

TRANSNATIONAL ORGANISED CRIME STRATEGY:

Year Two Action Plan 2021/22: Progress Tracker

Strategic Focus Area	Activity	Description	Resourcing	Outcome
UNIFY: Drive System Governance and Coordination	1. Expand TNOC governance model	Expanding the TNOC governance model to include financial supervisors (RBNZ and FMA) to ensure representation reflects identified TNOC vulnerabilities.	RBNZ and FMA representatives to join relevant governance groups	Completed RBNZ and FMA have representation at the TNOC Steering Group and TNOC (Intelligence) Sector Coordination Group.
	2. NZ TNOC Handbook	Developing a TNOC handbook outlining the roles, responsibilities, powers, and key contacts of all relevant agencies within the TNOC system. The aim is to provide a central reference point, increase coordination and information sharing, guide referrals around the system and maximise use of available tools.	TNOC Secretariat to coordinate with input from all agencies	Multi-year milestones
	3. TNOC Evidence Review	Commissioning an evidence review to understand the full scope, scale, and impacts of TNOC in NZ and develop an evidence base of current actions being undertaken across government to prevent and combat TNOC. This will create a picture of where we are now, so we can measure our progress against it.	TNOC Secretariat to coordinate with input from all agencies	Multi-year milestones Reports expected FY22/23.
	4. Develop measurement framework	Developing a framework to measure our progress over the life of the strategy towards our objectives.	TNOC Secretariat to coordinate with input from all agencies	Multi-year milestones
	5. Integrated agenda for legislative reform	Integrating timelines of all TNOC-relevant legislative reforms into one overarching agenda. This will enhance visibility and coordination and ensure that we understand the impacts of reforms across government, so we do not inadvertently create loopholes in our system.	Ministry of Justice to coordinate input from relevant agencies and keep agenda up to date	Multi-year milestones

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Appendix B

Strategic Focus Area	Activity	Description	Resourcing	Outcome
UNIFY (Cont.)	6. Addressing gaps in NZ's AML/CFT framework that are vulnerable to TNOC abuse	<p>This includes:</p> <ul style="list-style-type: none"> Identifying options to respond to the policy gaps identified in NZ's National Risk Assessment and FATF Mutual Evaluation, including in relation to administrative measures for remitters; transparency of beneficial ownership information; and AML/CFT obligations for reporting entities. Implementing a cross-agency approach to identifying and sanctioning unregistered remitters and those remitters wilfully involved in illegal activity. Using the AML/CFT statutory review process to identify further AML/CFT weaknesses that could attract TNOC. 	Ministry of Justice is the lead, supported by Police, DIA, MBIE, Customs, IRD, MFAT, SFO, RBNZ and FMA	<p>First milestone (review completed)</p> <p>Ministry of Justice completed review of AML/CFT Act, report provided to Minister of Justice on 30 June 2022. This Review showed how the Act is performing well, and recommended changes to regime. Implementation of the recommendations will be multi-year.</p>
	7. Aligning the Financial Crime and Corruption Strategy with the TNOC Strategy	Avoiding duplication and ensuring alignment of the new Financial Crime and Corruption Strategy with the TNOC Strategy, with a particular focus on preventing and combatting the corruption that enables TNOC.	SFO is the lead, with support from MOJ and Police	<p>Multi-year milestones</p>
	8. Strengthening the legal framework and addressing loopholes that attract TNOC	<p>This includes:</p> <ul style="list-style-type: none"> amendments to the Trade in Endangered Species Act 1989 to strengthen the management of international trade in endangered, threatened and exploited species; s.9(2)(f)(iv) OIA [REDACTED] the Maritime Powers Bill, which will provide NZ law enforcement agencies with powers to enforce NZ criminal law in international waters, in accordance with international law. 	<p>DOC is leading the Trade in Endangered Species reforms, s.9(2)(f)(iv) OIA [REDACTED] MFAT is leading the Maritime Powers Bill</p>	<p>Multi-year milestones</p> <p><u>Trade in Endangered Species Act 1989</u> Bill drafted, but likely to be introduced in the next term of government.</p> <p>s.9(2)(f)(iv) OIA [REDACTED]</p> <p><u>Maritime Powers Bill</u> The Maritime Powers Act commenced May 2022.</p>
	9. Utilising NZ's UNTOC Review to identify TNOC weaknesses and opportunities	<p>Part 1 of NZ's first UNTOC review will commence in December 2021. s.9(2)(f)(iv) OIA [REDACTED]</p>	Lead agency TBD. Police, MOJ, MFAT, Customs and MBIE will contribute	<p>s.9(2)(f)(iv) OIA [REDACTED]</p>

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Appendix B

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PREVENT AND DETECT: Strengthen Capability and Understanding	10. Coordinate education and public awareness campaigns	Developing an integrated outreach plan to coordinate agency (and cross-agency) efforts, both planned and already underway, to educate and raise awareness of TNOC risks. Identification and targeting of sectors that require further education and/or awareness raising.	TNOC Secretariat to coordinate, with input from all agencies	Refocused as ongoing responsibility of the TNOC Secretariat.
	11. Sector-specific guidance on TNOC risks	Developing sector-specific guidance for those sectors identified as being at the highest risk of TNOC abuse (i.e. financial, border, construction, and horticulture/viticulture) to improve their understanding of, and resilience to, TNOC.	Customs to lead for border sector; Police to lead for financial sector; MBIE to lead for construction, horticulture, viticulture sectors. Relevant agencies to support	Completed for year 2 Customs has provided detailed guidance and information through presentations to various supply chain industries across New Zealand. The Financial Intelligence Unit has provided specific guidance on TNOC related risks to the financial sector through Suspicious Activity Reporting. This activity will become an annual effort.
	12. Public/private project on addressing financial sector vulnerabilities	Project involving public sector agencies and financial institutions focused on jointly developing solutions to address TNOC vulnerabilities in the financial sector. This project will utilise the Financial Crime Prevention Network to engage with the banking sector.	Police to lead, with support from DIA, SFO, RBNZ and FMA	Completed A joint intelligence report was delivered by Financial Intelligence Unit, s.9(2)(b)(ii) OIA focused on drug-related offences and the methods of laundering associated cash. The paper has been circulated through the Financial Crime Prevention Network.
	13. Expansion of NZTCU support to the PTCN	This programme will focus on building intelligence capacity and capability of PTCN members, which will in turn enhance the TNOC intelligence we receive from Pacific partners.	Police to lead, with support from MFAT, Customs, MBIE and Corrections	Completed The NZTCU has officially opened. In-country visits to Cook Islands and Fiji have focused on capability building and gang awareness raising. Future visits will be to Tonga, Fiji, Samoa and Niue.

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DISMANTLE: Fuse Operational Priorities

14. NZ Inc. TNOC Collection Plan	Developing and implementing a cross-government TNOC collection plan, incorporating the offshore network.	TNOC Sector Coordination Group	Completed The TNOC Intelligence Collection Priorities have been completed (a live document), providing sector guidance to identify future and emerging TNOC risks.
15. Annual TNOC Strategic Assessment	A strategic assessment informed by the TNOC collection plan and timed so that it informs the development of the annual TNOC Action Plan. The assessment will include a future focus and incorporate information about offshore threats, to ensure we remain vigilant of emerging risks.	TNOC Sector Coordination Group	Completed This report focused on future TNOC risks in Illicit Drugs, Cybercrime, Cryptocurrency and Human Trafficking. The Report was released in August 2022 to the 19 partner agencies and continues to inform our activities.
16. Identifying and addressing barriers to sharing TNOC-relevant information	A multi-part project involving: (1) defining TNOC-relevant information; (2) identifying barriers to sharing TNOC-relevant information; (3) determining the appropriate solution to overcome these barriers; and (4) implementing the agreed solution.	Lead agency TBD, support from all agencies	Multi-year milestones
17. Information sharing training for staff	Training staff on what TNOC-relevant information can be shared, with who and when. This will increase awareness of existing information sharing powers to facilitate greater and more proactive information sharing between agencies.	All agencies to conduct internal training	Multi-year milestones (merged with Activity 16)
18. Review operational fusion opportunities	Considering opportunities to bolster existing cross-agency initiatives (e.g. ITOC and NZTCU) to support operational fusion on TNOC. This will include consideration of resourcing to support any expansion.	Steering Group	Review completed. Based on review results, we are now looking at establishing TNOC Strategic Intelligence Fusion Centre in FY22/23.
19. Criminal Proceeds (Recovery) Act 2009 amendments	Amending the CPRA to provide new powers to better respond to transnational and national organised crime offending by enabling restraint and forfeiture of assets in a more timely and effective manner.	MOJ is the lead, with support from Police	Multi-year milestones
20. [REDACTED]	[REDACTED]	s.9(2)(f)(iv) OIA [REDACTED]	[REDACTED]