



National Anti-Money Laundering Council

Established under the Financial Transactions Reporting Act

# NATIONAL POLICY ON PREVENTING MONEY LAUNDERING AND TERRORIST FINANCING



# Table of Contents

<b>Foreword by the Chair, National Anti-Money Laundering Council</b>	<b>2</b>
<b>Fiji's Risks and Vulnerabilities to Money Laundering and Terrorist Financing</b>	<b>3</b>
I. Risk of Money Laundering in Fiji	3
II. Risk of Terrorist Financing in Fiji	5
<b>National Strategies for Combating Money Laundering and Terrorist Financing</b>	<b>6</b>
I. Robust Measures to Prevent Money Laundering and Terrorist Financing at Financial Sector Level	7
A. Oversight and Regulation of Fiji's Financial Sector	7
B. Strong Licensing and Registration Measures	8
II. Comprehensive Legal Framework for Money Laundering and Terrorist Financing	9
III. Detection, Investigation and Prosecution of Money Laundering and Terrorist Financing	10
IV. Tracing and Recovering Proceeds of Crime to Disrupt Crime	11
V. Inter-Agency Collaboration and Coordination	11
A. Domestic Coordination	12
B. International Information Sharing and Collaboration	14
<b>Annex 1: Money Laundering Threats in Fiji</b>	<b>15</b>
<b>Annex 2: Financial and Business Sectors' Net Risks and Residual Vulnerability for Money Laundering in Fiji</b>	<b>16</b>
<b>Annex 3: Legal, Institutional and Other Measures for Addressing the Money Laundering Criminal Threats Fiji</b>	<b>17</b>
<b>Annex 4: Legal, Institutional and Other Measures for Addressing Money Laundering and Terrorist Financing Vulnerabilities in Fiji's Financial and Business Sectors</b>	<b>22</b>

## Foreword by the Chair, National Anti-Money Laundering Council

In 2025, with the endorsement of the National Anti-Money Laundering Council, Fiji conducted a National Risk Assessment (NRA) to identify and assess its risks for money laundering, terrorist financing and proliferation financing. This risk assessment is the second of its type, the first NRA was completed in 2015 with further updates in this assessment completed in 2020 and 2023.

The 2025 National Risk Assessment relied on qualitative and quantitative data and insights from key government agencies and private-sector stakeholders and provides an updated understanding of key threats, vulnerabilities, and the risks of money laundering, terrorist financing, and proliferation financing in Fiji.

The National Risk Assessment findings helps the National Anti-Money Laundering Council make informed decisions on strategies, planning, and resourcing to ensure Fiji's financial system remains resilient and protected from illicit finance. This national policy has been updated to incorporate the 2025 NRA findings and sets out the National Anti-Money Laundering Council's overarching strategies for mitigating the identified risks. This national policy will be subject to regular review to ensure its continued relevance, accuracy, and alignment with evolving risks and international standards. This policy aims to clearly convey the Government's stance on anti-money laundering, countering terrorist financing, and proliferation financing and to reinforce confidence in Fiji's financial sector and regulatory framework. The policy also aims to highlight the roles and responsibilities of partner government agencies and private sector entities.

Ms Selina Kuruleca  
Chairperson  
National Anti-Money Laundering Council  
October 2025

# Fiji's Risks and Vulnerabilities to Money Laundering and Terrorist Financing

## **I. Risk of Money Laundering in Fiji**

Based on the 2025 national risk assessment, the risk for money laundering in Fiji is assessed as “high”.

The top five criminal activities in Fiji that contributed to the high money laundering risk are as follows:

- i. Narcotics-Related Offences:* Narcotics-related crime poses a high and increasing money laundering threat in Fiji. The country has seen an increase in illicit drug cases, particularly involving methamphetamines and cocaine. Fiji's geographical location makes it a crucial transhipment route from the United States and South America to the Australian and New Zealand markets. This has led to a spillover into the domestic market, resulting in greater narcotics use within Fiji and the growth of local organised crime groups. There is also a growing locally produced marijuana market, adding to the problem.
- ii. Organised Crime and Racketeering:* Organised crime is a high and increasing money laundering threat in Fiji. It encompasses a range of high and medium-threat activities, including narcotics trafficking, cybercrime, fraud, and human trafficking. Transnational criminal groups, particularly outlaw motorcycle gangs, have strengthened their foothold in Fiji, aided by deportees from countries like the USA, Australia, and New Zealand.
- iii. Taxation and Customs-Related Crimes, including Smuggling:* Tax evasion remains a significant threat in Fiji, encompassing various forms, including direct and indirect taxation, false or non-declaration of income, VAT fraud, and customs duties. Cross-border smuggling is also a problem. These crimes pose a high and increasing money laundering threat.

- iv. Environmental Crimes:** Fiji faces significant environmental crime challenges, including illegal logging, illegal, unreported, and unregulated (IUU) fishing, wildlife trafficking, and unauthorised mining. These activities generate substantial criminal proceeds and present a high but stable money laundering threat.
- v. Bribery and Corruption:** Bribery and corruption are considered a high but stable money laundering threat in Fiji. While there are no significant cases of grand corruption, individual acts of bribery, forgery, embezzlement, and fraud continue to be of concern to authorities.

There are other criminal threats that contribute to the money laundering risk in Fiji, however, these criminal activities are assessed as “medium to low” threats for money laundering in Fiji. Refer to Annex 1.

**Cross-border Flows of Criminal Proceeds:** Fiji faces a complex and multi-layered cross-border money laundering threat environment characterised by its roles as a transit point, a source of illicit funds, a recipient of illicit funds, and a nation impacted by criminal activities whose proceeds do not directly enter its financial system.

An examination of money laundering investigation cases from 2020 to 2024 (indicative only, subject to verification) reveals a strong international nexus, with one case occurring offshore and six involving activities in Fiji and other foreign jurisdictions. This highlights the transnational nature of the money laundering threat facing Fiji.

**Sectoral Money Laundering Risks:** Fiji's 2025 national risk assessment, assessed 25 sectors which may be targeted by criminals and their associates to facilitate their money laundering, terrorist financing and other illicit activities. There are five Fiji sectors that are identified as having a “high net risk” to money laundering. These are as follows:

1. commercial banks,
2. foreign exchange dealers and money changers,
3. payment service providers,
4. legal practitioners, and
5. real estate agents.

Their high transaction volumes, diverse (including cross border and non-face-to-face) customer profiles, and, or multiple products/channels mean existing controls do not yet fully offset inherent vulnerabilities in these sectors.

There are other financial and business sectors in Fiji that are vulnerable and at risk to money laundering and terrorist financing, however these were assessed as having medium to low risk and residual vulnerabilities to these risks. Refer to Annex 2.

## **II. Risk of Terrorist Financing in Fiji**

Terrorist Financing (TF) is the process by which terrorists raise, move, store, and use funds to support their activities. These funds can come from both legal sources like donations or business income and illegal ones, such as drug trafficking, extortion, or fraud.

According to the FATF report on **Comprehensive Update on Terrorist Financing Risk**<sup>1</sup> terrorist financing has grown more complex, with groups using both digital and traditional methods, decentralised networks, and diverse funding sources—including criminal proceeds and legitimate businesses. Lone actors, rely on microfinancing from legal income and tech platforms like gaming and social media. Tracking funds linked to ideologically motivated attacks is challenging due to low visibility and inconsistent designations. Increasing overlap with organised crime further complicates detection and disruption efforts

Based on the 2025 national risk assessment, the risk of terrorism financing in Fiji is assessed as “**low**”. Fiji’s overall threat from terrorism financing is considered low. This assessment is based on the following factors:

- Terrorism and terrorist financing threats from internal actors and/or neighboring countries is assessed as low.
- Fiji has no designated terrorist organisations, nor are there any organisations

---

<sup>1</sup> [FATF report highlights evolving terrorist financing risks and warns of gaps in global understanding of the threats](#)

for which reasonable grounds exist to believe they are engaging in terrorist activities.

- Fiji is not classified as a country at risk on the Global Terrorism Index. There have been no terrorist incidents or casualties in recent years.
- Based on available open-source information, there is limited evidence to suggest a significant current threat of right-wing extremism in Fiji.
- There has been noticeable travel by Fijian residents or foreign visitors to and from high-risk jurisdictions known for terrorism. However, there are no cases of foreign fighters who are Fiji residents or citizens.
- Fiji does not provide significant aid, military equipment, or strategic goods to regions with an active terrorist threat.
- Fiji has a comprehensive terrorism financing legal framework and sufficient resources to investigate terrorism financing activities should it occur.

Fiji has conducted various risk and threat assessment which also contribute to an understanding of crime risks in Fiji.

### **National Strategies for Combating Money Laundering and Terrorist Financing**

Fiji has three broad strategies for mitigating the risk of money laundering and terrorist financing in Fiji. These includes measures to 1) prevent money laundering and terrorist financing; 2) detect and disrupt money laundering and terrorist financing activities should it occur; and 3) collaborate across agencies and with international partners to mitigate our risks.

A detailed outline of legal, institutional and other measures to address the criminal threats that contribute to money laundering and terrorist financing risk in Fiji is provided in Annex 3.

A detailed outline of legal, institutional and other measures to address the sectoral vulnerabilities that contribute to money laundering and terrorist financing risk in Fiji is provided in Annex 4.

## **I. Robust Measures to Prevent Money Laundering and Terrorist Financing at Financial Sector Level**

Financial institutions, along with designated non-financial businesses and professions (DNFBPs), are required to implement robust measures to prevent money laundering and the financing of terrorism. These obligations are enshrined in the Financial Transactions Reporting (FTR) Act 2004 of Fiji, which provides the legal framework for compliance and enforcement.

The FTR Act mandates key practices such as:

- Customer identity verification.
- Maintenance of accurate transaction records.
- Monitoring and reporting of suspicious activities.
- Due diligence in cross-border banking relationships.
- Disclosure of information related to terrorist property.

These measures align with the international standards set out by the Financial Action Task Force (FATF) Recommendations, which serve as a global benchmark for anti-money laundering (AML) and counter-financing of terrorism (CFT) efforts. These measures help to protect Fiji's financial systems and make it harder for criminals to launder their illicit proceeds or to fund terrorist activities.

### **A. Oversight and Regulation of Fiji's Financial Sector**

The Reserve Bank of Fiji (RBF) and the Financial Intelligence Unit (FIU) provide strong oversight and regulation of Fiji's financial institutions and designated non-financial businesses and professions to ensure that they comply with Fiji's anti-money laundering and counter-terrorism financing laws and requirements. The RBF and the FIU have the legal mandate to enforce compliance by financial institutions and covered businesses with anti-money laundering requirements.

The RBF and the FIU apply a risk-based approach to supervising financial institutions and covered businesses to ensure that supervisory resources are targeted proportionately at high-risk financial institutions and activities.

The sectors at high risk for money laundering and terrorist financing and that are subjected to enhanced supervision by the RBF and the FIU include:

1. commercial banks,
2. foreign exchange dealers and money changers,
3. payment service providers,
4. legal practitioners; and
5. real estate agents.

Other sectors at medium to low risk, are subjected to a lower level of supervision by the RBF and the FIU.



#### **Reserve Bank of Fiji**

Commercial banks, credit institutions, insurance companies/brokers, superanuation fund, foreign exchange dealers and money changers, capital market intermediaries, payment service providers.



#### **Financial Intelligence Unit**

Other Designated Non-Financial Businesses and Professions, such as, accounting firms, legal practitioners, real estate agents or businesses.

## **B. Strong Licensing and Registration Measures**

To protect Fiji's financial and business sector from being infiltrated by criminals and their associates, there are strong licensing and registration measures to ensure that suitable and qualified persons are approved to conduct critical financial services and business activities.

Persons wishing to operate in these businesses or sectors are required to apply for proper licences or to register from appropriate authorities. As part of these licensing or registration requirements, applicants must meet minimum standards set by the relevant licensing or registration authority.

Business Activity	Licensing or Registration Authority
Banking	Reserve Bank of Fiji
Insurance	Reserve Bank of Fiji
Funds Remittance Services	Reserve Bank of Fiji
Payment Services including mobile wallets	Reserve Bank of Fiji
Managed investment funds, unit trusts, investment advisory services	Reserve Bank of Fiji
Legal services	Legal Practitioners Unit
Accounting/Auditing	Fiji Institute of Chartered Accountants
Real estate services	Real Estate Agents Licensing Board

## II. Comprehensive Legal Framework for Money Laundering and Terrorist Financing

Fiji has a comprehensive legal framework to criminalise money laundering and terrorism financing in the Proceeds of Crime (POC) Act. The POC Act provides strong penalties (fine and/or prison term) for persons or entities convicted of money laundering and terrorist financing crimes.

Proceeds of Crime Act	Penalties for Money Laundering and Terrorist Financing Activities
Section 69, POC Act	<p>Money Laundering offences:</p> <ul style="list-style-type: none"> <li>• <u>Natural person</u>: fine not exceeding \$120,000 or a term of imprisonment not exceeding 20 years or both.</li> <li>• <u>Body corporate</u>: fine not exceeding \$600,000.</li> </ul>
Section 70A, POC Act	<p>Terrorist Financing offences:</p> <ul style="list-style-type: none"> <li>• <u>Natural person</u>: fine not exceeding \$120,000 or a term of imprisonment not exceeding 20 years or both.</li> <li>• <u>Body corporate</u>: fine not exceeding \$600,000.</li> </ul>

This legal framework provides the basis for Fijian authorities to investigate and prosecute money laundering and terrorist financing offences.

Fiji also has counter terrorism provisions in the Public Order Act. The Government is currently drafting a new Counter-Terrorism Bill and National Counter-Terrorism Strategy.

### **III. Detection, Investigation and Prosecution of Money Laundering and Terrorist Financing**

Fiji's financial institutions and designated non-financial businesses and professions report transactions suspected to be linked to money laundering and terrorist financing to the Financial Intelligence Unit. These measures act as detection mechanism within Fiji's financial system.

The FIU receives these reports of suspicious transactions and analyses these for potential money laundering and terrorist financing activities. Based on its analysis, the FIU then refer this information to relevant law enforcement agencies for their investigation.

The Fiji Police Force is responsible for investigating money laundering and terrorism financing crimes. The Counter Terrorism Unit within the Fiji Police Force is responsible for terrorism and terrorism financing intelligence gathering and dissemination. The AML Unit/Proceeds of Crime Unit is responsible for investigating terrorism financing and money laundering activities in Fiji.

The Office of the Director of Public Prosecution (ODPP) will prosecute all cases of money laundering and terrorist financing offences in the Courts.

FICAC is responsible for investigating and prosecuting money laundering offences linked to corruption and bribery cases.

The Fiji Courts are well placed to deal with money laundering and terrorist financing cases that come before it.

#### **IV. Tracing and Recovering Proceeds of Crime to Disrupt Crime**

A key strategy for Fiji to disrupt money laundering and serious financial crime is to trace and recover the proceeds of crime in particular the top 5 crimes that contribute to money laundering risk in Fiji. This strategy is designed to strip criminals of their illicit gains and reinforce the integrity of the justice system.

The POC Act provides the legal framework for identifying, tracing, freezing and confiscating the proceeds of crime. These provisions apply to the recovery of proceeds of “serious offences” as defined in the POC Act and not only money laundering and terrorist financing offences.

Authorities may:

- a. Freeze and seize assets linked to criminal activity;
- b. Apply for forfeiture orders after a conviction or even if the suspect has absconded;
- c. Recover property used in or gained from crimes like fraud, drug trafficking, or money laundering; and/or
- d. Forfeit illicit assets without a criminal conviction, if proven to be tainted.

There are also confiscation provisions in other laws other than the POC Act and these relate to specific crimes such as illegal logging and illegal fishing.

The Director of Public Prosecutions and Commissioner FICAC will make applications to the Court for restraint and forfeiture orders under the POC Act. The High Court has primary jurisdiction for dealing with applications from the ODPP for forfeiture and confiscation orders under the POC Act.

#### **V. Inter-Agency Collaboration and Coordination**

An essential strategy for Fiji in addressing the risks associated with money laundering and terrorist financing is the promotion of effective coordination and collaboration among domestic agencies on both policy and operational matters.

To support this approach, Fiji has established various national committees and multi-agency taskforces or working groups that are mandated to develop strategic responses, monitor implementation progress, and ensure alignment with national and international standards.

## **A. Domestic Coordination**

### **The National Anti-Money Laundering Council**

Established since 2008 under the FTR Act, the National Anti-Money Laundering Council (NAMLC) serves as Fiji's national coordinating and policy advisory body for all matters related to the prevention of money laundering and the financing of terrorism. It plays a pivotal role in shaping national strategies, guiding legislative reforms, and ensuring effective implementation of AML/CFT measures in Fiji.

The NAMLC is chaired by the Permanent Secretary for Justice, reflecting the government's commitment to legal oversight and institutional leadership. Its core members are heads of the Reserve Bank of Fiji, Office of the Director of Public Prosecutions, Fiji Police Force, Fiji Revenue and Customs Service and the Financial Intelligence Unit.

These members bring together financial, legal, law enforcement, and regulatory expertise to drive a unified national response to money laundering, terrorism financing and financial crime.

The NAMLC may invite other stakeholders such as heads of other government agencies and representatives from private sector institutions, to participate in meetings when relevant issues arise, fostering a collaborative and inclusive approach to AML/CFT governance. The Fiji Independent Commission Against Corruption (FICAC) is currently an invited member of the NAMLC.

 <p><b>National Anti-Money Laundering Council</b> Established under the Financial Transactions Reporting Act</p> <p>The functions of the Council are provided for in section 35(5) of the FTR Act and are:</p> <ol style="list-style-type: none"> <li>1. to advise the FIU and the Minister on any matters relating to the prevention of money laundering or the financing of terrorism;</li> <li>2. to make recommendations to the Unit and the Minister on any matter relating to the prevention of money laundering or the financing of terrorism;</li> <li>3. to assist the FIU and the Minister in the formulation of policies or strategies relating to the prevention of money laundering or the financing of terrorism; and</li> <li>4. to assist the FIU in coordination between various Government departments and with statutory corporations.</li> </ol> <p>As at October 2025</p>	<p><b>Members of the National AML Council</b></p> <table border="1"> <tr> <td data-bbox="459 266 613 409">  <p>Ministry of Justice</p> </td><td data-bbox="613 266 777 409">  <p>Office of the Director of Public Prosecutions</p> </td><td data-bbox="777 266 942 409">  <p>Fiji Police Force</p> </td></tr> <tr> <td data-bbox="459 430 613 573">  <p>Reserve Bank of Fiji</p> </td><td data-bbox="613 430 777 573">  <p>Fiji Revenue and Customs Service</p> </td><td data-bbox="777 430 942 573">  <p>Fiji Independent Commission Against Corruption</p> </td></tr> <tr> <td data-bbox="459 573 613 736"> <p>6 Member Agencies and 1 Invited Member</p> </td><td data-bbox="613 573 942 736">  <p><b>Fiji FIU</b> Fiji Financial Intelligence Unit</p> </td></tr> </table>	 <p>Ministry of Justice</p>	 <p>Office of the Director of Public Prosecutions</p>	 <p>Fiji Police Force</p>	 <p>Reserve Bank of Fiji</p>	 <p>Fiji Revenue and Customs Service</p>	 <p>Fiji Independent Commission Against Corruption</p>	<p>6 Member Agencies and 1 Invited Member</p>	 <p><b>Fiji FIU</b> Fiji Financial Intelligence Unit</p>
 <p>Ministry of Justice</p>	 <p>Office of the Director of Public Prosecutions</p>	 <p>Fiji Police Force</p>							
 <p>Reserve Bank of Fiji</p>	 <p>Fiji Revenue and Customs Service</p>	 <p>Fiji Independent Commission Against Corruption</p>							
<p>6 Member Agencies and 1 Invited Member</p>	 <p><b>Fiji FIU</b> Fiji Financial Intelligence Unit</p>								

## Multi-Agency Task Forces and Working Groups

Fiji's multi-agency task forces and working groups play a vital role in fortifying the national response to ML/TF and associated financial crimes. These collaborative platforms bring together representatives from key government agencies, regulatory bodies, law enforcement, and financial institutions to ensure a unified and strategic approach to combating financial threats.

Their core functions include coordinating public awareness initiatives to educate communities on emerging financial crime trends, engaging with stakeholders and international partners to assess sector-specific vulnerabilities and develop targeted risk mitigation strategies, monitoring the implementation of the national AML/CFT strategy, ensuring alignment with policy objectives and international standards. Other functions include, facilitating inter-agency coordination, enabling timely intelligence sharing, joint investigations, and harmonized enforcement actions, enhancing detection and reporting mechanisms for suspicious transactions, fraud, and illicit financial flows through capacity building and technological integration.

## B. International Information Sharing and Collaboration

Effectively addressing ML/TF risks requires strong international collaboration. Criminal networks often operate across borders, exploiting jurisdictional gaps, regulatory inconsistencies, and limited enforcement capacity to move illicit funds and conceal their activities. These transnational operations can involve complex financial structures, shell companies, and digital platforms that make detection and disruption increasingly difficult.

To counter these threats, Fiji actively engages with global partners through:

- **Intelligence sharing:** Exchanging financial and other intelligence and typologies with foreign intelligence and law enforcement agencies enabling early detection of cross-border criminal schemes.
- **Mutual legal assistance:** Facilitating extradition, evidence collection, and asset recovery through formal legal cooperation strengthens Fiji's ability to prosecute offenders and reclaim stolen wealth.
- **Joint investigations:** Coordinated operations with international law enforcement agencies enhance Fiji's capacity to dismantle sophisticated criminal networks and trace illicit financial flows.

Fiji also actively engages in regional or international multilateral forums and networks which facilitate information sharing, training, technical assistance and collaboration on policy and operational outcomes. These forums include amongst other, the Pacific Islands Forum, Pacific Islands Chiefs of Police (PICP), Pacific Financial Intelligence Community (PFIC), Pacific Islands Law Officers' Network (PILON), UNCAC Coalition - Asia Pacific, Oceania Customs Organisation and Pacific Islands Tax Administrators Association.

Ultimately, by building strong cross-border partnerships, Fiji not only strengthens its domestic resilience but also contributes to the global effort to disrupt criminal financing and uphold the integrity of the international financial system.

**Annex 1: Money Laundering Threats in Fiji**

MONEY LAUNDERING Threat Level	Criminal Offence	Trend
High	Narcotics Related Offences	Increasing
High	Participation in Organised Criminal Groups	Increasing
High	Taxation and Customs Crimes, Including Smuggling	Increasing
High	Environmental Crimes	Stable
High	Bribery and Corruption	Stable
Medium	Scams/Fraud/Cybercrime	Increasing
Medium	Sexual Exploitation	Increasing
Medium	Trafficking in Human Beings/Smuggling	Increasing
Medium	Robbery or Theft	Increasing
Medium	Forgery	Stable
Low	Counterfeiting Currency	Stable
Low	Counterfeiting and Piracy of Products	Stable
Low	Kidnapping/ Restraint/Hostage-taking	Stable
Low	Illicit Trafficking in Stolen and Other Goods	Stable
Low	Illicit Arms Trafficking	Stable
Low	Insider Trading and Market Manipulation	Stable
Low	Extortion	Stable
Low	Murder/Grievous Bodily Injury	Stable
Low	Piracy	Stable
Low	Terrorism (including Terrorist Financing)	Stable

**Annex 2: Financial and Business Sectors' Net Risks and Residual Vulnerability for Money Laundering in Fiji**

Sector	Money Laundering Risks (Likelihood x Consequence) (Inherent and Residual)	Residual Vulnerability
1. Commercial Banks	High	High
2. Foreign Exchange Dealers & Money Changers	High	High
3. Payment Service Providers	High	High
4. Legal Practitioners	High	High
5. Real Estate Agents	High	High
6. Insurance Companies and Brokers	Medium	Medium
7. Capital Markets	Medium	Medium
8. Credit Institutions	Medium	Medium
9. Accountants	Medium	Medium
10. Dealers in Precious Metals & Stones	Medium	Medium
11. Dealers in Motor Vehicles	Medium	Medium
12. Pawnbrokers	Medium	Medium
13. Dealers in Marine Vessels	Medium	Medium
14. Superannuation	Low	Low
15. Development Bank	Low	Low
16. Virtual Assets & Virtual Asset Service Providers	Low	Low
17. Company & Trust Service Providers (other than lawyers and accountants)	Low	Low
18. Cooperatives and Credit Unions	Low	Low
19. Casino Sector (none in existence)	Low	Low
20. Gaming Providers (other than casinos)	Low	Low
21. Dealers in Aircraft	Low	Low
22. Moneylenders	Low	Low
23. Dealers in Art, Antiques & Jewellery (other than DPMS)	Low	Low
24. Travel Agents	Low	Low

### Annex 3: Legal, Institutional and Other Measures for Addressing the Money Laundering Criminal Threats Fiji

Threats: Predicate Crime Evident in Fiji	Ranking of Threat for Money Laundering	Strategies	Priority (High/ Medium/ Low)	Agencies Responsible
Narcotics- Related Offences	High	<ul style="list-style-type: none"> <li>Criminalisation of drug trafficking and related activities under the Illicit Drug Control Act 2004.</li> <li>Provisions for cooperation with foreign investigation agencies on transnational drug cases.</li> <li>Investigation and prosecution of drug offences by FPF and ODPP.</li> <li>Forfeiture provisions for proceeds of drug offences.</li> <li>Strong networking between Fijian and foreign authorities on drug related cases.</li> </ul>	High	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> <li>FRCS</li> </ul>
Participation in Organised Criminal Group	High	<ul style="list-style-type: none"> <li>Investigation and prosecution of drug offences by FPF and ODPP.</li> <li>Enhance coordination among law enforcement agencies (LEAs) on organised crime, including both domestic and international links, recognising its connections to high-threat money laundering, criminal offences and other crimes such as scams and human trafficking.</li> <li>Prioritise establishing clear policies and procedures on participation in organised criminal groups by focusing on both outward and inward international cooperation.</li> </ul>	High	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> </ul>
Taxation, Customs Crimes, including Smuggling	High	<ul style="list-style-type: none"> <li>Investigation and prosecution of tax offences by FRCS</li> <li>Referral of tax cases to Police for ML investigations where necessary</li> <li>Prioritise establishing clear policies and procedures on taxation, custom crimes and smuggling by focusing on both outward and inward international cooperation.</li> </ul>	High	<ul style="list-style-type: none"> <li>Fiji Revenue and Customs Service</li> </ul>

### Annex 3: Legal, Institutional and Other Measures for Addressing the Money Laundering Criminal Threats Fiji (continued)

Threats: Predicate Crime Evident in Fiji	Ranking of Threat for Money Laundering	Strategies	Priority (High/ Medium/ Low)	Agencies Responsible
Environmental Crimes	High	<ul style="list-style-type: none"> <li>Environment Management Act 2005 criminalises certain environmental related acts.</li> <li>Offshore Fisheries Management Act 2012 criminalises unlicensed fishing vessels.</li> <li>Investigation and prosecution of these activities under the relevant laws.</li> <li>Strengthen Coordination on anti-money laundering and counter proliferation financing in the Maritime Sector.</li> <li>Improve inter-agency cooperation, particularly involving the lead agency under the Public Order Act to support effective implementation of targeted financial sanctions for proliferation financing.</li> <li>Prioritise establishing clear policies and procedures on environmental crime by focusing on both outward and inward international cooperation.</li> </ul>	High	<ul style="list-style-type: none"> <li>Ministry of Fisheries and Forestry</li> <li>Maritime Statutory Authority of Fiji</li> <li>Fiji Revenue &amp; Customs Service</li> <li>Prime Minister's Office</li> </ul>
Bribery and Corruption	High	<ul style="list-style-type: none"> <li>Strong bribery and corruption related offences in the Prevention of Bribery Act and Crimes Act.</li> <li>Investigation and prosecution of corruption.</li> <li>Prioritise establishing clear policies and procedures on bribery and corruption by focusing on both outward and inward international cooperation.</li> </ul>	High	<ul style="list-style-type: none"> <li>FICAC</li> </ul>

### Annex 3: Legal, Institutional and Other Measures for Addressing the Money Laundering Criminal Threats Fiji (continued)

Threats: Predicate Crime Evident in Fiji	Ranking of Threat for Money Laundering	Strategies	Priority (High/ Medium/ Low)	Agencies Responsible
Scams, Fraud and Cybercrime	Medium	<ul style="list-style-type: none"> <li>Provisions in the 2009 Crimes Act to criminalise theft.</li> <li>Investigation and prosecution of scams.</li> <li>Criminalisation of cybercrime activities in the Crimes Act 2009</li> <li>Investigation and prosecution of cybercrime activities.</li> <li>National cyber security strategy to address cyber security including cybercrime.</li> <li>Criminalisation of fraud under the 2009 Crimes Act (Part 17).</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> <li>Ministry of Communications</li> </ul>
Sexual Exploitation	Medium	<ul style="list-style-type: none"> <li>Provisions in the Crimes Act 2009 and Domestic Violence Act 2009.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> <li>Ministry of Women, Children &amp; Poverty Alleviation</li> </ul>
Trafficking in Human Beings/ Smuggling	Medium	<ul style="list-style-type: none"> <li>Criminalisation of human trafficking activities in the Crimes Act 2009.</li> <li>Investigation and prosecution of human trafficking activities.</li> <li>Dedicated Police unit to specialise in human trafficking investigations.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Fiji Police Force (Human Trafficking Unit)</li> <li>ODPP</li> </ul>
Robbery or Theft	Medium	<ul style="list-style-type: none"> <li>Provisions in the 2009 Crimes Act to criminalise theft.</li> <li>Investigation and prosecution of theft offences.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> </ul>

### Annex 3: Legal, Institutional and Other Measures for Addressing the Money Laundering Criminal Threats Fiji (continued)

Threats: Predicate Crime Evident in Fiji	Ranking of Threat for Money Laundering	Strategies	Priority (High/ Medium/ Low)	Agencies Responsible
Forgery	Medium	<ul style="list-style-type: none"> <li>Provisions in the 2009 Crimes Act to criminalise forgery.</li> <li>Investigation and prosecution of forgery activities.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> </ul>
<ul style="list-style-type: none"> <li>Counterfeiting Currency</li> <li>Counterfeiting and Piracy of Products</li> <li>Kidnapping, Restraint and Hostage-taking</li> <li>Illicit Trafficking in Stolen and Other Goods</li> <li>Illicit Arms Trafficking</li> <li>Insider Trading and Market Manipulation</li> <li>Extortion</li> <li>Murder, Grievous Bodily Injury</li> <li>Piracy</li> <li>Terrorism, including Terrorist Financing</li> </ul>	Low	<p>These criminal activities generate relatively very small proceeds.</p> <p>Current strategies to address these crimes are considered adequate. These include:</p> <p>Laws that criminalise these activities include:</p> <ul style="list-style-type: none"> <li>Reserve Bank of Fiji Act</li> <li>Gaming Act 2009-.</li> <li>Customs Act-</li> <li>Crimes Act 2009</li> <li>Copyright Act 1999</li> <li>Arms and Ammunition Act 2003</li> <li>Public Order Act</li> <li>Proceeds of Crime Act</li> </ul> <p>Investigation and prosecution of these activities under the relevant laws.</p>	Low	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> <li>FRCS (Customs)</li> </ul>

## Legal, Institutional and Other Measures for Addressing the Cross Border Money Laundering Threats in Fiji

Vulnerabilities for Money Laundering	Ranking of Threat for Money Laundering	Strategies	Priority (High/ Medium/ Low)	Agencies Responsible
Domestic Criminal Proceeds Laundered in Fiji	High	<ul style="list-style-type: none"> <li>Prioritise enforcement and intelligence efforts against tax evasion and corruption, which are major sources of domestic illicit funds.</li> <li>Strengthen criminal intelligence sharing between relevant agencies.</li> <li>Strengthen technical resources (equipments; technology) of key agencies such as Police, Customs.</li> </ul>	High	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>FRCS</li> </ul>
Outward Criminal Proceeds from Fiji	Medium	<ul style="list-style-type: none"> <li>Strengthen oversight of outward remittance channels and international cooperation and intelligence sharing.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> <li>FICAC</li> <li>FRCS</li> <li>FIU</li> <li>RBF</li> </ul>
External Criminal Proceeds Entering Fiji	Low	<ul style="list-style-type: none"> <li>Strengthen screening of inbound remittances and foreign investments.</li> <li>Expand asset recovery and mutual legal assistance capabilities.</li> <li>Enhance oversight of real estate and high-value assets.</li> </ul>	Low	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> <li>FIU</li> </ul>
Domestic Criminal Proceeds Laundered Entirely or Partly Offshore	High	<ul style="list-style-type: none"> <li>Strengthen border and maritime surveillance to disrupt facilitation.</li> <li>Enhance Inter-Agency and Regional intelligence sharing.</li> <li>Protect vulnerable populations from human trafficking and exploitation.</li> </ul>	High	<ul style="list-style-type: none"> <li>Fiji Police Force</li> <li>ODPP</li> <li>FRCS</li> <li>FIU</li> </ul>

## Annex 4: Legal, Institutional and Other Measures for Addressing Money Laundering and Terrorist Financing Vulnerabilities in Fiji's Financial and Business Sectors

Sectors	Net Risk for Money Laundering/ Terrorist Financing	Strategies	Priority (High/ Medium/ Low)	Agencies Responsible
Commercial Banks	High	<ul style="list-style-type: none"> <li>Strong legal provisions for the licensing and supervision of banks under the Banking Act and RBF supervision policy guidelines.</li> <li>Legal obligations to prevent and/or detect money laundering and terrorist financing under the FTR Act.</li> <li>Supervision of banks for compliance with anti-money laundering requirements.</li> <li>Incorporate dissuasive and proportionate sanctions.</li> </ul>	High	<ul style="list-style-type: none"> <li>Reserve Bank of Fiji</li> <li>FIU</li> </ul>
Foreign Exchange Dealers and Money Changers	High	<ul style="list-style-type: none"> <li>Strong legal provisions for the licensing and supervision of foreign exchange dealers and money changers under the Exchange Control Act.</li> <li>Legal obligations to prevent and/or detect money laundering and terrorist financing under the FTR Act.</li> <li>Supervision of foreign exchange dealers and money changers for compliance with anti-money laundering requirements.</li> <li>Incorporate dissuasive and proportionate sanctions.</li> </ul>	High	<ul style="list-style-type: none"> <li>Reserve Bank of Fiji</li> <li>FIU</li> </ul>
Payment Service Providers	High	<ul style="list-style-type: none"> <li>Strong legal provisions for the licensing and supervision of payment service providers under the National Payment Systems Act.</li> <li>Legal obligations to prevent and/or detect money laundering and terrorist financing under the FTR Act.</li> <li>Supervision of payment service providers for compliance with prudential and anti-money laundering requirements.</li> <li>Incorporate dissuasive and proportionate sanctions.</li> </ul>	High	<ul style="list-style-type: none"> <li>Reserve Bank of Fiji</li> <li>FIU</li> </ul>

**Annex 4: Legal, Institutional and Other Measures for Addressing Money Laundering and Terrorist Financing Vulnerabilities in Fiji's Financial and Business Sectors (continued)**

Sectors	Net Risk for Money Laundering/ Terrorist Financing	Strategies	Priority (High/ Medium/ Low)	Agencies Responsible
Legal Practitioner	High	<ul style="list-style-type: none"> <li>• Laws on registration and regulation of legal practitioners.</li> <li>• Legal obligations to prevent and/or detect money laundering and terrorist financing under the FTR Act.</li> <li>• Supervision of legal practitioners for compliance with anti-money laundering requirements.</li> <li>• Implementation of more effective and deterrent measures.</li> </ul>	High	<ul style="list-style-type: none"> <li>• Legal Practitioners Unit</li> <li>• FIU</li> </ul>
Real Estate Agent	High	<ul style="list-style-type: none"> <li>• Strong legal provisions for the licensing and regulation of real estate agents under the Real Estate Agents Licensing Board Act.</li> <li>• Legal obligations to prevent and/or detect money laundering and terrorist financing under the FTR Act.</li> <li>• Supervision of real estate agents for compliance with anti-money laundering requirements.</li> <li>• Implementation of more effective and deterrent measures.</li> </ul>	High	<ul style="list-style-type: none"> <li>• Real Estate Agents Licensing Board</li> <li>• FIU</li> </ul>
Insurance	Medium	<ul style="list-style-type: none"> <li>• Strong legal provisions for the licensing and regulation of insurers and brokers under the Insurance Act.</li> <li>• Legal obligations to prevent and/or detect money laundering and terrorist financing under the FTR Act.</li> <li>• Supervision of insurance companies for compliance with anti-money laundering requirements.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>• RBF</li> <li>• FIU</li> </ul>
Capital Market	Medium	<ul style="list-style-type: none"> <li>• Strong legal provisions for the licensing and regulation of capital markets under the RBF Act.</li> <li>• Legal obligations to prevent and/or detect money laundering and terrorist financing under the FTR Act.</li> <li>• Supervision of capital markets for compliance with anti-money laundering requirements.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>• RBF</li> <li>• FIU</li> </ul>

**Annex 4: Legal, Institutional and Other Measures for Addressing Money Laundering and Terrorist Financing Vulnerabilities in Fiji's Financial and Business Sectors (continued)**

Sectors	Net Risk for Money Laundering/ Terrorist Financing	Strategies	Priority (High/ Medium/ Low)	Agencies Responsible
Credit Institutions Sector	Medium	<ul style="list-style-type: none"> <li>Strong legal provisions for the licensing and regulation of credit institutions under the RBF Act.</li> <li>Legal obligations to prevent and/ or detect money laundering and terrorist financing under the FTR Act.</li> <li>Supervision of credit institutions for compliance with anti-money laundering requirements.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>RBF</li> <li>FIU</li> </ul>
Accountancy Sector	Medium	<ul style="list-style-type: none"> <li>Provision on registration and regulation of accountants under FICA Act.</li> <li>Legal obligations to prevent and/ or detect money laundering and terrorist financing under the FTR Act.</li> <li>Supervision of accountants for compliance with anti-money laundering requirements.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Fiji Institute of Chartered Accountants</li> <li>FIU</li> </ul>
Dealers in Precious Metals and Stone Sector	Medium	<ul style="list-style-type: none"> <li>Relevant provisions in the Gold Dealers Act 1965 including licensing requirements.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Ministry of Lands and Mineral Resources</li> <li>FIU</li> </ul>
Motor Vehicle Dealers Sector	Medium	<ul style="list-style-type: none"> <li>Licensing by the Land Transport Authority.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Land Transport Authority</li> <li>FIU</li> </ul>
Pawnbrokers Sector	Medium	<ul style="list-style-type: none"> <li>Licensing and general guidelines under the Second Hand Dealers Act.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Respective town/city councils</li> <li>FIU</li> </ul>
Marine Vessel Dealers Sector	Medium	<ul style="list-style-type: none"> <li>Maritime Safety Authority of Fiji. oversees vessel registration in Fiji.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>MSAF</li> <li>FIU</li> </ul>

Other sectors with low net risk and residual vulnerability for money laundering are not included in this table.





## National Anti-Money Laundering Council

Established under the Financial Transactions Reporting Act