Pacific directorate has developed a monitoring, evaluation, research, and learning (MERL) framework. This is a tool to gather evidence needed to help manage, learn and make decisions about PACD program activities. The MERL framework also helps to navigate PACD program activities through risks, issues and uncertainties.

To develop the MERL framework, the Pacific directorate held a workshop in December 2024, facilitated by an expert in design, monitoring, and evaluation from the Australian Federal Police (AFP). The workshop identified that a new program design was needed to explicitly outline the unique services that the PACD program is able to deliver, which differ from other TA providers in the region. The new program design reflects the program's engagement with political and government leaders responsible for AML/CFT, and an ongoing priority focus for the program will be on activities which enhance political support for improvements to Pacific jurisdiction's AML/CFT systems, so that other TA providers can then provide their capacity-building activities. The development of the new program design enabled the establishment of a logical MERL framework which will be used to demonstrate the successes of the program.

The program design and MERL framework are aligned with the PACD program phase II grant funding agreement and were approved by MFAT in January 2025. The 2024-2025 annual report is structured against the new program design objectives, but as the MERL framework was approved halfway through the 2024-2025 Business Plan, the Pacific directorate is continuing to develop the baseline data systems and will make its first report against the full set of MERL framework indicators in the 2025-2026 progress report. All future annual reports and business plans will be aligned with the new program design and report against the MERL framework, which have replaced the previous PACD Program Phase II Strategic Plan.

The program design logic is below, and the full program design is in annex A and the MERL framework is in annex B.

PROGRAM GOAL

TO SUPPORT ECONOMIC STABILITY, SAFETY AND SECURITY OF PACIFIC ISLANDS COMMUNITIES BY STRENGTHENED AND TARGETED EFFORTS AGAINST FINANCIAL CRIME



2024-2025 Report Against PACD Program Business Plan

Contributing Objective 1: Increased awareness of, and demand for, support available from APG/PACD, including implementation planning, TA coordination, and other APG services, contributing to the Overarching Objective

Activity 1: Increased Direct Engagement

Task 1.1: Specific APG-delivered events

Sub-task 1.1.1: Use Annual Meeting / TA&T Forum to enhance engagement with key stakeholders

The 2024 APG Annual Meeting and Technical Assistance and Training (TA&T) Forum was attended by over 400 delegates from across the Asia/Pacific during the week of 23 September in Abu Dhabi, United Arab Emirates. The 2024 TA&T Forum was the major TA coordination event of the APG year and involved coordination meetings of the APG DAP Group, Pacific regional TA coordination meetings with all Pacific members and the DAP Group, and individual TA coordination meetings with each Pacific member and the DAP Group. During the meeting delegates discussed important issues and took critical decisions to strengthen collaboration, cooperation and overall effectiveness in combating serious financial crime. The APG also welcomed the Deputy Vice Minister of Finance for International Affairs at Japan's Ministry of Finance, Mitsutoshi Kajikawa of Japan, as the new APG Co-Chair for 2024-2026. Four APG mutual evaluation reports (MERs) were adopted, all of which are PACD program-eligible members: The Marshall Islands, Nauru, Papua New Guinea, and Timor-Leste. Since the adoption of these MERs the PACD program has delivered Strategic Implementation Planning (SIP) workshops in PNG, Nauru, the Marshall Islands, and Timor Leste. See Activity 10 for more details on these SIP workshops.

The Pacific directorate undertook comprehensive planning and preparation, including information collection, donor coordination and extensive pre-briefings for the 2025 Annual Meeting and TA&T Forum which will be held in August 2025 in Tokyo, Japan.

See activity 8 for more details on the TA&T Forum.

Sub-task 1.1.2: Support Pacific members to attend and contribute to the annual APG Typologies Workshop

The APG delivered the 25th Annual Typologies Workshop in Kuala Lumpur, Malaysia in November 2024. The Typologies Workshop brought together leading experts from the public sector, private industry and civil society to share knowledge and expertise on ML/TF/PF trends and AML/CFT/CPF implementation. The 2024 workshop included two streams: abuse of legal persons, and cyber enabled fraud/scams. The plenary sessions included presentations on case studies from APG members, the typologies work of APG observers, and the FATF Global Network.

Sub-task 1.1.3: Provide sponsorship for Pacific members to attend the APG Annual Meeting

The PACD program funded one member from the Vanuatu Financial Intelligence Unit (VFIU), one from the National Reserve Bank of Tonga, and one from the Nauru FIU, to attend the Annual Meeting.

Sub-task 1.1.4: Provide sponsorship for Pacific members to attend the Typologies Workshop

The PACD program funded one member from the PNG Financial Analysis & Supervision Unit (FASU), one member from Samoa's FIU, and one member from Nauru's FIU to attend and contribute to the

2024 Typologies Workshop. These attendees presented to the event with expertise on trends and context in the Pacific.

Task 1.2: Other forums and workshop

In November 2024 the Pacific Director attended the 3rd Annual Pacific Financial Intelligence Community (PFIC) Plenary Meeting in Brisbane. The meeting included discussion on the consideration of the PFIC 2024 work program and potential future activities, as well as how members can work together to strengthen the Pacific's resilience to emerging financial crime threats. The Pacific Director delivered presentations on FATF requirements related to virtual assets and virtual asset service providers, and an update on the ME process and the technical assistance available to Pacific jurisdictions.

The Pacific directorate attended the 43rd Annual Meeting of the Pacific Islands Law Officers' Network (PILON) in Fiji in October 2024. PILON is dedicated to promoting a safe and secure Pacific by addressing key law and justice issues through a network of senior law officers from 19 Pacific Island nations, including Australia and New Zealand. At the meeting, members discussed various topics including corruption and the rapidly evolving linkages between corruption and transnational organised crime and its impacts on the Pacific region. The Pacific Director gave an overview of the APG and the ME process, timing of assessments in the Pacific and the TA available to Pacific jurisdictions.

The PACD program funded an APG Secretariat member to attend a PILON Corruption Working Group Workshop in Nadi, Fiji in February. The workshop, focused on asset seizure and confiscation, was organised by PILON in collaboration with Fiji, Australia, and other partners. Recognising that asset confiscation is essential to an effective anti-money laundering and counter-terrorism regime, the workshop brought together prosecutors and law enforcement officers from each PILON member to strengthen each jurisdiction's asset confiscation capability by facilitating knowledge sharing and regional collaboration. The workshop focussed on building participants' knowledge and skills in the investigation and litigation of asset confiscation matters, including through practical exercises and group discussions. As a result of the APG Secretariat's participation in the workshop, awareness of new requirements related to asset recovery in the next round of MEs of Pacific jurisdictions increased, as well as opportunities for technical assistance more broadly from the PACD program. Following active networking with Pacific participants during the workshop, PNG requested further support from the PACD program to assist in the implementation of an agency-specific action plan for the Royal Papua New Guinea Constabulary (RPNGC) regarding action items in their ICRG observation period.

The Pacific Director attended the Asset Recovery Interagency Network - Asia Pacific (ARIN-AP) annual general meeting in Sydney in November. ARIN-AP is an informal network of law enforcement and central authority contacts established to exchange information on individuals, companies and assets at the international level, with the intention of facilitating the pursuit and recovery of proceeds of crime. Investigators can use ARIN-AP enquiries to assist their investigations in the Asia Pacific Region. Current member countries include the Cook Islands, Timor-Leste, Tonga, and Vanuatu.

The APG Secretariat has continued to engage with the Pacific Islands Forum Secretariat (PIFS) via the World Bank's CBR project (see Task 5.6).

Sub-task 1.2.1: Support Pacific members to attend and contribute to non-APG forums and workshops

In April, the PACD program funded the Governor of the Reserve Bank of Samoa and one APG Secretariat staff member to attend the 2025 Private Sector Consultative Forum (PSCF) in India. See Task 5.4 for more details.

Sub-task 1.2.2: Provide sponsorship for Pacific members to attend non-APG forums and workshops

In April, the PACD program funded the Governor of the Reserve Bank of Samoa and one APG Secretariat staff member to attend the 2025 PSCF in India. See Task 5.4 for more details.

Task 1.3: Meetings

Sub-Task 1.3.1: Diplomatic engagement in relevant jurisdictions

The Pacific directorate engaged with diplomatic corps members during visits to APG members, and through virtual briefings. Briefings were delivered at SIP workshop and ME preparation visits to Fiji, the Marshall Islands, PNG, Timor Leste and Vanuatu. The briefings included bilateral and multilateral missions and focused on issues of priority assistance, support for international cooperation and messaging on the importance of strategic AML/CFT leadership. During the visit to Fiji, the Pacific directorate provided briefings to the PIFS and to the Ambassador of the European Union to the Pacific to address Pacific-wide AML/CFT issues. As part of intensive support to PNG as it prepares for ICRG grey listing, the Pacific directorate has also engaged extensively with diplomatic corps representatives in PNG.

Sub-Task 1.3.2: Meetings with private sector in relevant jurisdictions

The Pacific Director met with members of the private sector during visits to Vanuatu, PNG, Nauru and the Marshall Islands. Briefings with the private sector focused on issues of capacity building, joint development of guidance, collaboration on the risk-based approach and the key role of the private sector in messaging to lawmakers and leaders on the importance of strategic AML/CFT leadership.

In April, the PACD program supported an APG Secretariat staff member to attend the 2025 PSCF in India. See Task 5.4 for more details.

Task 1.4: Strategic Implementation Planning workshops, Mutual Evaluation workshops, High-Level Visits

Sub-task 1.4.1: Provide sponsorship for Pacific members to attend Mutual Evaluation-related Workshops (shared task with 10.3.6 below)

The APG Secretariat delivered a pilot Regional ME Preparation Workshop focused on supporting ME coordination staff, which was sponsored by Japan and held in Nadi, Fiji in April 2025. The Pacific directorate administered the Japanese funding to ensure delivery of this regionally significant event that involved several Pacific members. The PACD program is likely to support this event in the next reporting period.

Activity 2. Increased Media Presence

Task 2.1: Develop press releases and engage with relevant journalists

The APG Secretariat appointed a communications specialist to support its communications to members, who is also providing support to the Pacific directorate. This enhanced communications work will involve the development of an APG Secretariat communications strategy, which will include a PACD program communications strategy during the next reporting period.

During the November 2024 SIP workshop in PNG, the Pacific Director joined a media conference held by the PNG Government to deliver messages regarding the importance of the PNG Government working together to address the recommendations in their MER, to avoid ICRG listing. See Activity 13 for more details.

During the Marshall Islands SIP workshop in February, the Pacific Director met with representatives from a non-governmental organisation (NGO) working with jurisdictions in the Pacific on media strategies and training. The PACD program intends to engage with this NGO more closely in the next reporting period.

Task 2.2: Social media engagement

APG Secretariat has continued to increase the coverage of PACD program events and activities on the APG website and via social media posts. The APG Secretariat communications specialist has worked with the PACD directorate to develop posts for the new APG Secretariat LinkedIn page, which was launched in late June.

Task 2.3: PACD Program Newsletter

The PACD program has continued to produce quarterly program updates via a newsletter to ensure Pacific members, DAP Group members and other stakeholders are up to date with PACD program activities, AML/CFT news and other TA&T opportunities. The APG Secretariat has also updated its membership-wide newsletter which includes updates on the PACD program, so they reach a wider audience.

Activity 3. Expanded Supporting Materials

Task 3.1: Prepare layered supporting materials for all above

The Pacific directorate intends to develop supporting materials for government agencies in Pacific jurisdictions to engage with local media to communicate with their communities the importance of AML/CFT work, how it is relevant to their citizens, and the success stories on AML/CFT. This work will be conducted in the next financial year.

Contributing Objective 2: Increased regional coordination to enhance risk-based AML/CFT systems by Pacific Jurisdictions and Donors and Providers

Pacific Jurisdictions

Activity 4. Identify or create full range of coordination forums/working groups required

Task 4.1: Develop and maintain a database and calendar of AML/CFT forums and working groups

See Activity 8 for details.

Activity 5. Directly support regional discussion/actions

Task 5.1: Regional PF risk assessment

Sub-task 5.1.1: Sponsorship to PF Risk Assessment Workshop

The PACD program funded seven members (four men and three women) from seven jurisdictions (Solomon Islands, Tuvalu, PNG, New Zealand, Cook Islands, Vanuatu, and Nauru) to attend the two day UNODC Regional Counter Proliferation Financing Workshop for Pacific Island Countries in Fiji in November 2024. The PACD program also funded an APG Secretariat Deputy Director to attend to speak about national risk assessments on proliferation financing. The APG Secretariat co-hosted the event under the PACD program, and key stakeholders in attendance included UNODC, Kings College London, Australian Transaction Reports and Analysis Centre (AUSTRAC), and the New Zealand Police FIU. The workshop focused on international best-practice in counter proliferation financing frameworks, improving regulatory oversight, enhancing intelligence-sharing mechanisms, and boosting the ability of Pacific nations to detect and counter proliferation financing. The workshop also involved Pacific jurisdictions conducting a strengths, weaknesses, opportunities and threats (SWOT) analysis, and completing a scenario-based exercise. For the PACD program, the workshop identified the additional technical assistance needs of five participating members.

Task 5.2: Joint Supervision support

Sub-task 5.2.1: Sponsorship of Pacific jurisdictions to conduct joint supervision activities together

See task 9.4.1 and task 9.4.2 for details.

Task 5.3: Support emerging regional discussions / actions as they emerge

The PACD program supported discussion of emerging regional issues on financial crime risk management throughout the year.

Citizenship by investment scheme risk management: Discussions were held during the 2024 TA&T Forum, bilaterally with various TA providers and with Vanuatu, Nauru and the Solomon Islands regarding risks and risk management associated with citizenship by investment schemes.

Open shipping registries and proliferation financing risk management: With inputs from the Pacific directorate the APG Secretariat, with support from the UNODC, prepared and issued a shipping registries and PF risk factsheet in March 2025. The factsheet and highlighted case studies provided practical examples of proliferation financing risks and approaches to assessments that can inform members' understanding and response to proliferation financing risks

Coordinating review of emerging financial crime risks – a pilot approach: During the SIP workshop visit to the Marshall Islands in February 2025 the Pacific directorate initiated a model outline for a piloting interagency review process to identify financial crime risks associated with ‘get revenue quick’ schemes that may be proposed to Pacific governments. This reflects Pacific members’ experience of increasing numbers of approaches to lawmakers for potentially very risky schemes, including special economic zones, crypto asset schemes, golden passports, etc.

Task 5.4: Private Sector Consultative Forum (PSCF) sponsorship

In April, the PACD program funded attendance by Pacific AML/CFT leaders at the 2025 PSCF in India. The annual PSCF is attended by representatives from the financial sector, non-financial businesses and professions, civil society, academia, FATF members and other stakeholders. PSCF provides an opportunity for FATF and its members to directly interact with the private sector and civil society to strengthen partnerships in AML/CFT. India hosted the 2025 event which included more than 200 participants from around the world. The APG was represented by the Central Bank of Samoa Governor Atalina Ainuu-Enari and Deputy Governor Margaret Chan Cheuk-Tafunai, as well as Suzie White from the APG Secretariat. APG Co-Chair, Mitsutoshi Kajikawa, also attended and presented on complex proliferation financing schemes. Governor Atalina was a panellist during a key session focused on financial inclusion, de-risking and CBR challenges faced by Samoa and the Pacific more broadly. Discussions at the Forum focused on payment transparency issues, the evolving AML/CFT landscape, financial inclusion, supervision and the risk-based approach, beneficial ownership, digitalisation, information sharing and data privacy, terrorist financing and proliferation financing. A panel session on women in AML built on the FATF’s initiative to advance diversity and inclusion efforts in the FATF and wider global network through the inclusion of the private sector and civil society into this important conversation. While not a panellist, Governor Atalina was asked by the FATF President to intervene and share her experience as a female leader. Governor Atalina spoke about Samoan culture and women’s strong empowerment in Samoa. The event had low FATF-Style Regional Body (FSRB) attendance and Samoa was the only APG non-FATF member at the event.

Task 5.5: Contribute to Pacific Banking Forum events and programs

The PACD program supported the July 2024 Pacific Banking Forum, organised by Australia and United States and held in Brisbane, Australia in July 2024. The APG was represented by the Australian APG Co-Chair, the incoming APG Co-Chair from Japan and the APG Secretariat. The focus of the Forum was on the decline of correspondent banking relationships in the region, and steps forward to address this issue. The Pacific Director was included on an expert panel in relation to opportunities to enhance targeted AML/CFT measures to ensure that financial crime risk management does not add to de-risking pressures. The outcomes statement of the Forum provides further details. Following the Forum, the APG has committed to enhance the coordination of technical assistance in the Pacific, and initiate a forum between Pacific regulators and supervisors, and US correspondent banks, to provide an avenue for Pacific authorities to provide updates to those banks on risk, context and implementation of the FATF standards.

The Pacific Director also contributed to the October 2024 Pacific Banking Forum Roundtable, which was a follow-on event to the Forum. The Roundtable included discussions on the World Bank’s CBR project, feedback from development partners in the region, and discussions on private sector solutions to this issue.

The PACD program has continued to contribute to virtual meetings of the Pacific Islands Forum Pacific De-Risking Group (PDG) in December 2024 and May 2025. The meetings covered the Pacific Strengthening CBR Project, discussion on strengthening payment systems and AML/CFT compliance, outlining the Pacific CBR Roadmap, and updates from partners of the project, including from the Pacific Director. The APG Secretariat has continued to liaise closely with the co-chair of the PDG.

Task 5.6: World Bank CBR project [Pacific Strengthening Correspondent Banking Relationships project]

The PACD program is continuing to prioritise regional and member-specific responses to AML/CFT concerns that may contribute to the loss of CBRs. The APG Secretariat has been very closely involved with the World Bank and the PIFS through the design and initiation of their Pacific Strengthening Correspondent Banking Relationships Project. The Pacific directorate has held regular consultation calls with the World Bank and has briefed various other stakeholders on the project, and held a half day briefing and coordination meeting with the PIFS in January 2025, which included discussion of the CBR project. In June the Pacific directorate also provided input on the Project's remedial plans for PNG, Kiribati, Tonga, Samoa, Solomon Islands, and Tuvalu.

The Pacific directorate virtually attended and provided input to the World Bank's virtual second meeting of the Pacific De-Risking Group in November. This meeting included a review of the draft Terms of Reference for the two PDG working groups, discussion on the progress of the Pacific CBR Roadmap, and updates on the regional work being completed to improve AML/CFT compliance with international standards, which was delivered by the Pacific Director.

Task 5.7: Supervisors Forum

The second in-person meeting of the Pacific AML/CFT Supervisors' Forum was held in July 2024 in Brisbane, Australia. The Forum was organised by the Pacific directorate and delegates were sponsored through PACD program funding. The Forum was co-hosted by the APG Secretariat, the New Zealand Department of Internal Affairs (DIA) and the PIFS. The Forum brought together 62 AML/CFT supervisors and practitioners from each of the APG's 12 Pacific members, as well as delegates from Australia, New Zealand, United States, PIFS and World Bank. Participants shared key updates and discussed AML/CFT supervisory trends and developments in the Pacific region, with a variety of in-depth sessions and presentations delivered over the two days, including:

- Risk assessments and employing a risk-based approach to AML/CFT supervision
- Correspondent banking relationships and de-risking in the Pacific
- Best practices and lessons learnt in the supervision of financial institutions and designated non-financial businesses and professions (DNFBPs) and virtual asset service providers (VASPs)
- AML/CFT engagement strategies
- Recent remedial and enforcement actions
- Preparations for the APG Global 5th Round of mutual evaluations
- Technical assistance and training needs and activities

Key outcomes from the Supervisors Forum include a proposal for the future of the Pacific AML/CFT Supervisors' Forum, identification of supervisory-related technical assistance needs, and the development of proposals for joint supervision across jurisdictions.

The PACD program funded 8 women and 10 men to attend, one each from the Cook Islands, Fiji, Nauru, Niue, Pacific Islands Forum Secretariat (PIFS) PNG, the Marshall Islands, Samoa, Solomon Islands, Tonga, Tuvalu, and Vanuatu, two from Palau, and four from New Zealand. Pacific delegates resolved for the Pacific Supervisor's Forum to more closely align with the PFIC in future years, with the PACD program continuing to provide support.

Activity 6. Integrate regional issues/views into Contributing Objectives 1 & 3 activities

Task 6.1: Develop and update briefing notes on each Pacific Jurisdiction's AML/CFT political priorities, as agreed to with the jurisdiction

The PACD program has developed briefing notes on each Pacific Jurisdiction's AML/CFT priorities, which are updated as needed in consultation with the jurisdiction. These materials will be used so the PACD program and wider APG Secretariat maintain an up-to-date record of details about each jurisdiction and may also be used (with permission) when engaging with the private sector, development partners, and TA providers. It is also hoped that they can be used to communicate clearly with correspondent banks to outline the positive steps each jurisdiction is taking to avoid de-banking.

Donors and Providers

Activity 7. DAP Meeting Input

Task 7.1: Convene Pacific-focussed DAP meetings a minimum of four times per year

The Pacific directorate has continued to engage with individual TA donors and providers (on an as-needed basis) and Pacific regional organisations to discuss coordination, delivery, and progress of TA activities to Pacific members. For this reporting period, the Pacific directorate has been in contact with several TA donors and providers including, but not limited to, the ADB, Australian Attorney-General's Department (AGD), AUSTRAC, IMF, New Zealand DIA, PIFS, UNODC and the World Bank.

The following DAP Group meetings were held in the reporting period:

- July 2024 – ICRG-focussed including PNG
- August 2024 – Pacific-focussed
- November 2024 – Pacific and ICRG-focussed meetings
- March 2025 – Pacific and ICRG-focussed meetings

In addition to these formal DAP meetings, there have been multi-donor meetings about PNG and its upcoming grey listing.

Joint

Activity 8. Technical Assistance Forum Input

Task 8.1: Maintain up to date records of TA needs of Pacific jurisdictions

Sub-task 8.1.1: Pacific TA Overviews

The Pacific directorate continues to maintain up-to-date overviews for each Pacific member. Overviews include APG Pacific members' recent TA activities, active TA projects, and future TA needs. Overviews are developed in consultation with APG members and DAP Group members and were updated following the TA Forum and on an ad-hoc basis as required (for example after the pre-ME visit to Vanuatu and the SIP workshop in PNG). Overviews inform the prioritisation of the Pacific directorate's TA activities and are available to all DAPs as a resource to support their TA to APG Pacific members. Work is currently underway to maintain a dashboard of TA needs and programs for each Pacific jurisdiction, which would be updated monthly and are able to be accessed by DAPs as

needed. The APG Secretariat is developing a new website which will be launched before December 2025 and will enable the Pacific directorate to do this more efficiently and effectively.

Sub-Task 8.1.2: Pacific TA Calendar

Several Pacific jurisdictions have requested that the Pacific directorate also establish and maintain a calendar of AML/CFT forums, working groups, training, and other relevant information and so the directorate has maintained a TA&T calendar on the APG website since February 2025, which includes details on upcoming trainings, events, and other relevant details for DAPs and Pacific jurisdictions. The Pacific directorate has encouraged DAPs to add their programs to this calendar.

Task 8.2: Deliver Annual TA&T Forum

The Pacific directorate was critically involved in the preparation and delivery of the 2024 TA&T Forum. In parallel to the 2024 Annual Meeting, the APG convened its 22nd TA&T Forum which provided a collaborative platform to ensure AML/CFT technical assistance in the Asia Pacific region is coordinated, sequenced and synchronised. Participants included 25 TA recipient members and 19 DAPs. The high number of participants reflects the increased volume of AML/CFT TA activities occurring across the region. The Forum involved 29 meetings, including a closed five-hour session for DAPs to discuss the coordination of TA, three sub-regional meetings for members and DAPs (Pacific, South Asia and Southeast Asia), and 25 individual meetings between TA recipient members and DAPs. The 2025 TA&T Forum welcomed three new DAPs including the European Union AML/CFT Global Facility, Germany's Global Program Combating Illicit Financial Flows (GIZ) and Luxembourg's Institute for Legal Support and Technical Assistance (ILSTA). The APG also welcomed one new observer organisation, the International Institute for Justice and the Rule of Law (IJJ). The IJJ recently launched a significant program of TA in the Asia Pacific region.

Comprehensive preparations occurred during the report period for the 2025 TA&T Forum to be held in August 2025, including compiling TA needs information from Pacific jurisdictions, TA information from DAPs, and input from members on the agenda for the Pacific Sub-Regional Meeting.

Task 8.3: Support or develop additional technical assistance activities as they emerge

Nil further activities to report in this financial year.

Contributing Objective 3: Increased capacity that enhances risk-based AML/CFT systems of selected stakeholders

Activity 9. Provider of last resort (short notice/ad-hoc) capacity development assistance

Task 9.1: Legislative drafting

Sub-Task 9.1.1: NCBF legislation for Cook Islands

The PACD program has continued to fund a legislative drafting project with the Cook Islands focusing on non-conviction-based asset forfeiture (NCBF), which is aligned with the new requirements on NCBF under FATF Recommendation 4. The project is being delivered by Lexbridge Lawyers and will involve a program in the Cook Islands to meet with key stakeholders in person to further the project ahead of its planned completion in December 2025.

Sub-Task 9.1.2: NCBF model legal framework

The PACD program has engaged Lexbridge Lawyers to prepare model legal provisions and policy guides for NCBF. This work is a follow on from the Cook Islands legislation in Sub-Task 9.1.1, and has included consultation with Pacific delegations. The model legal provisions and policy guides projected will be progressed in the next financial year.

Sub-Task 9.1.3: TFS legislation for Palau

The PACD program, through Lexbridge Lawyers, finalised a legislative drafting project to enhance Palau's targeted financial sanctions (TFS) framework for terrorism and proliferation financing (FATF Recommendations 6 and 7). This project had been on hold due to low capacity in Palau, but was reinvigorated in the reporting period. The project built on the existing TFS model provisions and focused on expanding the framework to cover proliferation financing. The project included elaboration of a legislative drafting plan, and support for preparation of the following draft legislation:

- Amendments of Chapter 33 of Title 17 of Penal Code
- Weapons Proliferation Sanctions Bill
- Weapons Proliferation and Terrorism Financing Bill
- Transmittal letter – Palau sanctions bills

This project is now substantially complete.

Task 9.2: Reviews of Non-Profit Organisation Sector

Sub-Task 9.2.1: NPO review for Fiji

The Pacific directorate, through an engaged non-profit organisations (NPO) expert, finalised a project to support enhancements to Fiji's risk-based approach to NPOs and compliance with FATF Recommendation 8. This project delivered the following:

- An updated review of the NPO sector in Fiji, covering all elements of FATF criterion 8.1 including:
 - identification of current higher-risk NPOs
 - establishment of criteria for identification of future higher-risk NPOs
 - recommendations for competent authorities
- A review of Fiji's NPO legislation, including a gap analysis against the requirements of Rec 8.
- A visit with relevant stakeholders on the NPO sector review

- Development of an AML/CFT monitoring strategy, work program and manual for Fiji's at-risk NPOs in accordance with FATF criteria 8.2, 8.3 and 8.4 which included sustainable outreach and education programs, and risk-based supervision and monitoring manuals for NPOs

Representatives from the Ministry of Justice in Fiji were satisfied with the work and noted that the manual was comprehensive and easy to understand.

Task 9.3: Deliver mentoring and training for law enforcement

The PACD program, through a respected asset recovery expert, provided short-term targeted technical assistance to Papua New Guinea to ensure that a baseline priority plan was in place to allow PNG to progress with critical reforms and targeted implementation in financial investigations and asset management. The project was in response to an urgent request for assistance to meet the priority recommended AML/CFT/CPF actions included in the 2024 PNG MER and the 2024 SIP workshop outcomes from November 2024.

The project covered:

- Remote engagement and pre-planning with the RPNGC and other key stakeholders.
- In-country operational planning support to the RPNGC in developing a structured, priority plan for targeted and sequenced implementation of SIP workshop outcomes. This included interagency workshops, case-focused planning, review of guides and operational planning tools and advisory support.
- Remote desk-based support, including follow up and future state planning, updated guides and an end of project report to the RPNGC and APG Secretariat summarising key outcomes and future plans.

The project was a success and the RPNGC have requested follow up assistance.

Task 9.3.1: Asset confiscation support and mentoring for Tonga

The PACD program funded an asset confiscation mentoring project in Fiji and Tonga to enhance the law enforcement capacity of those Pacific members. An external asset recovery law enforcement expert delivered the projects through on-the-job training and operational support to the competent authorities in both jurisdictions. Across several week-long visits to Fiji and Tonga, the expert aided investigators in progressing urgent casework and assisted in developing standard operating procedures (SOPs), identifying evidence, devising investigation plans, and sharing analytical tools and templates that were relied upon to support ongoing cases. The visits were also conducted in conjunction with an expert from the Australian AGD, who provided strategic asset confiscation policy design support.

The hands-on mentoring approach was well received by the authorities, and workshops conducted throughout the visits saw widespread participation by relevant agencies in both jurisdictions. The operational case support similarly saw several positive outcomes, including the successful development of restraint applications and preparation of several money laundering charges. In light of these outcomes, the Tongan Director of Public Prosecutions directly requested that the project be extended and the PACD program funded the expert to conduct an additional two-week visit to Tonga in late 2024.

Task 9.3.2: Asset confiscation support and mentoring for Fiji

See details in Task 9.3.1.

Task 9.4: Deliver mentoring and training for supervisors

At the Pacific Supervisors' Forum in Brisbane in July (see Activity 10), AML/CFT supervisors from the region highlighted their changing TA needs in relation to supervision. Members noted that they are seeking additional modes of assistance to complement training, including more on the job assistance,

mentoring and the conduct of joint supervision, to enhance knowledge and outcomes. The PACD program had intended to fund supervision mentoring between the Solomon Islands and PNG, and Palau and PNG but due to timing constraints this project has been moved into the next financial year.

Sub-Task 9.4.1: DNFBP supervision mentoring

A mentoring project with the New Zealand DIA focused on DNFBP supervision had been paused, but planning for the project will continue in the next financial year.

Sub-Task 9.4.2: Joint Money Transfer Operator (MTO) supervision

The Pacific directorate collaborated with Australia, New Zealand, Tonga and Samoa on opportunities for joint AML/CFT supervision. The Pacific directorate developed two programs on joint supervision, one between Australia, New Zealand and Samoa, and the other one between Australia, New Zealand, and Tonga. These programs focus on the top local remitters / money transfer operators (MTOs) remitting to and from Tonga and Samoa. The program includes collaboration between the jurisdictions, and guidance on how to take fast tracked priority steps to intensify AML/CFT guidance, outreach and risk-based supervision of a priority set of remitters.

The project with Tonga went through to completion, with lessons learned shared between regulators. The project with Samoa has seen delays due to conflicting priorities from participant jurisdictions but is expected to be delivered next financial year.

Task 9.5: Deliver mentoring and training for Financial Intelligence Units

There have been nil updates on this task in this financial year.

Task 9.6: Deliver mentoring and training for relevant government policy agencies

There have been nil updates on this task in this financial year.

Task 9.7: Provide assistance for other capacity building requests on an ad-hoc basis from Pacific jurisdictions

There have been nil updates on this task in this financial year.

Sub-Task 9.7.1: Provide sponsorship for FATF Standards training

The Pacific directorate has taken steps towards future delivery of FATF standards training to greater numbers of officers amongst Pacific members. During the reporting period, the FATF released the delivery materials of the Standards Training Course (STC) so that FSRBs and other organisations could deliver this training outside of Korea for the first time. The STC enhances participants' understanding of the FATF Standards on AML/CFT and the implementation of effective measures to combat ML/TF. It is an intermediate level training, designed for AML/CFT practitioners with prior exposure to the FATF standards, and is delivered through a series of e-learning, presentations, group discussions and small group activities.

The Pacific directorate has been working with the Training and Capacity directorate to develop an STC which will be delivered to Pacific participants in Auckland next year.

Activity 10. National implementation planning and coordination support

Task 10.1: Provide support to Pacific jurisdictions to implement the recommendations from their Mutual Evaluation Report

In May 2025 the Pacific Deputy Director travelled to PNG as part of the PACD program activity supporting planning by the RPNGC (see also Task 9.3). The visit included a workshop with the PNG Office of the Public Prosecutor (OPP), FASU, and RPNGC in which members from each agency discussed how to progress several cases which had been stalled for a number of years. The visit also included ICRG-related briefings to the Independent Commission Against Corruption (ICAC) and RPNGC executive on steps to be taken to progress through the ICRG action plan.

In May 2025 the APG Secretariat hosted the RPNGC, the OPP, and AFP members who are deployed to PNG and those in the Criminal Assets Confiscation Taskforce for technical briefings on the ICRG. The day-long discussions focused on PNG's preparation for the ICRG process, and how the AFP and APG Secretariat can support the RPNGC and OPP through this process.

In June 2025 the Pacific Director and Deputy Director travelled to PNG to brief the PNG Technical Working Group (TWG) and National Coordination Committee (NCC) on preparations for their upcoming grey listing. At the TWG briefing, the Director worked through the current progress report which the group had submitted to the APG Secretariat for feedback on, including progress against the deficiencies identified in the MER. At the briefing to the NCC, the Deputy Director outlined the key dates that PNG will need to prepare for, the statutory reforms that will need to be implemented, and the importance of strong leadership throughout this process. The briefing also contained reflections on the progress that PNG had already made and reinforced the PACD program's continuing support.

Task 10.2: Deliver Strategic Implementation Planning (SIP) Workshops to Pacific jurisdictions

Sub-Task 10.2.1: Nauru SIP workshop

The Pacific Director and a Policy Officer visited Nauru to deliver a SIP workshop in January. The visit focused on improving the conditions for banking services and ongoing financial inclusion initiatives, as well as protecting the investment and revenue conditions in Nauru from financial crime. The workshop ensured that officials from Nauru increased their understanding of the recommended actions included in the MER and the practical steps Nauru agencies should prioritise to achieve those actions. The workshop focussed on several areas including strategic context for the AML/CFT system, what effectiveness looks like, stress-testing existing strategic planning including TA, international cooperation, domestic coordination, contingency planning, pathways to Egmont membership, and strategic opportunities with the global 5th round. The APG Secretariat also held a one-day workshop focused on the FATF standards and regional AML/CFT implementation experience sharing. The SIP workshop visit resulted in a summary of priority TA needs which was shared with TA providers to request assistance and support coordination of TA.

Sub-Task 10.2.2: Marshall Islands SIP workshop

The Pacific Director delivered the Marshall Islands SIP workshop in June 2025, following the adoption of their MER at the 2024 APG Annual Meeting. The SIP workshop supported the Marshall Islands' AML/CFT Council agencies to consider priority steps for each of the recommended actions in the MER. The workshop resulted in a detailed SIP workshop outcomes document provided to the AML/CFT Council, which sets out the full details of the prioritised actions with a particular focus on AML/CFT efforts to protect CBRs. The SIP workshop visit included briefings with the private sector and diplomatic corps representatives, and it resulted in a summary of priority TA needs which was shared with TA providers to request assistance and support coordination of TA.

Sub-Task 10.2.3: Timor-Leste SIP workshop

The PACD program supported the APG Secretariat to deliver the Timor Leste SIP workshop in June 2025, following the adoption of their MER at the 2024 APG Annual Meeting. The delegation included representatives from the UNODC, the Portuguese Government, and the APG Secretariat. The PACD program funded the travel for the APG Secretariat members and for the representative from Portugal. The workshop was delivered to a 13-agency joint group which considered policies, procedures and activities to address the key deficiencies identified in Timor-Leste's MER, and on opportunities for enhanced interagency cooperation and better-targeted technical assistance and training. Timor-Leste still requires TA support in key areas including beneficial ownership, customs, tax, asset recovery, development of a national anti-corruption strategy, and targeted financial sanctions. The delegation also provided a briefing to the diplomatic corps on priority steps which Timor-Leste need to take after the workshop. Attendees included Australia, Malaysia, New Zealand, the Philippines, Portugal, the United States, the ADB and the UNODC. The SIP workshop resulted in a summary of priority TA needs, which was shared with TA providers to request assistance and support coordination of TA.

Sub-Task 10.2.4: PNG SIP workshop

In December the PACD program delivered a SIP workshop to PNG, following the adoption of PNG's MER at the 2024 APG Annual Meeting. The APG delegation included the Pacific Director and Deputy Director, and another APG Deputy Director who had worked on PNG's ME. All relevant PNG agencies took part, and the PNG government welcomed a wide range of TA donors and providers to attend and contribute to the entire workshop. This included Australian government representatives (the AFP, AGD), the UNODC and United Nations Development Programme (UNDP), United States Treasury, and the ADB. The SIP workshop was jointly hosted by FASU and the Department of Justice & Attorney General (DJAG). The workshop was held over three days, to consider policies and activities to address the key deficiencies identified in PNG's MER. Attendees included the PNG Chief Secretary (who opened the workshop), and over 100 representatives from contributing agencies to the NCC. The APG delegation focused on opportunities for enhanced interagency cooperation and better targeted TA&T, and in addition to the workshop provided briefings to the diplomatic corps and to the private sector on priority steps. The NCC adopted the summary outcomes of the SIP workshop and committed to address the deficiencies identified in the MER. The workshop also resulted in a summary of priority TA needs, which was shared with TA providers to request assistance and support coordination of TA.

Following the workshop, the Pacific Director and Deputy Director travelled to Brisbane to brief the Commissioner of the RPNGC, who was unable to attend the workshop in Port Moresby (the RPNGC has a high number of actions in the MER which need to be addressed). The meeting resulted in an exchange of letters which added to the list of priority TA needs that were shared with TA providers to request assistance and support coordination of TA.

Sub-Task 10.2.5: Tonga SIP workshop

The Pacific directorate held virtual follow up TA coordination meetings with Tonga to follow on from the May 2024 SIP workshop visit, including the status of priority TA needs.

The outcomes and expenditure of the May 2024 Tonga SIP workshop are reported in last year's PACD program annual report, but there were some miscategorised funds from that financial year which were moved over into the PACD program accounting records after that annual report was completed. These are included in the detailed expenditure section of this report.

Sub-Task 10.2.6: Fiji SIP workshop

This will occur in 2027 or 2028.

Sub-Task 10.2.7: Vanuatu SIP workshop

This will occur in 2027 or 2028.

Sub-Task 10.2.7: Niue SIP workshop

This will occur in the 2025-2026 financial year.

Task 10.3: Provide support to Pacific jurisdictions to prepare for upcoming Mutual Evaluations

Sub-Task 10.3.1: Pre-ME support to Fiji

The APG Secretariat conducted a high-level visit to Fiji in April to brief leaders on strategic opportunities to harness the momentum of the upcoming APG ME process to deliver on Fiji's national interests. The visit was led by the APG's Japanese Co-Chair, Deputy Vice Minister of Finance for International Affairs Mitsutoshi Kajikawa and supported by the Pacific Director. The APG delegation observed the need for critical reforms including urgent legislative amendments to strengthen targeted financial sanctions legislation and the addition of more staff to the Ministry of Justice to ensure key statutory reforms on beneficial ownership of companies/trusts and NPOs. The visit also identified the need to prioritise many actions including enhancing interagency coordination, adjusting priorities and policies at national and agency level (as per updated findings from Fiji's national risk assessment), and to prioritise results on asset recovery. The visit resulted in a summary of priority TA needs, which was shared with TA providers to request assistance and support coordination of TA.

Sub-Task 10.3.2: Pre-ME support to Vanuatu

Based on an invitation from the Prime Minister of Vanuatu, an APG delegation visited Port Vila in August 2024 to provide intensive ME preparation assistance with two years before Vanuatu's next ME. The APG delegation included representatives from the United States Treasury, the United Kingdom's HM Treasury, and the Director and Deputy Director of the Pacific directorate. High level meetings were held with Prime Minister Charlot Salwai, the Attorney General, the Office of the Public Prosecutor, and many other agencies. Workshops were held with the joint agency working groups (supervisory and law enforcement) to consider prioritised policies and activities that deliver effective AML/CFT measures to address the greatest risks faced by Vanuatu. The APG delegation also held meetings with the private sector, diplomatic corps, and development partners, to brief them on the need for Vanuatu to prioritise its ME preparation and to deepen risk-based implementation of AML/CFT measures to ensure positive results with the ME. The PACD program will continue to support Vanuatu's AML/CFT priorities and will work to identify fast-tracked technical assistance in preparation for Vanuatu's upcoming ME. The visit resulted in a summary of priority TA needs, which was shared with TA providers to request assistance and support coordination of TA.

An additional TA coordination support visit had been planned for this financial year, however due to a severe earthquake in December 2024 this was postponed until the coming financial year.

Sub-Task 10.3.3: Pre-ME support to Niue

This occurred in the 2023-2024 financial year.

Sub-Task 10.3.4: Pre-ME support to Samoa

This will occur in the 2025-2026 financial year.

Sub-Task 10.3.5: Pre-ME support to Palau

This will occur in 2027 or 2028.

Sub-Task 10.3.6: Support the delivery of Pre-ME Workshops (shared task with 1.4.1 above)

See details in Sub-Task 1.4.1.

Task 10.4: Provide support to Pacific jurisdictions to coordinate their technical assistance

Sub-Task 10.4.1: Tuvalu Implementation Support

The Pacific directorate met with Tuvalu delegates in the margins of the Pacific Banking Forum and held calls to discuss TA coordination and implementation planning during the reporting period.

A TA coordination support visit to Tuvalu had been planned in this financial year, however after consultation with the FIU it was agreed that the visit should be postponed until after they attended the 2025 TA Forum. The visit is now planned for the next financial year.

Sub-Task 10.4.2: Samoa TA Coordination visit

A TA coordination support visit was scheduled this financial year to Samoa, however due to the election in August 2025, this has now been moved to the following financial year.

Activity 11. Assessor Workforce Development

Task 11.1: APG Assessor training

Sub-task 11.1.1: Provide sponsorship for Pacific members to attend assessor training

The program funded one man from Nauru and one man from PNG to attend assessor training during the reporting period.

Sub-task 11.1.2: Provide mentoring support for Pacific members who will or have attended assessor training

See task 11.2 and task 11.3.

Sub-Task 11.1.3: Support Pacific Assessors to participate in the Mutual Evaluations of other Pacific jurisdictions

In the reporting period, the program funded one man from the Solomon Islands and one woman from Fiji to be assessors on the ME of Niue. See also task 11.3.

Task 11.2: Develop and deliver Follow Up Report (FUR) training program

The Pacific directorate developed a program to support new assessors from Pacific Jurisdictions between completing assessor training and commencing a follow up report or an ME. The training program was piloted internally with new staff in the APG Secretariat, and on review it was decided that it needed modifications before being delivered externally. The program will be implemented in the next financial year. See also task 11.3.

Task 11.3: Develop additional training and mentor programs for Pacific assessors as required

The Pacific directorate is developing a program to support Pacific assessors through the ME process, including working towards the option of a hybrid secondment into the APG Secretariat. This work will commence in the 2025-2026 financial year.

See also task 11.2.

Sub-Task 11.3.1: Assist Pacific jurisdictions to develop plans to meet their assessor contribution targets

While the Pacific directorate outlined options for some Pacific members, this work will commence in the 2025-2026 financial year.

Activity 12. Other focussed capacity development (addressing legislative/policy frameworks, bank de-risking issues, asset recovery, etc.)

The PACD program has continued to support targeted capacity development projects at the request of Pacific jurisdictions, as outlined in Activity 9.

Cross-cutting Contributing Objective: Enhanced benefits and roles for women in relation to AML/CFT activities in the Pacific

Cross Cutting Activity 1 (G1): Scoping study of benefits, challenges, needs and risks associated with AML/CFT systems/outcomes affecting Pacific women, and defining why an enhanced role of women is important to AML/CFT systems in the region

Cross Cutting Task 1.1: Compile research on impact of ML/FT and on the AML/CFT work on women in the Pacific, in order to better target mainstreaming activities

This work has been budgeted for and will commence in the 2025-2026 financial year.

Cross Cutting Task 1.2: Seek views of women from Pacific jurisdictions on their experiences

At the 2024 TA Forum, the Secretariat sought Pacific members' feedback on actions to enhance the role of women in AML/CFT in the Pacific. Based on extensive feedback received, the APG Secretariat strongly reinforced to members that any program must be guided by the needs of women from the Pacific region who work in AML/CFT, for it to be a success. Feedback was also sought on potential initiatives or thematic areas to respond to the priority needs of Pacific women, or if members have any specific expertise in this area which could be used or replicated regionally. This scoping exercise received scattered feedback from members, and the PACD program has continued to engage with members on this issue. See Cross Cutting Sub-Task 2.1.1 below for more details.

The APG Ad Hoc Group on strategic AML/CFT Leadership included interviews with a number of Pacific women leaders in AML/CFT roles. Input from the interviews contributed to the Phase 1 report of the Ad Hoc Group which was reported to the 2025 APG Annual Meeting.

Cross Cutting Activity 2 (G2): All PACD program activity designs to be gender mainstreamed

Cross Cutting Task 2.1: Gender mainstream all PACD program activity designs

The Pacific directorate has commenced work on gender mainstreaming all PACD program activities. As part of that focus the directorate is taking further steps to encourage nominations from Pacific members to APG events reflect the greatest diversity of participants. Currently nominations for assessor training include the following note: *Nominations are welcome, irrespective of the applicant's racial or ethnic origin, opinions or beliefs, gender, sexual orientation, health, or disabilities.*

More work on the gender mainstreaming of all PACD program activities will be conducted in the next financial year.

Sub-Task 2.1.1: Develop guidelines, policies, and arguments for how to ensure all PACD program activities are gender-mainstreamed

At the 2024 Annual Meeting the APG established a Diversity and Inclusion (D&I) Network to best support the regional AML/CFT workforce. This program complements the work of the PACD program as the Network is developing a diversity and inclusion strategy for consideration at the 2025 APG Annual Meeting. Amongst the Network's two female Co-Chairs, one is a woman from Nauru who has been actively engaged in this work. The PACD program offered sponsorship for her to attend the 2025 Annual Meeting to speak to the Plenary about the work of the Committee but due to operational requirements she was unable to attend. The PACD program will continue to offer support to her in this role, and to the finalisation and implementation of the APG D&I Strategy.

Cross Cutting Task 2.2: Collect gender-disaggregated data for all PACD program activities

The PACD program maintains a gender-disaggregated database of participants on PACD program-sponsored travel sponsorship and participants at PACD program events. This reporting framework will be expanded to include gender disaggregated data for all activities in the next financial year.

Cross Cutting Task 2.3: Gender mainstream jurisdiction-level APG planning for Pacific jurisdictions

This work will commence in the next financial year.

Cross Cutting Activity 3 (G3): Increase the number of women from the Pacific who are assessors on MEs in the global 5th round

Cross Cutting Task 3.1: Training program targeted to women in AML/CFT to become ME assessors for the global 5th round

See details in cross cutting task 3.2 below.

Cross Cutting Task 3.2: Support program/s targeted to women in AML/CFT to become assessors for the global 5th round

The Pacific directorate is developing a pilot scholarship program to support women from Pacific jurisdictions to become assessors on MEs. The program will launch in the next financial year.

Sub-Task 3.2.1: Support for and implementation of the APG breastfeeding fund

The PACD program administered the breastfeeding fund supported by a voluntary contribution received from the UK to support women in AML/CFT involved in mutual evaluations who have breastfeeding commitments. The Pacific directorate supported the preparation for the use of the fund for a woman from Fiji to attend the 2025 APG Annual Meeting with her child and a carer.

Detailed Expenditure 2024-2025

The following section provides a summary of 2024-2025 expenditure against the costed work plan in the *PACD Program Business Plan 2024-2025*. There is an underspend for 2024-25 of NZD\$225,062.79¹ primarily due to delays in the delivery of projects caused by limitations on several jurisdiction's capacity to receive the assistance. The underspend will be reallocated to the 2024-2025 work plan, noting several projects are ongoing.

Activity	Expenditure (NZD) ²
Activity 1. Increased Direct Engagement	
Sub-task 1.1.1: Use Annual Meeting / TA Forum to enhance engagement with key stakeholders Sub-task 1.1.3: Provide sponsorship for Pacific members to attend the APG Annual Meeting Task 8.2: Deliver Annual TA Forum	\$44,364.81
Sub-task 1.1.2: Support Pacific members to attend and contribute to the annual APG Typologies Workshop	\$5,480.00
Sub-task 1.2.1: Support Pacific members to attend and contribute to non-APG forums and workshops (PILON Oct, PFIC Nov, PILON Feb)	\$4,361.74
Activity 5. Directly support regional discussion/actions	
Sub-task 5.1.1: Sponsorship to PF RA Workshop	\$30,014.96
Task 5.4: PSCF sponsorship	\$19,734.78
Task 5.7: Supervisors Forum (2024)	\$31,925.42
Activity 8. Technical Assistance Forum input	
[See Activity 1]	
Activity 9. Provider of last resort (short notice/ad-hoc) capacity development assistance	
Sub-Task 9.1.1: NCBF legislation for Cook Islands	\$114,893.67
Sub-Task 9.1.3: TFS legislation for Palau	\$0.00
Sub-Task 9.2.1: NPO review for Fiji	\$22,875.82
Task 9.3: Deliver mentoring and training for law enforcement: RPNGC Priority Planning Support	\$31,924.02
Task 9.3.1: Asset confiscation support and mentoring for Tonga Task 9.3.2: Asset confiscation support and mentoring for Fiji	\$81,476.65
Sub-Task 9.4.1: DNFBP supervision mentoring	\$0.00
Sub-Task 9.4.2: Joint Money Transfer Operator (MTO) supervision	\$0.00

¹ (1 AUD = 1.09124 NZD, as of 27 July 2025)

² (1 AUD = 1.09124 NZD, as of 27 July 2025)

Activity 10. National implementation planning and coordination support	
Task 10.1: Provide support to Pacific jurisdictions to implement the recommendations from their Mutual Evaluation Report (PNG)	\$15,990.88
Sub-Task 10.2.1: Nauru SIP workshop	\$8,396.48
Sub-Task 10.2.2: Marshall Islands SIP workshop	\$13,976.83
Sub-Task 10.2.3: Timor-Leste SIP workshop	\$14,366.92
Sub-Task 10.2.4: PNG SIP workshop	\$14,189.20
Sub-Task 10.2.5: Tonga SIP workshop	\$2,032.01
Sub-Task 10.3.1: Pre-ME support to Fiji	\$0.00
Sub-Task 10.3.2: Pre-ME support to Vanuatu	\$5,167.75
Sub-Task 10.4.1: Tuvalu Implementation Support	\$0.00
Sub-Task 10.4.2: Samoa TA Coordination visit	\$0.00
Activity 11. Assessor workforce development	
Sub-task 11.1.1: Provide sponsorship for Pacific members to attend assessor training	\$18,494.46
Sub-Task 11.1.3: Support Pacific Assessors to participate in the Mutual Evaluations of other Pacific jurisdictions	
Other Expenditure	
MERL Framework	\$0.00
Standard administrative costs	\$6,038.43
Domestic travel	\$5,693.84
Learning and development	\$0.00
Unallocated expenses	-\$4,261.46 ³
Staff Budget	\$802,496.90
TOTAL	\$1,289,634.10

³ yet to be allocated travel expenses - travel expenses that have been accrued but unable to separate into individual trips at the time of reporting

PACD Program Design Risks and Assumptions

Risk/Assumption	Situation in 2024-2025 Financial Year
A1. Geopolitical situation in the Pacific and within the DAP Group remains broadly continuous with strong and overlapping offers for AML/CFT assistance	This remains the case aside from a reduction in funding from the United States which has impacted the UNODC. The PACD program remains unaffected.
A2. Financial crime trends and basic capacity to respond remain broadly consistent, noting the worsening situation with drug trafficking and organised crime, in part from 'returnee' serious offenders	This pattern of worsening situation with drug trafficking in the region has continued in the reporting period.
A3. Acute revenue pressures remain for Pacific jurisdictions with associated capacity challenges and loss of human capital- challenges for AML/CFT implementation	<p>This had an impact on the following projects this financial year:</p> <ul style="list-style-type: none"> • Sub-Task 9.4.1: DNFBP supervision mentoring • Sub-Task 9.4.2: Joint Money Transfer Operator (MTO) supervision • Sub-Task 10.4.1: Tuvalu Implementation Support <p>Please see the individual sections for more information.</p>
A4. Short-notice revenue raising schemes are implemented before ML/TF risk controls are in place. Promoters of such schemes target PICs (eg CBI, DAO sector, etc), particularly the legislative branch of government	While this remains an ongoing concern in the region, this did not have a direct impact on the PACD program in the reporting period.
A5. Major country-level events (climate change effects, acts of god, political developments) don't undermine member's ability to move ahead on AML/CFT work	<p>During the reporting period, Vanuatu experienced a 7.3 magnitude earthquake in which 14 people died and government services were redirected, impacting preparations for their upcoming ME and ability to receive TA.</p> <p>Samoa will have an election called at short notice in August 2025 which has delayed the planned PACD program TA visit.</p>
A6. Pressures on Pacific members' correspondent banking relationships continues, including pressures for debanking and derisking (categories of customers, services and products)	This remains an ongoing priority concern in the region, and has had a direct impact on the PACD program in the reporting period as related projects are prioritised.
A7. Pacific jurisdictions remain engaged in the PACD program and in APG membership requirements	This has not changed in the reporting period.
A8. Support continues from members and from the DAP group for PACD programs, including the APG's agreed TA coordination role	This remains the case aside from a reduction in funding from the United States which has impacted US and UNODC programs. The PACD program remains unaffected.
A9. Pacific jurisdictions and organisations recognise the need for gender considerations in AML/CFT work	This has not changed in the reporting period.
A10. MFAT remains supportive of the PACD program	This has not changed in the reporting period.

Annex A – PACD Program Design (Full)

Goal: To support economic stability, safety and security of Pacific Islands communities by strengthened and targeted efforts against financial crime

Objectives / Activities	Tasks	Sub-Tasks
Overarching Objective Substantive actions to enhance risk-based AML/CFT systems by leadership and technical personnel of: <ul style="list-style-type: none"> - Pacific governments and private sectors - regional multilaterals - donors and providers 		
Contributing Objective 1 Increased awareness of, and demand for, support available from APG/PACD, including implementation planning, TA coordination, and other APG services, contributing to the Overarching Objective		
Activity 1. Increased Direct Engagement	Task 1.1: Specific APG-delivered events	Sub-task 1.1.1: Use Annual Meeting / TA Forum to enhance engagement with key stakeholders
		Sub-task 1.1.2: Support Pacific members to attend and contribute to the annual APG Typologies Workshop
		Sub-task 1.1.3: Provide sponsorship for Pacific members to attend the APG Annual Meeting
		Sub-task 1.1.4: Provide sponsorship for Pacific members to attend the Typologies Workshop
	Task 1.2: Other forums and workshop	Sub-task 1.2.1: Support Pacific members to attend and contribute to non-APG forums and workshops
		Sub-task 1.2.2: Provide sponsorship for Pacific members to attend the non-APG forums and workshops
	Task 1.3: Meetings	Sub-Task 1.3.2: Diplomatic engagement in relevant jurisdictions
Sub-Task 1.3.3: Meetings with private sector in relevant jurisdictions		
Task 1.4: Strategic Implementation Planning workshops, Mutual Evaluation workshops, High-Level Visits	Sub-task 1.4.1: Provide sponsorship for Pacific members to attend Mutual Evaluation-related Workshops (shared task with 10.3.6 below)	
Activity 2. Increased Media Presence	Task 2.1: Develop press releases and engage with relevant journalists	
	Task 2.2: Social media engagement	
	Task 2.3: PACD Newsletter	
Activity 3. Expanded Supporting materials	Task 3.1: Prepare layered supporting materials for all above	
Contributing Objective 2 Increased regional coordination to enhance risk-based AML/CFT systems by: <ul style="list-style-type: none"> - Pacific jurisdictions - donors and providers 		
Pacific Jurisdictions		

Activity 4. Identify or create full range of coordination forums/working groups required	Task 4.1: Develop and maintain a database and calendar of AML/CFT forums and working groups	
Activity 5. Directly support regional discussion/actions	Task 5.1: Regional PF risk assessment	Sub-task 5.1.1: Sponsorship to PF RA Workshop
	Task 5.2: Joint Supervision support	Sub-task 5.2.1: Sponsorship of Pacific jurisdictions to conduct joint supervision activities together
	Task 5.3: Support emerging regional discussions / actions as they emerge	
	Task 5.4: PSCF sponsorship	
	Task 5.5: Contribute to Pacific Banking Forum events and programs	
	Task 5.6: World Bank CBR project	
	Task 5.7: Supervisors Forum	
Activity 6. Integrate regional issues/views into Contributing Objectives 1 & 3 activities	Task 6.1: Develop and update briefing notes on each Pacific Jurisdiction's AML/CFT political priorities, as agreed to with the jurisdiction	
Donors and Providers		
Activity 7. DAP meeting input	Task 7.1: Convene Pacific-focussed DAP meetings a minimum of four times per year	
Joint		
Activity 8. Technical Assistance Forum input	Task 8.1: Maintain up to date records of TA needs of Pacific jurisdictions	Sub-task 8.1.1: Pacific TA Overviews
		Sub-Task 8.1.2: Pacific TA Calendar
	Task 8.2: Deliver Annual TA Forum	
	Task 8.3: Support or develop additional technical assistance activities as they emerge	
Contributing Objective 3		
Increased capacity that enhances risk-based AML/CFT systems of selected stakeholders		
Activity 9. Provider of last resort (short notice/ad-hoc) capacity development assistance	Task 9.1: Legislative drafting	Sub-Task 9.1.1: NCBF legislation for Cook Islands
		Sub-Task 9.1.2: NCBF model legal framework
		Sub-Task 9.1.3: TFS legislation for Palau
	Task 9.2: Reviews of Non-Profit Organisation Sector	Sub-Task 9.2.1: NPO review for Fiji
	Task 9.3: Deliver mentoring and training for law enforcement	Task 9.3.1: Asset confiscation support and mentoring for Tonga
		Task 9.3.2: Asset confiscation support and mentoring for Fiji

	Task 9.4: Deliver mentoring and training for supervisors	Sub-Task 9.4.1: DNFBP supervision mentoring Sub-Task 9.4.2: Joint Money Transfer Operator (MTO) supervision
	Task 9.5: Deliver mentoring and training for Financial Intelligence Units	
	Task 9.6: Deliver mentoring and training for relevant government policy agencies	
	Task 9.7: Provide assistance for other capacity building requests on an ad-hoc basis from Pacific jurisdictions	Sub-Task 9.7.1: Provide sponsorship for FATF Standards training
Activity 10. National implementation planning and coordination support	Task 10.1: Provide support to Pacific jurisdictions to implement the recommendations from their Mutual Evaluation Report	
	Task 10.2: Deliver Strategic Implementation Planning (SIP) Workshops to Pacific jurisdictions	Sub-Task 10.2.1: Nauru SIP
		Sub-Task 10.2.2: RMI SIP
		Sub-Task 10.2.3: Timor-Leste SIP
		Sub-Task 10.2.4: PNG SIP
		Sub-Task 10.2.5: Tonga SIP
		Sub-Task 10.2.6: Fiji SIP
		Sub-Task 10.2.7: Vanuatu SIP
	Task 10.3: Provide support to Pacific jurisdictions to prepare for upcoming Mutual Evaluations	Sub-Task 10.2.7: Niue SIP
		Sub-Task 10.3.1: Pre-ME support to Fiji
		Sub-Task 10.3.2: Pre-ME support to Vanuatu
		Sub-Task 10.3.3: Pre-ME support to Niue
		Sub-Task 10.3.4: Pre-ME support to Samoa
Task 10.4: Provide support to Pacific jurisdictions to coordinate their technical assistance	Sub-Task 10.3.5: Pre-ME support to Palau	
	Sub-Task 10.3.6: Support the delivery of Pre-ME Workshops (shared task with 1.4.1 above)	
	Sub-Task 10.4.1: Tuvalu Implementation Support	
		Sub-Task 10.4.2: Samoa TA Coordination visit
Activity 11. Assessor workforce development	Task 11.1: APG Assessor training	Sub-task 11.1.1: Provide sponsorship for Pacific members to attend assessor training

		Sub-task 11.1.2: Provide mentoring support for Pacific members who will or have attended assessor training
		Sub-Task 11.1.3: Support Pacific Assessors to participate in the Mutual Evaluations of other Pacific jurisdictions
	Task 11.2: Develop and deliver Follow Up Report (FUR) training program	
	Task 11.3: Develop additional training and mentor programs for Pacific assessors as required	Sub-Task 11.3.1: Assist Pacific jurisdictions to develop plans to meet their assessor contribution targets
Activity 12. Other focussed capacity development (addressing legislative/policy frameworks, bank de-risking issues, asset recovery, etc.)		
Cross-cutting Contributing Objective		
Enhanced benefits and roles for women in relation to AML/CFT activities in the Pacific		
Cross Cutting Activity 1: Scoping study of benefits, challenges, needs and risks associated with AML/CFT systems/outcomes affecting Pacific women, and defining why an enhanced role of women is important to AML/CFT systems in the region	Cross Cutting Task 1.1: Compile research on impact of ML/FT and on the AML/CFT work on women in the Pacific, in order to better target mainstreaming activities	
	Cross Cutting Task 1.2: Seek views of women from Pacific jurisdictions on their experiences	
Cross Cutting Activity 2: All PACD activity designs to be gender mainstreamed	Cross Cutting Task 2.1: Gender mainstream all PACD activity designs	Sub-Task 2.1.1: Develop guidelines, policies, and arguments for how to ensure all PACD activities are gender-mainstreamed
	Cross Cutting Task 2.2: Collect gender-disaggregated data for all PACD Activities	
	Cross Cutting Task 2.3: Gender mainstream jurisdiction-level APG planning for Pacific jurisdictions	
Cross Cutting Activity 3: Increase the number of women from the Pacific who are assessors on MEs in the global 5th round	Cross Cutting Task 3.1: Training program targeted to women in AML/CFT to become ME assessors for the global 5th round	
	Cross Cutting Task 3.2: Support program/s targeted to women in AML/CFT to become assessors for the global 5th round	Sub-Task 3.2.1: Support for and implementation of the APG breastfeeding fund
Risk/Assumptions		
A1. Geopolitical situation in the Pacific and within the DAP Group remains broadly continuous with strong and overlapping offers for AML/CFT assistance		
A2. Financial crime trends and basic capacity to respond remain broadly consistent, noting the worsening situation with drug trafficking and organised crime, in part from 'returnee' serious offenders		

A3. Acute revenue pressures remain for Pacific jurisdictions with associated capacity challenges and loss of human capital-challenges for AML/CFT implementation
A4. Short-notice revenue raising schemes are implemented before ML/TF risk controls are in place. Promoters of such schemes target PICs (eg CBI, DAO sector, etc), particularly the legislative branch of government
A5. Major country-level events (climate change effects, acts of god, political developments) don't undermine member's ability to move ahead on AML/CFT work
A6. Pressures on Pacific members' correspondent banking relationships continues, including pressures for debanking and derisking (categories of customers, services and products)
A7. Pacific jurisdictions remain engaged in the PACD program and in APG membership requirements
A8. Support continues from members and from the DAP group for PACD programs, including the APG's agreed TA coordination role
A9. Pacific jurisdictions and organisations recognise the need for gender considerations in AML/CFT work
A10. MFAT remains supportive of the PACD program

Annex B – PACD Program MERL Framework

Objectives / Activities	Indicators	Indicator Valance +ve = more is better -ve = less is better	Indicator Disaggregates	Baseline Approach	Indicator Source
Overarching Objective Substantive actions to enhance risk-based AML/CFT systems by leadership and technical personnel of: <ul style="list-style-type: none"> - Pacific governments and private sectors - regional multilaterals - donors and providers 	OO1. Number (and detailed list) of substantive improvements to AML/CFT systems arising from APG/PACD-assisted AML/CFT activities in the Pacific	Positive	<ul style="list-style-type: none"> -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Regional coordination tag (y/n) -Position(s) (personnel involved) -Improvement type(s) (specific AML areas/CFT areas) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n) 	Past ME results Other past formal assessments	MEs Other formal assessments Systematic stakeholder dialogues
Contributing Objective 1 <i>Increased awareness of, and demand for, support available from APG/PACD, including implementation planning, TA coordination, and other APG services, contributing to the Overarching Objective</i>	CO1.1 Number (and detailed list) of formally recorded responses to APG/PACD direct engagement <i>-responses may be positive, negative or mixed</i>	Conditional	<ul style="list-style-type: none"> -Response type (positive, negative, mixed) -Jurisdiction(s) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Specific organisation(s) involved -Regional coordination tag (y/n) -Position(s) (personnel involved) -Response topic(s) (specific AML areas/CFT areas) -Heightened gender relevance tag (y/n) 	Audit of past records	Systematic stakeholder dialogues Media monitoring
	CO1.2 Number (and detailed list) of media items mentioning APG/PACD support or attributable AML/CFT issues <i>-responses may be positive, negative or mixed</i>	Conditional	<ul style="list-style-type: none"> -Response type (positive, negative, mixed) -Jurisdiction(s) -Media type(s) involved (print/TV/radio/social media, etc.) -Specific organisation(s) involved -Target audience(s) (who is being lobbied or informed) -Article topic(s) (specific AML areas/CFT areas) -Heightened gender relevance tag (y/n) 	Retrospective media monitoring, where possible All new instances recorded	Media monitoring
	CO1.3 Number (and detailed list) of instances in which APG/PACD guidance is closely replicated in the media or guidance of members/other s	Positive	<ul style="list-style-type: none"> -Media type(s) involved (if applicable) -Jurisdiction(s) -Specific organisation(s) involved -Regional coordination tag (y/n) -Target audience(s) (who is being lobbied or informed) -Guidance topic(s) (specific AML areas/CFT areas) -Heightened gender relevance tag (y/n) 	Retrospective media monitoring, where possible All new instances recorded	Systematic stakeholder dialogues Media monitoring

	CO1.4 Number (and detailed list) of relevant requests for assistance received by APG/PACD to facilitate positive AML/CFT action	Positive	-Request topic(s) (specific AML areas/CFT areas) -Jurisdiction(s) -Regional coordination tag (y/n) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Specific organisation(s) involved -Position(s) (personnel involved) -Response type (nil, partial or full) -Heightened gender relevance tag (y/n)	Audit of past years' requests (where possible)	Modified email inbox system and phone records
Activity 1. Increased Direct Engagement	1.1.1 Numbers of relevant stakeholders/or ganisations directly engaged in forums, workshops, meetings and related activities - double counting of individuals avoided	Positive	-Gender-Organisation type(s) involved (mem. gov./bank/DAP/etc.)-Specific organisation(s) involved- Jurisdiction(s)-Position(s) -Event type-Engagement topic(s) (specific AML areas/CFT areas)- Heightened gender relevance tag (y/n)	All new instances recorded	Event registrations/ minutes
Activity 2. Increased Media Presence	1.2.1 Number of new media releases provided	Positive	-Jurisdiction (s) -Media type(s) involved (print/TV/radio/social media, etc.) -Specific organisation(s) involved -Target audience(s) (who is being lobbied or informed) -Article topic(s) (specific AML areas/CFT areas) -Heightened gender relevance tag (y/n)	Audit of past years' releases	Program records
	1.2.2 Number of other direct journalist engagements (subset of 1.1.1)	Positive	-Gender(s) -Jurisdiction (s) -Media type(s) involved (print/TV/radio/social media, etc.) -Specific organisation(s) involved -Position(s) -Target audience(s) (who is being lobbied or informed) -Article topic(s) (specific AML areas/CFT areas) -Heightened gender relevance tag (y/n)	Audit of past years' engagements (where possible)	Program records
	1.2.3 Number of APG/PACD social media posts	Positive	-Jurisdiction (s) -Specific SM platform(s) involved -Target audience(s) (who is being lobbied or informed) -Article topic(s) (specific AML areas/CFT areas) -Heightened gender relevance tag (y/n)	Audit of past years' SM posts	Program records
	1.2.4 Number of hits to APG/PACD social media posts	Positive	-By SM post/platform -Other data analytics, as available (platform dependent)	Audit of past years' data (where possible)	Site analytics

	1.2.5 Number of relevant articles released in APG newsletter	Positive	-Target audience(s) (who is being lobbied or informed) -Article topic(s) (specific AML areas/CFT areas) -Heightened gender relevance tag (y/n)	Audit of past years' newsletters	Program records
Activity 3. Expanded Supporting materials	1.3.1 Number (and detailed list) of new or improved supporting materials produced and distributed by APG/PACD	Positive	-Target audience(s) (who is being lobbied or informed) -Supporting material topic(s) (specific AML areas/CFT areas) -Heightened gender relevance tag (y/n)	Audit of past years' materials	Program records
Contributing Objective 2 Increased regional coordination to enhance risk-based AML/CFT systems by: - Pacific jurisdictions - Donors and providers	CO2.1 Number (and detailed list) of examples of unnecessary duplication in regional AML/CFT efforts	Negative	-Duplication focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n)	Past ME results Other past formal assessments All new instances recorded	MEs Other formal assessments Systematic stakeholder dialogues
	CO2.2 Number (and detailed list) of examples of competing approaches to improving risk-based AML/CFT systems	Negative	-Confliction focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n)	Past ME results Other past formal assessments All new instances recorded	MEs Other formal assessments Systematic stakeholder dialogues
	CO2.3 Number (and detailed list) of examples of uncoordinated AML/CFT activities overburdening local personnel or other resources	Negative	-Over-burdened area(s) (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n)	Past ME results Other past formal assessments All new instances recorded	MEs Other formal assessments Systematic stakeholder dialogues
	CO2.4 Number (and detailed list) of APG/PACD-assisted, jointly planned and implemented AML/CFT regional activities	Positive	-Coordination focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n)	Audit of past years' activities	Program records

	CO2.5 Number (and detailed list) of other (not activity-based) examples of APG/PACD assisted regional coordination between Pacific jurisdictions, between Pacific jurisdictions and DAPs, and between DAPs	Positive	<ul style="list-style-type: none"> -Coordination focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n) 	Audit of past years' activities	Program records
	CO2.6 Number (and detailed list) of improvements to AML/CFT systems/outcomes arising from APG/PACD-assisted, coordinated AML/CFT regional activities (subset of 001.)	Positive	<ul style="list-style-type: none"> -Improvement focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n) 	Past ME results Other past formal assessments All new instances recorded	MEs Other formal assessments Systematic stakeholder dialogues
	CO2.7 Number (and detailed list) of requests received by APG to facilitate regional coordination (subset of CO1.4)	Positive	<ul style="list-style-type: none"> -Request topic(s) (specific AML areas/CFT areas) -Jurisdiction(s)-Regional coordination tag (y/n) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Specific organisation(s) involved-Position(s) (personnel involved) -Response type (nil, partial or full) -Heightened gender relevance tag (y/n) 	Audit of past years' requests (where possible)	Modified email inbox system and phone records
Activity 4. Identify or create full range of coordination forums/working groups required	2.4.1 Number (and detailed list) of existing or potential forums/working groups identified as required for specific regional coordination purposes	Neutral	<ul style="list-style-type: none"> -Specific purpose focus/foci (specific AML areas/CFT areas) -Forum/group title (existing or proposed) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Heightened gender relevance tag (y/n) 	All new instances recorded	Program records
Activity 5. Directly support regional discussion/actions	2.5.1 Number (and detailed list) of regional discussions supported by APG/PACD	Positive	<ul style="list-style-type: none"> -Forum/group focus/foci (specific AML areas/CFT areas) -Forum/group title (existing or proposed) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Heightened gender relevance tag (y/n) 	Audit of past years' support (where possible)	Program records

	2.5.2 Numbers of relevant stakeholders directly engaged in supported regional discussions supported by APG/PACD -double counting of individuals avoided	Positive	-Forum/group focus/foci (specific AML areas/CFT areas) -Forum/group title -Gender -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Specific organisation(s) involved -Jurisdiction(s) -Position(s) -Heightened gender relevance tag (y/n)	All new instances recorded Past records, where available	Forum registrations Forum minutes
Activity 6. Integrate regional issues/views into Contributing Objectives 1 & 3 activities	2.6.1 Number (and detailed list) of examples of regional considerations being integrated into Contrib. Objectives 1 & 3 activities	Positive	As per 'regional coordination' tagged indicators	All new instances recorded	Disaggregated from CO1 and CO3 indicators using regional coordination tags
Activity 7. DAP meeting input	2.7.1 Number (and detailed list) of examples in which a DAP has provided regionally-focussed TA based on requests made or discussions held during DAP meetings	Positive	-TA Activity focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n)	Audit of past years' records, where available All new instances recorded	DAP meeting minutes
Activity 8. Technical Assistance Forum input	2.8.1 Number (and detailed list) of examples in which DAP members have provided regionally-focussed TA based on requests made or discussions held at the TA Forum	Positive	-TA Activity focus/foci (specific AML areas/CFT areas)- Organisation type(s) involved (mem. gov./bank/DAP/etc.)- Jurisdiction(s)-Specific organisation(s) involved- Position(s) (personnel involved)- Outcome type(s) (specific effects)-Heightened gender relevance tag (y/n)	Audit of past years' records, where available All new instances recorded	TA forum minutes
Contributing Objective 3 Increased capacity that enhances risk-based AML/CFT systems of selected stakeholders	CO3.1 Number (and detailed list) of examples of APG/PACD-supported increased capacity being used to implement improvements to AML/CFT systems	Positive	-Capacity use focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Regional coordination tag (y/n) -Position(s) (personnel involved) -User gender(s) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n)	Past ME results Other past formal assessments Initial survey/dialogue iterations	MEs Other formal assessments Systematic stakeholder dialogues Follow-up surveys of supported capacity development participants

	CO3.2 Number (and detailed list) of examples of APG/PACD-supported increased capacity being used to create or improve AML/CFT-related policies and legislation (subset of CO3.1)	Positive	<ul style="list-style-type: none"> -Capacity use focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Regional coordination tag (y/n) -Position(s) (personnel involved) -User gender(s) -Outcome type(s) (specific effects) -Heightened gender relevance tag (y/n) 	Past ME results Other past formal assessments Initial survey/dialogue iterations	MEs Other formal assessments Systematic stakeholder dialogues Follow-up surveys of supported capacity development participants
	CO3.3 Number (and detailed list) of positive AML/CFT policies/legislation formally approved/passed as a result of APG/PACD-supported drafting projects (subset of CO3.2/001.1)	Positive	<ul style="list-style-type: none"> -Policy focus/foci (specific AML areas/CFT areas) -Official policy name -Policy approver -Approval date -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Outcome type(s) (specific effects) -Regional coordination tag (y/n) -Heightened gender relevance tag (y/n) 	Past ME results Other past formal assessments Initial survey/dialogue iterations	MEs Other formal assessments Systematic stakeholder dialogues Follow-up surveys of supported capacity development participants
	CO3.4 Number (and detailed list) of examples of improvements to AML/CFT systems arising from APG/PACD-supported capacity development for strategic planning activities	Positive	<ul style="list-style-type: none"> -Improvement focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Regional coordination tag (y/n) -Heightened gender relevance tag (y/n) 	Past ME results Other past formal assessments Initial survey/dialogue iterations	MEs Other formal assessments Systematic stakeholder dialogues Follow-up surveys of supported capacity development participants
	CO3.5 Number of Pacific-based assessors successfully completing Mutual Evaluations	Positive	<ul style="list-style-type: none"> -Gender-Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Specific organisation(s) involved -Jurisdiction(s) -Position(s) -Specific ME -Regional coordination tag (y/n -will be y in all cases) -Heightened gender relevance tag (y/n) 	Past ME records	ME records
Activity 9. Provider of last resort (short notice/ad-hoc) capacity development assistance	3.9.1 Number of organisations/s takeholders successfully engaged in APG/PACD-supported capacity development	Positive	<ul style="list-style-type: none"> -Specific capacity development activity/sub-activity -Capacity development type(s) (training, mentoring, TA, etc.) -Capacity development focus/foci (specific AML areas/CFT areas) -Gender -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Specific organisation(s) involved -Jurisdiction(s) -Position(s) -Regional coordination tag (y/n) 	All new instances recorded	Participant registrations Program records
Activity 10. National implementation planning and coordination support					
Activity 11. Assessor workforce development					

<p>Activity 12. Other focussed capacity development (addressing legislative/policy frameworks, bank de-risking issues, asset recovery, etc.)</p>			<p>-Heightened gender relevance tag (y/n)</p>		
<p>Cross-cutting Contributing Objective Enhanced benefits and roles for women in relation to AML/CFT activities in the Pacific</p>	<p>CC01.1 Number (and detailed list) of examples of positive/negative experiences of Pacific women professionally/personally affected by AML/CFT activities (either as workers in these areas or as members of the public)</p>	<p>Conditional</p>	<p>-Experience type (positive, negative, mixed) -Issue focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Regional coordination tag (y/n) -Position(s) (personnel involved) -Outcome type(s) (specific effects)</p>	<p>All new instances recorded</p>	<p>Follow-up surveys of supported capacity development participants Targeted surveys/dialogues Disaggregated from other indicators using 'Heightened gender relevance' tags</p>
	<p>CC01.2 Number (and detailed list) of case studies highlighting how women have influenced or shaped AML/CFT strategies and policies in the Pacific (subset of CC01.1)</p>	<p>Positive</p>	<p>-Influence focus/foci (specific AML areas/CFT areas) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Regional coordination tag (y/n)</p>	<p>All new instances recorded</p>	<p>Follow-up surveys of supported capacity development participants Targeted surveys/dialogues Disaggregated from other indicators using 'Heightened gender relevance' tags</p>
	<p>CC01.3 Number (and detailed list) of examples of gender-specific challenges being addressed through activities that focus on AML/CFT-related crimes disproportionately affecting women (subset of CC01.1)</p>	<p>Positive</p>	<p>-Challenge focus/foci (specific AML areas/CFT areas) -Challenge type (professional, personal, mixed) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Regional coordination tag (y/n)</p>	<p>All new instances recorded</p>	<p>Follow-up surveys of supported capacity development participants Targeted surveys/dialogues Disaggregated from other indicators using 'Heightened gender relevance' tags</p>

	CC01.4 Number (and detailed list) of Pacific (national or regional) AML/CFT strategies/policies that explicitly include gender considerations	Conditional	-Strategy/Policy focus/foci (specific AML areas/CFT areas)- Inclusion effect(s) on women (positive, negative, mixed)- Official policy name-Policy approver-Approval date- Organisation type(s) involved (mem. gov./bank/DAP/etc.)- Jurisdiction(s)- Specific organisation(s) involved- Outcome type(s) (specific effects)- Regional coordination tag (y/n)	All new instances recorded	Follow-up surveys of supported capacity development participants Targeted surveys/dialogues Disaggregated from other indicators using 'Heightened gender relevance' tags
Cross cutting Activity 1: Scoping study of benefits, challenges, needs and risks associated with AML/CFT systems/outcomes affecting Pacific women, and defining why an enhanced role of women is important to AML/CFT systems in the region	CCA1.1 Numbers (and detailed lists) of issues identified	Conditional	-Experience type1 (positive, negative, mixed) -Experience type2 (benefits, challenges, needs, risks [to be refined by data]) -Issue focus/foci (specific AML areas/CFT areas) -issue type (professional, personal, mixed) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Regional coordination tag (y/n)	Study findings	Study findings
Cross cutting Activity 2: All PACD activity designs to be gender mainstreamed	CCA2.1 Number (and detailed list) of instances in which scoping study findings were used to shape APG/PACD assistance	Positive	-APG/PACD activity name/reference -Issue focus/foci (specific AML areas/CFT areas) -issue type (professional, personal, mixed) -Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Jurisdiction(s) -Specific organisation(s) involved -Position(s) (personnel involved) -Outcome type(s) (specific effects) -Regional coordination tag (y/n)	All new instances recorded	Program records
Cross cutting Activity 3: Increase the number of women from the Pacific who are assessors on MEs in the global 5th round	CCA3.1 Number of Women successfully completing MEs as formal assessors (subset of CO3.5)	Positive	-Organisation type(s) involved (mem. gov./bank/DAP/etc.) -Specific organisation(s) involved -Jurisdiction(s) -Position(s) -Specific ME -Regional coordination tag (y/n - will be y in all cases)	Past ME records	ME records
Assumptions (risks)					
A1. Geopolitical situation in the Pacific and within the DAP Group remains broadly continuous with strong and overlapping offers for AML/CFT assistance					
A2. Financial crime trends and basic capacity to respond remain broadly consistent, noting the worsening situation with drug trafficking and organised crime, in part from 'returnee' serious offenders					
A3. Acute revenue pressures remain for Pacific jurisdictions with associated capacity challenges and loss of human capital-challenges for AML/CFT implementation					
A4. Short-notice revenue raising schemes are implemented before ML/TF risk controls are in place. Promoters of such schemes target PICs (eg CBI, DAO sector, etc), particularly the legislative branch of government					

A5. Major country-level events (climate change effects, acts of god, political developments) don't undermine member's ability to move ahead on AML/CFT work
A6. Pressures on Pacific members' correspondent banking relationships continues, including pressures for debanking and derisking (categories of customers, services and products)
A7. Pacific jurisdictions remain engaged in the PACD program and in APG membership requirements
A8. Support continues from members and from the DAP group for PACD programs, including the APG's agreed TA coordination role
A9. Pacific jurisdictions and organisations recognise the need for gender considerations in AML/CFT work
A10. MFAT remains supportive of the PACD program