



BANK OF PAPUA NEW GUINEA

**Assessment of the Risk
of Terrorist Financing
through
Non-Profit Organisations
in Papua New Guinea**

Financial Analysis and Supervision Unit 2022



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1.0 EXECUTIVE SUMMARY

This risk assessment was conducted to satisfy Papua New Guinea (PNG)'s obligations under the international Anti-Money Laundering and Counter Terrorist Financing (AML/CTF) standards set by the Financial Action Task Force (FATF) of which PNG must comply with by virtue of its membership to the Asia/Pacific Group on Money Laundering (APG)¹. From the 40 FATF international standards which are referred to as "Recommendations", Recommendation 8 on Non-Profit Organisations (NPOs) is issued for countries to adopt approaches that monitor and prevent misuse by terrorist financing. This risk assessment demonstrates the assessment of the risk of terrorist financing through NPOs in PNG from data collected that ranged from 2016 to 2018.

An examination of the intelligence holdings and information from a range of domestic sources indicates that the risk of terrorist financing of any type in, through or from PNG from any person or entity is **low**.

An assessment of NPOs in PNG has identified 8,109 NPOs that fit the FATF definition of NPOs. An assessment of the areas in which those NPOs operate has identified that none of them operate in; have links to; or have ever provided funding or assistance to conflict areas or areas in which terrorist organisations operate. The risk of these entities sending funds or resources to conflict areas or areas considered to be high-risk for terrorist financing is assessed as **low**.

An assessment of intelligence and information obtained from Papua New Guinean authorities during the period 2016 – 2018 indicates that there has been no report of NPOs or charities in PNG being misused for terrorist financing purposes, or found to sympathise with or condone terrorism, or linked to known or suspected terrorist groups.

PNG has experienced no terrorism incidents and terrorist incidents in the Asia Pacific region are rare.

There is no intelligence or evidence, investigations or Mutual Legal Assistance (MLA)² requests or Egmont Secure Web (ESW) requests³ suggesting that NPOs in PNG have been or are being exploited for raising, storing or moving funds for terrorist financing.

With all of these matters taken into account, the risk of terrorist financing through, by or from NPOs in PNG is therefore assessed, currently, as **low**.

2.0 RECOMMENDATIONS

Regardless of the identified low risk of terrorist financing through NPOs – as identified by this risk assessment - it is recommended that PNG authorities undertake the following actions:

- Develop policies to promote accountability, integrity, and public confidence in the administration and management of NPOs;
- Develop mechanisms and policies to allow the application of effective, proportionate and dissuasive sanctions for violations by NPOs;

¹ APG is a FATF-styled Regional Body that comprises of 41 member countries in the Asia-Pacific region whom the members are committed to implement the FATF international standards against money laundering, the financing of terrorism and financing and the proliferation of weapons of mass destruction.

² Mutual legal assistance (MLA) in criminal matters is a process by which States seek for and provide assistance to other States in servicing of judicial document and gathering evidence for use in criminal cases.

³ The Egmont Group of Financial Intelligence Units is an international organization that facilitates cooperation and intelligence sharing between national financial intelligence units (FIUs) to investigate and prevent money laundering and terrorist financing.

- Develop mechanisms and policies to allow co-operation, co-ordination and information-sharing to the extent possible among all levels of appropriate authorities or organisations that hold relevant information on NPOs;
- Undertake outreach and educational programmes to raise and deepen awareness among NPOs as well as the donor community about the potential vulnerabilities of NPOs to terrorist financing abuse and terrorist financing risks, and the measures that NPOs can take to protect themselves against such abuse;
- Work with NPOs to develop and refine best practices to address terrorist financing risk and vulnerabilities;
- Encourage NPOs to conduct transactions via regulated financial channels;
- Conduct sustained outreach to NPOs and apply supervision and monitoring of NPOs;
- Put in place mechanisms and policies to ensure that, when there is suspicion or reasonable grounds to suspect that a particular NPO is involved in terrorist financing (and related activities) that this information is promptly shared with competent authorities, in order to take preventive or investigative action; and
- Designate points of contact and procedures to respond to potential international requests for information regarding NPOs suspected of terrorist financing or involvement in other forms of terrorist support.

3.0 BACKGROUND

The development of the NPO Risk Assessment stems out of Section 72 (2) (b) of the *Anti-Money Laundering and Counter Terrorist Financing Act 2015* which empowers FASU to ‘develop risk assessments or typology reports in relation to and raise awareness of money laundering and terrorist financing and obligations on financial institutions and DNFBPs....’.

The PNG 2017 National Risk Assessment described the NPO sector in PNG as ‘highly vulnerable’ to money laundering and terrorist financing. This thematic risk assessment on the NPO sector fills the knowledge-gap with respect to that vulnerability by assessing whether those vulnerabilities are being exploited, or are likely to be exploited in the future.

This is PNG’s first NPO Risk Assessment but it represents the commencement of a continuous process to ensure that, as risks change, authorities are able to react in a timely manner.

The methodology for this risk assessment is drawn from the FATF 2019 Guidance on Terrorist Financing (TF) Risk Assessments⁴ as well as the United Nations Office on Drugs and Crime (UNODC) Guidance Manual for Member States on Terrorist Financing Risk Assessments⁵.

4.0 FATF REQUIREMENTS REGARDING NPOs

The FATF Methodology for Assessing Technical Compliance with the FATF Recommendations and the Effectiveness of AML/CTF Systems states⁶:

- Without prejudice to the requirements of Recommendation 1, since not all NPOs are inherently high risk (and some may represent little or no risk at all), identify which subset of organizations fall within the FATF definition of NPO, and use all relevant sources of information, in order to identify the features and types of NPOs which by virtue of their activities or characteristics, are likely to be at risk of terrorist financing abuse;*
- Identify the nature of threats posed by terrorist entities to the NPOs which are at risk as well as how terrorist actors abuse those NPOs;*
- Review the adequacy of measures, including laws and regulations, that relate to the subset of the NPO sector that may be abused for terrorism financing support in order to be able to take proportionate and effective actions to address the risks identified; and*

4 <http://www.fatf-gafi.org/media/fatf/documents/reports/Terrorist-Financing-Risk-Assessment-Guidance.pdf>

5 http://www.unodc.org/documents/terrorism/Publications/CFT%20Manual/Guidance_Manual_TF_Risk_Assessments.pdf

6 <http://www.fatf-gafi.org/media/fatf/documents/methodology/FATF%20Methodology%2022%20Feb%202013.pdf>

- (d) *Periodically reassess the sector by reviewing new information on the sector's potential vulnerabilities to terrorist activities to ensure effective implementation of measures.*

Regardless of the level of identified risk related to terrorist financing through NPOs, PNG is required by the FATF to have sustained outreach concerning terrorist financing issues.

Page 39 of the FATF assessment methodology states:

- (a) *have clear policies to promote accountability, integrity, and public confidence in the administration and management of NPOs;*
- (b) *encourage and undertake outreach and educational programmes to raise and deepen awareness among NPOs as well as the donor community about the potential vulnerabilities of NPOs to terrorist financing abuse and terrorist financing risks, and the measures that NPOs can take to protect themselves against such abuse;*
- (c) *work with NPOs to develop and refine best practices to address terrorist financing risk and vulnerabilities and thus protect them from terrorist financing abuse; and*
- (d) *encourage NPOs to conduct transactions via regulated financial channels, wherever feasible, keeping in mind the varying capacities of financial sectors in different countries and in different areas of urgent charitable and humanitarian concerns.*

PNG is required to have a targeted “risk-based” supervision or monitoring of NPOs:

Countries should take steps to promote effective supervision or monitoring such that they are able to demonstrate that risk based measures apply to NPOs at risk of terrorist financing abuse

During Mutual Evaluation PNG will be required to demonstrate:

- *the steps taken to promote effective supervision or monitoring and that risk based measures are applied to NPOs at risk of terrorist financing abuse;*
- *the capacity of authorities to (a) monitor the compliance of NPOs with the requirements of Recommendation 8, including the risk-based measures being applied to them; and (b) be able to apply effective, proportionate and dissuasive sanctions for violations by NPOs or persons acting on behalf of these NPOs;*
- *the effectiveness of co-operation, co-ordination and information-sharing to the extent possible among all levels of appropriate authorities or organisations that hold relevant information on NPOs;*
- *the investigative expertise and capability to examine those NPOs suspected of either being exploited by, or actively supporting, terrorist activity or terrorist organisations;*
- *The access to information on the administration and management of particular NPOs (including financial and programmatic information) may be obtained during the course of an investigation;*
- *The mechanisms to ensure that, when there is suspicion or reasonable grounds to suspect that a particular NPO is involved in terrorist financing (and related activities) that this information is promptly shared with competent authorities, in order to take preventive or investigative action; and*
- *The points of contact and procedures to respond to international requests for information regarding particular NPOs suspected of terrorist financing or involvement in other forms of terrorist support.*

5.0 THE INTERNATIONAL CONTEXT – LOCATIONS WHERE TERRORIST ACTIVITY IS MOST PREVALENT

The assessment of the risk of terrorist financing through NPOs in PNG must be made in the international context. Analysis of available intelligence and information on the methods of terrorist financing around the world shows that the current risk of terrorist financing anywhere in the world through NPOs is **low**.

The United States (US) Government's Terrorist Incident Designation List⁷ shows that of the most recent 200 terrorist incidents (which date back to 10 November 2008) occurring anywhere in the world, only 4 occurred in the Asia Pacific Region.

Two incidents occurred in the Philippines in 2009 and 2011; one incident in Indonesia in 2009 and one in New Zealand in 2019. Apart from the incident in New Zealand, the other terrorist incidents occurred over a decade ago. The incident in New Zealand occurred on 15 March 2019 and was a self-funded attack on a mosque by a lone actor.

PNG has limited cultural or historic ties to the Philippines, Indonesia or New Zealand and none of the incidents in the Asia Pacific would give rise to a risk that future incidents in the region would be funded from PNG.

Over half of the incidents listed by the US government occurred in five locations: Afghanistan, Iraq, the West Bank, Syria and Somalia. PNG has no traditional or cultural links to any of these areas, though some refugees that were placed at Manus in PNG do have such links. The numbers of those refugees have reduced over time and all remittances to these areas are automatically flagged by FASU in the database, and none of the remittances to these areas have been conducted by NPOs.

The risk of funding of terrorism from PNG is therefore considered to be **low**.

6.0 CONTEMPORARY METHODS OF TERRORIST FINANCING

6.1 Financing of recruitment for terrorist purposes

The FATF 2018 report on *Financing of Recruitment for Terrorist Purposes* notes the main sources of funding for terrorist recruiters are:

- Support from terrorist organisations;
- Donations (including misuse of NPOs) and crowdfunding; and
- Proceeds of criminal activity.

The report does not rank the sources of funding or provide an indication of the relative risk presented by the sources listed above.

6.2 Terrorist financing in West and Central Africa

The FATF 2016 report on *Terrorist Financing in West and Central Africa*⁸ considered the possible funding sources (the threats), particularly in relation to Boko Haram and groups linked to Al-Qaeda, including Al-Qaeda in the Lands of the Islamic Maghreb (AQIM) and its affiliates.

The confirmed sources of funding for terrorism in West and Central Africa were:

- Extortion
- Robbery and looting
- Cattle/livestock rustling
- Donations
- Abuse of NPOs
- Local businesses and commercial enterprises
- Kidnapping for ransom

The suspected and potential sources of funding for terrorism in West and Central Africa were:

- Drug trafficking
- Trafficking of weapons
- Trafficking of other goods – such as wildlife, ivory, luxury cars, precious stones and metals
- Smuggling of migrants
- Trafficking in persons
- Oil smuggling
- Cigarette smuggling
- Piracy
- Cybercrime and fraud

It must be noted that NPOs were not among the suspected or potential funding sources for terrorism in West and Central Africa.

6.3 Emerging terrorist financing risks

The FATF 2015 report into *Emerging Terrorist Financing Risks*⁹ noted that:

- Approximately 33% of the terrorist financing prosecutions in the US since 2001 came from direct donations from individuals to terrorist networks
- Abuse and misuse of NPOs remained a factor in terrorist financing and the subset of those NPOs that are at risk of terrorist abuse are those engaged in service activities and which are also operating in close proximity to an active terrorist threat

With respect to the FATF emerging risks, and the list of terrorist incidents identified by the US Government¹⁰ PNG has identified no NPOs operating in PNG that operate in close proximity to an identified terrorist threat. The risk of this situation changing in the foreseeable future is assessed as **low**.

⁸ <http://www.fatf-gafi.org/media/fatf/documents/reports/Terrorist-Financing-West-Central-Africa.pdf>

⁹ <http://www.fatf-gafi.org/media/fatf/documents/reports/Emerging-Terrorist-Financing-Risks.pdf>

¹⁰ <https://ovc.ojp.gov/program/international-terrorism-victim-expense-reimbursement-program-itverp/terrorist-incident-designation-list>

6.4 Risk of terrorist abuse in NPOs

The FATF 2014 report into *Risk of Terrorist Abuse in Non-Profit Organisations*¹¹ noted that 57% of evaluated states were not compliant or only partially compliant with the current FATF Recommendation 8, while only 5% of states were fully compliant or largely compliant with the Recommendation.

This statistic is possibly explained by the findings of jurisdictions' own risk assessments and reporting on the funding sources for the major terrorist groups, which suggest that NPOs are typically found to be low or medium risk (see the section on The International Context of Terrorist Financing through NPOs below).

The FATF report on the Risk of Terrorist Abuse in Non-Profit Organisations does not provide a context for the relative risk posed by NPOs compared to other methods of raising, moving, and storing terrorist funds, nor does it assess the relative volume of terrorist funds flowing through NPOs compared to other sources.

Unfortunately, the report provides no means by which jurisdictions might estimate the relative risk of terrorist financing through NPOs compared to other sources of terrorist funding. Such information, however, would be vital for jurisdictions to decide the level of risk and therefore, the volume of resources that should be applied to NPOs compared to other terrorist financing risks.

The report on the Risk of Terrorist Abuse in Non-Profit Organisations reviewed 102 case studies, and noted the methods that led to each of those cases being detected. These were:

- Open-Source information was the trigger in 96% of the cases
- NPO regulatory information was the trigger in 68% of cases
- National Security intelligence was the trigger in 63% of cases
- Law enforcement information was the trigger in 58% of cases
- Financial Intelligence Unit (FIU) and other financial information was the trigger used in 49% of cases
- Foreign information was the trigger in 6% of cases¹²

This suggests that regulatory oversight and outreach to NPOs - which is required by the FATF under Recommendation 8 - has historically perhaps not been the most effective method of detecting terrorist financing through NPOs.

Regardless of this, FASU has implemented a process to detect all remittances to countries that exhibit a high terrorist risk including those mentioned as the highest risk in the US government Terrorist Incident database¹³

6.5 Financing of the terrorist organisation ISIL

The 2015 FATF report on Financing of the Terrorist Organisation Islamic State in Iraq and the Levant¹⁴ identified that Islamic State in Iraq and the Levant (ISIL) earned revenue primarily from five sources, listed in order of magnitude:

¹¹ <http://www.fatf-gafi.org/media/fatf/documents/reports/Risk-of-terrorist-abuse-in-non-profit-organisations.pdf>

¹² <http://www.fatf-gafi.org/media/fatf/documents/reports/Risk-of-terrorist-abuse-in-non-profit-organisations.pdf> p.51

¹³ <https://ovc.ojp.gov/program/international-terrorism-victim-expense-reimbursement-program-itverp/terrorist-incident-designation-list>

¹⁴ <http://www.fatf-gafi.org/media/fatf/documents/reports/Financing-of-the-terrorist-organisation-ISIL.pdf>

- a) illicit proceeds from occupation of territory, such as bank looting, extortion, control of oil fields and refineries, and robbery of economic assets (including cultural artefacts) and illicit taxation of goods and cash that transit territory where ISIL operates;
- b) kidnapping for ransom;
- c) donations including by or through NPOs;
- d) material support such as support associated with foreign terrorist fighters; and
- e) fundraising through modern communication networks. These revenue streams are inconsistent and shift based on the availability of economic resources and the progress of coalition of military efforts against ISIL.

The report makes it apparent that though NPOs were a source of funding, such funding represented a relatively minor portion of ISIL's funding and that NPOs operating in the region was not the most significant risk with respect to terrorist funding.

The report goes on to note **“The overall quantitative value of external donations to ISIL is minimal relative to its other revenue sources.**

FATF updates on the report note that as ISIL moves to an ‘underground insurgency’, ISIL will continue to try to extort civilians and commercial activity, and to attempt kidnapping for ransom operations, to make up for its financial losses. FATF's internal reporting indicates that the total amount of ISIL's revenue derived from the sale of oil and oil products has decreased dramatically. Nonetheless, ISIL's primary sources of revenue still include the smuggling and sale of oil and oil products, as well as extortion and taxation of local populations in areas under its control. Other varied revenue streams from both legitimate sources (salaries, savings, unemployment benefits, loans) and illegitimate sources (kidnapping for ransom; bank looting; and other extortion activity, including outside of ISIL dominated territory) continue to be exploited for the benefit of the terrorist group, as well.¹⁵

Notably, NPOs are not expected to be a significant future source of terrorist funding for ISIL.

The risk associated with potential funding in the future from NPOs in PNG for ISIL is therefore assessed as **low**.

6.6 FATF monitoring and actions on terrorist financing risks and actions taken to combat ISIL, Al-Qaeda and affiliates financing

On February 27, 2015, the FATF issued its report on the *Financing of the Terrorist Organisation Islamic State in Iraq and the Levant* (detailed above).

Since that time, the FATF has been monitoring evolving terrorist financing risks associated with the ISIL and its affiliates through regular internal reporting. In February 2018, this process was broadened to include Al-Qaeda and its affiliates.

None of the reporting by FATF on this topic mentions NPOs as significant sources of funding, for ISIL, Al-Qaeda or its affiliates nor are there indications that the actions that targeted NPOs had a significant impact on terrorist funds or terrorist groups.

In fact, these reports discuss *“numerous arrests and prosecutions around the globe against foreign terrorist fighters, unlicensed or complicit MVTs and other structures (such as front companies) used for TF purposes. Similarly, targeted financial sanctions have been implemented at both domestic and international levels against individuals and entities associated with ISIL, Al-Qaeda and their affiliates in order to cut off terrorist funds”*¹⁶

¹⁵ <http://www.fatf-gafi.org/publications/methodsandtrends/documents/isil-alqaeda-affiliates-financing-update.html>

¹⁶ <http://www.fatf-gafi.org/publications/methodsandtrends/documents/isil-alqaeda-affiliates-financing-update.html>

The FATF reporting on the financing of ISIL, Al-Qaeda and affiliates overwhelmingly suggests that the application of resources to target NPOs has potentially had limited impact on these groups.

The risk of NPO funding of ISIL and its affiliates from NPOs in PNG is therefore assessed as **low**.

6.7 Terrorist financing disruption strategies

The FATF's October 2018 non-public report on *Terrorist Financing Disruption Strategies*¹⁷ suggests a number of novel and powerful tools and methods for disrupting terrorist financing.

These include:

- Targeted financial sanctions – blocking access to funds and assets
- Criminal sanctions and alternative charges – to undermine the activities of facilitator networks
- Cross border cash disruption – limiting the ability of terrorist groups to use cash
- Sanctions for legal entities – targeting front and shell companies
- Alternative methods – non-public advisories, alerts, travel bans
- Other means to disrupt terrorist financing (non-public advisories and alerts, imposing travel bans, etc.)

None of these tools or methods involve NPOs. The potential for PNG authorities to impact on terrorist financing through the application of resources targeted at NPOs is therefore assessed as **low**.

7.0 THE PNG NATIONAL CONTEXT OF TERRORIST FINANCING

Understanding the context of terrorist financing in PNG is vital to assessing the risks associated with terrorist financing through a particular method or channel such as NPOs.

A range of PNG authorities were surveyed by FASU to identify whether any terrorist financing intelligence, information, investigations, MLA requests, ESW requests or informal communications might indicate that any person or entity in PNG had been involved in terrorist financing. Data collected ranged from 2016 to 2018.

The agencies and authorities surveyed by FASU were:

- Investment Promotion Authority (IPA);
- Department of Justice and Attorney-General (DJAG);
- National Intelligence Office (NIO);
- Prime Minister and National Executive Council (PM&NEC);
- Office of the Public Prosecutor (OPP); and
- Royal Papua New Guinea Constabulary (RPNGC).

A questionnaire was used to carry out the survey. Refer to **Appendix 1** for details.

The response by these agencies indicates that there is no information held by any agency to suggest that any Papua New Guinean person or entity has been involved in terrorist financing.

¹⁷ [https://www.fatf-](https://www.fatf-gafi.org/media/fatf/documents/brochuresannualreports/TF%20Disruption%20strategies%20handout.pdf)

[gafi.org/media/fatf/documents/brochuresannualreports/TF%20Disruption%20strategies%20handout.pdf](https://www.fatf-gafi.org/media/fatf/documents/brochuresannualreports/TF%20Disruption%20strategies%20handout.pdf)

In addition to the survey of government agencies, FASU conducted a detailed search of FASU's own intelligence-holdings. The data and intelligence holdings searched were:

- Open-source and intelligence-holding searches for key terms associated with terrorist financing in PNG;
- Threshold transaction searches covering remittances and receipts from high terrorist financing risk areas of the world; and
- Suspicious Matter Report (SMR) analysis for any SMRs related to terrorist financing.

FASU's data holdings indicate some transactions to high terrorist financing risk countries but these transactions had previously been subject to extensive examination and determined to not be related to terrorist financing.

8.0 THE INTERNATIONAL CONTEXT OF TERRORIST FINANCING THROUGH NPOs

Understanding the risk and context of terrorist financing through NPOs internationally is essential to understanding the risk of terrorist financing through NPOs in PNG.

A review of sources of information on the risk of terrorist financing through NPOs internationally was conducted. This covered the following:

- National Risk Assessments; Terrorist Financing Risk Assessments; and Terrorist Financing through NPO Risk Assessments from each of the 56 jurisdictions and regions identified in the FATF 2019 *Guidance on Terrorist Financing Risk Assessments*¹⁸
- The 2017 Regional¹⁹ Terrorist Financing through NPOs Risk Assessment
- The European Supranational Money Laundering and Terrorist Financing risk assessment.

The review of each of these documents identified that:

- Of the 42 jurisdictions and regions for which risk assessments could be accessed, only two (the Netherlands and Tunisia) currently identify terrorist financing through NPOs as **'high-risk'**; Refer to **Appendix 2** for details.
- Ten (10) of the 42 currently identify terrorist financing through NPOs as **low-risk**;
- Three (Cayman Islands, Ireland and Philippines) of the 42 currently identify terrorist financing through NPOs as **medium/low-risk**;
- One (Italy) identified that the risk was **negligible** in relation to terrorist financing through NPOs;
- One (Hong Kong) identified **no apparent threat** in relation to terrorist financing through NPOs;
- Three (Australia, Indonesia and South East Asia & Australia) of the 42 currently identify terrorist financing through NPOs as **medium-risk**; and
- Twenty two (22) of the jurisdictions did not provide an assessment of the risk of terrorist financing through NPOs²⁰;

The Regional Risk Assessment on terrorist financing in Australia and the Asia Pacific found that Brunei and New Zealand had a **low risk**; Australia, Malaysia, Philippines and Thailand had a **medium risk**; and Indonesia had a high risk (Indonesia's risk rating has since been downgraded by a subsequent assessment to **medium**²¹).

¹⁸ <http://www.fatf-gafi.org/media/fatf/documents/reports/Terrorist-Financing-Risk-Assessment-Guidance.pdf> p43, page 57

¹⁹ Australia, Brunei, Indonesia, Malaysia, New Zealand, Philippines, and Thailand.

²⁰ In some of these NPOs were not mentioned at all and in others they were mentioned without a ranking of the relative risk.

²¹ <http://www.ppatk.go.id/backend/assets/uploads/20200219164851.pdf>

These independent assessments show that, in the international context, terrorist financing through or by NPOs does not typically present a high risk.

9.0 TERRORIST FINANCING THROUGH NPOs IN PNG

A 2014 FATF report found that NPOs most at risk being “those engaged in ‘service’ activities which are operating in close proximity to an active terrorist threat” and those “that send funds to counterpart or ‘correspondent’ NPOs located in or close to where terrorists operate.

Surveys of a range of agencies in PNG identified no incidents of terrorism within PNG from data collected that ranged from 2016 to 2018. Furthermore, there is no intelligence or allegations of terrorist financing by NPOs in PNG.

An analysis of transactions, SMRs and open-source intelligence indicates that there have been very few transactions of any type to areas located in or close to where terrorists operate. None of these transactions were conducted by NPOs and none were sent to NPOs in those countries of high terrorist financing-risk.

10.0 THE NPO SECTOR IN PNG

10.1 The number and type of NPOs that fall within the FATF definition

The number of NPOs in PNG that fall within that definition is detailed in the table below:

Total number of NPOs (as at October 2019)	8,117
Number of NPOs based on FATF categories	8,109
Charity*	658
Religious	1,036
Cultural**	2,721
Social	1,799
Educational	173
Fraternal***	1,325
Other (if PNG uses other categories)	397
<i>Political parties</i>	83
<i>Primary Agricultural business</i>	314
Notes:	
*Charity also includes associations classified as (1) community projects and (2) foundations	
**Cultural also includes associations classified as (1) community, landowner and ethnicity and (2) resource owners	
***Fraternal also includes associations classified as (1) conservation, (2) health, (3) organisational, (4) sports, (5) women's group and (6) youth group	
~ The difference between the total number of NPOs and NPOs based on FATF categories is because of the eight (8) association names that have been classified as old association with no documents.	

11.0 LEGISLATION AND PROCESSES FOR THE SUPERVISION OF NPOs in PNG

The legislation and processes through which NPOs are supervised and regulated in PNG are as follows:

The *Associations Act of 1966* does not allow for the conduct of due diligence. IPA allows for Form 1 and 2 which are a Notice of Intention and a Notice of Incorporation to be completed respectively. The notice of intention includes the constitution. The only information besides objectives is the name and address of the person submitting Form 1.

Form 2 focuses mainly on payment of the registration fee and a public announcement through a newspaper advertisement.

The proposed amendment to the *Associations Act 1966* will include the following:

- Who can form and register as associations
- Formalising the role of a committee member

- Clarifying the role of the Public Officer
- Financial transparency to members
- Improved reporting to members and the Registrar
- Improving Registrar's powers
- AML Compliance

The proposed bill is with the Office of the State Solicitor and is awaiting the parliamentary vetting process.

12.0 CONCLUSION

The analysis of contemporary terrorist financing methods in the world today indicate that, though NPOs were a key method at a point in time, they no longer form a significant part of the funding of terrorist organisations around the world.

The analysis of the terrorist financing context in PNG indicates that no entities or individuals have been prosecuted, investigated or alleged to have been involved in terrorist financing.

PNG authorities, including the NIO and FASU have routine systems for monitoring, in the case of FASU, the transactions to or from high terrorist financing risk areas and ensure that financial institutions are aware of the red flags for terrorist financing.

Analysis of the risks identified by jurisdictions around the world indicates that of all the independent assessments conducted by 56 jurisdictions only two (the Netherlands and Tunisia) have identified NPOs as high-risk for terrorist financing.

An assessment of information and intelligence holdings of a wide range of PNG authorities has indicated nothing to suggest that NPOs in PNG are involved, associated or have sympathies for terrorist groups and there is no information available to suggest that they have been, or are being used to fund terrorism.

It is the conclusion of this assessment that the risk of terrorist financing through, or by NPOs in PNG is therefore currently **low**.

APPENDIX 1: PNG RISK ASSESSMENT ON NPOs – INFORMATION COLLECTION QUESTIONNAIRE

FASU is collecting information for the PNG's Non-profit Organisations (NPO) risk assessment. It focuses on qualitative and quantitative information. This questionnaire is divided into four sections that mirror the proposed report structure:

- Regional NPO landscape
- Main Terrorist Financing / Counter Terrorism threats to NPOs
- Main vulnerabilities
- Risk consequences.

Time period: please note the collection period is for the **last three years, i.e. 2016-2018**. If you have data for **2019 to date** that you consider important for the assessment, please also include it and indicate the month it runs to.

SECTION 1: NPO LANDSCAPE

NB This section aims to provide a high-level overview of PNG's NPO sector and regulatory framework. More detailed information is also sought on these issues in section 3 on vulnerabilities.

	QUESTION	AGENCY	AGENCY RESPONSE	UNABLE TO ANSWER?
1.1 REQ	<p>Please provide statistics on the size and makeup of your national NPO sector including list:</p> <ul style="list-style-type: none"> • Total number of NPOs • Number of service to 'expressive' NPOs²² • Number of NPOs based on FATF categories <ul style="list-style-type: none"> ○ Charity ○ Religious ○ Cultural ○ Social ○ Educational ○ Fraternal²³ ○ Other (if PNG uses other categories) 			
1.2 REQ	<p>Financial snapshot</p> <p>Please provide information on the financial size and activity of your national NPO sector including:</p> <ul style="list-style-type: none"> • Value of sector assets • Share (%) of GDP • Value of funds raised • Incoming funds to NPOs (top 5/10 foreign donor countries)* • Outgoing funds to NPOS (top 5/10 foreign destination countries)* • Intra-regional NPO funds flows (ASEAN + Australia) *include intra-regional countries if relevant 			
1.3 REQ	<p>Regulatory snapshot</p> <p>Please provide information on the NPO regulatory framework:</p> <ul style="list-style-type: none"> • Are NPOs required to be licensed or registered (if a mix, please provide a breakdown)? • Number and name of supervisor(s) • If multi-supervisors, please explain who regulates what categories or elements of the NPO sector • Are there any categories of NPO not supervised or exempted (and if so, on what grounds are they exempt) 			

²² An expressive NPO is an NPO involved in expressive activities. These include programs focused on religious activities, sports and recreation, arts and culture, interest representation, and advocacy.

²³ A fraternal NPO is an NPO a type of social organization whose members freely associate for a mutually beneficial purpose such as for social, professional or honorary principles.

SECTION 2: NPO THREATS

The key intelligence question is to determine extent to which NPOs are victims of misuse or are fronts/shams that exploit good-will (reflecting FATF guidance).

The second key question relates to the source or destination of funds flows – outgoing or incoming – and proximity to terrorist risks (conflict zone or area/community targeted for fund raising).

	QUESTION	AGENCY	AGENCY RESPONSE	UNABLE TO ANSWER?
2.1 REQ	<p>General regional terrorism and TF environment</p> <p>Is PNG’s terrorism profile in the National Risk Assessment still current:</p> <ul style="list-style-type: none"> • Unchanged • Worse • Improved? <p>If it has changed, please briefly indicate how and why. Please provide any general update on your PNG’s terrorism environment and view of the regional terrorism threat environment.</p>			
	<p>Level of misuse of NPOs</p> <p>The next questions cover a range of factors for measuring the level of misuse. Please provide case studies and any other relevant information where available. This could include whether cases relate to domestic, regional or international activity.</p>			
2.2 REQ	How many counter-terrorism investigations or operations have involved NPOs in PNG in the last three years?			
2.5 REQ	How many NPOs or cases involving NPOs have been convicted for terrorism or TF offences in the last three years (please distinguish terrorism/TF offence cases)? Please also provide information on the sanctions/sentences made against NPOs and related personnel.			
2.7 REQ	<p>Volume of TF linked to NPOs (NB data on the amounts connected to NPOs is also relevant for Part 4 below on Consequences.)</p> <p>Please provide the number of STRs linked to NPOs and the yearly total amounts for the last three years.</p>			
2.8 REQ	Please provide the value and number of transactions linking TF to NPOs in investigations, prosecutions and convictions involving NPOs for the last three years.			
2.9	Please provide any other information that might provide a base for calculating or estimating the volume (amount and level of transactions/detected and suspected) of TF linked to NPOs.			
2.10	How much incoming funding (detected, suspected or estimated) to NPOs comes from high-risk countries, for the last three years?			

	NB 'High-risk' countries as defined in PNG's National Risk Assessment or other authorities and international bodies (e.g. FATF). If unable to answer, please provide a general assessment or risk rating.			
2.11	How much funding (detected, suspected or estimated) is sent from NPOs in PNG to high-risk countries, for the last three years?			
2.12	NPO links to domestic, regional and foreign terrorist groups Please provide the number of NPOs in PNG with suspected or confirmed links to terrorist groups, broken down by: <ul style="list-style-type: none"> • Domestic terrorist groups • Regional terrorist groups (e.g. groups such as JI or Abu Sayef, etc) • (Other) foreign terrorist groups 			
2.13	Please list the main active designated terrorist groups in PNG with links to NPOs. Where possible please also provide the number of NPOs linked to those groups.			
2.14	Please list the main regional terrorist groups with links to NPOs in PNG. Where possible please also provide the number of NPOs linked to those groups.			
2.15	Please list the main (other) foreign terrorist groups with links to NPOs in PNG. Where possible please also provide the number of NPOs linked to those groups.			
2.16	In PNG do you have NPOs with suspected/confirmed links to ISIL, al-Qaida or their affiliate groups? If so, please provide the number of NPOs linked to those groups.			
2.15	Are there any NPOs in PNG that are designated for terrorism financing (or other) sanctions or have links with designated entities? If so, how many and please list their names and the names of any designated entities with links to NPOs.			
2.17	Are there any cases of NPOs sending funds to or receiving funds from designated entities (domestic or international)? If so, please provide details and any case studies.			
	TF methodologies and NPOs			
2.18	Please outline the main TF methodologies identified involving NPOs with: <ul style="list-style-type: none"> • Raising funds • Storing funds • Transferring funds – domestic, regionally and further abroad • Use of funds 			
2.19	Please provide any examples of TF related to NPOs that involve sophisticated and complex methodologies (e.g. a series of front companies, shuttling funds through many jurisdictions to obscure the money trail, etc.)			

SECTION 3: VULNERABILITY

Part One looks at sector vulnerabilities, Part Two examines regulatory and government vulnerabilities.

	QUESTION	AGENCY	AGENCY RESPONSE	UNABLE TO ANSWER?
	PART ONE – SECTOR VULNERABILITIES			
3.1 REQ	<p>What is the general level of TF risk understanding across your NPO sector?</p> <p>Is it poor/low, reasonable but needs major improvement, or reasonably sound with minor improvement needed?</p> <p>How aware of TF risk are the high-risk NPOs / parts of the NPO sector?</p>			
3.2 REQ	<p>What is the level of NPO compliance with general regulation?</p> <p>How well do NPOs comply with AML/CTF requirements?</p> <p>Where possible please differentiate any compliance differences across parts of the sector.</p>			
3.3 REQ	<p>Does the sector, or parts of it, have in place codes of good conduct or better practice to strengthen self-regulation?</p> <p>If so, do these address AML/CTF?</p> <p>If not, do they cover general good practice that might help mitigate TF risk?</p>			
3.4 REQ	<p>Please list the main NPO sources of funding and financial channels used to receive, store, move and use funds/donations.</p> <p>How much involves visible regulated channels compared with less visible / more risky channels (e.g. banks compared with remitter/hawala and online, cash intensity of donations and disbursements)?</p> <p>Where possible please provide information or estimates (e.g. low, medium, high) of funds raised, stored, moved and used relating to:</p> <ul style="list-style-type: none"> • Banks • Remitters (regulated) • Hawala / unregulated remitters • Cash • Electronic transfers • Cash couriers <p>If unable to answer, please provide a general assessment or comment.</p>			
3.8 REQ	<p>How many NPOs in PNG receive funds from foreign high-risk countries (i.e. countries with active terrorist groups)?</p> <p>How many NPOs in PNG send funds to foreign high-risk countries (i.e. countries with active terrorist groups)?</p>			

	<p>How many NPOs in PNG receive services from foreign high-risk countries (i.e. countries with active terrorist groups)?</p> <p>How many NPOs in PNG deliver services to foreign high-risk countries (i.e. countries with active terrorist groups)?</p>			
3.9	<p>How many NPOs are based and/or operate in locations that terrorist groups target for radicalisation, propaganda and fund raising?</p> <p>If possible, please identify locations that are higher risk (e.g. cities, provincial towns, rural, and border areas).</p>			
	PART TWO – REGULATORY & GOVERNMENT VULNERABILITIES			
	Adequacy of licensing/registration			
3.10 REQ	<p>Briefly provide the regulatory landscape of your jurisdiction?</p> <ul style="list-style-type: none"> • What are the law and regulations in place? • What are the market entry requirements? • What is the average number of registrations annually? • No of rejected applications? <ul style="list-style-type: none"> – Rejection due to TF links? • In the case of multi-regulators, how do you prevent registration ‘shopping’?²⁴ <p>If unable to answer, please provide a general assessment or comment.</p>			
	Visibility over sector			
3.11 REQ	<p>Has PNG conducted a domestic review on the NPO sector?</p> <ul style="list-style-type: none"> • If yes, please describe an overview of the process? i.e. scope, when, who, agencies involved, etc. • Please explain the gaps that have been identified? • What are the mitigating measures put in place to address the gap? 			
3.12 REQ	<p>Has PNG conducted a risk assessment on the sector? If so, what rating was assigned to the sector?</p> <ul style="list-style-type: none"> • If yes, please describe an overview of the process? i.e. scope, when, who, agencies involved, etc. • Which sub-sector(s) has been identified as high risk? • What are the measures applied to these high risk subsector(s)? 			
	Risk-sensitive oversight/monitoring			
3.13 REQ	<p>Do the competent authorities in PNG have the power to subject NPOs to monitoring and apply sanctions?</p>			

²⁴ That is, what measures are in place between regulators to avoid rejected applicants from one regulator applying to another regulator?

3.14 REQ	Do the competent authorities in PNG require NPO to submit annual financial statements to the regulator and/or members that provide detailed breakdown of income and expenditure? It this for all NPOs? If only some, which subsectors must report financially and which subsectors are excluded?			
3.15 REQ	Are the NPOs in PNG required to maintain important information (purpose and objectives, key persons who own or direct their activities, senior officers, etc.)? Is this information publicly available?			
3.16 REQ	What is the extent of monitoring activities (on-site, off-site monitoring ²⁵) as conducted by the competent authorities in your countries? Please provide statistics to support your response whenever applicable.			
3.17 REQ	Do the competent authorities in PNG possess the capacity and capabilities to conduct effective monitoring/supervision? Please provide: <ul style="list-style-type: none"> • Number of supervisors²⁶? • Is there any specific unit that is entrusted to undertake supervision? • Are they subjected to continuous training? [Note: to ascertain capacity of supervisors] • Is there any specific unit/division specialising in managing TF risk? 			
	Extent of outreach			
3.18 REQ	How many outreach programs have been organised by the authority from 2016 to 2018? <ul style="list-style-type: none"> • What are types of outreach programs has been conducted? i.e awareness, dialogue, etc. Provide statistics to support your response. • How many of those programs are TF specific? 			
3.19 REQ	How many NPOs participated in these outreach programs? <ul style="list-style-type: none"> • Total number NPOs • Percentage of NPOs identified as high risk 			
3.20 REQ	Are there any guidelines of best practices produced by competent authority in PNG? If so, how successful has it been?			
	Use of enforcement and other measures			
3.21 REQ	Do the competent authorities in PNG have the power to apply effective, proportionate and dissuasive sanctions for violations by NPOs or persons acting on behalf of the NPOs?			

²⁵ Offsite monitoring includes self-assessment questionnaire, submission of internal audit report, review of financial statements, i.e. depending on countries' requirements.

²⁶ Note: terms can be interchangeable.

3.22 REQ	What are the different avenues/measures available to the authorities in PNG when taking actions for violations involving NPOs? (investigative, criminal, civil or administrative action)			
3.23 REQ	To what extent have these measures been enforced? Provide statistics to support your response. If unable to answer, please provide a general assessment or comment.			
3.24 REQ	What other measures, if any, are taken to identify and initiate prompt investigation to combat terrorist misuse of NPO?			
	Cooperation			
3.25 REQ	Is there any legal framework to enable competent authorities to cooperate domestically and internationally? <ul style="list-style-type: none"> • What is the nature of that cooperation? i.e. coordination between competent authorities, sharing of information etc. • Provide statistics on the number of cooperative interactions: <ul style="list-style-type: none"> – Among competent authorities – Between competent authorities and private sector – Among private sectors – With International counterparts. 			
3.26 REQ	What mechanism(s) or body do the authorities use to ensure proper and regular cooperation and coordination of national level policies and operational activities to address terrorist misuse of NPO?			
3.27 REQ	Is financial intelligence and other relevant information accessed and used in investigations to develop evidence and trace criminal proceeds related to terrorist misuse of NPO?			

SECTION 4: CONSEQUENCES

This section covers use of funds, socio-economic impact and political impact.

	QUESTION	AGENCY	AGENCY RESPONSE	UNABLE TO ANSWER?
	Use of funds			
4.1	Are TF funds linked to NPOs used more for operational purposes or for organisational purposes? Are you able to estimate the ratio of use between operational and organisational?			
4.2	Where NPO funds are used operationally, what are the main operational items: <ul style="list-style-type: none"> • Travel • Weapons and explosives • Training • Staging attacks • Other? 			
4.3	Where NPO funds are used organisationally, what are the main organisational items: <ul style="list-style-type: none"> • Salaries • Payments to family including those of deceased terrorists • Propaganda, radicalisation activity and meetings • Running costs of a terrorist group or network • Other? <p>If unable to answer, please provide a general assessment or comment.</p>			
	Socio-economic impact <i>These questions relate to the impact on NPOs and the sector of adverse publicity about their involvement in terrorism. It may involve court cases, warnings from authorities or international concern and criticism.</i>			
4.4	Has there been any observed or reported (in the media, anecdotal or from NPOs directly) loss of public confidence in NPOs due to terrorism links? If so, how serious has been the impact (low, medium, high)? Provide examples.			
4.5	Has there been any reputational damage and if so how much (low, medium, high)? Provide examples.			
4.6	Have NPOs suffered a drop in charitable donations or funding (including from official sources) due to terrorism links and how much? Or has there been little if any change?			
4.7	Have NPOs had bank accounts closed (de-risking) or been denied financial services due to general concerns about terrorism links or adverse publicity?			

4.8	<p>What do you estimate to be the overall socio-economic impact on NPOs from concerns or adverse publicity about links to or involvement in terrorism?</p> <p>If unable to answer, please provide a general assessment or comment.</p>			
	Political impact			
4.9	<p>Has your government faced difficulty in its foreign policy and foreign relations due to overseas concerns about NPO links to terrorism? If so can you please provide details on the nature of the concerns and the impact?</p>			
4.10	<p>Has your government or country incurred damage to its international reputation or come under pressure in international circles and forums due overseas concerns over NPO links to terrorism? Again please provide any relevant detail.</p>			
4.11	<p>Has there been any loss of public confidence in the government and authorities due to concerns about terrorism links to NPOs?</p>			
4.12	<p>What do you estimate to be the overall political impact on NPOs from concerns or adverse publicity about links to or involvement in terrorism?</p> <p>If unable to answer, please provide a general assessment or comment about extent or indicators of socio-economic impact.</p>			

SECTION 5: HIGH-RISK NPOs

		AGENCY	AGENCY RESPONSE	UNABLE TO ANSWER?
5.1	Please provide a profile of the characteristics of high-risk or at-risk NPOs PNG has identified through assessments, investigations, case studies and other evidence.			
5.2	<i>Service or expressive style NPOs</i> Are high-risk NPOs more likely to be service-style organisations or 'expressive' organisations? If a mix of both, can you provide a ratio or say which type dominates? Please also detail the types of services and expressive activities high-risk NPOs engage in.			
5.3	<i>Location</i> Where are high-risk NPOs mainly located? Are these locations and communities bases for or targeted by terrorists?			
5.4	<i>Funding sources and channels</i> What funding sources and financial channels do high-risk NPOs use? Are these less visible and considered risky in their own right (e.g. cash intensive sources and couriering, online, remitter/hawala, etc.)?			
5.4	<i>Registered/licensed or not</i> Are high-risk NPOs mainly registered/licensed and subject to some degree of regulatory oversight? Or are they unregistered / unlicensed and outside the regulatory framework?			
5.5	<i>High-risk country links</i> Do high-risk NPOs operate in, send/receive funds to/from or have links with high-risk countries? If unable to answer, please provide a general assessment or comment. Please provide examples or case studies if available.			

APPENDIX 2: THE INTERNATIONAL CONTEXT OF TF THROUGH NPOs - FINDINGS OF TERRORIST FINANCING RISK ASSESSMENTS

No	Jurisdiction	Year	NPOs Risk Rating	Finding In relation to NPOs	Source
1	Armenia	2017	Low	NPOs that meet the FATF definition are considered to be exposed to low risk of FT abuse	https://www.cba.am/Storage/EN/FDK/risk_assessment/NRA_Update_Executive_Summary(Public)_eng.pdf
2	Australia	2017	Medium	The overall terrorism financing risk for the npo sector as medium (p9)	https://www.acnc.gov.au/tools/reports/national
3	Austria	2015	N/A	Report in GERMAN	
4	Bahamas	2016	No assessment	(No risk assessment conducted on NPOs)- "however LEAs have noted that there has not been any reported financing of terrorism through NPOs". (p16)	https://www.centralbankbahamas.com/download/016371800.pdf
5	Belarus	2018	N/A	Report in RUSSIAN	
6	Bhutan	2017	Low	all the sectors process lower risk (p5)	https://www.rma.org.bt/RMA%20Publication/NRAReports/NRAonMLFT.pdf
7	British Virgin Islands	2017	Low	No NPO appears to engage in high-risk activities (p 11)	https://www.bvifsc.vg/sites/default/files/nra_report.pdf
8	Canada	2018	No assessment	(Charities and NPOs mentioned among other methods)	https://www.fintrac-canafe.gc.ca/intel/assess/tfa-2018-eng
9	Cayman Islands	2015	low medium	The residual TF risk to service-provision NPOs with extra-jurisdictional characteristics remains low-medium. (p.38)	https://www.mfs.ky/wp-content/uploads/2020/04/TF-NPO-Risk-Assessment-V.4.2-12-02-2020.pdf
10	Chile	2016	N/A	Report in SPANISH	
11	Colombia	2016	N/A	Report in SPANISH	
12	Cook Islands	2015	Low	The level of threat and vulnerability presented is LOW (p22)	https://www.fsc.gov.ck/cookIslandsFscApp/content/assets/4ed0a6a77eeff3b86781fa059a5eed81/Cook%20Islands%20National%20Risk%20Assessment%20Report%202015.pdf
13	Czech Republic	2017	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://www.financnianalytickyurad.cz/download/FileUploadComponent-1029799670/1524655342_cs_report-od-the-first-round-of-nat-ml_ft-risk-assessment.pdf
14	Fiji	2015	No assessment	NPOs vulnerability rated as high, TF rated as low, no explicit assessment of TF through NPOs	https://www.fijifiu.gov.fj/getattachment/fcf3a39e-c6b5-4b89-8c9a-10c3caa5e2d/Fiji-National-Risk-Assessment-Report.aspx
15	Finland	2015	N/A	Report in FINNISH	
16	France	2018	N/A	Report in FRENCH	
17	Ghana	2016	No assessment	Vulnerability assessed as very high. No assessment made of risk associated with TF through NPOs in the NRA	
18	Greece	2019	N/A	Report in GREEK	
19	Hong Kong	2018	No apparent threat	There is no apparent TF threat identified for the NPO sector in Hong Kong. (p106)	https://www.fstb.gov.hk/fsb/aml/en/doc/hk-risk-assessment-report_e.pdf
20	Indonesia	2020	Medium	NPOs are no longer at high risk for financing terrorism but rather to medium risk (p33)	http://www.ppatk.go.id/backend/assets/uploads/20200219164851.pdf
21	Ireland	2016	Medium Low	Riskrating Medium Low (p4)	http://www.justice.ie/en/JELR/National_Risk_Assessment_Money_Laundering_and_Terrorist_Financing_Oct16.pdf/Files/National_Risk_Assessment_Money_Laundering_and_Terrorist_Financing_Oct16.pdf
22	Isle of Man	2015	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://www.gov.im/media/1350893/isle-of-man-national-risk-assessment-2015.pdf
23	Israel	2017	No assessment	Donations charities and Da'wah mentioned as a means of raising funds. No assessment of risk	https://www.justice.gov.il/Units/HalbantHon/Pirsumim/Documents/TF_Risk_Assesment_ENG.pdf
24	Italy	2014	Negligible	the specific risk identified is negligible (p30)	http://www.dt.mef.gov.it/export/sites/sitodt/modules/documenti_en/prevenzione_reati_finanziari/prevenzione_reati_finanziari/NRA_Synthesis_11_01_2017.pdf
25	Japan	2014	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://www.npa.go.jp/sosikihanzai/jafic/en/nenzihokoku_e/data/jafic_e.pdf
26	Kyrgyzstan	2017	N/A	Report in RUSSIAN	
27	Lithuania	2015	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	http://www.fntt.lt/data/public/uploads/2016/10/d3_Inra2015.pdf

28	Luxemburg	2018	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	http://www.caa.lu/uploads/documents/files/20122018-NRA-ENJ.pdf
29	Malta	2018	N/A	Report unable to be found	
30	Mexico	2016	N/A	Report in SPANISH	
31	Mongolia	2016	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://www.mongolbank.mn/documents/cma/20170515_NRA_report.pdf
32	Netherlands	2017	High	(Funds from domestic/international foundations or (non-profit) organisations ranked first among ten risks) p75)	https://english.wodc.nl/binaries/Cahier%202017-14_2689e_Summary_tcm29-291391.pdf
33	New Zealand	2017	Low	New Zealand's overall risk of terrorism financing through non-profit organisations as low.	https://amlsolutions.co.nz/wp-content/uploads/2018/04/National-Risk-Assessment-2018.pdf
34	Norway	2016	No assessment	(No assessment made on the risk associated with TF through NPOs)	https://pst.no/globalassets/artikler/utgivelser/npo-report-english.pdf
35	Peru	2016	N/A	Report in SPANISH	
36	Philippines	2018	low medium	"TF risk is assessed as low medium" (p5).	http://www.amlc.gov.ph/images/PDFs/NPO%20Risk%20Assessment.pdf
37	Portugal	2015	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://www.portalbcft.pt/sites/default/files/anexos/pt_nra_synthesis.pdf
38	Russian Federation	2018	Low	Attracting funds to finance terrorist activities through non-profit organizations - low risk group. (p23)	http://www.fedsfm.ru/content/files/documents/2018/национальная%20оценка%20фт_англ_2.pdf
39	Seychelles	2017	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	
40	Singapore	2019	Low	"To ensure that the risks in this sector remain low" (p82)	https://www.mas.gov.sg/-/media/MAS/Regulations-and-Financial-Stability/Regulatory-and-Supervisory-Framework/Anti_Money-Laundering_Countering-the-Financing-of-Terrorism/Singapore_NRA_Report.pdf
41	Slovak Republic	2017	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://www.minv.sk/swift_data/source/policia/fsj/mv/ANNEX%2034.pdf
42	Slovenia	2016	N/A	Report unable to be accessed	
43	Sri Lanka	2014	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	http://fiusrilanka.gov.lk/docs/Other/Sri_Lanka_NRA_on_ML_2014_-_Sanitized_Report.pdf
44	Sweden	2015	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://www.fi.se/globalassets/media/dokument/rapporter/2014/finans_terrorism.pdf
45	Switzerland	2015	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://www.fedpol.admin.ch/dam/data/fedpol/kriminalitaet/geldwaescherei/nra-berichte/nra-bericht-juni-2015-e.pdf
46	Tajikistan	2017	N/A	Report in RUSSIAN	
47	Tunisia	2017	High	(p.193)	https://ctaf.bct.gov.tn/ctaf_f/userfiles/files/NRA_REPORT_Vf.pdf
48	Turks & Caicos Islands	2017	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://tcifsc.tc/wp-content/uploads/2019/02/tc-national-amlcft-strategy-may-2018.pdf
49	Uganda	2017	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://fia.go.ug/sites/default/files/2019-12/Money%20Laundering%20And%20Terrorist%20Financing%20National%20Risk%20Assessment%20Report_1.pdf
50	Ukraine	2016	N/A	Unable to access site	
51	United Kingdom	2017	Low	As such we now assess the risk of abuse of NPOs altogether for terrorist financing as low (p 73)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/655198/National_risk_assessment_of_money_laundering_and_terrorist_financing_2017_pdf_web.pdf
52	United States	2018	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://home.treasury.gov/system/files/136/2018ntfra_12182018.pdf
53	Vanuatu	2017	Low	"there is little to suggest that the sector poses anything other than a low risk for terrorist financing. (p33)	https://fiu.gov.vu/docs/Vanuatu%20NRA%202017.pdf
54	Zimbabwe	2015	Low	low vulnerability and the low threat level produced a low TF risk rating (p19)	https://www.fiu.co.zw/wp-content/uploads/2017/07/NRA-Summary-July-2015-final.pdf
55	Europe	2019	No assessment	(No assessment made on the risk associated with TF through NPOs in the NRA)	https://www.mfs.ky/wp-content/uploads/2020/04/TF-NPO-Risk-Assessment-V.4.2-12-02-2020.pdf
56	South East Asia and Australia	2017	Medium	The overall terrorism financing (TF) risk for the region's non-profit organisation (NPO) sectors is assessed as medium	https://www.austrac.gov.au/sites/default/files/2019-06/regional-NPO-risk-assessment-WEB-READY_ss.pdf

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