Oceania Customs Organisation Secretariat

DUTY TRAVEL REPORT

Trade-Based Money Laundering (TBML) Workshop

Operation DOMINO II Post-Action Debrief

Staff Member	Mohammed Ajaz	
Destination:	Tanoa International Hotel, Nadi, Fiji	
Source of funding:	Fully funded by Australian Border Force	
Travel Dates:	Departure Date:	4 May 2025
	Arrival Date:	9 May 2025
Purpose of Travel:	The purpose of this duty travel was to attend and contribute to the "Trade-Based Money Laundering (TBML) Workshop and the Operation DOMINO II Post-Action Debrief", held from 5-7 May 2025. The event brought together Customs officials from 14 Pacific Island countries, and representatives from the Australian Border Force (ABF).	
Activity description:	The 3-day Debrief event brought together participating members of Operation DOMINO II to review and discuss country-specific reports. This marked the final phase of the operation, which commenced in March 2025. Operation DOMINO II began with a workshop focused on enhancing data analysis skills using Microsoft Excel. This was followed by a "Month of Action," during which Members actively exchanged trade data and conducted verifications of import and export transactions to identify potential cases of undervaluation and financial crimes. The final Debrief featured expert presentations, case studies, and group discussions centered on Trade-Based Money Laundering (TBML) and the outcomes of Operation DOMINO II. Key Highlights: - Day 1: - Opening remarks - Overview of money laundering and illicit financial flows - Introduction to TBML - Case studies and group reflections - Day 2: - Country presentations from Australia, CNMI, Cook Islands, FSM, Kiribati, Nauru, New Caledonia, Niue, and Timor-Leste - Each Member shared their activities and findings from Operation DOMINO II - Day 3:	

	o Country reports from Tonga, Tuvalu, Vanuatu, Solomon Islands, Fiji, and Papua New Guinea o Tactical group debrief and closing remarks The sessions provided valuable insights into regional trade enforcement and data-sharing practices. Based on the discussions and findings, the OCO Secretariat will draft the final Operation DOMINO II Assessment Report.

Outcomes:	Key Outcomes:
	
	1. Enhanced Awareness and Capacity Building:
	   o Participants gained practical knowledge of TBML indicators.
	2. Successful Regional Collaboration:
	   o Operation DOMINO II demonstrated the effectiveness of coordinated intelligence-driven actions.
	   o Cross-border information sharing increased during the operation, signalling growing trust and cooperation.
	3. Country-Specific Insights:
	   o Presentations highlighted both achievements and constraints—such as resource limitations and analytical skills.
	   o Some jurisdictions identified suspicious financial patterns requiring further investigation. Specifics of the outcome is discussed in the Assessment Report.
	4. Commitment to Future Collaboration:
	   o Countries expressed interest in ongoing tactical operations and capacity development in financial crime detection.

Recommendations/follow up activities:	The OCO, ABF and the participating Members agree to: 1. Adopt the standard data template: finalise and implement the data exchange format being developed by UNCTAD. 2. Explore the opportunity to utilize a secure online sharing platform for exchange of data. 3. Expand use of post-clearance audit (PCA): Members must execute PCA protocols for all high-risk cases identified. 4. Foster FIU collaboration: build cross-agency partnerships to analyse potential TBML cases further. 5. Enhance capacity building: conduct follow-up workshops focused on Excel analysis, TBML detection, and enforcement.

	6. Institutionalise regional operations: make such regional joint operations a standing activity under OCO trade enforcement programs.
Acknowledgement	• I wish to sincerely acknowledge the Australian Border Force for their leadership and coordination with the Operation Domino II and funding the 3-day Debrief event. • Special thanks to the facilitators; Ms. Aneeta Kakoschke and Jack Raymont • My sincere gratitude to my Pacific Customs colleagues who participated in the regional operation and withheld the meaningful purpose of the operation.
Meeting documents where available *(to put on server with* *hyperlink):*	The documents for training can be found here.

Photos:

Oceania Customs Organisation Secretariat

DUTY TRAVEL REPORT

Workshop on Strengthening Customs in Countering Trade-Base Money Laundering Nadi, Fiji, May 8 – 9, 2025

Staff Member	Mohammed Ajaz	
Destination:	Tanoa International Hotel, Nadi, Fiji	
Source of funding:	Primarily funded by the International Monetary Fund (IMF), with partial funding provided by the OCO	
Travel Dates:	Departure Date:	4 May 2025
	Arrival Date:	9 May 2025
Purpose of Travel:	The purpose of this duty travel was to attend and contribute to the 'Workshop on Strengthening Customs in Countering Trade-Based Money Laundering (TBML)', held from 8–9 May 2025. The two-day event was scheduled back-to-back with the Operation Domino II Debrief, as it targeted the same Customs officials from 13 Pacific Island countries. Facilitators from the Australian Border Force (ABF), who led the Operation Domino II Debrief, also attended the workshop as observers.	
Activity description:	The two-day workshop enhanced awareness on Trade-Based Money Laundering (TBML). The sessions, facilitated by IMF experts, covered both foundational and practical components of anti-money laundering (AML) and counter-financing of terrorism (CFT), with special emphasis on the role of Customs administrations. The workshop delivered a combination of theoretical presentations, group exercises, and interactive discussions. Key topics included: • Understanding the FATF AML/CFT standards applicable to Customs. • Role of Financial Intelligence Units in supporting Customs operations. • Techniques for identifying and investigating TBML. • Emerging risks and typologies related to TBML and cross-border currency smuggling.	
Outcomes:	• **Enhanced Technical Knowledge:** Participants gained deeper insight into AML/CFT concepts,	

	including the global regulatory framework and enforcement mechanisms.
	• **Practical Investigative Techniques:** Case-based exercises helped strengthen analytical approaches to TBML identification, including red flag indicators and evidence gathering.
	• **Improved Inter-agency Coordination Understanding:** Emphasis was placed on collaboration between Customs and Financial Intelligence Units (FIUs) to facilitate effective TBML investigations. Increased awareness on the Financial Action Task Force Standards that are relevant for Customs.
	• **Awareness of Emerging Threats:** Discussions around current TBML trends provided a forward-looking understanding of how criminal organizations adapt their methods, especially in the Pacific context.
Recommendations/follow up activities:	Whilst the workshop featured an overview of the Anti-Money Laundering (AML) and Counter Financing Terrorism (CFT), future workshops would be most targeted on specific Customs related trade-base money laundering. The participants agree to:
	• **Capacity Building:** It is recommended that OCO continues to support and coordinate similar workshops with specific emphasis on detecting TBML through Customs interceptions and identifying the red flags in Customs transactions.
	• **Customs-FIU Collaboration Framework:** Member administrations should prioritise establishing or strengthening formal information-sharing protocols with FIUs to streamline investigations.
	• **TBML Risk Profiling:** Develop or update national Customs risk management frameworks to integrate TBML-specific indicators and intelligence.
	• **Knowledge Dissemination:** Encourage participants to cascade the learnings to broader operational staff through peer-to-peer learning and debrief sessions.
Acknowledgement	Sincere gratitude is extended to the International Monetary Fund (IMF) for their major funding support and technical facilitation of the workshop. Special thanks to the distinguished facilitators, Mr. Mohammad Ehteshamul

	Hoque and Mr. Thomas Hansen, for sharing their expertise and delivering a highly engaging workshop.
Meeting documents where available *(to put on server with hyperlink):*	The documents for training can be found [here]().

Photos:

Assessment Report

Oceania Customs Organisation Secretariat

Australian BORDER FORCE

Introduction

Operation Domino II is a regional Customs enforcement initiative coordinated by the OCO Secretariat, in partnership with the Australian Border Force (ABF) as operation and technical leads. Building on the momentum of Operation Domino I, this operation focused on detecting undervaluation and trade-based money laundering (TBML) through the sharing and analysis of standardised trade data across participating OCO members.

Objectives

The operation aimed to:

- Facilitate the exchange of standardised import and export datasets among OCO members,
- Detect possible undervaluation of selected commodities,
- Promote compliance outcomes through data-driven analysis and post-clearance audits,
- Identify red flags linked to trade-based money laundering, and
- Enhance regional cooperation and intelligence-sharing among Customs administrations.

Participation

Participating members generated trade data on targeted commodities and provided export datasets to participating members for comparative analysis with imports. Participants included Customs officials from Australia, Commonwealth of Northern Mariana Islands, Cook Islands, Federated States of Micronesia, Fiji, Kiribati, Nauru, New Caledonia, New Zealand, Niue, Papua New Guinea, Solomon Islands, Timor-Leste, Tonga, Tuvalu, and Vanuatu. Participants leveraged collaborative mechanisms for cross-border verification of trade declarations. New Zealand contributed to data exchange, however, did not participate in the data analysis due to resourcing issues.

Operational Phases

Phase	Dates (2025)	Activity	Outcome
Preparatory	03 – 07 March	Data Management & Analysis Workshop	Pre-operation capacity building
	10 – 21 March	Trade Data Exchange	Submission and circulation of standard datasets
Operational	24 March – 21 April	Month of Action	Data analysis, risk profiling, and case identification
	22 April	Operational Report Submission	Completed reports submitted to OCO Secretariat
Evaluation	05 – 07 May	Post-operation Debriefing	Peer review, knowledge exchange, and planning

Key Findings

The analysis and collaboration under Operation Domino II yielded significant findings across participating jurisdictions, demonstrating both the strength of regional cooperation and the practical benefits of data-driven enforcement. The targeted commodities for the operation were from tariff headings 2203 (Beer), 2204 (Wine), 2207(Spirit over-proof), 2208 (Spirits underproof) and 8703 (Motor Vehicles designed for transporting people). The operation was subjected to trade periods; July to December 2024.

The subject matter expertise provided by ABF throughout the operation cannot be understated. In addition to the face-to-face workshops, participants uplifted their data analysis skills immensely through weekly virtual meetings where ABF provided technical support to assist with complex data analysis.

1. Discrepancy and Risk Indicators

- Participating members collectively identified a wide range of anomalies in trade data, including:
    - Systemic undervaluation of goods,
    - Misclassification of dutiable items,
    - Overvaluation risks possibly linked to trade-based money laundering (TBML),
    - Data inconsistencies between import and export records,
    - Discrepancies and errors in cargo reporting and,
    - Possible diversion of Free Trade Zone goods
- Several cases have already been identified for audit and post-clearance verification.
- Tabulated results of the operation are as follows:

COUNTRY	# OF DISCREPANCIES	# OF IMPORT LINES	# OF EXPORT LINES	IMPORT CVAL (AUD)	EXPORT CVAL (AUD)
VU	20	636	1147	$ 4,198,809.77	$ 3,396,466.99
CK	1124	5086	2442	$ 10,793,289.58	$ 7,926,755.60
FJ	38	674	879	$ 20,538,773.49	$ 20,914,807.38
FSM	24	7	52	$ 111,240.48	$ 53,226.00
KI	272	369	225	$ 1,601,503.60	$ 877,490.67
NR	0	489	278	$ 356,149.75	$ 356,913.00
NC-AU	29	78	171	$ 2,661,099.00	$ 2,579,439.00
NC-NZ	2	31	179	$ 1,217,367.92	$ 1,132,895.36
NU	66	44	110	$ 291,431.45	$ 609,783.65
PNG	4	3856	3983	$ 21,878,171.37	$ 9,040,274.48
SB	12	590	738	$ 1,660,668.69	$ 1,169,028.73
TL	237	135	118	$ 1,572,281.12	$ 1,687,803.00
TO	293	172	465	$ 338,004.75	$ 4,002,418.00
TV	0	9	15	$ 43,244.30	$ 122,263.00
CNMI	0	0	0	$ -	
AU	104	8344	5997	$ 227,169,863.52	$ 232,146,151.66
	2,225.00	20,520.00	16,799.00	$ 294,431,898.78	$ 286,015,716.52

Financial Risk Estimate

- Based on the verification of 37,319 import and export entry lines, a total of 2,225 discrepancies were identified, representing approximately 5.9% of the entries reviewed. The total import value assessed amounted to AUD 294.4 million. This level of discrepancy indicates a significant revenue risk exposure within the trade data set, suggesting potential revenue leakage, misclassification, undervaluation, or non-compliance with regulatory requirements. The findings emphasize the need for enhanced risk profiling and targeted post-clearance audit interventions to mitigate financial risks and strengthen the integrity of trade transactions.

Standout Country Highlights

- **Timor Leste**: Detected two major vehicle importers systemically undervaluing vehicles to stay below the luxury car tax threshold. This finding represents a significant revenue risk and potential fraud scheme. The outcomes of the pending audits are highly anticipated.
- **Fiji**: Showcased strong analytical improvement by applying Excel-based data visualisation techniques learned in earlier workshops to large, complex datasets, leading to clearer insight generation and risk prioritisation.
- **Cook Islands**: Took an innovative approach by involving investigation officers from the beginning of the operation, ensuring analysis and enforcement were aligned from the outset.
- **New Caledonia**: Participated with remarkable resilience amidst civil unrest back home, contributing critical insights and maintaining full engagement throughout the operation.
- **Niue**: Demonstrated outstanding commitment by producing quality results despite limited human resources, showcasing flexibility and effective workload management.
- **Tonga**: Uncovered deliberate misclassification of spirits and alcoholic beverages as "ginger beer," highlighting a tactic used to evade excise duties.
- **Vanuatu and Solomon Islands**: Identified strong indicators of TBML, especially through anomalous pricing and trade flow patterns. These findings have been flagged for deeper financial investigation and interagency collaboration.
- **Papua New Guinea:** amidst identifying suspicious TBML, the officers found a substantial amount of Free Trade Zone goods entered for export but no documents found to substantiate the actual movement of goods. Further investigation is required to rule out illegal disposal for home consumption.

Data Quality Observations

- Challenges with data formatting and standardisation persisted. Despite widespread use of ASYCUDA World, the lack of harmonized data fields across countries impeded analysis and delayed some risk detection efforts.
- The development of a standardised data template in coordination with UNCTAD and ABF was seen as a crucial step forward, however, the UNCTAD had not been able to configure the ASYCUDA system with the requested template, prior or during the operation.

Strategic Value and Capacity Building

Operation Domino II advanced regional capacity in trade data analysis, enhanced cooperation between enforcement agencies, and promoted risk-based post-clearance audit practices. It aligned directly with the OCO Strategic Plan 2022–2027 priorities:

- **Law Enforcement and Border Security**
- **Trade Management and Facilitation**
- **Revenue Management and Compliance**

The Month of Action served as an invaluable hands-on exercise for Customs officers, deepening understanding of valuation risks and enhancing enforcement readiness.

Challenges Identified

- Inconsistent data fields across jurisdictions affected uniformity in analysis.
- Limited analytical capacity in some administrations hampered full participation.
- Interagency collaboration gaps reduced access to external data such as financial intelligence or shipping details.
- Short operation timeline limited the depth of intervention or on-site audits during the Month of Action.

Recommendations

The OCO, ABF and the participating Members agree to:

1. Adopt the standard data template: finalise and implement the data exchange format being developed by UNCTAD.
2. Explore the opportunity to utilize a secure online sharing platform for exchange of data.
3. Expand use of post-clearance audit (PCA): Members must execute PCA protocols for all high-risk cases identified.
4. Foster FIU collaboration: build cross-agency partnerships to analyse potential TBML cases further.
5. Enhance capacity building: conduct follow-up workshops focused on Excel analysis, TBML detection, and enforcement.
6. Institutionalise regional operations: make such regional joint operations a standing activity under OCO trade enforcement programs.

Conclusion

Operation Domino II reinforced the effectiveness of regional collaboration in identifying undervaluation and associated financial crimes. The operation highlighted vulnerabilities in trade reporting, opportunities for capacity growth, and the immense value of cross-border intelligence exchange. The commitment and engagement of participating members were central to the operation's success and will be vital in future planned operations.

TRAINING OUTCOME STATEMENT

Workshop on Strengthening Customs in Countering Trade-Based Money Laundering (TBML)

8-9 May, Nadi, Fiji

The Workshop on Strengthening Customs in Countering Trade-Based Money Laundering (TBML), co-organized by the Oceania Customs Organisation (OCO) and the International Monetary Fund (IMF), was held from May 8–9, 2025, in Nadi, Fiji. The workshop brought together 23 Customs officials from 13 Pacific Island countries, including the Cook Islands, Fiji, the Federated States of Micronesia (FSM), Kiribati, Nauru, Niue, New Caledonia, Papua New Guinea (PNG), the Solomon Islands, Tonga, Tuvalu, and Vanuatu, as well as the Commonwealth of the Northern Mariana Islands (CNMI). Additionally, two officials from the Australian Border Force (ABF) participated as observers. The event provided a foundational overview of Anti-Money Laundering and Countering the Financing of Terrorism (AML/CFT) with a specific focus on the role of Customs in addressing Trade-Based Money Laundering.

The workshop was supported by Mr. Mohammad Ehteshamul Hoque (IMF) and sessions were facilitated by Mr. Thomas Hansen (External Expert), who brought extensive global experience in AML/CFT enforcement and interagency collaboration.

Over the two-day workshop, participants:

- Received a broad overview of the international AML/CFT landscape, including the FATF standards and the relevance of Customs in the global enforcement architecture;
- Explored foundational concepts in AML/CFT and the interface between financial systems and trade channels;
- Discussed institutional roles and collaboration mechanisms, particularly between Customs and Financial Intelligence Units (FIUs);
- Gained insight into cross-border currency smuggling and emerging TBML risks and typologies.

While the workshop primarily focused on building foundational understanding, the case studies and hands-on practical exercises stood out as highlights, significantly enhancing participants' grasp of how AML/CFT concepts apply in real-world and Customs operations. These activities helped bridge the gap between theoretical knowledge and operational application, giving participants confidence to better recognise and respond to trade-based money laundering risks.

Key Outcomes:

- Strengthened foundational knowledge of AML/CFT principles among Pacific Customs administrations;
- Improved understanding of how TBML techniques manifest in trade operations;
- Increased awareness of the role of Customs in financial investigations and inter-agency cooperation;
- Enhanced analytical skills through engaging, scenario-based learning that demonstrated practical approaches to detecting and investigating TBML;
- Reinforced the need for continued capacity building and regional collaboration to address evolving financial crime threats.

The OCO Secretariat commends the high level of participation and engagement demonstrated during the workshop and extends its gratitude to the facilitators and participants. The insights gained will support future capacity development efforts and strengthen Customs' contribution to national and regional AML/CFT strategies.

End

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TRAINING POST EVALUATION

Operation Domino II Debriefing & Workshop on Strengthening Customs in Countering Trade-Based Money Laundering (TBML)

Summary of Training Evaluation Results

Overview

The Operation Domino II Debriefing and Workshop on Strengthening Customs in Countering Trade-Based Money Laundering (TBML), jointly facilitated by the Oceania Customs Organisation (OCO), the Australian Border Force (ABF), and the International Monetary Fund (IMF), received highly positive feedback from participants. The sessions focused on enhancing trade data analysis, strengthening regional collaboration, and improving the capacity of Customs administrations to detect undervaluation and TBML risks. Additionally, the workshop broadened participants' understanding of anti-money laundering and counter-financing of terrorism (AML/CFT) measures within the trade environment. A summary of the training evaluation, by the participants, is provided below:

1. Logistics & Organization

- Well-coordinated workshop with logistical support appreciated by participants.
- Recommendations included earlier dissemination of travel itineraries and extending TBML workshop duration.

2. Facilitators & Delivery

- Presenters were knowledgeable and approachable.
- Excel training significantly boosted participants' data analysis capabilities.
- TBML sessions were insightful but content-heavy; more practical and interactive elements were suggested.

3. Relevance & Impact

- Trade data exchange is seen as vital for identifying undervaluation and improving audit accuracy.
- Participants recognized the benefit of comparing import/export data across jurisdictions.
- Main challenges included limited time, technical constraints, and data inconsistencies.

4. Lessons Learned

- Regional cooperation and data sharing enhance revenue protection and risk detection.
- Participants gained essential Excel and analytical skills.
- Continued learning and cross-agency teamwork are critical for operational success.

5. Application & Way Forward

- Many plan to share insights through internal training and presentations.
- Participants intend to work more closely with Financial Intelligence Units and audit teams.
- Findings will inform future profiling, compliance checks, and audit strategies.

6. Most Valuable Aspects
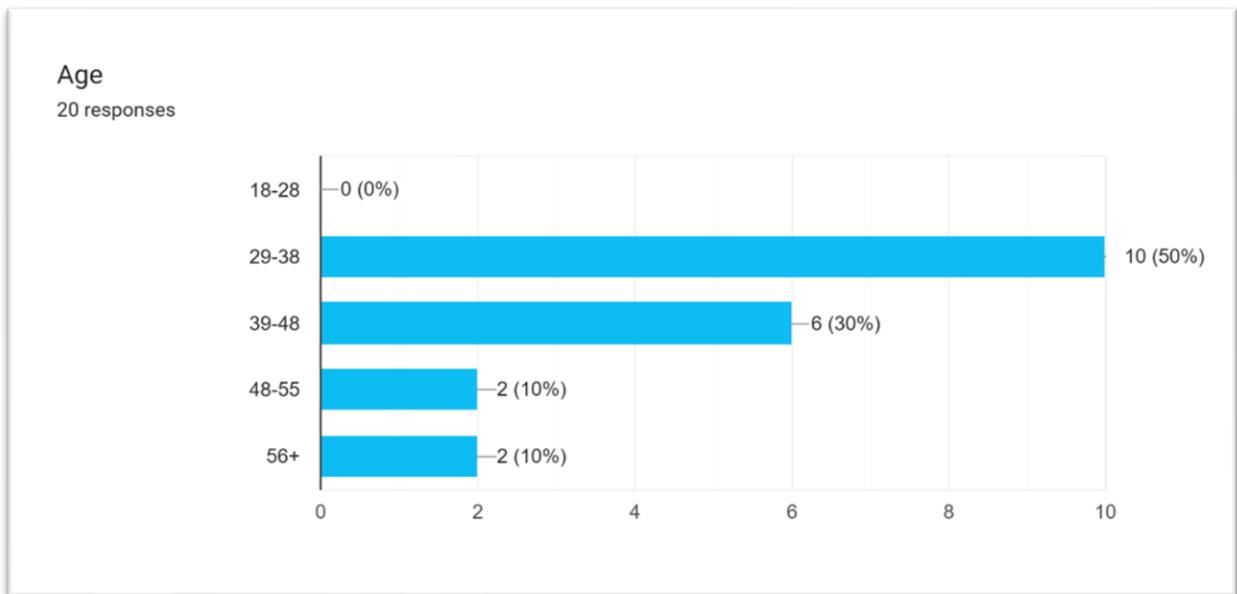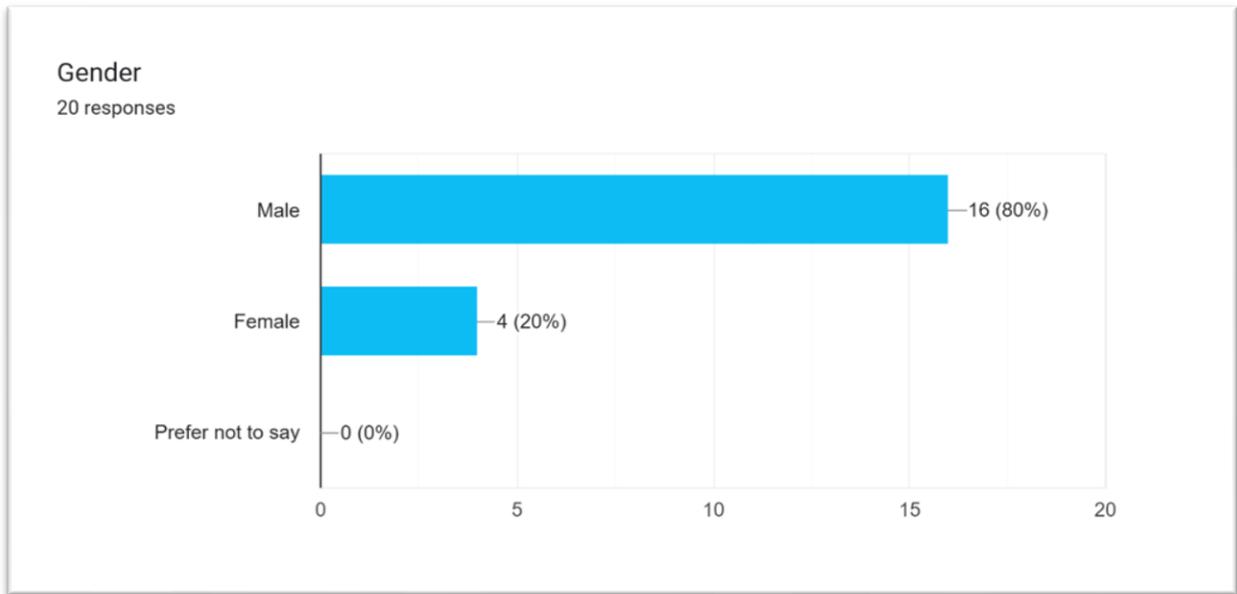
- Hands-on Excel/data analysis training.

- Awareness of TBML methods and red flags.
- Peer-to-peer learning and regional information exchange.
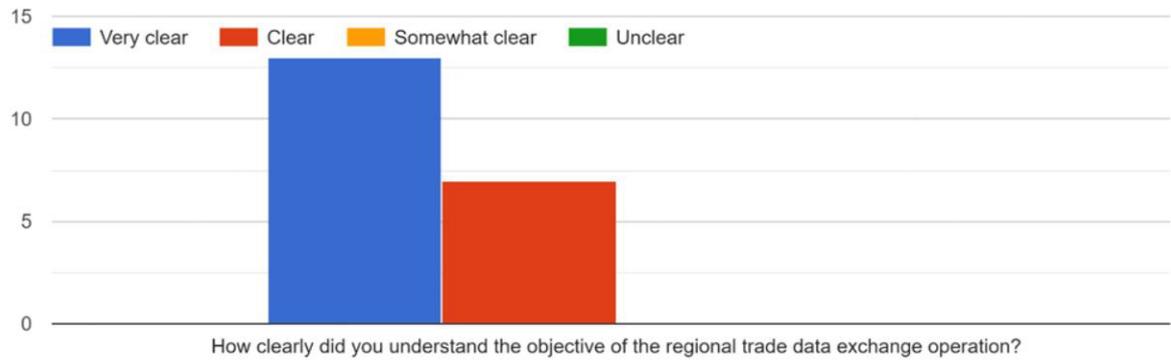
Conclusion

The OPS Domino II and TBML Awareness Workshop was a valuable learning platform. It successfully built regional capacity, enhanced analytical skills, and promoted a collaborative approach to managing Customs risks. Participants endorse continued support, follow-up training, and expansion of future OPS Domino operations.

Full details of the Training Evaluation are attached, as Annex A.
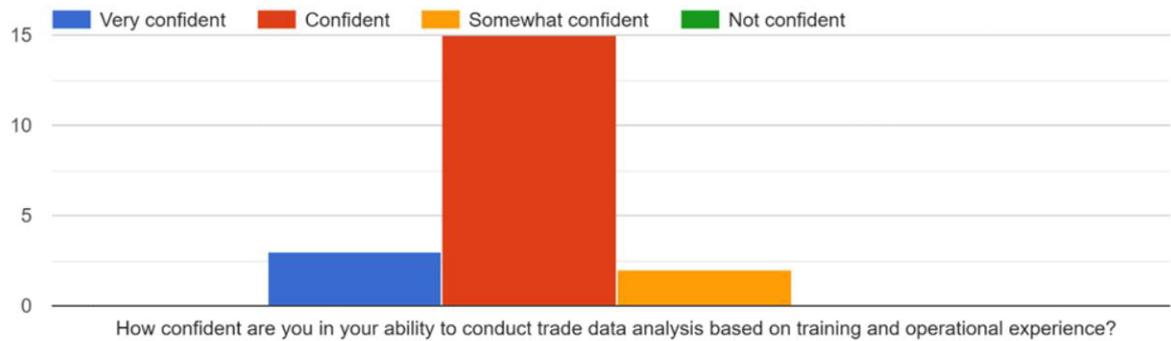
ANNEX A
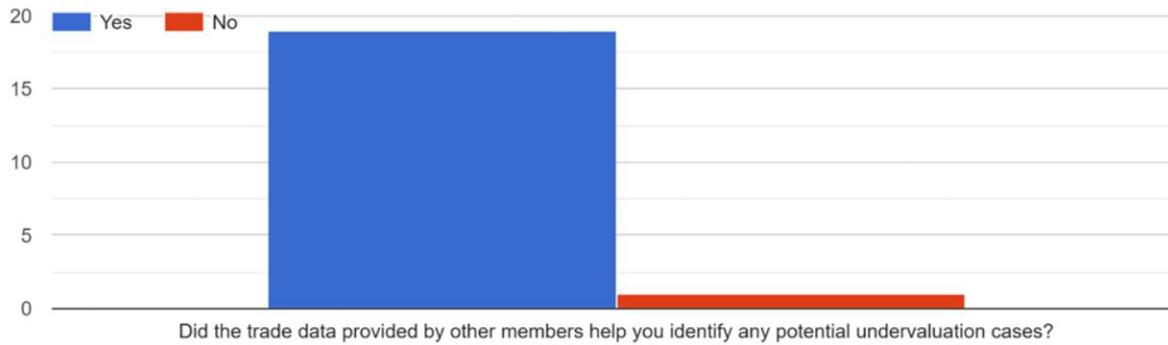

Gender
20 responses

Male	16 (80%)
Female	4 (20%)
Prefer not to say	0 (0%)

Age
20 responses

18-28	0 (0%)
29-38	10 (50%)
39-48	6 (30%)
48-55	2 (10%)
56+	2 (10%)

![Oceania Customs Organisation Secretariat logo]

1A(i). Understanding of the Operation - Ops Domino II Debriefing

Legend: ■ Very clear ■ Clear ■ Somewhat clear ■ Unclear

How clearly did you understand the objective of the regional trade data exchange operation?

1A(ii). Understanding of the Operation - Ops Domino II Debriefing

Legend: ■ Very confident ■ Confident ■ Somewhat confident ■ Not confident

How confident are you in your ability to conduct trade data analysis based on training and operational experience?
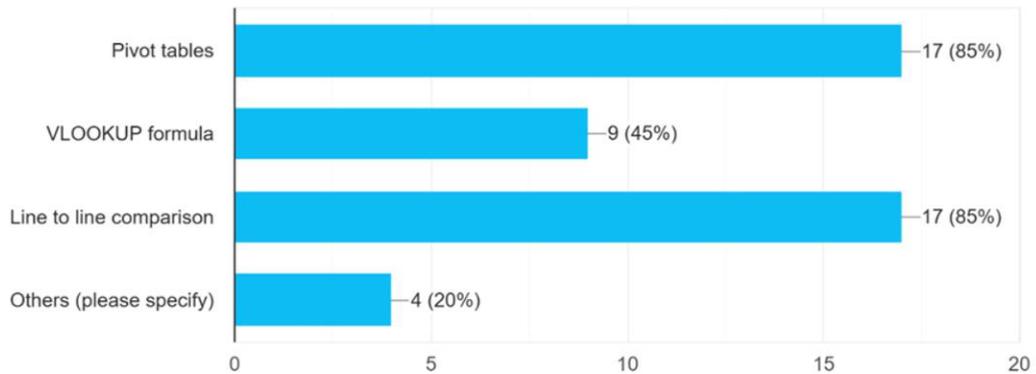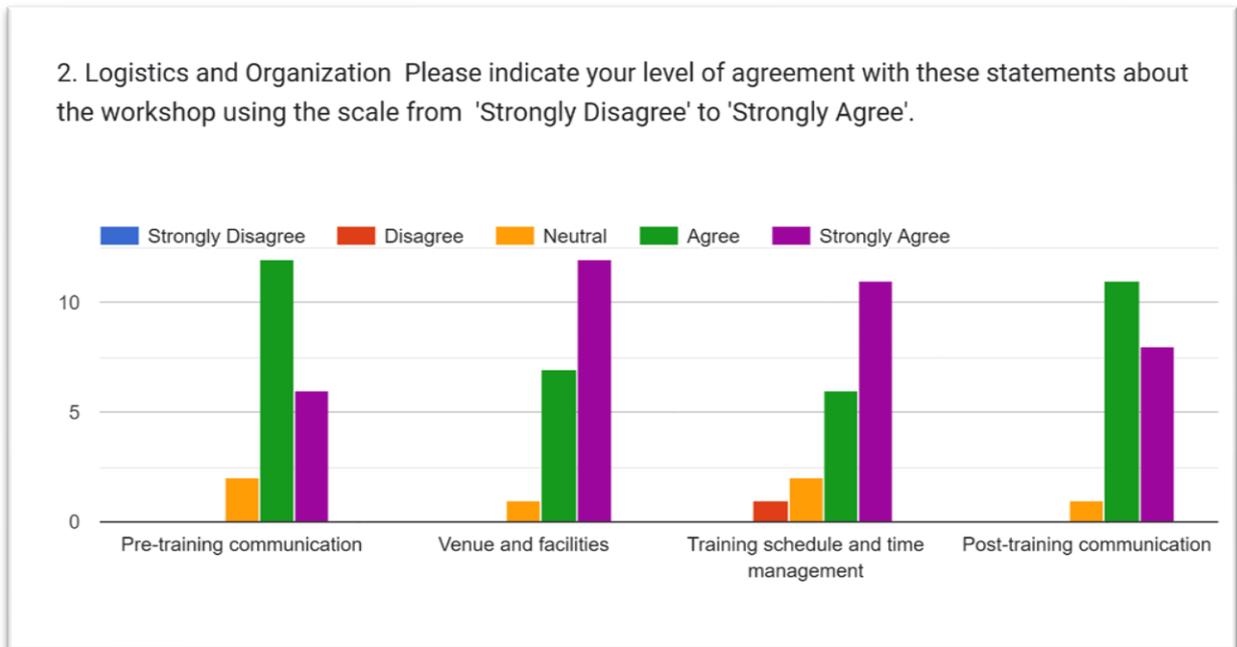
1A(iii). Understanding of the Operation - Ops Domino II Debriefing

1A(iv). Understanding of the Operation - Ops Domino II Debriefing
20 responses

1B. Training Content - Trade-Based Money Laundering Workshop

2. Logistics and Organization Please indicate your level of agreement with these statements about the workshop using the scale from 'Strongly Disagree' to 'Strongly Agree'.

2.1 Logistics and Organization Comments : 18 responses

The logistics and organization in this operation have been highly ineffective.

no comments

Arrangement was done really well.

Great presentation across the board.

Effective phases, helping the team stay aligned and on track.

Very efficient as we know that Logistics is never an easy way.

Excellent

I appreciate all the work put in by both OCO and ABF to ensure the success of this training. I have no complaints or notes to add just very appreciative of the opportunities offered. Sorry perhaps one note - if we could have had more time for the Money Laundering workshop, a lot to take in over 2 days.

No comments

TBML was great & really enjoyed, however information overload - 2 weeks in too few days as indicated by trainer.

Appreciate the two team for the afford that gives us during the workshop.

Nothing to complain about, excellent logistics and organization
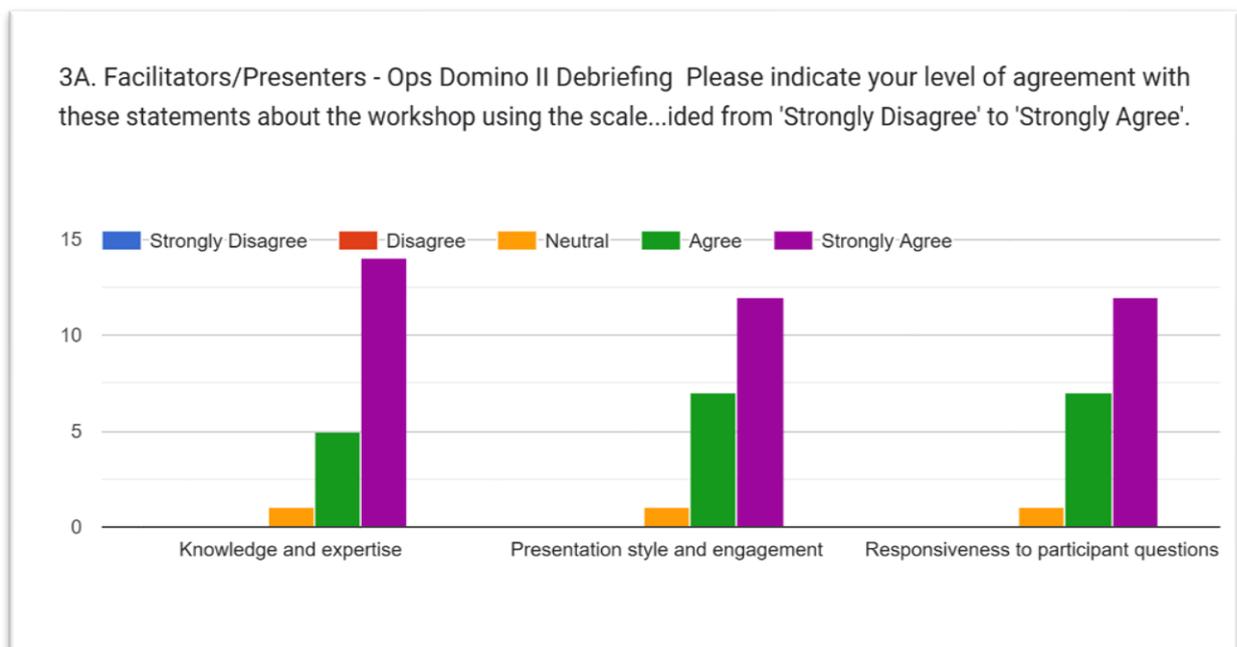
All good

Request if OCO does follow up invitations 24 hours after dissemination if the recipient (Comptroller/Director) fail to acknowledge.
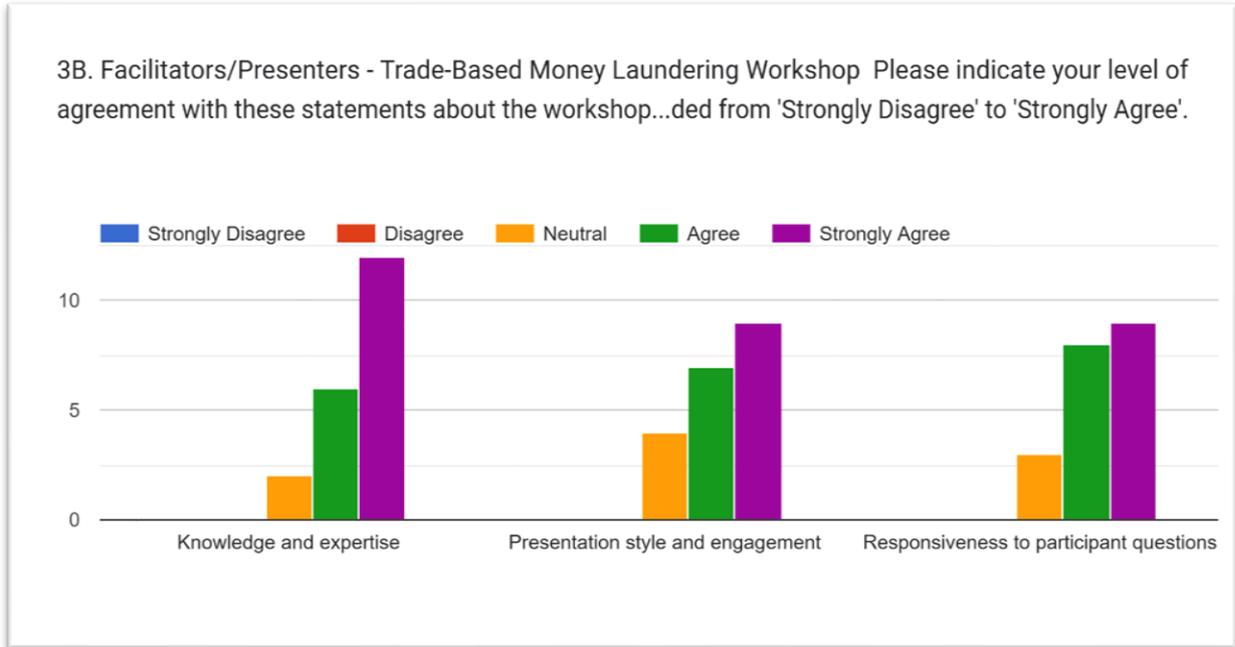
Participants receiving late confirmed itinerary can be improved in future workshops/trainings

Everything was well organized

Flights route to be considered taking into consideration lengthy transit hours, transit accommodation requirements and delay visa application or approval.

Neutral

3A. Facilitators/Presenters - Ops Domino II Debriefing Please indicate your level of agreement with these statements about the workshop using the scale...ided from 'Strongly Disagree' to 'Strongly Agree'.

3B. Facilitators/Presenters - Trade-Based Money Laundering Workshop Please indicate your level of agreement with these statements about the workshop...ded from 'Strongly Disagree' to 'Strongly Agree'.

3.1A Facilitators/Presenters Comments: Ops Domino II Debriefing: 17 responses

solid understanding of the subject matter

no comments

They have a lot of experiences in these areas, thus it makes it easier for follow and understand what was being presented.

Great presentation(s) and quick response to any questions or concerns.

The Excel training provided a significant advantage in compiling reports more efficiently. ABF's support throughout the training and implementation process is highly appreciated.

Strong team work, efficient and go-ahead

Good

My appreciation to Aneeta, Jack and Ajaz for sharing your knowledge with us and having the patience to work with officers from across the pacific. Very easy to engage with and approachable which I really appreciated.

no comment

Good amount of information provided.

The Presenter a deliver well

Great work

I agree to the presenters and facilitator that they deliver a very informative sharing and skills about Data Analysis to capture undervaluation

Fortunate to have gained and skill up my knowledge from the presentations received by the ABF experts

The presenters were well knowledged

Facilitators have been very helpful supportive during the OPs.

Neutral

3.1B Facilitators/Presenters Comments: Trade-based Money Laundering Workshop: 18 responses

case studies and participant involvement, would have greatly improved the overall experience.

no comments

Wealth of knowledge and experiences in their area of expertise. Makes the topic interesting.

Very knowledgeable about topic but need more hands-on exercise and more group involvement.

The trainer demonstrated strong subject matter expertise, which was evident throughout the session. Their delivery was enriched with numerous real-world scenarios, helping participants relate the concepts to practical applications.

experts in this field with strong experience

Clear but too much information

Wow, a world of knowledge here for both Tom and Ehtesham. Tom a never ending well of knowledge on the subject of money laundering with so much to share to the point I became a little overwhelmed not only at the information but the implications if we do nothing and the work ahead of us.

no comment

Enjoyed however information overload only negative.

The presenter well deliver presentation but their are limit time to deliver it with example.

Excellent

I also agree to the presenters and facilitators that they deliver a very instructive sharing and knowledge about money laundering
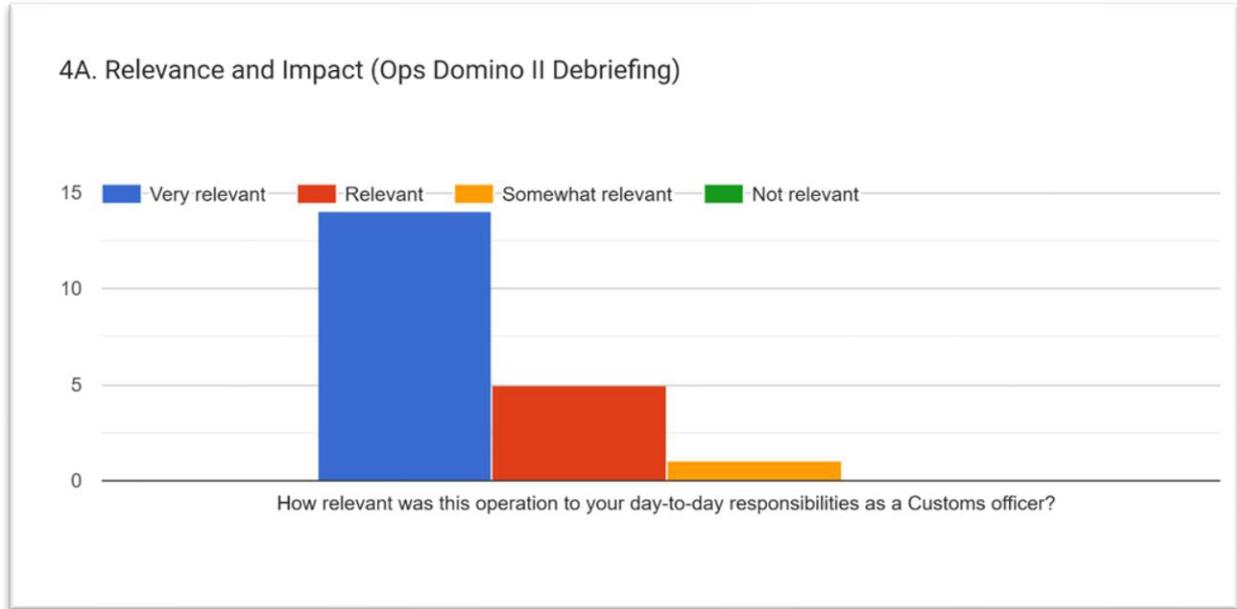
All good.

Fortunate to finally receive TBML training and awareness

Very well knowledge

The vast knowledge and experience displayed during the presentations by the presenter(s) is commendable and appreciated.

Neutral

4A. Relevance and Impact (Ops Domino II Debriefing)

How relevant was this operation to your day-to-day responsibilities as a Customs officer?

4B. Relevance and Impact (Ops Domino II Debriefing)- In your opinion, how can trade data exchange improve revenue protection in your administration? 20 responses

Relevant in the fight against customs fraud and trade-based money laundering. It strengthens data-sharing mechanisms among customs administrations. Impact on money laundering, particularly in the Pacific region

Sharing of data between export and import countries allows us customs to cross check invoices and detect discrepancies in real time.

Makes the comparison or verification checks much easier. Discrepancies that cause revenue loss can be detect and retrieve faster. Other issues of Trade Base Money Laundering can also be detected for further investigation.

A great tool to teach others from different sections of my agency.

by determining the export value. making sure that value comparison is available for post audits

with skills and knowledge acquired through Operation Domino, analysis work can continue and improve.

The training significantly improved our ability to identify potential undervaluation or overvaluation of trade imports through better data analysis techniques. Tools such as conditional formatting, pivot tables, and advanced formulas now enable more accurate and faster detection of anomalies in trade data.

it must be obvious that exchange data is the right way if you want to be more efficient

Effective with data exchange between our country

In the past we have only analyzed our import data and worked off of errors picked up based off of our processes and legislations. Its another story when you actually work with the export data and manage to do line by line comparisons do you actually pick up more and see more information and discrepancies whether its undervaluation, misclassification or error in declarations, so much more.

By matching the cif or fob from export countries with Import countries values.

Benefit financially is huge comparing import/ export data across countries, savings or incorrect invoicing or discrepencies.

Improving on how to determine whether import good are undervalue or not by compare from data export.

Identification of companies, the nature of the goods, and reduced values will allow you to establish selection criteria and target sensitive imports

Trade data exchanges save resources in inputting, checking, and correcting data entry they prevent data manipulation and secure data integrity and consistency in a way of comparing and reconciling the systems' data, which substantially enhances customs operations, for example, cargo traceability.

It does as what we have seen in each power points.

can improve revenue protection in customs by enhancing the accuracy, transparency, and verification of trade transactions

Preventing importers to claim under valued goods

Trade data exchange will greatly assist in Identifying areas of revenue leakage and implementing measures in terms of audits and or profiling of imports to recover revenue and promote compliance.

In my opinion, trade data exchange is invaluable for revenue protection in Timor-Leste Customs Authority. It significantly enhances our ability to compare and identify import and export records and their declared values. For example, the data we received from Australia proved very helpful in identifying potentially high-risk importers who warrant further audit, especially concerning the vehicles they imported.

4C. Relevance and Impact (Ops Domino II Debriefing)- What challenges did you face during the analysis phase? *(E.g. data quality, lack of tools, time constraints, technical skills)*

challengers' technical skills, data not quality

Lack of interoperability between systems like ASYCUDA, TIN systems, or electronic single windows. Outdated IT infrastructure and poor internet connectivity, especially in developing countries.

Data quality and time constraints

Lack of applications (Asycuda), time constraints, and Microsoft excel skills.

time constraints due to short staff and responsibility constraints.

timeframe parameters were too narrow for the operation. data- NZ datasets lacked consignee names, mass, container numbers.

The report server was not implemented as planned, which significantly impacted the centralization and timely consolidation of data.

time constraints, lack of expertise using Excel

need to upgrade skills in excel and pivot table, so easier to capture errors in data exchange

I would say the main challenge for us was the time constraint where we had 2 months and was cut down to a month for the operation. Even though we did manage to complete everything required of us, my colleague and I agreed we could have done more. We will actually be running another analysis in July by extracting the data not only for country of export but origin too and comparing that with the current export data we have and see if it makes any difference compared to our first analysis.

all good

More looking at ways to use current resources more effectively to get end result.

We can see here that their is a different in data that capture by different administration so to compare line to line item is very hard because different in importer and exporter.

Time constraints, technical skills

lack of tools to use time consuming too short need more techincal skills

Minimal

The short period to conduct analysis with the compact of customs duties to attend to during the analysis phase

Lack of tools, technology and just need more training.

Time constraints and technical skills were some of the main challenges faced.

The challenges are that the data lacks unique identifiers as well as the incoterms did not match. These information would have been useful for us to do line by line comparison and analyze the value.

4D. Relevance and Impact (Ops Domino II Debriefing)- What were the key lessons you learned from this Operation? 20 responses

The ability to share data real-time updates Cross-Border Collaboration: Ops Domino II demonstrated how international cooperation in data sharing can enhance security efforts and combat transnational threats.

Lesson learn: Revenue collection improves significantly when customs, tax authorities, and other agencies work in a coordinated and integrated manner.

The outcome shows that Customs Officers around the region have learnt and acquire the skills of data analytics and audit checks. They have come to understand how to work with data analytics and make sense of it.

Formula usage and pivot tables.

collaboration between export countries and more time is required to fully analyze the data

Teamwork, Higher levels of excel work and analytical skills

Effective data sharing is crucial in validating the accuracy of trade-related information across borders. It allows for cross-referencing actual data with declared values, which is essential in identifying discrepancies that may indicate attempts to evade customs duties or manipulate trade records.

team work at international level is always the direct way to success

The importance of monitoring exports data and the comparison with import data

Communication and sharing information is vital if we are to make any difference with border and revenue collection. We are small nations limited with resources, knowledge and experience but when we work together we can achieve much, we can learn and help each other. I really appreciated the excel training, that made a world of difference but I think and I am sure the others agree, more training required whether through OCO/ABF or within our own administrations.

Knowing that the unique identifier will be considered for a uniform data

Biggest lesson is we need to implement every quarter across key customs categories.

I learn a lot in Excel of how to use pivot table and formular to create a report.

Highly appreciated exchanges with our colleagues in the Pacific, teamwork, trust, and patienc

focus more learn more put more effort in learning the skills for data analysis and you will gain more and improve yourself more to share and care delivers the knowledge to others in the workplace

Importance of data sharing

Insights of a more relevant ways to conduct analysis

How to be more proficient with excel

Analysis of trade data is a big task and area of its own were with practice and exercise one will come to appreciate the results and the outcome overtime.

Establishing good relations with foreign Customs administrations is crucial for fostering trusted data exchange, which can help with undervaluation or risk analysis.

4E. Overall Training Effectiveness (Trade-based Money Laundering Workshop)

4.1A Overall Regional Operation Effectiveness Comments (Ops Domino II Debriefing) : 18 responses

Highly effective tools and collaboration within the Oceania customs to help protect our borders from any threat

In most regional operations have resulted in increased revenue collection, better fraud detection, and enhanced customs compliance.

The discrepancies detected will help to collect extra revenue in.

Great way to get information from other countries.

This operation is effective as it enables collaboration amongst highly skilled officers across the region

The operation was well-presented and executed with strong strategic relevance. One of the most valuable aspects highlighted during Ops Domino II was the importance of inter-country data sharing.

sharing intelligence with capacity building and strong motivation for the officers are essential

Pretty good but only require more time to be trained to understand more about Trade base money laundering

I enjoyed being a part of OP Domino II as I did not complete OP Domino I. Working alongside fellow officers to achieve the same goals, building a network and learning as one team. The results of the operation has indicated areas within our processes that need to be addressed with a refresher training and awareness to be raised for all involved.

All good

Excellent exercise and learned different ways/ techniques to get end result.

Ops Domino 2 Debriefing it show that using Asycuda system is very importance that it stored and keep data for many purpose, but it need to be re-adjust so that the data it capture a same with other in the region.

Very satisfied
very relevant to my daily work at office
Learned a lot that has been covered throughout the whole operation donimo workshops
Very well organized and good training structure
The OPS has broadened my knowledge and skills and can now see the importance of trade data sharing and data analysis when putting it into perspective / practice at workplace.
Neutral

4.1B Overall Training Effectiveness Comments (Trade-based Money Laundering Workshop): 18 responses

I need to learn more about what, where, how, and when Trade-Based Money Laundering (TBML) is happening in the Pacific region

The training addressed a critical and growing threat to revenue collection and financial integrity.

Under-valuation is not only an issue but over valuation is also an issue for Trade Base Mooney Laundering. These two days workshop is an eye opener for a lot of Customs Officers as they will be able tell what is under valuation and over valuation.

Good training, need more information.

Effective as it opens a pathway to a more iron clad risk management system.

The training was highly effective in building awareness and understanding of how criminals exploit trade mechanisms for trade-based money laundering (TBML)—transforming illicit funds into seemingly legitimate trade transactions. Real-life scenarios that illustrated common TBML schemes, making the content more relatable and easier to understand.

good approach of this issue but need to compare legal framework at international level v national rules

Upgrade skills need more training which will help with the efficientness of our work

Just when I thought ok I have a lot of work to focus on with the results of the operation, now we have another contender - Trade Based Money Laundering. The training was very effective to me by showing me all the different ways money can be laundered, the lengths criminals will go to, the adverse effects on the country, the economy and the people. A real threat.

All good

Excellent, probably highlight for me as individual.

This topic is very interested me as i first hear, but we need more time for the topic to be deliver.

Very satisfied

I strongly agree to the training of Trade based money laundering workshop in which met its stated objectives, improves my knowledge, and somehow a little relevant to my work.

Gained some insights on TBML over an interesting two days workshop

Very effective and good training

The TBML training knowledge gain is now vital in terms of looking at signs of TBML when conducting audits.

Neutral

5. How do you plan to apply the knowledge and skills gained from this training in your organisation? 20 responses

I would like to collaborate with the WCO, OCO, and customs authorities in the Pacific region to protect our borders and share my skills with all my colleagues.

I will incorporate the red flags and typologies discussed during the training into our organization's risk assessment and profiling processes. This includes flagging suspicious trade transactions such as under- or over-invoicing, misclassification of goods, and repeated shipments with minimal value discrepancies. I intend to initiate more structured collaboration with other relevant agencies, such as the Financial Intelligence Unit (FIU), customs, and tax departments, to improve information sharing and jointly investigate potential TBML cases.

Apply directly to my every day tasks. It relates a lot to my daily tasks.

Share tools and data with coworkers.

by sharing with colleagues and work together with other agencies including exporting agencies.

Improved Analysis work means I can contribute effectively to high levels of risk management.

The knowledge gained from the training will greatly assist in locating and generating reports that identify instances of under- and over-valuation in trade data. Detecting potential risks related to trade-based money laundering (TBML).

I have a better and broad understanding about all different ways in this domain and I gained clear view of the matter and how to spot non-compliance behaviour

working together with our other country colleagues in sharing data and some skills to capture errors and our goals to prevent illegal items from entering our country.

Well my colleague and I already have plans to deliver a basic Excel training with our team using the materials provided during the operation briefing. We presented our report of the workshop via a power point presentation and our team was quite to learn more with excel. We will also be delivering another presentation of the debrief and the Trade Based Money Laundering and will probably deliver a short training for the TBML. Dennis and I agreed it will be a good idea to engage with our FIU to assist with more trainings around awareness, what to look for. Some of the issues noted from the analysis will be raised in our next Customs Brokers Meeting especially the information captured in the import declarations. A refresher for our Trade team on processing import/export declarations.

By keep on practising to learn and confident then host a training for officers to learn

Train/ share knowledge provided in workshop/operation with Airport/Maritime divisions to upskill team members.

My plan is to share the knowledge that i gain from the two workshop. but in my administration their no particular unit like this is good to know, we might come across a situation like this but we know how to solve.

Presentation of reports to teams and establishment of working groups to guide audits

Do some in training program for staffs to build up their capacity and to share the knowledge and skills that we have learn throughout this training.

Starting by day one upon return.

Share some insights from TBML to our FIU team

Will share with our compliance section about monitoring importers and the goods

The knowledge gained will be taught to my fellow colleagues and also will be doing data analysis before conducting any audits and or doing an audit plan.

Sharing the knowledge and skills I gained with the team.

6. What were the most valuable aspects of the Training for you? 20 responses

Collaboration and teamwork help achieve goals efficiently and effectively

The hands-on exercises and group discussions were incredibly valuable for applying the theory to real-world scenarios. These sessions enhanced my analytical thinking and helped me better understand the roles different stakeholders play in detecting and preventing TBML.

All of the aspects are valuable to me.

Microsoft excel training was really great training.

sharing of analysis findings and the learning about mistakes made and how to adapt in future data analysis

Teamwork, Developing Knowledge in areas such as TBML and Analysis work.

Awareness on Trade-Based Money Laundering (TBML): Provided insights into common methods criminals use to launder money through trade.

the real and strong feeling to be part of the big Customs family with the possibility to share and compare our different techniques of work and investigation.

Communicating with other members sharing knowledge's and skills, it helps me alot to focus more on data analysis as it is my first time

OP Domino - data analysis, networking, information sharing TBML - Awareness - Difference between Money Laundering and TBML - methods of concealment

High value items will be taken into account for money laundry. It must be noted and investigation should be made to confirm the status of the carrier,

Knowledge, understanding and building relationships with other OCO members.

The opportunity to learn and apply new skills, and to connect with peers and mentors to share knowledge and experiences.

The teaching methods, the availability of the instructors, the training materials, and the whitening techniques

1)the essential skills of how to make use and keep perfectly our data 2)the approach of excel pivot tables etc for good data quality it could come up with good and clear reports at the end of the day

Practicals

Tools available to utilize while conducting trade data analysis

Being aware that commodities good be undervalued and therefore could be losing revenue for our community.

Gaining of Data analysis knowledge and skills, sharing of information and experience between the participating countries and learning about TBML from the expects.

Data exchange between countries.

7. Additional Feedback: 20 responses

An energizer for when we look sleepy or bored

no comment, everything was perfect and meaningful

None.

Domino II - create a group chat for more effective communication. Money laundering- more group activities to be better understand topic.

operations on other commodities

This Workshop is valuable as ideas are shared, and the region works as one to identify and work on risks

The training was very well presented. Both trainers demonstrated great knowledge and expertise, and their extensive experience was clearly evident throughout the sessions. This practical experience significantly enhanced the learning process and is highly appreciated. The knowledge gained will be directly beneficial in our daily tasks, improving our ability to identify trade discrepancies and compliance risks. Thanks to OCO for organizing such a well-structured and impactful workshop. We look forward to participating in more workshops of this kind in the future.

Thank you to OCO and ABF for providing this unique opportunity to be best in my daily missions with the capacity to have a global view on different customs matters.

Hopefully, in the future we can have more time do training on TBML which is an interesting topic and important to our role.

I think I have covered it all in my previous responses but once again, my thanks to OCO, ABF and IMF for the trainings offered. Truly appreciated and I hope our own team can learn from us and fingers crossed we see results even the little one.

Nothing to add, all good

Follow up Ops Domino 3 or extended TBML would be very beneficial.

The Ops-Domino 2 is well flow but the DBML workshop i think we had to have more time.

The training was informative and very interesting. Is it possible to obtain a link to follow the development of whitening techniques?

I would like to thank OCO for your productive support to manage this training and also met our travel logistics for us to come over to learn more skills from the facilitators and other participants experience in order for us to take back the skills to broaden our staff capacity building in our workforce. Secondly i just want to comment about the time is too short for this training need more like a week but once again thanks and see u when i see u

nil

Many thanks to OCO for their continued effort in bringing in these valuable workshop and trainings into the pacific

Great training and insight overall wish to have more training to be more efficient on my work place.

The training was a great opportunity for the OCO member countries to come together and discuss issues and find solutions to counter undervaluation in the Oceania region with support and training from ABF - appreciate OCO to give us this opportunity to participate and experience such at internation level workshop/training and operation and looking forward to more similar ops in the future.

Thank you!