



**Asia-Pacific
Economic Cooperation**

**Independent Assessment of the Anti-Corruption
and Transparency Experts' Working Group**

**SOM Steering Committee on Economic and
Technical Cooperation**

August 2012

APEC Project SCE 01/2011

Prepared by:

Michael (Mick) Symons, LLM, MBA, LLB (with Honours)

Anti Corruption Consultants Australia (ACCA)

Sydney, Australia

mick@acca-aust-com.au

www.acca-aust.com.au

Produced for

Asia Pacific Economic Cooperation Secretariat

35 Heng Mui Keng Terrace Singapore 119616

Tel: (65) 68919 600 Fax: (65) 68919690

Email: info@apec.org Website: www.apec.org

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APEC#212-ES-01.3

Executive Summary

The Anti-Corruption Transparency Work Group (ACT) has the responsibility to address the impact of corruption across the Member Economies of APEC.

Their activities include the development of specific education and enforcement programs to assist the Member Economies to address corruption related issues.

The ACT also liaises with other bodies including the United Nations Convention Against Corruption (UNCAC), the OECD/Asian Development Bank initiative on corruption, the OECD in relation to the Convention relative to the Bribery of Foreign Officials. They also liaise with other public and private institutions including Non-Government Organisations to gain an understanding of the trends and issues relating to corruption that have the potential to impact on the Member Economies.

This review examined the general activities of the ACT for five years (2007, 2009-2012) to determine if the activities were in line with the Terms of Reference as well as supporting the overall goals of APEC. In addition to these specific years, the review also examined various declarations and publications directly relating to the activities of the ACT.¹

An initial scan indicates the ACT complies with the Terms of Reference agreed to in March 2011. However, a closer analysis identifies some areas of concern likely to impact on the credibility and longevity of the ACT.

An examination of the submissions made and activities undertaken in the relevant period indicates there is a core group of 4-6 Member Economies driving the agenda. It appears the other Economies are content to attend the various events without necessarily providing total commitment or engaging in direct involvement.

There may be a variety of reasons for this. Some of these may be the limited expertise of nominated officials, the lack of authority for these parties to commit to programs, the cost of involvement in various programs, limited resources within the particular Economy or the inability of the Economy to introduce segments of the program because of legislative constraints unique to that particular Economy.

There does not appear to be any mechanism to enable an accurate assessment of the impact of ACT activities within individual Economies or the APEC community. This makes it difficult to determine the value of the activities of ACT. An examination of recognised external data from a variety of sources indicates the ACT has virtually had no impact on the level of corruption within the APEC community since 2007.²

I can understand this conclusion will cause some concern. However, it remains a logical conclusion because of the lack of relevant data available from the ACT. This is a clear indication the ACT must ensure every project/programme includes a feedback component to determine the value of the particular activity. There should be provision for an external (and independent) review of the activity to measure both the adoption and the effectiveness of that particular program within the Economy.

¹ More than 400 documents were reviewed

² See "[So What Analysis](#)"

This review will also allow adjustment or termination of the activity if it is not meeting the appropriate outcome. It is also important for the ACT to recognise the need for targeted programs within specific Economies rather than trying to apply a generic "one size fits all" program across the APEC community.

The chair of the ACT rotates annually in line with the change in Host Economy. This is contrary to the APEC consolidated guidelines relative to the chair of workgroups. This guideline indicates there should be a minimum period of two years.

The annual rotation adopted by ACT does not allow the continuity of work plans. This is evident from an examination of the 2011-2012 work plans. There were 15 identified activities in the 2011 planned. I have not located any detailed report indicating if any of these particular activities were achieved. The 2012 work plan refers to "continuing the initiatives" of 2011 without specifically identifying the particular activities.

The adoption of a two-year Chair period would allow the continuation of programs across a longer period. There is also a need to address the records maintained by the ACT. As highlighted, there were 15 identified activities in the 2011 work plan. As previously stated, there is no specific documentation indicating whether any of these were achieved and, if not, why not. This does not assist in determining if the ACT is operating effectively and meeting the specified requirements of APEC.

The ACT is part of a group of organisations or agencies with similar goals in relation to reducing corruption. These include, but are not necessarily limited to, UNCAC, ADB/OECD Anticorruption, G20, OECD Convention on Bribery of Foreign Officials, Financial Action Task Force and the Asia Pacific Group on Money Laundering.

One of the ACT functions appears to be an avenue for Member Economies to report on their adoption of various Conventions or activities linked to these other organisations. A number of the submissions reviewed related to the implementation of the OECD Convention on the Bribery of Foreign Public Officials and UNCAC. This is also done in meetings linked to these respective conventions.

The ACT faces the potential of being absorbed by these other groups, as there is little to differentiate its activities. There is a continual battle for resources as a number of the Member Economies have a common interest across these agencies and bodies.

The ACT has to take urgent action to identify its core business. It has to identify unique opportunities to complement rather than mirror the activities of the other agencies. This will provide a greater benefit to the Member Economies.

AOEC has indicated a need for fora to develop closer working relationships – to develop synergies to benefit the APEC Economies. The Terms of Reference of the ACT identify the need for these relationships. It appears, based on the material reviewed, there is limited contact between the ACT and other APEC Fora. Corruption is like a flawed thread in a tapestry – it is present across the APEC community and has the potential to impact on the activities of all the Work Groups and Task Forces. The ACT has to urgently commit to engaging with other Fora to develop joint activities on reducing the impact of corruption in the various areas.

APEC has identified the need for all Fora to take into account the needs of women when developing programs. There is no material to indicate the ACT has adopted a structured program to address these needs. As such, it is important for the ACT to collaborate with the PPWE to ensure any programs/projects considered by the ACT address the needs of women.

Key Recommendations

Chair of the ACT

It is recommended:

1. The ACT reverts to the biannual rotation of the Chair in line with Consolidated Guidelines on the Rotation System for Lead Shepherd/Chair and Deputy Lead Shepherd/Chair of APEC Working Groups and Other APEC For a.

Record Keeping

It is recommended:

2. Annual Work plans prepared by the Chair are to include a table listing the proposed activities to be addressed for the relevant period.
3. The table is to include reference to the link between the particular activity and the Terms of Reference of the ACT and section indicating the action taken relative to this particular activity
4. The Chair (at the end of his/her period) is to provide a status report on each of the activities. This report to address which activities were successfully completed, those not achieved (with reasons why) and those terminated.
5. The incoming Chair (with the support of the ACT) is to identify what specific activities will be carried over from the previous period. These activities will then form part of the work plan for that period. Reasons must be provided if it is determined any activity is to be terminated.
6. All work plans and attachments (including tables) must be presented and form part of the formal record of the relevant SOM.

Involvement of all Member Economies in ACT activities

It is recommended

7. The Chair of the ACT (or nominee/s) examines the involvement of all Economies in specific projects to identify the Economies that have not been active in either proposing or participating in specific programs.
8. That, once these Economies have been identified, the Chair of ACT (or nominee/s) to meet with these Economies to identify ways they can either directly sponsor or become a co-sponsor of specific initiatives.
9. The Chair of the ACT (or nominee/s) identify a sub-group within the ACT to identify programs such as workshops, symposiums or conferences which could be conducted in Economies that have not been directly involved in previous events. This may involve an Economy providing financial assistance and/or guidance in the presentation of the program.

Involvement with other Fora

It is recommended

10. The Chair of the ACT (or nominee/s) reviews the current Terms of Reference of all other APEC Work Groups and Task Forces to identify any potential synergistic relationships with the purpose of the ACT as outlined in the Terms of Reference of the ACT.
11. Once this occurs, the Chair of the ACT (or nominee/s) is to arrange meetings with the respective Fora to explore this relationship.
12. The Chair of the ACT (or nominee/s) is to explore scheduling of SOM meetings to allow direct liaison between Fora where there is a common linkage.

Developing a unique position for the ACT

It is recommended

13. The Chair of the ACT (or nominee/s) identifies other organisations engaging in similar anti-corruption activities within the APEC region in order to determine where the ACT and these organisations engage in similar activities.
14. The Chair of the ACT (or nominee/s) is to identify unique activities in line with the ideals of APEC and consistent with the Terms of Reference of the ACT to allow the ACT to differentiate its activities from other similar organisations
15. The Chair of the ACT (or nominee/s) is to then develop projects and/or programs to allow the ACT to capitalise on this unique positioning.

Monitoring of results of ACT activities

It is recommended

16. The Chair of the ACT (or nominee/s) identifies an appropriate process to enable quantitative and qualitative measurement of all ACT projects and/or programs.
17. The results of this research to be utilised to monitor and modify projects and/or programs to ensure APEC achieves maximum results from these activities.

Participation of women in ACT activities

It is recommended

18. Member Economies should be encouraged to nominate women either as representatives of the Economy or guests at ACT meetings and/or seminars, the workshops, symposiums.
19. The Chair of the ACT (or nominee/s) to form a sub-group with representatives from the PPWE to ensure the interests of women are considered in all planned activities

General Recommendations

It is recommended

20. That the web site for the ACT is subject to regular review at least once every six months to ensure the links are updated and operative.

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Introduction

In January 2011, a decision was made to conduct an independent review of the activities of the Anti-Corruption and Transparency Work Group (ACT).³ This evaluation is in accordance with the ongoing resolution to evaluate the activities of APEC work groups on a regular basis.

The terms of reference for this review are set out in Appendix 1.

There was a twofold purpose to the review: To determine if the ACT complied with the stipulated terms of reference as well as reinforcing the primary aims of APEC. Secondly, to determine if the current Terms of Reference for the ACT are appropriate to fulfill the anti-corruption goals of APEC.

I examined a series of publications linked to the activities of APEC and the ACT to determine if the ongoing activities of the ACT were in line with the overall goals of APEC.

In addition, I examined the activities and terms of references of other APEC Work Groups and Task Forces to determine if there was any potential to develop a relationship between the ACT and these APEC entities. This is in line with the discussion instigated to consider a framework relative to [Cross-Cutting Issues in APEC: Creating Effective and Closer Coordination Among SOM Steering Committee on ECOTECH \(SCE\) Fora](#).

I distributed a survey in an effort to obtain some feedback from Member Economies of the ACT. I met with some representatives to further explore relative issues.

There was also a requirement to explore how the ACT can better take into account the APEC commitment to given gender greater consideration in accordance with directions outlined in the “Policy Partnership on Women and the Economy” (PPWE). This was examined in line with the outcome of the September 2011 meeting of the PPWE where four policy areas were identified. These were (i) Access to Capital; (ii) Access to Markets; (iii) Capacity and Skills Building and (iv) Women’s Leadership.

It was difficult to obtain relevant data to gauge the effectiveness of the various activities of the ACT. There does not appear to be any structured qualitative measurement process within APEC or the ACT to determine how effective the programs were. I turned to data from a number of external international agencies in an effort to gauge the effectiveness of the ACT in introducing programs designed to reduce corruption within the Member Economies. I appreciate I may be criticized by some of the Economies for using this data but it does provide a valuable insight into corruption within the various Economies and allows reflection on the impact of the ACT.

Background of the ACT

The ACT evolved from the 2004 Santiago APEC Ministerial Meeting. It was decided Member Economies were to implement procedures designed to fight corruption and ensure transparency across the APEC family.

The ACT was initially formed as a Task Force with a limited life. It was provided with the stability of the status of a Work Group in March 2011. This allows the ACT to develop long-term strategies in line with their Terms of Reference⁴.

³ The review will consider the activities of the Anti-Corruption and Transparency Task Force and the Anti-Corruption and Transparency Work Group as it was known from March 2011.

The overall purpose of the ACT is ensure ongoing commitment from all Member Economies to the principles of the [Santiago Commitment to Fight Corruption and ensure Transparency](#) as well as contributing to the [APEC Code of Conduct for Business](#) and the [APEC course of action on fighting corruption and ensuring transparency](#).

The [2007 Statement on Actions for Fighting Corruption through Improved International Legal Cooperation](#) provides a further reference to the activities of the ACT.

The ACT has expanded, in line with the overall goals, to ensuring acceptance and compliance with various conventions such as the United Nations Convention Against Corruption (UNCAC) and the OECD Convention on Combatting Bribery of Foreign Public Officials in International Business Transactions. These actions are designed to increase the awareness of the influence of corruption across the Member Economies.

There is an ongoing need for the ACT to review various trends and issues across the world in general and the APEC Economies in particular to ensure awareness of potential corruption trends and either adopt or develop programs to counter these trends. There is a restriction to general actions as all activities must be in line with the overall goals of APEC.

The ACT provides, within the approved guidelines, access to their meetings for persons/organisations to provide specialist advice and assistance. This includes, but is not necessarily limited to, the American Bar Association (ABA), the World Bank, the Asian Development Bank, INTERPOL, OLAF and the OECD. There is also the opportunity to identify specialists from specific areas (health, counterfeiting, money laundering etc) to highlight issues within their respective fields.

Structure of the ACT

The Chair of the ACT revolves on an annual basis with the nominee from the current host economy. There is a triad approach to leadership with the Chair receiving assistance from two Vice-Chairs. One is from the previous year – the other from the following year's host economy.

This is not in accordance with the revised [APEC guidelines set for the Chair of Working Groups](#). It is also contrary to information provided in the [March 2011 submission](#) to upgrade the ACT to a Working Group.

The APEC guidelines stipulate:

1. Each APEC working group and other APEC fora will select a Lead Shepherd/Chair, who will have a minimum two-year term (two calendar years). Exceptions to this rule require approval by the groups concerned as well as the SCE.
2. One or more Deputy Lead Shepherds/Chairs will be selected by the working groups and other APEC fora to assist the Lead Shepherd/Chair. The Deputy Lead Shepherd(s)/Chair(s) will be selected from a different APEC economy than the Lead Shepherd/Chair, and their tenure will be staggered by one year with that of the Lead Shepherd/Chair, where possible. The resulting one-year "overlap" period is designed to ensure continuity of leadership and to allow new incoming Lead Shepherds/Chairs to benefit from the advice of an experienced

⁴ The Terms of Reference in this instance refer to the amended Terms of Reference as submitted with the request to upgrade the ACT from a Task Force to a Work Group. The "link" on the ACT (APEC) website relates to the previous Task Force Terms of Reference – this needs to be upgraded.

Deputy. Exceptions to this rule, due to specific group circumstances, will be granted on a case-by-case basis and will require approval by the groups concerned as well as the SCE.

The 2011 submission stated:

Leadership arrangements would be in accordance with the Consolidated Guidelines on the Rotation System for Lead Shepherd/Chair and Deputy Lead Shepherd/Chair of APEC Working Groups and Other APEC Fora. Notably, the Chair/co-Chair would serve for a two-year period, consistent with the Leaders' Santiago Commitment (see page 3 of submission).

The Terms of Reference (as submitted in 2011) contradict the submission and the APEC guidelines by stating:

The Working Group will be managed by a Chair and a Vice Chair, with support from the APEC Secretariat. The host APEC economy each year will become the Chair of the Working Group. The Working Group will have two Vice Chairs, one of whom will be from the following year's host economy and the other from preceding host economy.

This announcement of the chair designation will take place before the end of the calendar year to ensure the appropriate handover of the relevant information as well as a joint work plan proposal for the coming chairmanship.

The nomination of the vice chairs will rely on the Economy and this title won't necessarily be attached to the person that the Economy will nominate or it nominated as ACT Chair in each host year.

The Terms of Reference also refer to a group known as "Friends of the Chair" (FOTC) comprising of the outgoing and incoming chairs. The Chair can approve the participation of other representatives from within the ACT. This appears to formalise the "triad" of the former Chair and pending Chair. I have not been able to identify any formal record of any meetings held by the FOTC.

It is apparent, from the documentation recorded in the respective years on the APEC site, there is a pattern of activities that appear to align to a particular theme adopted by respective Chairs. This, in my opinion, does not allow for projects or programs introduced in one period to be followed (with the same intensity) into the following period. The respective Chair influences the theme of his or her period.

I see no reason for ACT to continue to maintain the current process of rotating the Chair on an annual basis. The ACT should revert to the standard APEC practice of two-year terms for the Chair. This will provide some continuity for programs.

Terms of Reference of the ACT

The current Terms of Reference were agreed to in March 2011⁵. The Terms of Reference provide general guidelines for the ACT. They state the purpose of the ACT is to:

- Coordinate the implementation of the Santiago Commitment to Fight Corruption and Ensure Transparency, the APEC Course of Action on Fighting Corruption and Ensuring Transparency and the APEC Transparency Standards; including promoting cooperation in areas such as extraditions, legal assistance and judicial and law enforcement, asset forfeiture and recovery.
- Elaborate more specifically on actions outlined in the APEC Course of Action, and subsequent actions in succeeding years called by Senior Officials, Ministers, and Leaders including, for example, combating corruption and illicit trade.

⁵ See Annex 3 of [Upgrading the Anti-Corruption and Transparency Task Force](#))

- Promote the implementation of ACT initiatives such as the APEC Conduct Principles for Public Officials and the APEC Code of Conduct for Business.
- Facilitate the implementation of the United Nations Convention against Corruption (UNCAC) by member economies where appropriate.
- Promote programs and initiatives to increase the participation of the private sector in the development of anti-corruption policies and/or measures within the economies, as well as to enhance the support by governments of efforts for greater integrity within the private sector.
- Develop innovative training, targeted capacity building and results oriented technical assistance to fight corruption and ensure transparency, in conjunction with the APEC Anticorruption and Transparency (ACT) capacity-building program;
- Intensify individual and joint actions to fight corruption and ensure transparency, including cooperation with other multilateral and regional intergovernmental institutions where appropriate;
- Exchange information between anti-corruption experts on the implementation of domestic anti-corruption commitments and successful practices to fight corruption and enhance the transparency of public and private sectors.
- Cooperate with the international organizations, as appropriate, to implement the APEC Course of Action on Fighting Corruption and Ensuring Transparency;
- Facilitate cooperation between APEC fora, including the Finance Minister's Process and Committee on Trade and Investment and its relevant sub-fora on corruption issues and assist in making recommendations on proposals/projects to Senior Officials

There is no reference to the adoption of any processes to measure the effectiveness of the activities of the ACT. This is a specific requirement to ensure the efficacy of any programs initiated by the ACT. There is an oblique reference to it with a requirement for the ACT to develop "...results orientated technical assistance" to fight corruption".

The failure of an appropriate feed-back mechanism is a major flaw in the activities of the ACT. I will elaborate further on this later.

Review of Documents

I examined ACT documents from 2007, 2009, 2010, 2011 and 2012 determine if this material reflected the terms of reference of the ACT and the activities undertaken were in line with the overall guidelines of APEC. I was constrained by only having access to the material on the [APEC site](#). There may be other relevant material not published on this site.

Interviews/Research

ACT representatives were asked to complete a survey in an effort to gain information relative to this review. Appendix 2 is a copy of the questionnaire.

The intention of the questionnaire was to obtain some insight on how members of ACT regarded it as a force within APEC, what were its strengths and weaknesses, what were the opportunities for the ACT and any were potential threats to ACT.

There was also an opportunity to comment on specific issues relative to the ACT. Regrettably, there was a lack of interest in this approach – only four parties responded from the 21 members. This means 81% of the group either did not have any ideas or were indifferent to the review process.

It was also difficult to obtain access to members for direct interviews. I spoke with a limited number directly and by telephone. This did assist in gathering information but did not provide an overall perspective.

I also attempted to gain information by direct email contact with representatives from some of the Economies. Only one of these parties assisted with relevant information.

There was no provision within the scope of the review to assist with travel to the various economies to meet with the representatives. This may not have been of great assistance as it appears, from my limited contact with parties, there is a reluctance (with some exceptions) to be seen as a driver of ideas. Most of the members appear to be satisfied to move with the group and provide support when asked.

I must express disappointment with the apparent apathy of the majority of members of the ACT with their lack of response to any effort to obtain relevant material.

The results of the questionnaire provided limited assistance. The respondents were asked to provide information relative to a SWOT⁶ analysis. They were then asked to provide feedback on specific issues. One possible restriction was the possibility the respondents believed any information provided indicated a formal and binding response from their home Economy. One of the respondents identified this as an issue.

The responses were insightful in relation to the strengths of the ACT. There was agreement the ACT provided a platform to exchange ideas, concepts and projects to combat corruption. This was enhanced by the inclusion of a mix of practitioners and policy makers. The ACT also provided an opportunity to report and, in some instances, expedite the adoption of various conventions such as UNCAC and the OECD Convention on Bribery of Foreign Officials. The involvement of external agencies such as ASEAN, the OECD, the Pacific Islands Forum, and the Pacific Economic Cooperation Council, together with representatives from APEC Secretariat and the APEC Business Advisory Council (ABAC), increased the scope of the impact of the ACT on APEC economies.

The weaknesses included an acceptance the ACT is not distinct from other anti-corruption movements such as the G20 group, UNCAC or OECD.

The respondents referred to what appeared to be a lack of acceptance of the obligations of Mutual Legal Assistance within the APEC economies. They also suggested a number of the themes explored by ACT created difficulties, as they may not necessarily be relevant to particular Economies. There was an inability to enforce any resolutions agreed to by the ACT due to the general nature of APEC. There was also concern that, due to the varying standards of economic development and diverse legal systems within the group, it was difficult and in some instances impossible for all Members to adopt resolutions agreed to by the ACT.

⁶ SWOT is a standard analysis tool of Strengths, Weaknesses, Opportunities and Threats – Strengths and Weaknesses relate to the internal aspects of the organisation and Opportunities and Threats relate external agencies

The respondents indicate there was an opportunity for the ACT to work in collaboration with other groups with a similar mandate. There was a need to explore areas of public-private corporation among Member Economies such as the monitoring of the assets and/or financial transactions of politically exposed persons and reporting suspicious transactions to the appropriate authorities. The juxtaposition of workshops and ACT meetings is important as it provides an opportunity for members to increase their knowledge especially in specialised areas.

Corruption occurs across a wide variety of activities. The link to corruption provides the ACT with an opportunity to work closely with other APEC Work Groups and/or Task forces to provide assistance in the areas of corruption investigation and corruption prevention (see Appendix 4).

The respondents further indicated the ACT should be acutely aware of the external threats such as a plethora of international fora including OECD, the Asian Development Bank, the World Bank, Anti-Corruption Agency Forum, International Anti-Corruption Conferences, South East Asian Parties Against Corruption (SEA-PAC), G20, UNCAC, and Asia Pacific Group. All these groups, at various levels, have the same ideal to combat corruption. As such, they are competitors in the sense they require participation by the Member Economies leading to a financial decision as to what group should be supported. ACT needs to be conscious of the competing interests and ensure it provides "value for money" to maintain continuity – see Table 1.

The respondents also provided information on ten key areas relative to the function of the ACT. These were:

1. Outcomes of the ACT
2. Is the ACT operating effectively and efficiently?
3. How would you strengthen the strategic priorities and direction to future work?
4. How do you believe the ACT can achieve a better focus in order to more effectively and efficiently manage its tasks?
5. How do you believe the ACT can achieve a better focus in order to ensure its capacity building activities are providing benefits in line with the priorities of the Ministers and Leaders?
6. There are a number of workgroups and task forces within the APEC family - can you identify methods to develop synergies where ACT can meld with these other groups?
7. Role within the private sector - can you provide information on what you would see as opportunities for greater collaboration with non-APEC parties including the private sector, civil society and other internal organisations?
8. Can you identify ways where ACT can access external resources to assist with the development and implementation of programs?
9. APEC has an expressed commitment to give gender a greater consideration in accordance with the directions outlined by the Policy Partnership on Women and the Economy - explain how you believe ACT can take into account this commitment.

Appendix 3 is a synopsis of the responses.

Stakeholders

The primary stakeholder is the APEC group of the 21 Member Economies. Other major stakeholders include the World Bank, Asian Development Bank, American Bar Association, Transparency International, OECD, the United Nations, the World Trade Organisation, and G20.

The list of stakeholders extends to the citizens of each Member Economy because of the impact of corruption on their daily lives – any effort to reduce or eliminate corruption has a direct impact on this group.

Similar organisations

The ACT directly collaborates with the World Bank, OECD/ADB (Anti-Corruption initiative for Asia Pacific), Transparency International, the G20 Anti-Corruption Working Group and European Commission Anti Fraud Office (OLAF).

There is also a general association with OECD in the area of corruption of foreign public officials and an acknowledgement of the role of the United Nations Convention Against Corruption (UNCAC) as a driving force to Member Economies to address corrupt activities within the APEC umbrella.

G20 - Anti-Corruption Working Group

The G20 Anti-Corruption Working Group has a similar function to the ACT across the G20 Block. It was established during the G20 Summit in Toronto in 2010 acknowledging the impact of corruption on economic growth.

This group seeks to foster the United Nations and OECD tools to combat international corruption, prevent the access of corrupt officials to the financial system, fight money laundering and tax havens, strengthen agreements on mutual aid, extradition and confiscation of assets, improve the protection of denouncers, and exchange best practices.⁷

The G20 group comprises 19 Nations and the European Union. Ten countries are represented both in the G20 and APEC.⁸

The scope of G20 incorporates around 90% of global GDP, 80% of global trade and two-thirds of the world's population.⁹ APEC represents the most economically dynamic region in the world. This area has generated nearly 70% of global economic growth since 1990. APEC Member Economies account for more than 2.5 billion or 41.4% of the total world population with a combined gross Domestic Product (GDP) of US\$19 trillion (57.8% of global GDP), and constituting 47% of world trade.¹⁰

The [G20 Anti-Corruption Action Plan](#) is a plan to enable action on combating corruption, promoting market integrity, and supporting a clean business environment. These are similar ideals as those espoused by the ACT.

ADB/OECD Anti-Corruption Initiative for Asia and the Pacific

The blue print for this initiative is the action plan agreed to at the 3rd annual ADB/OECD Anti-Corruption Conference for the Asia Pacific in November 2001. There are now 28 countries and economies in the Asia Pacific region who have endorsed the plan and committed to its goals and implementation process.

⁷ See <http://www.g20.org/index.php/en/working-groups>

⁸ Australia, Canada, Indonesia, Japan, Mexico, People's Republic of China, Republic of Korea, Russia, Singapore (invited) and the United States of America.

⁹ <http://www.g20.org/index.php/en/what-is-the-g20>

¹⁰ *Guidebook on APEC Procedures and Practices*, November 2007, APEC Secretariat - www.apec.org/apec/about/policies_and_procedures.html

The [ADB/OECD Anti Corruption Initiative for Asia and the Pacific](#) has three main pillars: Developing effective and transparent systems for public service; strengthening Anti-Bribery Actions and Promoting Integrity in Business Operations and Supporting Active Public Involvement. There are a series of sub topics linked to each of these pillars.

Their action plan also closely mirrors the activities of the ACT.

OECD Convention on Combatting Bribery of Foreign Officials in International Business Transactions

The primary focus of the [OECD Convention on Combatting Bribery of Foreign Officials in International Business Transactions](#) is the supply side of corruption. The 34 OECD member countries and five non-member countries - Argentina, Brazil, Bulgaria, Russia, and South Africa - have adopted this Convention. The OECD has an active peer review program monitoring the implementation of the required practices including policies and appropriate legislation.

The Relationship between the ACT and APEC

Goals of APEC

The initial goal of APEC (1989) was to “further enhance economic growth and prosperity for the region and to strengthen the Asia-Pacific community”.¹¹

The 1993 [Seattle Declaration](#) refers to the need for APEC to “undertake work aimed at deepening and broadening the outcome of the Uruguay Round, strengthening trade and investment liberalization in the region, and facilitating regional cooperation”.

Further refining occurred in 1994 when the Bogor Goals reinforced the role of APEC. Included in the [Leaders Declaration](#) was the statement that APEC

... needs to reinforce economic cooperation in the Asia-Pacific region on the basis on equal partnership, shared responsibility, mutual respect, common interest, and common benefit, with the objective of APEC leading the way in:

- strengthening the open multilateral trading system;
- enhancing trade and investment liberalization in the Asia-Pacific; and
- intensifying Asia-Pacific development cooperation

The statement from the [2011 Ministerial Meeting](#) provided a vision of future goals of APEC. This statement is important because it provides a guide for the activities of all APEC Work Groups and Task Forces to ensure their activities align with this vision.

This Statement indicates APEC will be embarking on a concentrated program of action to take three significant steps towards achieving "seamless regional economy" by focusing on three key priorities: (1) strengthening regional economic integration and expanding trade; (2) promoting green growth; and (3) expanding regulatory cooperation in advancing regulatory convergence.

¹¹ See [Purpose and Goals of APEC](#)

The link between the ACT and APEC

Purpose of the ACT

The Santiago Commitment drives the agenda of the ACT. In addition, the ACT supports the APEC Course of Action and the APEC Transparency Standards. It also promotes cooperation in areas such as extradition, legal assistance and judicial/law enforcement (especially asset forfeiture and recovery).

The ACT is also required to reinforce the overall goals of APEC. This indicates the need for the ACT to monitor annual Ministerial Statements to ensure their activities are in line with the themes, strategies and actions of APEC and associated fora.

ACT Projects

The ACT presented a Medium Term Working Plan for 2010-2015 in the course of the March 2011 submission to upgrade to a Working Group (See Annex 1 – page 4 of [Upgrading the Anti-Corruption and Transparency Task Force](#)). This work plan indicated the ACT would:

1. Promote of the implementation of existing APEC commitments
2. Support the APEC Growth Strategy by Promoting Sustainable Growth & Enhancing Human Security: Combating money laundering, illicit trade, and dismantling illicit networks.
3. Enhance Public Private Partnerships and enhance good governance in the NPO sector
4. Formulate a public outreach strategy to gain the support of relevant stake holders

The detailed [Work Plan for 2011](#) indicated the ACT would:

1. Continue working with other APEC sub-fora on combating corruption and illicit trade and targeting related illicit networks through public-private partnerships and synergies with other collaborative regional platforms;
2. Continue to strive to achieve optimal results, to build synergies across APEC sub-fora and relevant regional and international organisations and experts, and to ensure the activities of these entities are more fully aligned and integrated with APEC's core mission including strengthening regional economic integration and expanding trade;
3. Adapt and refine the APEC code of conduct the business for specific industries sections, such as pharmaceutical products;
4. Consider the evaluation report of the APEC Code of Conduct for Business Pathfinder Project;
5. Develop guidelines for economies on effective personal financial/asset disclosure systems and public officials that will help prevent conflicts of interest and combat illicit enrichment;
6. Continue collaboration with the Counter-Terrorism Task Force (CTTF) on the AUSTRAC-led series of workshops leveraging anti-money laundering systems against corruption and restoring integrity the financial markets;
7. Partner with the APEC Business Advisory Council (ABAC), Life Science Innovation Forum (LSIF), Intellectual Property Experts Group (IPEG) and other APEC sub-fora to identify more effective strategies to combat corruption and illicit trade across the Asia Pacific region, specifically including counterfeit medicines;

8. Develop innovative synergies to strengthen supply chain integrity, disrupt illicit markets, and dismantle illicit networks on account of each harmful to APEC communities;
9. Partner with several APEC and sub-fora to strengthen cooperation on supply chain integrity and to combat corrupt channels often found in their production and regional distribution;
10. Discuss other areas of the illicit trade to future cooperation to protect the environment and ensure strong, sustainable, and balanced growth including combating corruption related to illegal fishing and illicit trafficking of forest products, and are satiated trade in illicit networks;
11. Work with other APEC sub-fora to promote more sound fiscal and transparent management systems such as small and medium enterprises and good governance projects that promote green investment that helps increase energy efficiency, and anchor a more resilient global financial system;
12. Identify pragmatic strategies to contribute to the APEC Growth Strategy by stemming corruption and illicit trade, disrupting illicit markets, and strengthening cooperation to dismantle illicit networks, at the same time taking into consideration the need to safeguard the health and safety of regional communities;
13. Continue to partner with ABAC and other APEC sub-fora towards developing public-private partnerships and informal regional "network of networks" to disrupt illicit markets and dismantle illicit networks;
14. Work with the APEC SME Working Group, and others, in support of specific projects that create more business opportunities for small and medium-sized enterprises (SMEs) and enhance their access to global markets; and
15. Work across APEC sub-fora to develop more long-term approach is including ensuring that ACT members are committed to implementing leaders' commitments to fight corruption.

The Work Plan refers to the following "Expected Outcomes/Deliverables for 2011":

Reporting:

- Compose a 2011 ACT Report outlining all the activities undertaken by ACT in 2011, to be tabled at the concluding SOM meeting and integrated into Summit outcomes;
- Compose two reports (SOM I and SOM II) on corruption and illicit trade (counterfeit medicines – dialogue and workshop) and a SOM III report on financial disclosures systems (preventing and detecting conflicts and illicit enrichment).

Deliverables:

- Elevate the ACT Task Force into a Working Group.
 - Implement ACT five year mid-term strategy.
- Develop ACT Guidelines on Financial/Asset Disclosure Systems for Conflicts of Interest and Illicit Enrichment.
- Develop more robust reporting/mechanism on APEC anti-corruption commitments including UNCAC.

- Synchronize and collaborate more effectively across APEC sub-fora to combat corruption and illicit trade.
- Explore regional synergies:
 - APEC/ASEAN projects;
 - Coordinate more closely with ADB, OECD, UNODC, World Bank, IACA;
 - Develop a Public-Private Partnership and Regional Mechanism to Support an Informal “Network of Networks” to Combat Corruption and Illicit Trade and Dismantle Illicit Networks across Asia Pacific.

The 2012 ACT Work Plan was not as detailed. This plan indicated:

Anticipated activities:

1. ACT will continue to work in line with its five-year Work Plan for 2010 to 2015;
2. ACT will continue its activities to encourage and assist member economies in implementing the principles of UNCAC within each economy's domestic legal framework;
3. ACT will continue working on the initiative started by the US and previous chairs including effective financial disclosure and combating illicit trade;
 - a. In particular, examining how the work of ACT on illicit trade can be integrated with the 2012 Russian Initiative on establishing reliable supply chains within (the) APEC region and outside;
4. The ACT five-year Work Plan indicates all economies are expected to prepare by the second ACT meeting in 2012 interim reports on the implementation of APEC anti-corruption commitments. Russia (the current chair) has suggested, as well is this requirement, in a single document should be compiled outlining interim progress made by all APEC economies in fighting corruption and ensuring transparency;
5. ACT will continue to work with the business sector to explore ways in which governments and businesses can synergise their efforts to fight corruption;
 - a. The focus to be on further enhancing the ACT-ABAC dialogue on combating corruption;
6. ACT will continue to enhance collaboration with international organisations in the fight against corruption utilising workshops and project collaboration;
7. ACT will invite regional and international organisations interested in fighting corruption, such as UNODC, OECD, World Bank and other(s) to participate as observers in ACT's meetings and workshops;
8. ACT will hold a workshop on fighting corruption in business transactions with particular emphasis on how the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions can be instrumental in fighting corruption in the business sector;
9. ACT would look into the possibility of drafting and adopting an anticorruption declaration summarising all the good work the ACT has done over the years

Expected Outcomes-Deliverables for 2012

- Workshop on fighting corruption in business transactions with participation of the OECD and other international organisations (Kazan, May);
- Preparation of Interim Reports on implementation of APEC Anti-Corruption commitments by SOM II and tabled at the 15th ACT Meeting;
- ACT-ABAC Dialogue on Combating Corruption to Promote Economic Growth and Competitiveness (Kazan, May);
- Explore ways to integrate ACT efforts to fight corruption and illicit trade with 2012 Russian initiative on establishing reliable supply chains within APEC region and outside; and
- Declaration on fighting corruption

The ACT has engaged in various activities in recent years. These include but are not necessarily limited to:

- Engagement of the Private Sector in developing a Code of Conduct for business;
- Active education of public and private officials with particular emphasis on anti-corruption issues;
- Improvement in law enforcement techniques with a particular emphasis on the use of anti-money laundering and asset recovery systems targeting corrupt activities;
- Exploring the corruption aspects linked to transnational crime;
- Encouraging Member Economies to address the issues of corruption in an open and transparent manner; and
- Workshops relating to investigating and prosecuting corruption and illicit Trade

The ACT has published five major reports since 2007. These are:

- Capacity Building Workshop on Combating Corruption Related to Money-Laundering (December 2007)
- APEC Anti-corruption Code of Conduct for Business (September 2007)
- International Symposium "Anti-Corruption and Administrative Reform" (June 2008)
- Anti-Corruption Cooperation-Stocktaking of Bilateral and Regional Arrangements on Anti-Corruption Matters between/among APEC Member Economies (January 2010) and
- Implementation of the Code of Conduct for Business in Chile (March 2011)

These activities are in line with the Terms of Reference for the ACT and directly contribute to the goals of APEC.

As previously outlined, research was conducted on the material published by the ACT for the periods, 2007, 2009, 2010, 2011 and 2012. This required an examination of approximately 400 documents. The purpose of this examination was to determine if the activities were in line with the Terms of Reference for the ACT as well as linking to the overall goals of APEC.

In 2007, there were at least 133 activities directly linked to the Terms of Reference of ACT. USA, Thailand, Vietnam and Australia contributed the most papers and/or reports in this period.

In 2009, there was a marked decrease in the number of contributions according to the recorded material. There were at least 33 activities recorded in this period. It is difficult to determine, based on available material, the reason for this reduced number. The trend continued in 2010 with 25 submissions from Member Economies.

In 2011 there were 85 submissions directly relating to the Terms of Reference of ACT. The USA contributed the most in this period. They were also the Host Economy for 2011.

The 2012 material is still being submitted. There are currently 47 submissions on the APEC database relative to the activities of the ACT in this period.

This sampling indicates the focus of the ACT is generally in line with the requirements of the Terms of Reference by providing information and/or reporting on linked activities.

Achievement of designated goals

There were 15 distinct designated outcomes in the 2011 Work Plan. The [Summary Record of the 13th ACT Meeting and related Workshops](#) and the [Summary Report for the 12th ACT Meeting](#) refer to some of the achievements in 2011. However, there does not appear to be a detailed submission addressing the proposed activities and exactly what was achieved relative to each particular outcome. This has the potential to provide an avenue of criticism in that the activities listed in the work plan were not achieved due to this failure to link the activities to the outcomes.

The 2012 Work Plan is not as ambitious in scope. It did not provide the variety of outcomes as the 2011 plan. The proposed workshops have been conducted and a consolidated report prepared. The plan states the *ACT will continue working on the initiative started by the US and previous chairs including effective financial disclosure and combating illicit trade*. This has not occurred with the exception of a workshop with OECD relative to bribery of Foreign Officials and a workshop involving ABAC on Combating Corruption to Promote Economic Growth and Competitiveness.

There is no record of any structured liaison with any other Working Groups in 2012 and limited exposure to the other Working Groups and Task Forces in 2011.

The Future of the ACT

The ACT was granted the status of a Work Group in March 2011. While this may provide some degree certainty for the future of the ACT it needs to be recognised by all Member Economies the ACT will only survive if it provides positive outcomes to the respective Economies.

This is a challenge the ACT needs to face and act on. At present, it is difficult to obtain any reliable data to indicate the actions of the ACT have directly impacted on corruption within the APEC community. The inability to provide this data through verifiable research may lead some Economies to question their involvement in times of economic rationalism.

Relationship with other working groups

The 2010 submission to upgrade indicated one of the “deliverables” was to “synchronize and collaborate more effectively across APEC sub-fora to combat corruption and illicit trade”.

There is little evidence of activity in this area. There has been some apparent liaison between the Experts on Logging and Associated Trade Work Group and the Counter Terrorism Task Force.

However, there is a need for greater liaison between the ACT and all the other Work Groups and Task Forces associated with APEC.

This is an issue of concern across APEC. It was addressed in [May 2012](#) where it was determined there should be a relationship between the various SCE Fora leading to more effective outcomes for the APEC Member Economies. Some of the areas considered included:

Joint Meetings of SCE fora

- SCE may suggest the holding of joint meetings between different SCE fora to ensure closer collaboration and to avoid duplication of mandates on cross-cutting issues.
- SCE fora may also want to explore holding joint meetings to identify and discuss cross-cutting issues.
- The result of a joint meeting could be joint projects and joint activities that have benefits broader than a single forum.
- Joint meetings should not be limited to SCE fora but can also include the fora under other APEC Committees.

Joint Activities

- APEC Activities could be more effectively coordinated for better results and higher impact.
- APEC activities are events approved and conducted by APEC fora with participation from APEC members.
- APEC activities include fora meetings, workshops, seminars, symposiums, and training courses.
- SCE fora with activities that are cross-cutting in nature, may consider formally inviting related APEC fora to send a representative or member.
- Joint activities should not be limited to activities among fora under the SCE, but also with fora under other APEC Committees.

Joint Projects

- APEC Projects could be more effectively coordinated for better results and higher impact.
- SCE fora should consult and coordinate with other related fora when developing projects of a cross-cutting nature.

ACT should take immediate action to identify areas of common interest with other fora to take the lead in this area. The common link is corruption. It permeates all areas and provides the avenue for such liaison. I have identified areas associated with each of these areas to enable ACT to consider stronger involvement with these parties. Refer to Appendix 4.

Involvement of all Member Economies

Participation in the ACT is more than attending meetings – there needs to be an ongoing commitment from the Member Economies to embrace the goals of ACT by ensuring representatives can make a substantial contribution and are fully aware of the relevant activities within their Economy.

There has been a quorum at all ACT meetings since 2009. There has not been a meeting where every Economy was represented. The average attendance over seven meetings in this period was 18. The number of official representatives varied from 41-50 with an average of 45 per meeting. The gender break down was 65% male – 35% female.

A review of the material presented by the various Economies at the 2008, 2009 - 2012 (to date) indicates there is a group of about six Economies directing the agenda through active participation in projects and

programs. Others provide the required reports on such matters as the adoption of the OECD Foreign Official Bribery and the UNCAC. These Economies follow the lead of the prime motivators but do not appear to want to be directly involved as an active participant.

There have been instances of co-sponsored activities between two or more Economies. This is a practice to be encouraged to open all Economies to the potential impact of ACT. It would be worthwhile considering the co-hosting of events in Economies that have not been directly involved with events. This would provide publicity and encourage consideration and adoption of some of the initiatives promoted by the ACT.

It is important for the ACT to achieve active participation from all Member Economies. This may stave off any potential action where the various Economies start to rationalise the financial impact of attending the various meetings if there is no evidence of a benefit flowing from their involvement.

Appendix 5 provides a graphical representation of the contributions over the three years. It is apparent the “Host” Economy in 2007 and 2011 were the major contributors as they had the opportunity to be able to provide access to external groups in line with the Terms of Reference of the ACT.

Competition

There is “competition” between various institutions such as the G20, ASEAN, SEA-PAC, WTO, OECD-ADB, the Group of States Against Corruption (GRECO), the International Chamber of Commerce (ICC) and APEC. Each organization has an interest in reducing corruption. Each one expects participation by various States and Economies.

It will eventually reach a stage where decisions on what forum to attend will become a financial decision linked to the *actual not perceived* benefits.

ACT must be conscious of this threat and ensure it provides positive benefits to the Member Economies.

There is duplication of resources with some APEC Economies required to participate in other economic forums. Table 1 highlights this potential conflict.

ADB/OECD Anti Corruption Initiative for Asia and the Pacific	ACT	G20 Anti-Corruption Working Group	Financial Action Task Force (FATF)	Asia/Pacific Group on Money Laundering (APG)
Australia	Australia	Australia	Australia	Australia
	Brunei			Brunei
	Canada	Canada	Canada	Canada
	Chile			
Peoples Republic of China	Peoples Republic of China	Peoples Republic of China	Peoples Republic of China	Peoples Republic of China
Hong Kong, China	Hong Kong, China		Hong Kong, China	Hong Kong, China
Indonesia	Indonesia	Indonesia		Indonesia
Japan	Japan	Japan	Japan	Japan
Republic of Korea	Republic of Korea	Republic of Korea	Republic of Korea	Republic of Korea
Malaysia	Malaysia			Malaysia
	Mexico	Mexico	Mexico	

ADB/OECD Anti Corruption Initiative for Asia and the Pacific	ACT	G20 Anti-Corruption Working Group	Financial Action Task Force (FATF)	Asia/Pacific Group on Money Laundering (APG)
	New Zealand		New Zealand	New Zealand
Papua New Guinea	Papua New Guinea			Papua New Guinea
	Peru			
	The Philippines			The Philippines
	Russia	Russia	Russia	
Singapore	Singapore	Singapore (invited)	Singapore	Singapore
	Chinese Taipei			Chinese Taipei
Thailand	Thailand			Thailand
	The United States	The United States	The United States	The United States
	Viet Nam			Viet Nam

Table 1 - Concurrent participation in Anti Corruption or related Forums

The ACT will need to reflect on what actual (and measurable) benefits it can provide to the Member Economies to remain viable in tightening financial constraints.

So What Analysis

The purpose of a “so what analysis” is to try to determine the outcomes of the activities of the ACT. Currently Member Economies report to the ACT about the implementation of the United Nations Convention Against Corruption, the implantation of the OECD Bribery of Foreign Officials convention and various other initiatives developed, in part, by the ACT. These include such areas as Combating Corruption Related to Money-Laundering, Implementation of the Code of Conduct for Business in the various Economies, and other various programs designed to impact on the awareness of corruption and reduce the impact of corruption.

There does not appear to be any ongoing mechanism for an ongoing assessment of the effectiveness of these programs.

An examination of data from a variety of recognised sources provides an insight into the impact of the ACT on the Member Economies.

The Transparency International “[Corruption Perceptions Index](#)” reflects the “perception” of corruption within in a country. The data is presented in a scale between 0 – 10 with the countries where it is perceived there is “less corruption” rating higher in the scale. One would expect the impact of the activities of the ACT over a period would result in an improvement. I examined the five years from 2007-2011. Table 2 reflects the data for that period.

This Table indicates six of the 21 countries were “perceived” to be more corrupt in 2011 as compared to 2007. I acknowledge it is not statistically sound to take an average of the outcomes over the five-year period but it is interesting to note each year averages out to 5.4. This potentially indicates there has not been a change in the Corruption Perception Index across this period. It could also be argued, based on this material, the activities of ACT have not affected the various economies.

	T/I 2007	T/I 2008	T/I 2009	T/I 2010	T/I 2011
Australia	8.6	8.7	8.7	8.7	8.8
Brunei Darussalam			5.5	5.5	5.2
Canada	8.7	8.7	8.7	8.9	8.7
Chile	7	6.9	6.7	7.2	7.2
People's Republic of China	3.5	3.6	3.6	3.5	3.6
Hong Kong, China	8.3	8.1	8.2	8.4	8.4
Indonesia	2.3	2.6	2.8	2.8	3
Japan	7.5	7.3	7.7	7.8	8
Republic of Korea	5.1	5.6	5.5	5.4	5.4
Malaysia	5.1	5.1	4.5	4.4	4.3
Mexico	3.5	3.6	3.3	3.1	3
New Zealand	9.4	9.3	9.4	9.3	9.5
Papua New Guinea	2	2	2.1	2.1	2.2
Peru	3.5	3.6	3.7	3.5	3.4
The Philippines	2.5	2.3	2.4	2.4	2.6
Russia	2.3	2.1	2.2	2.1	2.4
Singapore	9.3	9.2	9.2	9.3	9.2
Chinese Taipei	5.7	5.7	5.6	5.8	6.1
Thailand	3.3	3.5	3.4	3.5	3.4
The United States	7.2	7.3	7.5	7.1	7.1
Viet Nam	2.6	2.7	2.7	2.7	2.9

Table 2 – Comparison of Transparency International Corruption Perception Index Results 2007 to 2011

I also examined the Global Corruption Barometer provided by Transparency International in an effort to establish the impact of the activities of the ACT within the various economies.

This data was extracted from the 2010/2011 Global Corruption Barometer.¹² Two questions were considered: (1) *In the past three years, how has the level of corruption in this country changed* and (2) *How would you assess your current government's actions in the fight against corruption*. These questions are relevant because the data provides direct information as to the impact of ACT on the activities within the country as well as the activities of the representative governments.

A disturbing trend is the percentage of persons who believe corruption has increased in the previous three years. The period under review is from 2006/2007 through to 2010/2011. A period when the ACT has been active in presenting programs relating to the reduction of corruption. Figure 1 provides a graphical representation of this particular aspect of the data.

¹² See http://archive.transparency.org/policy_research/surveys_indices/gcb/2010_11/results

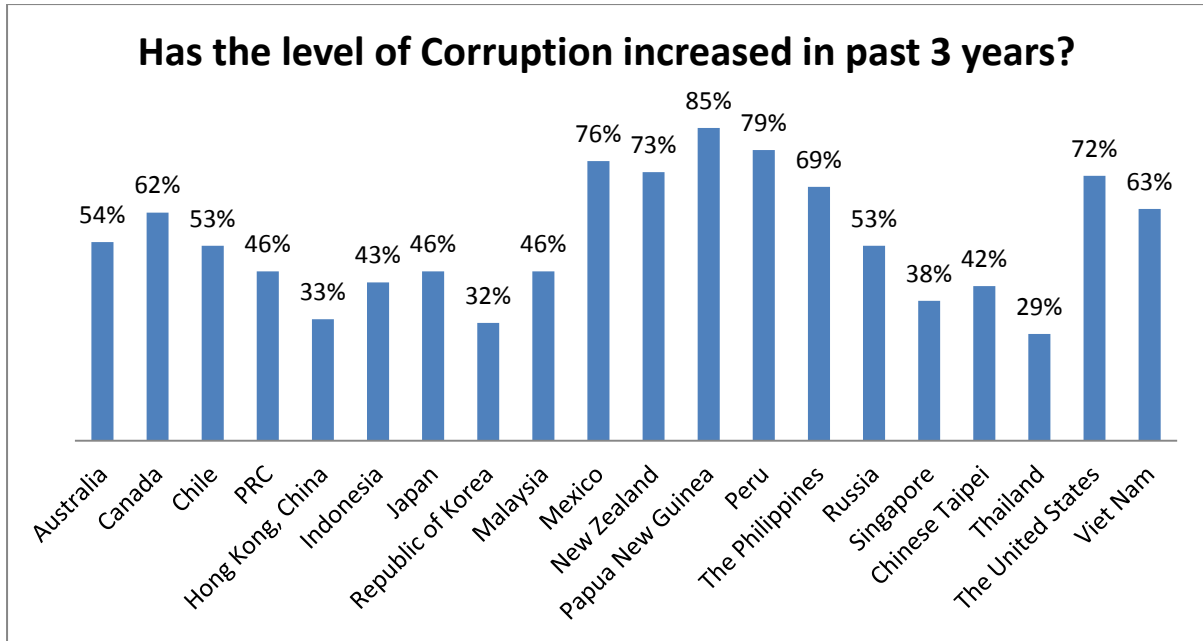


Figure 1 - Increase in Corruption in period 2006/2007 - 2010/2011

There is also information relative to the percentage of persons who regard the efforts of their government as ineffective in the fight against corruption. Figure 2 provides a graphical representation of the data relative to the ineffectiveness of the actions of the government

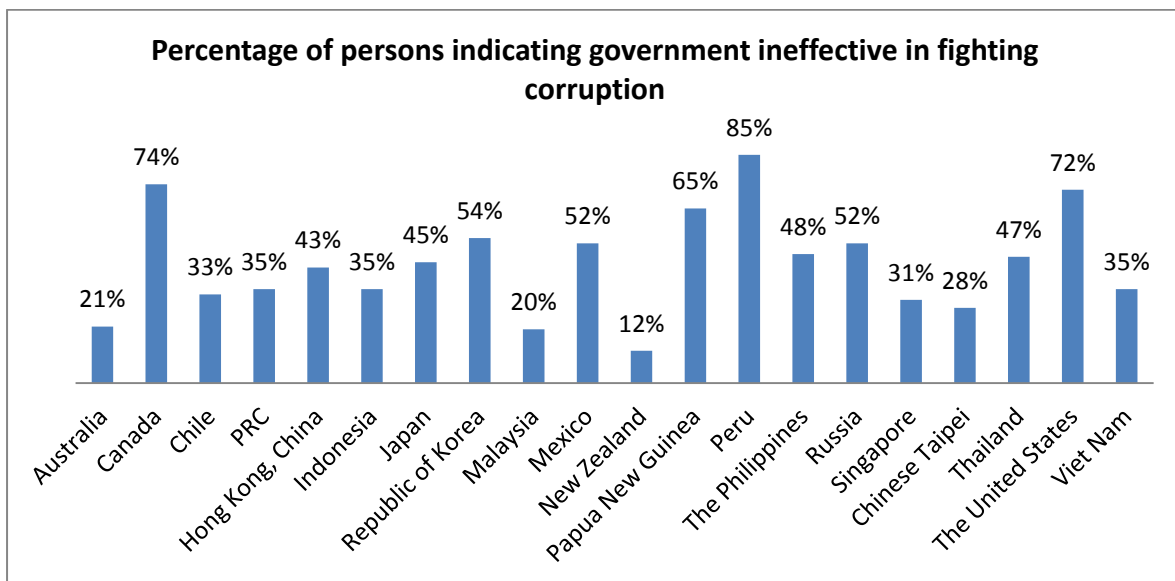


Figure 2 - Percentage who believe their government is INEFFECTIVE in fighting corruption (2010/2011)

I also examined data from other sources to determine verify the data presented by Transparency International.

The 2011 Gallup poll relating to whether corruption was or was not wide spread within business in a particular country also indicated major corruption issues across the Member Economies. Brunei Darussalam and Papua New Guinea were not included in this survey.¹³

The outcome of this poll indicates corruption in business is an issue for developed and developing countries. It highlighted developing nations may suffer more because corruption can restrict financial development and foreign investments and foster income inequality (Figure 3).

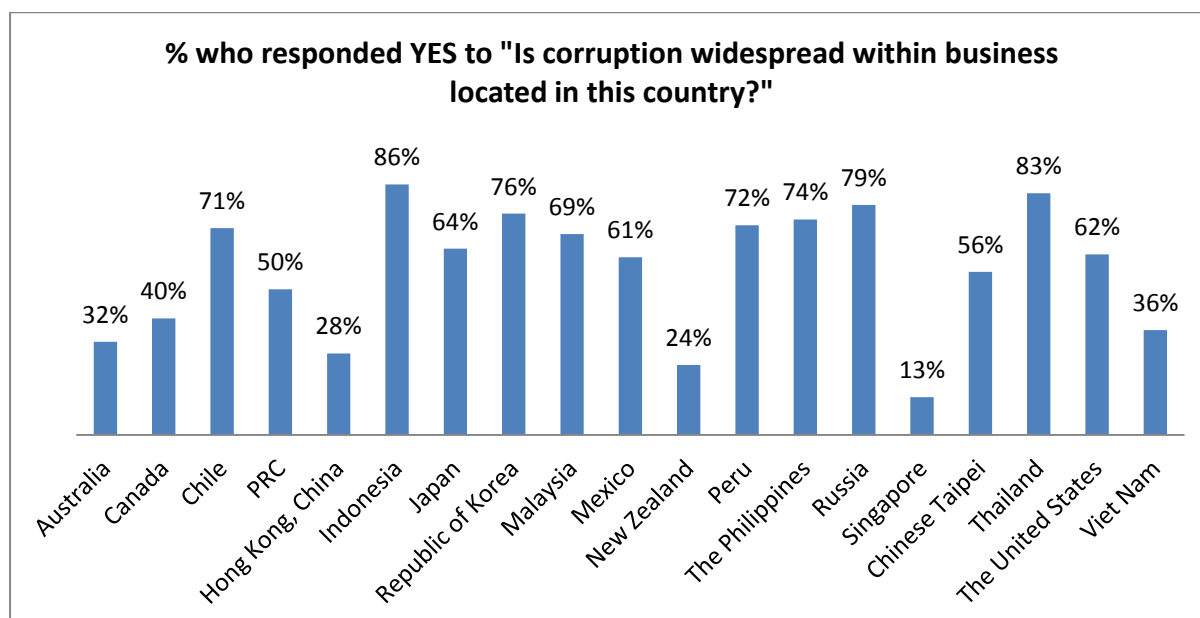


Figure 3 - Data from 2011 Gallup Poll

The World Bank prepares data on World Wide Governance Indicators. This project constructs aggregate indicators of six broad dimensions of governance including the control of corruption. Control on Corruption is assessed on an estimate of governance where the range is from approximately -2.5 (weak) to +2.5 (strong). In addition, the countries are "ranked" with a range between 0 (lowest) to 100 (highest) in rankings.¹⁴ Table 3 represents the estimate of governance for the Member Economies and Table 4 represents the "rankings" of the Member Economies.

Country	2008	2009	2010
Australia	2.12	2.06	2.06
Brunei	0.48	0.98	0.86
Canada	2.01	2.06	2.06
Chile	1.34	1.37	1.50
PRC	-0.44	-0.50	-0.60
Hong Kong, China	1.96	1.86	1.94
Indonesia	-0.58	-0.81	-0.73
Japan	1.26	1.33	1.54

¹³ <http://www.gallup.com/poll/154571/majority-worldwide-sees-widespread-corruption-businesses.aspx#1>

¹⁴ See <http://info.worldbank.org/governance/wgi/index.asp>

Country	2008	2009	2010
Republic of Korea	0.42	0.46	0.42
Malaysia	0.07	-0.05	0.12
Mexico	-0.22	-0.30	-0.37
New Zealand	2.37	2.43	2.36
Papua New Guinea	-1.27	-1.36	-1.14
Peru	-0.20	-0.32	-0.23
The Philippines	-0.70	0.76	-0.82
Russia	-1.04	-1.12	-1.07
Singapore	2.31	2.27	2.18
Chinese Taipei	0.48	0.57	0.75
Thailand	-0.47	-0.31	-0.34
The United States	1.45	1.16	1.23
Viet Nam	-0.66	-0.52	-0.58

Table 3 - Estimate of Governance for the Member Economies

Country	2008	2009	2010
Australia	96	96	96
Brunei	72	79	78
Canada	95	97	97
Chile	90	90	91
PRC	41	38	33
Hong Kong, China	95	94	95
Indonesia	33	22	27
Japan	86	87	92
Republic of Korea	69	71	69
Malaysia	61	57	61
Mexico	50	49	44
New Zealand	99	100	100
Papua New Guinea	5	5	10
Peru	51	47	50
The Philippines	27	24	22
Russia	12	11	13
Singapore	99	99	99
Chinese Taipei	72	72	74
Thailand	39	48	47
The United States	92	85	86
Viet Nam	30	37	33

Table 4 - Percentile Rank among the Member Economies (range from 0 lowest to 100 highest)

The purpose of presenting this material from the various sources is to allow reflection on the impact of the activities of ACT.

An outcome of the “so what analysis” indicates it is important for the ACT to reflect on the direct impact of their activities in reducing corruption within their Member Economies.

The material provided considers the overall issues linked to corruption within the Member Economies. A sweeping assessment could be the ACT has had no overall impact on the impact of corruption in a number of the economies – at least as far as the respondents to the various surveys are concerned.

The data stands alone because there is no contrary data from the ACT indicating the activities of the ACT have directly reduced corruption within the majority of the Member Economies.

The ACT must include a process to enable assessment of their projects or programs to assure all interested parties their activities are not only relevant but they have a positive impact on the majority of the Member Economies.

What is the Core Business of the ACT?

This question flows from the “So What Analysis”. It is important for the ACT to identify exactly what is their Core Business. That is, the activity they are the best at; and activity which is unique to the ACT as compared to the plethora of other corruption related groups in the Asia Pacific area.

The next process is to dissect the Core Business into achievable programs that provide measurable results. A reading of the ACT material since 2009 provides an impression of a number of general statements linked to workshops and presentations. However, there is no indication within the available material the ACT engages in any research or other methods to determine if their actions are productive in reducing corruption within the APEC Member Economies.

The ACT has to identify corruption related issues unique to the APEC goals and focus on these issues to provide the service expected by the Member Economies. This is the “unique selling” proposition to market to the Economies to gain greater acceptance of their role.

The ACT interim report on the [implementation of APEC Anti-Corruption commitments](#) (Russia, Kazan 2012) provides information on the activities of 15 of the 21 Member Economies^{15,16}. This report provides detailed information as to the implementation of the various aspects of the UNCAC, the FATF provisions, and the implementation of the OECD Convention on the Bribery of Foreign Public Officials. There is very little information on the specific activities of the ACT and its role in reducing corruption. The use of the ACT as a reporting mechanism as to compliance with other conventions does not reflect the core business of this Work Group. These actions would have occurred without the intervention of the ACT as the various economies were signatories to these conventions (See Table 1).

¹⁵ The Countries in this report are: Brunei Darussalam, Chile, Peoples Republic of China, Hong Kong China, Indonesia, Japan, Republic of Korea, Malaysia, Russian Federation, Singapore, Chinese Taipei, Thailand, The United States and Vietnam.

¹⁶ Australia submitted a [separate report](#).

ACT link to APEC Policy Partnership on Women and the Economy (PPWE)

APEC has developed a [Framework for Integration of Women into APEC \(1999\)](#). This framework highlights

(That) close linkages exist between the issues and activities of other APEC fora and the issues affecting women in micro, small and medium enterprises, science and technology, human resources development, finance, fisheries, tourism, transportation, telecommunications, and other sectors.

The document further highlights:

The specific realities faced by women must be recognised, understood and systematically taken into account in the formulation and implementation of policies, programs (including economic recovery programs, and projects

The implementation strategy for this particular framework requires all APEC fora to *actively consider* the involvement of women in projects and activities, especially in the area of decision-making.

The Policy Partnership on Women and the Economy (PPWE) reinforces the role of women within APEC. A 2011 meeting of the PPWE identified four key policy areas to be considered in relation to the involvement of women within the APEC community. These were (i) Access to Capital; (ii) Access to Markets; (iii) Capacity and Skills Building and (iv) Women's Leadership.

The 1999 Framework requires the ACT to consider the impact of any projects or programs on women. This impact is to be factored into the activities. The four policy areas identified by the PPWE provide a focus point for the ACT in assessing what projects could be developed in conjunction with the PPWE to address potential corrupt activities across these areas.

The ACT should form a subgroup (including representatives from the PPWE) to examine these issues. This group can examine various trends and issues across the Member Economies and provide recommendations as to appropriate programs to be introduced by the ACT. It may also be appropriate for the PPWE to be involved in the initial planning of all future projects and programs developed by the ACT to ensure consideration of gender related issues in this activities.

The membership of the ACT is open to nominated candidates from the Member Economies and guess in accordance with the APEC protocol on inviting guests. The Member Economies should provide personnel with the appropriate expertise. Gender should not be an issue. The ACT does not have the charter to insist on gender balance for their various activities. An analysis of the attendance records at seven SOM meetings since 2009 indicate 35% of the delegates are women.

Summary

The ACT does comply, in spirit, with the Terms of Reference as agreed to in March 2011. The Terms of Reference are, by requirement, general in identify activities. The ACT is required to identify specific projects to comply with the Terms of Reference.

The regular SOM meetings afford opportunities for Member Economies to provide information on compliance with various anticorruption conventions such as the UNCAC and the OECD Convention on the Bribery of Foreign Officials.

There is a need for the ACT to consider exactly what its core business is. At present, the ACT appears to drift from various projects at the behest of a small group of members.

This does not belittle these particular activities but rather highlights what appears to be a shallow approach necessitated by this wide focus.

Chair of the ACT

The current structure of rotating the Chair every 12 months in line with the Host Economy does not provide an opportunity to the continuity of action.

The transition from 2011 to 2012 highlights this issue. There were 15 identified activities proposed in the 2011 plan. I have not been able to get information on how many of these activities were achieved in 2011.

The summary reports of the 12th and 13th ACT meetings do not provide the specific information.¹⁷ The work plan for 2012 refers to continuing "working on the initiative started by the US and previous Chairs". There are no details of what "initiatives" are under consideration.¹⁸

It appears the 2011 proposed outcomes by the US are no longer a priority of the ACT. Indonesia assumes is the Chair in 2013. This change will likely result in another set of proposed initiatives that may mirror previous proposals.

The current 12-month rotation does not provide continuity and stability. There is no material evidence indicating the Friends of the Chair process within the ACT assists in ensuring the stability of the ACT.

As such, the Chair of the ACT should revert to the process as outlined in the Consolidated Guidelines on the Rotation System for Lead Shepherd/Chair and Deputy Lead Shepherd/Chair of APEC Working Groups and Other APEC Fora and rotate biannually

Active participation of all Member Economies

It is difficult to determine the "active" participation of Member Economies. I have attended two meetings and noted there is active participation across the floor on various matters. There is no apparent record of these comments. It was also apparent at these meetings there were some Economies that did not engage with other Members.

I have examined the material submitted by the various economies for 2007, and 2009-2012.¹⁹ This indicates each Member Economy has contributed at least once over the period under consideration.²⁰

The data indicates one Economy contributed 25% of the material, six other Economies contributed between 10% to 5%. The other economies were under 4%.

This indicates a disproportionate spread of participation. There may be various reasons for this. One possible reason maybe the status of representatives in that these persons may not have (a) the knowledge or (b) the authority to commit to the various activities.

¹⁷ A [presentation by the 2011 Chair](#), Mr Luna, covered some of the outcomes of 2011 but did not provide specific details relative to the activities proposed in the 2011 work plan.

¹⁸ There is comment on the need to consider the effect of financial disclosure and illicit trade.

¹⁹ I reviewed the data available on the APEC Internet site relative to material recorded for the year is under consideration. I then examined each item to determine which Economy submitted the material. The numbers were obtained by collating this information.

²⁰ Some of these contributions were reports on the progress of the implementation of UNCAC within their Economy.

There is a need for the ACT to examine the participation ratio of the Member Economies. This as this examination should ascertain reason(s) for the apparent lack of participation in the various ACT programmes and/or projects.

Involvement with other Fora

The 2011 work plan indicated the ACT was going cheap issue involvement with other Fora. This was partially achieved. APEC has identified the need for all Fora to consider creating effective and closer coordination between these groups.

ACT should take immediate action to identify links with other Fora within APEC and develop, in conjunction with these Fora, mutual programs.

Involvement with External Organisations

There are a number of external organisations with similar goals to ACT.

The ACT should examine the goals of these respective organisations to determine where they mirror the goals of ACT.

The ACT then needs to examine its core business to identify where it can differentiate itself from these organisations. The subsequent unique positioning will enable the implementation of targeted programs rather than mirroring these other organisations.

What has the ACT achieved?

I appreciate some Economies will argue the ACT has been instrumental in introducing various programs with a direct impact on corruption within the APEC community.

However, this argument stumbles without credible data to support it. The ACT must take urgent steps to introduce a feedback or measurement mechanism in all activities to determine the effectiveness of these activities. It is pointless replicating programs across the Member Economies if the particular program does not have any measurable impact.

Participation of women in ACT activities

There is a need for the ACT to consider how any proposed programs and/or projects linked with the Framework of Integration of Women into APEC and the activities of PPWE.

The ACT should form a sub-group with representatives from the PPWE to ensure the interests of women are considered in all planned activities.

General Comment

The ACT has the potential to be the leader of the specific anticorruption measures within the APEC Economies.

It can achieve this by identifying distinct areas where planned activities will have a direct impact on corruption.

The development of stronger links with other fora will assist in identifying these unique opportunities.

The ACT should not be a repository to reports as to the progress of other anticorruption activities. It should stand alone as a strong and effective end of the in its own right.

Recommendations

Chair of the ACT

It is recommended:

1. The ACT reverts to the biannual rotation of the Chair in line with Consolidated Guidelines on the Rotation System for Lead Shepherd/Chair and Deputy Lead Shepherd/Chair of APEC Working Groups and Other APEC Fora.

Record Keeping

It is recommended:

2. Annual Work plans prepared by the Chair are to include a table listing the proposed activities to be addressed for the relevant period.
3. The table is to include reference to the link between the particular activity and the Terms of Reference of the ACT and section indicating the action taken relative to this particular activity
4. The Chair (at the end of his/her period) is to provide a status report on each of the activities. This report to address which activities were successfully completed, those not achieved (with reasons why) and those terminated.
5. The incoming Chair (with the support of the ACT) is to identify what specific activities will be carried over from the previous period. These activities will then form part of the work plan for that period. Reasons must be provided if it is determined any activity is to be terminated.
6. All work plans and attachments (including tables) must be presented and form part of the formal record of the relevant SOM.

Involvement of all Member Economies in ACT activities

It is recommended

7. The Chair of the ACT (or nominee/s) examines the involvement of all Economies in specific projects to identify the Economies that have not been active in either proposing or participating in specific programs.
8. That, once these Economies have been identified, the Chair of ACT (or nominee/s) to meet with these Economies to identify ways they can either directly sponsor or become a co-sponsor of specific initiatives.
9. The Chair of the ACT (or nominee/s) identify a sub-group within the ACT to identify programs such as workshops, symposiums or conferences which could be conducted in Economies that have not been directly involved in previous events. This may involve an Economy providing financial assistance and/or guidance in the presentation of the program.

Involvement with other Fora

It is recommended

10. The Chair of the ACT (or nominee/s) reviews the current Terms of Reference of all other APEC Work Groups and Task Forces a to identify any potential synergistic relationships with the purpose of the ACT as outlined in the Terms of Reference of the ACT.

11. Once this occurs, the Chair of the ACT (or nominee/s) is to arrange meetings with the respective Fora to explore this relationship.
12. The Chair of the ACT (or nominee/s) is to explore scheduling of SOM meetings to allow direct liaison between Fora where there is a common linkage.

Developing a unique position for the ACT

It is recommended

13. The Chair of the ACT (or nominee/s) identifies other organisations engaging in similar anti-corruption activities within the APEC region in order to determine where the ACT and these organisations engage in similar activities.
14. The Chair of the ACT (or nominee/s) is to identify unique activities in line with the ideals of APEC and consistent with the Terms of Reference of the ACT to allow the ACT to differentiate its activities from other similar organisations
15. The Chair of the ACT (or nominee/s) is to then develop projects and/or programs to allow the ACT to capitalise on this unique positioning.

Monitoring of results of ACT activities

It is recommended

16. The Chair of the ACT (or nominee/s) identifies an appropriate process to enable quantitative and qualitative measurement of all ACT projects and/or programs.
17. The results of this research to be utilised to monitor and modify projects and/or programs to ensure APEC achieves maximum results from these activities.

Participation of women in ACT activities

It is recommended

18. Member Economies should be encouraged to nominate women either as representatives of the Economy or guests at ACT meetings and/or seminars, the workshops, symposiums.
19. The Chair of the ACT (or nominee/s) to form a sub-group with representatives from the PPWE to ensure the interests of women are considered in all planned activities

General Recommendations

It is recommended

20. That the web site for the ACT is subject to regular review at least once every six months to ensure the links are updated and operative.

Appendices

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Appendix 1 Terms of Reference for Review

Annex A

Consultancy Terms of Reference (ToR)

The Contractor will be engaged by the APEC Secretariat to provide the following consultancy services:

1. Work cooperatively with the ACT Chair and members, the SCE, and the APEC Secretariat to provide a robust analysis of the work and operations of the group and recommendations for ways to ensure the overall goals and objectives of APEC are met. In undertaking the tasks the consultant will:
 - Review key APEC policy documents, including Leaders' and Ministers statements, ACT records of meetings, key project documentation and activities to assess the outcomes and how they support the main objectives/goals of ACT and APEC and their impacts in APEC member economies;
 - Evaluate whether ACT is operating effectively and efficiently; whether the group's Terms of Reference or operation could be modified to better respond to APEC ECOTECH priorities and contribute to the achievement of APEC goals;
 - Identify ways to strengthen ACT's strategic priorities and direction for future work;
 - Provide recommendations on how the forum can better focus and more efficiently and effectively manage its tasks and assure that its capacity building activities are providing benefits according to Leaders' and Ministers' priorities;
 - Identify ways to develop synergies among the work of the forum and other relevant APEC groups;
 - Identify opportunities and provide recommendations for greater collaboration with non-APEC parties, including the private sector, civil society and other international organizations; identify ways for ACT to tap resources for programs;
 - Explore how ACT can better take into account the APEC commitment to give gender greater consideration in accordance with directions outlined by the Policy Partnership on Women and the Economy;
 - Finalize an array of recommendations on the above-mentioned areas. Recommendations are to be provided in two lists: the first list containing a maximum of 5 decision points for consideration by SCE to provide further instruction to the group, and the second list covering those recommended actions that can be further discussed for implementation by the ACT itself.
 - Provide a draft report on initial findings, of no more than 30 pages, written clearly and containing robust analysis to be conveyed to the APEC Secretariat, members of SCE and ACT.
 - Analyze member economies' responses to the draft report on initial findings;
 - Produce and present the final report employing a clear and diplomatic style of presentation. *The final report is expected to be delivered to the second SCE meeting of 2012* (date is still to be determined but is anticipated for May/June 2012) unless the first meeting of the ACT is held less than 4 weeks prior to SCE2 in which case the timelines will be agreed between contractor and the Project Overseer.

To prepare the assessment report, the contractor will:

- Submit a detailed work plan and timelines to be agreed with the Project Overseer;
- Work closely with APEC Secretariat staff;
- Become familiar with APEC key documents, APEC goals/objectives and procedures, other official and non-official assessments of APEC sectoral work;
- Review and evaluate previous and current goals, objectives, relevant work plans and documents, and activities;
- Attend relevant forum meetings and activities to gain a deeper understanding of the group's operation;

- " Conducting a survey across APEC member economies for an extensive consultations with members;
- " Quantify the number of people affected, directly and indirectly, by relevant APEC programs; evaluate the cost effectiveness of select programs; estimate the sustainability and replicability of relevant programs.

Appendix 2: Copy of questionnaire sent to Member Economies

Research questions for survey

This questionnaire has been sent to you because of your involvement at the February 2012 Anti Corruption and Transparency Work Group (ACT) meeting in MOSCOW.

I have been asked by APEC to review the ACT to determine if it is meeting the charter and to identify strategic issues likely to impact on the ACT in the future.

One of the key aspects of this review is to obtain information from interested parties and to incorporate, where relevant, this material into my final report.

I would be very grateful if you will participate in this process. Your assistance will ensure all relevant issues are considered.

You can download this word file and complete the information and then send it back to me as an attachment – my email address is mick@acca-aust.com.au or mick11002@hotmail.com (this address provided as some agencies do not recognise the previous address). You may wish to post the material back to me at ACCA – PO Box 270 Stanhope Gardens, NSW Australia 2768

I thank you for your participation in this project. Your information will ensure a better focus and outcome for the ACT in the future.

I may seek further information from you in the course of this project.

Yours sincerely

Original Signed

M.D. (Mick) SYMONS

Managing Director

7 April 2012

Research

1 . SWOT

The first issue to consider is what is known as a SWOT analysis. This is a common process where you examine the strengths, weaknesses, threats and opportunities of an organisation.

The Strengths and Weaknesses are assessed on an internal basis while the Opportunities and Threats are those external to the organisation.

With that in mind could you please list

The INTERNAL Strengths of the ACT

The INTERNAL Weaknesses of the ACT

The EXTERNAL Opportunities for the ACT

The EXTERNAL threats to the ACT

2. General Research questions

2.1. Outcomes of ACT

The ACT has engaged in a number of projects and activities since its inception in 2004.

I would like you to consider these activities, identify the ones you have knowledge of and provide information on how you believe these projects support or supported the main objectives of the ACT and APEC (use separate sheet if necessary).

2.2. Is ACT operating effectively and efficiently?

In this section, I would like you to consider if the Terms of Reference or operation could be modified to better respond to APEC ECOTECH priorities and contribute towards the achievement of APEC goals (use separate sheet if necessary).

2.3. How would you strengthen the strategic priorities and direction for future work?

2.4. How do you believe the ACT can achieve a better focus in order to more effectively and efficiently manage its tasks?

2.5. How do you believe the ACT can achieve a better focus in order to assure its capacity building activities are providing benefits in line with the priorities of the Ministers and Leaders?

2.6. There are a number of work groups and task forces within the APEC family - can you identify methods to develop synergies where ACT can meld with these other groups? (In this instance you need to consider the role of the other work groups and forums).

2.7. *Role within the private sector - Can you provide information on what you would see as opportunities for greater collaboration with non-APEC parties including the private sector, civil society and other internal organizations?*

2.8. *In relation to point 2.7 - can you identify ways where ACT can access external resources to assist with the development and implementation of programs? (In this instance you can also identify what external resources and the relevant programs).*

2.9. *APEC has an expressed commitment to give gender a greater consideration in accordance with the directions outlined by the Policy Partnership on Women and the Economy. Explain how you believe ACT can take into account this commitment? (see <http://goo.gl/NLYIY>)*

This may incorporate ways you believe the ACT can impact on issues relating to women in APEC member economies

2.10. *Any other information you believe may be relevant to the future direction and goals of ACT*

Attachment 3: Synopsis of responses to questionnaire

1. SWOT ANALYSIS

The INTERNAL Strengths of the ACT

- ACT provides a platform for sharing good practices, experiences and knowledge in combating corruption.
- ACT provides networking among other agencies or entities.
- The internal strength of the ACT is that it is composed of representatives possessed of specialist expertise and experience in the anti-corruption area who are engaged full time in their home country in their anti-corruption work. This specialist expertise and experience is invaluable to the ACT in devising practical and workable solutions to the issues with which it deals. Furthermore, as a result of the way in which APEC is structured, decisions and deliberations of ACT are communicated directly to the relevant political leaders of the APEC economies. This is not simply a matter of ensuring that the decisions and deliberations of ACT are communicated to people that need to be aware of them, it also means that the decisions and deliberations would have an impact upon the anti-corruption policies of the member economies.
- The ACT is a working group participated in by anti-corruption experts and law enforcement officials from all interested APEC member economies. Through the meeting and workshops hosted by the ACT or interested economies, good and useful experiences in relation to anti-corruption and transparency measures employed by an economy can be introduced to all other economies. Further, by way of reporting the development on implementing the UNCAC and other initiatives in the ACT meetings, each economy can understand how far other economies has done in this field and then review itself whether it has done enough.
- In addition, as a result of participation from APEC Observers, including ASEAN, the OECD, the Pacific Islands Forum, and the Pacific Economic Cooperation Council, together with representatives from APEC Secretariat and the ABAC, more ideas on combating corruption and enhancing transparency can be shared by all APEC economies.
- The membership of ACT includes jurisdictions with well-established anti-corruption agencies. This is a large resource of skills, knowledge and products for other jurisdictions to draw upon.
- ACT provides an important opportunity to build trust between jurisdictions, which greatly facilitates closer regional cooperation against corruption.
- The ACT provides the opportunity for shared and deeper understanding of common and regional anti-corruption strategic priorities.

The INTERNAL Weaknesses of the ACT

- APEC Course of Action is not any different from UNCAC provisions and articles.
- ACT as an informal channel of communication for mutual legal assistance MLA matters is not fully explored by member utilized.
- The wide diversity of anti-corruption regimes in member economies makes it difficult, at times, for the ACT to provide relevant and meaningful themes and issues that will meet the needs of all members.

- APEC is only a forum participated in by interested Asia-Pacific economies. Since APEC is not an international organization, it follows that all initiatives put forward by APEC and its working groups, including the ACT, as well as the declarations and commitments endorsed by the ministers and leaders of the economies are not compulsory. Certainly, APEC and the ACT will encourage all economies to follow these initiatives, declarations and commitments, but to what extent they will be followed or enforced will be dependent on the condition and determination of each economy.
- Giving the different extent of economic development and diverse legal systems, we understand it might be very difficult, if not impossible, to require all economies obligatorily implement the initiatives, declarations and commitments made by the APEC or its working groups. However, it would be better if we can work out a mechanism to help the economies implement those initiatives, declarations and commitments to the greatest possible extent.

The EXTERNAL Opportunities for the ACT

- There are other APEC fora to and from which ACT could work in collaboration. As it is, ACT and other APEC working groups are working in silo.
- The ACT is one of the many regional/international forums in which anti-corruption initiatives and challenges are addressed. The ACT could do more to collaborate with other such forums performing a similar task
- Resulting from globalization, cross-board trade and investment are thriving. Corruption is considered as a distortion to normal international commerce and will increase transaction cost when doing international business. Consequently, most of international or regionally organizations and forums relating to trade and economy, such as the OECD, ADB and APEC, pay great attention to the anti-corruption issue.
- Although APEC is only a regional forum, the total amount of trade and investment conducted by all APEC's members share a very high percentage in the world. Therefore, the anti-corruption issues discussed in APEC and its working groups must have some impacts on other international organizations and the economies outside APEC. In particular, thanks to cooperation with other international organizations, APEC can improve its capability on providing more comprehensive and enforceable initiatives to be followed and implemented by all APEC economies.
- Build on private sector links: UNCAC and the newly revised FATF 40 (focusing on corruption) hold opportunities for public-private cooperation, such as bank monitoring of politically exposed persons (politicians and senior officials) and reporting suspicious transactions.
- One benefit that could be further exploited is the time when members are together for APEC ACT meetings. The recent practice of hosting productive workshops after the APEC ACT meeting should be encouraged, and established as normal practice.
- Another benefit is the chance to build links with related working groups. APEC ACT should meet with the Experts Group on Illegal Logging and Associated Trade (EGILAT) in 2013, given EGILAT's interest in cooperation with SPEC ACT and the role of corruption behind illicit forest trade.

The EXTERNAL threats to the ACT

- There are too many International forum such as Organisation for Economic Co-operation and Development (OECD), Asian Development Bank (ADB) and the Organisation for Economic Co-operation and Development (OECD), Anti-Corruption Agency Forum, International Association of Anti-Corruption Authorities (IAACA), International Anti-Corruption Conferences (IACC), South East Asian Pacific Against Corruption (SEA-PAC), and Asia Pacific Group (APG) to discuss the same issues in fighting corruption.
- Because there are many other regional/international bodies performing a similar task, there is always a risk that the ACT will become marginalized and irrelevant unless its outcomes are recognized as valuable and helpful to member economies.
- Not aware of any direct threats. Indirectly, all multi-lateral anti-corruption groups are in a form of competition, because they involve costs and benefits for participating economies. There are a large number of anti-corruption groupings (UNCAC, ADB-OECD, G20, and IAACA). Many economies (perhaps most) are unable to participate effectively in all such groupings. APEC ACT should seek to remain attractive in this competitive environment by keeping costs down and benefits high.
- One cost that should be kept under careful control is the reporting workload. APEC ACT should consider adopting a system whereby members only report on APEC ACT commitments, not commitments made elsewhere, such as compliance with UNCAC. UNCAC is the global standard for anti-corruption frameworks and has its own peer review mechanism.

2. GENERAL RESEARCH QUESTIONS

2.1. OUTCOMES OF ACT

The ACT has engaged in a number of projects and activities since its inception in 2004.

I would like you to consider these activities, identify the ones you have knowledge of and provide information on how you believe these projects support or supported the main objectives of the ACT and APEC (use separate sheet if necessary).

Malaysia has participated in various capacity building projects such as:

- Workshop on Asset Recovery, Asset Disclosure;
- Seminar on Code of Conduct for PUBLIC OFFICIAL AND PRIVATE SECTOR;
- “APEC Dialogue on Corruption and Illicit Trade;
- Combating Counterfeit (Falsified) Medicines and Strengthening Supply Chain Integrity;
- Anti-Money laundering;
- Efforts Workshop on Successful Training Techniques for Implementing the Principles of Conduct for Public Officials; and
- Other projects which we have benefited and supported in implementing and achieving APEC – ACT objectives.

ICAC of Hong Kong: Since the inception of the ACT, the ICAC of Hong Kong, China has been sending representatives to attend all the meetings and is aware of the projects and activities in which the ACT engaged and, wherever resources permitted, the ICAC also sent representatives to participate in the workshops/seminars conducted by the ACT. All these projects/activities were

relevant to the agenda of ACT and supported its main objectives as well as those of APEC, i.e. combating corruption and promoting transparency.

Chinese Taipei: In principle, Chinese Taipei fully supports the projects and activities initiated by the ACT. In many cases, Chinese Taipei has adopted the measures which are consistent with the ACT's initiatives.

We find some initiatives of APEC or ACT quite useful and constructive. For example, APEC in 2007 endorsed a model Code of Conduct for Business and a model Code of Conduct Principles for Public Officials. By referring to those Model Codes, Chinese Taipei established the Integrity and Ethics Directions for Civil Service in 2008 in order to guide all civil servants to execute duties with integrity, fairness and lawful administration.

In addition, by referring to APEC's model Code of Conduct for Business, Chinese Taipei also widely disseminates the "Handbook of Business Principles of Integrity for Small and Medium Enterprise" to enterprises incorporated or doing business in this jurisdiction, thus contributing to the public sector and private sector anti-corruption partnership.

This Handbook is prepared from the perspective of enterprises, reminding them the risk of breaching business integrity and the preventive measures thereof in the hope that they begin to emphasize the profound meaning of sustainable management represented by business integrity.

Australia

- Private sector engagement – Australia funded a pilot project to design and implement the *APEC Code of Conduct for Business* in Vietnam, Thailand (2009) and Chile (2011). Australia subsequently co-sponsored the Philippines' proposal to implement the *Code of Conduct* in 2012. The United States strongly supports this collaboration with the private sector, and has built on Australia's work in particular industry sectors (e.g. construction and pharmaceuticals). These initiatives support the APEC Leaders' commitment to work toward implementation of punitive and preventive anti-corruption policies and practices, consistent with the *UN Convention against Corruption*, and various APEC commitments.
- Modern law enforcement techniques – The ACT pioneered the use of anti-money laundering and asset recovery systems against corruption. The use of these systems is also a priority for the G20. Australia assisted in the design and delivery of conferences on this topic in Thailand (2007 and 2009) and Australia (2010). China, the US and Australia co-sponsored Thailand's proposal for a fourth conference in July 2012.
- Transnational crime – APEC has exerted significant efforts to prevent and disrupt transnational crimes that are facilitated by corruption, including environmental crime. Following the *Sydney APEC Leaders' Declaration on Climate Change, Energy Security and Clean Development (2007)*, which called for renewed action on sustainable marine and forest management, Australia hosted the international *Fish, Forests and Filthy Lucre Conference* in 2010 to strengthen regional cooperation against illegal deforestation and fishing.
- Cultural change – The ACT has had a positive effect on cultural change in the Asia-Pacific region, leading the way in talking openly about corruption.

2.2. *Is ACT operating effectively and efficiently?*

In this section, I would like you to consider if the Terms of Reference or operation could be modified to better respond to APEC ECOTECH priorities and contribute towards the achievement of APEC goals (use separate sheet if necessary).

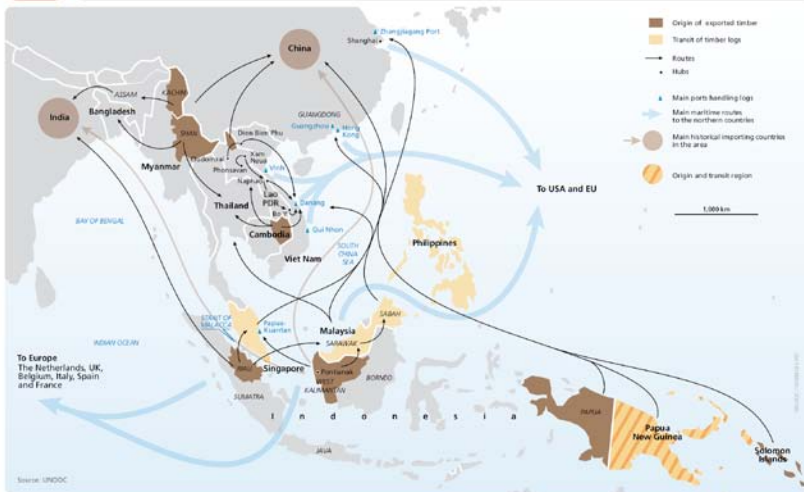
- In our view, APEC ACT is operating effectively and efficiently towards the achievement of APEC goals.
- The purpose, structure and administration of the ACT are clearly set out in its Terms of Reference. All along, the ACT has been operating well within its terms. If it is considered there is a need to better respond to APEC ECOTECH priorities and contribute towards the achievement of APEC goals, perhaps better coordination with other APEC sub-forums and the latter's knowledge and participation in ACT events will help.
- The prevailing Terms of Reference of the ACT seems quite comprehensive and complete to achieve APEC goals in relation to anti-corruption and transparency. Although one of the mandates of the ECOTECH is to coordinate and supervise ECOTECH-related Working Groups and SOM Special Task Groups, we are not very sure if the ACT is one of the ECOTECH-related Working Groups. Therefore, we do not find it necessary, at this moment, to modify the ACT's Terms of Reference to respond to APEC ECOTECH priorities.
- Reducing regional corruption would clearly support the achievement of the following APEC goals and objectives:
 - Regional economic integration: A [recent analysis](#) suggests deeper economic integration is associated with lower levels of corruption. Hence, APEC ACT work to reduce corruption should support the achievement of APEC's objective or regional economic integration.
 - Addressing the social dimensions of globalisation (inclusive growth): Reducing corruption is fundamental to achieving inclusive growth. The [IMF found](#) that corruption increases income inequality and poverty, harms the formation of human capital, reduces the level and effectiveness of social spending, and perpetuates unequal holding of assets and unequal access to education.
 - Safeguarding the quality of life through sustainable growth: A recent [Cambridge paper](#) found that "the correlation between a wide range of different corruption indices and growth in genuine wealth per capita is very robust and is of economic significance . . . rampant corruption can put an economy on an unsustainable path along which its capital base is being eroded."¹
 - Structural reform: Effective implementation of UNCAC would be a major beneficial structural reform for APEC.
 - Human security: Corruption harms human security in various ways: graft in the [management of disaster relief funds](#), [enabling transnational crime](#), [facilitating violent extremism](#), [facilitating deforestation](#) and associated climate change.
 - APEC ACT has addressed transnational illicit trade and organised crime more explicitly in recent years. Perhaps the terms of reference for APEC ACT could be updated to affirm the working group's role in opposing transnational crime associated with corruption.

2.3. How would you strengthen the strategic priorities and direction for future work?

Priorities for future work:-

- Fully implement Code of conduct of Public officials;
 - Fully implement Business Code of conduct in private sector;
 - Fully implement Code of conduct in SMEs;
 - APEC ACT should consider giving priorities in creating transparency and governances among business communities;
 - Focus on combating private-sector corruption; and
 - Enhance corporate criminal and civil liability of corruption offences among member economies.
-
- A longer term planning of the projects, irrespective of the change of chairmanship, may help strengthen proprieties and direction for future work.
 - All the important issues presented and discussed in the ACT will be brought back to the competent authorities of Chinese Taipei for their consideration. In the event that an issue is listed as priorities by APEC or the ACT, a high-level official from the competent authority may establish a task force to implement such priorities.
 - Continue the focus on the multi-year plan. This reduces the risk of loss of focus due to annual change in the APEC ACT Chair.
 - Simplify and concentrate the strategic focus. The distinctive value of APEC ACT is the opportunity it provides to cooperate against shared problems in the Asia-Pacific region, especially transnational problems facilitated by corruption.
 - APEC ACT could try to ensure some of its activities lead to results “at the sharp end” through collaborative law enforcement action. For example, illicit trade or trafficking in people, goods, and environmental resources could be the subject of a regional strategy.
 - This could be facilitated by greater investment in mapping regional illicit pathways. The UNODC diagram below illustrates a transnational crime pathway (forest products) that could be used to inform an APEC strategy against corruption-enabled illicit trade.

FIG. 140: ILLICIT TIMBER FROM SOUTH-EAST ASIA TO THE WORLD



2.4. How do you believe the ACT can achieve a better focus in order to more effectively and efficiently manage its tasks?

- A proper monitoring system with stock taking by ACT Secretariat ;
- A longer term planning of the projects, irrespective of the change of chairmanship, may help strengthen proprieties and direction for future work.
- Affording smoother and better mutual assistance on legal matters among member economies – in areas of asset tracing and recovery; recording of evidence; seizure of properties in relation to offences of corruption, money laundering – with ACT liaison persons as the channel of communication between enforcement agencies of ACT member economies and their competent authorities.
- The ACT may create some ad hoc groups which are organized by certain interested member economies, respectively. These ad hoc groups can be tasked to help implement the ACT’s priorities or programs and, if necessary, provide consultation to the economies on how to implement these ACT’s goals.
- The multi-year work program is an important innovation that should be supported.
- The APEC Secretariat could work with the Chair to ensure items on the annual plan receive enough attention in the working group meetings, and are therefore less susceptible to annual changes in the Chair or the interest of the host country.

2.5. How do you believe the ACT can achieve a better focus in order to assure its capacity building activities are providing benefits in line with the priorities of the Ministers and Leaders?

- All capacity building needs proposed are to be in line with the Ministers and Leaders priorities. Any capacity building programme which are not in line with the Ministers and Leaders priorities and APEC ACT objectives should not be considered for APEC Funding
- Usually, the ACT's activities are participated in by anti-corruption experts and law enforcement officials coming from APEC member economies. However, in consideration of wide influence of the ACT's anti-corruption initiatives on all levels of public and private sectors, it might be more desirable if the ACT's capacity building activities can invite more participants from diverse backgrounds. Only more and more stakeholders from both public and private sectors take part in the ACT's activities, the priorities of the Minister and Leaders can be understood and easily implemented in the APEC economies.
- ACT Chair could consider taking on the priorities of the Ministers and Leaders as made known in the preceding year's Ministerial Statement/Leaders' Declaration and come up with proposals for member economies' consideration and endorsement.
- APEC ACT includes members with highly sophisticated anti-corruption agencies. These agencies could be encouraged to assist countries with less developed systems and newly created agencies.
- So far, there has been little explicit recognition of the greater capacity building needs of less developed APEC members.
- As UNCAC implementation review reports become available, they could be used to guide APEC ACT capacity building efforts.

2.6. There are a number of work groups and task forces within the APEC family – can you identify methods to develop synergies where ACT can meld with these other groups? (In this instance you need to consider the role of the other work groups and forums).

- Developing anti-corruption action plans on certain or specific corruption- prone systems, practices and procedures of Working Groups from:
 1. Small and Medium Enterprise;
 2. Health;
 3. Expert Group on Illegal Logging and Associated Trade;
 4. Ocean and Fisheries;
 5. Tourism ; and
 6. Transportation.
- In the event that APEC working groups and task forces other than the ACT initiate activities touching on the issue of anti-corruption and transparency, the ACT might cooperate with the relevant working groups and task forces from the very beginning. For instance, the SMEs of APEC in recent years paid great attention to business ethics in private sectors. In particular, the SMEs last year passed draft voluntary codes of business

ethics in the sectors of the medical device, biopharmaceutical, and construction. It is beyond doubt that the issue of business ethics in private sectors is linked with anti-corruption in private sectors. For that reason, the ACT and SMEs may jointly organize an ad hoc group to discuss, draft, and implement such ethics codes in private sectors.

- The Programme Director or APEC Secretariat responsible for the ACT forum will be in a better position to advise the ACT on this.
- There is a strong unrealised opportunity for greater cooperation between the APEC ACT and the [APEC Experts Group on Illegal Logging and Associated Trade](#), which was created in 2011 to enhance the efforts of member economies to take concrete steps to combat illegal logging and associated trade, promote trade in legally harvested forest products, and support capacity building activities in member economies.
- The World Bank has found [corruption is a significant enabler of illegal logging](#). Deforestation causes more greenhouse emissions than all forms of transport combined (www.climate.gov.au). Given the lack of work in this area to date, initial collaboration with the EGILAT could involve producing a Declaration on Combating Forest Crime.
- A regional APEC cooperation strategy would be well worth considering as many illegal logging syndicates are transnational, and are often beyond the capacity of any single country to disrupt effectively.

2.7. Role within the private sector – Can you provide information on what you would see as opportunities for greater collaboration with non-APEC parties including the private sector, civil society and other internal organizations?

- ACT should collaborate with:
 - a. SMEs of non-APEC parties,
 - b. State Parties/Signatories of-
 - (i) CITES (Convention on International Trade of Endangered Species of Fauna and Flora);
 - (ii) Basel Convention (Control of Trans-boundary Movements of Hazardous Waste and their Disposal).
 - c. International Labour Organization (on Human Trafficking);
 - d. Off-Shore Bank Authorities; and
 - e. Transparency International
- We are of the view that all of private sector, civil society and other internal organizations are vital stakeholders on the issue of anti-corruption in every economy. As stated at point 2.5, it would be better if the workshops and other activities can be participated in by non-APEC parties in order to achieve a wide consensus on anti-corruption works.

- From time to time, ACT has been, in consultation with ABAC, involved with the private sector and non-APEC parties in some of its activities, such as workshops and seminars. This should continue.
- A key opportunity is to work with the private sector on effective implementation of revised FATF AML/corruption standards.
- Key opportunities in tackling corruption and transnational crime start with depriving corrupt officials and international syndicates of the fruits of their crimes – by tracking illicit financial flows and confiscating tainted assets.
- The financial sector can conduct ongoing monitoring of the accounts of politically exposed persons associated with high risk sectors to identify and report suspicious transactions. The ability to target funds in a bank account that appears suspicious, also provides a strong disincentive for transnational criminal networks to operate in a jurisdiction.
- The private sector can also offer valuable perspective on risk, which can inform the ACT's targeting of priorities.

2.8. *Can you identify ways where ACT can access external resources to assist with the development and implementation of programs? (In this instance, you can also identify what external resources and the relevant programs).*

- Malaysian Anti-Corruption Academy (in kind- facilities such as venue, hostels, lecture halls etc)
- World Bank
- United Nation Developments Programme (UNDP)
- International Anti-Corruption Academy (IACA)
- With more attention paid to corruption in private sectors, it seems necessary to introduce external resources which can assist the private sectors to prevent corruption. The external resources may include trade associations, business associations and other industry trade groups.
- The anti-corruption experts and law enforcement officials are fully aware of importance of anti-corruption, both in public and private sectors, but they may lack experience working in private sectors. On that account, the anti-corruption initiatives in private sectors which are discussed, suggested and drafted by those experts and officials may not be so useful for achieving the planned objectives. On the other hand, the trade associations or groups understand the operation of specific private sectors and therefore can provide with useful ways on how to prevent corruption in these fields. Provided that the ACT can closely work with those external resources when discussing and drafting anti-corruption initiatives involving in private sectors, the objectives of these initiatives will be more easily reached.
- Through ACT's organization of workshops or seminars and member economies' involvement of non-APEC parties in their economies in such activities.
- AusAID provides funding through the [Public Sector Linkages Program](#) for multi-stakeholder efforts and has done so for projects including the programs described at **2.1**.

2.9. APEC has an expressed commitment to give gender a greater consideration in accordance with the directions outlined by the Policy Partnership on Women and the Economy. Explain how you believe ACT can take into account this commitment? (see <http://goo.gl/NlYlY>)

This may incorporate ways you believe the ACT can impact on issues relating to women in APEC member economies

- ACT could spearhead a programme (educational) / guidelines on “The integrity of the family unit and the role of housewives or women’s organization in combating corruption”.
- In a meeting held in San Francisco, United States in September 2011, APEC economies discussed four policy areas to increase women’s economic participation: (i) Access to Capital; (ii) Access to Markets; (iii) Capacity and Skills Building; and (iv) Women’s Leadership. Viewing from the four areas, the (iii) Capacity and Skills Building and (iv) Women’s Leadership may be relevant to the operation of the ACT.
- In this regard, the ACT can encourage more female experts and officials to participate in its programs and activities. Further, in order to increase the decision-making participation of women within the ACT, the ACT may give priority to women as chair or speaker in some meetings, activities, and workshops.
- All along, ACT has no gender issue as there is active participation of both men and women in its meetings and activities. According to Transparency International, fighting corruption can reduce the harmful effects of corruption on women and girls. Corruption compromises the social, economic and political participation of women, and undermines effective service delivery. The ACT may address its commitment to giving gender a great consideration through:
 - increased collaboration with the APEC Policy Partnership on Women and the Economy (PPWE) to identify and address opportunities to promote gender equality through its anti-corruption initiatives. The PPWE also provides policy advice on gender issues and supports gender equality where relevant to the APEC process
 - including gender equity in outreach to the private sector and civil society on anti-corruption measures and capacity building projects.

2.10. Any other information you believe may be relevant to the future direction and goals of ACT

No respondent provided any answer to this request

Appendix 4: Table highlighting links between ACT and other APEC Work Groups and Task Forces

POTENTIAL LINKAGES BETWEEN THE ACT AND OTHER APEC WORK GROUPS AND TASK FORCES

Type	Name	Outline of Activities	Link to Corruption
TF	Counter Terrorism Task Force	<ul style="list-style-type: none"> • Role of the Counter Terrorism Task Force is to • coordinate the implementation of Leaders' Statements and commitments on fighting terrorism and enhancing human security • assist members to identify and assess counter-terrorism needs • coordinate capacity building and technical assistance programs • cooperate with relevant international and regional organisations • facilitate cooperation between APEC fora on counter-terrorism issues. 	<ul style="list-style-type: none"> • Corruption to provide funding and/or access to terrorist groups; • Corruption within government agencies to provide information to terrorist groups
TF	Mining Task Force	<p>Role of the Mining Task Force is to:</p> <ul style="list-style-type: none"> • Pursue policies that enhance the sustainable production, trade and consumption of minerals and metals thereby improving the economic and social wellbeing of our people. • Foster regular exchange between member economies about experiences with regulations, policies and practices and about significant developments in each economy's minerals and metals sector. • Foster investment certainty in the APEC minerals sector through the pursuit of open minerals and metals markets and the articulation of clear and predictable investment policies. • Promote cost effective, evidence based, transparent and objective-based measures which improve the efficiency in the regulation of the minerals industry to contribute to economic, environment and social development outcomes. • Encourage, support and promote initiatives by the minerals and metals industry and stakeholders that contribute to national and international sustainable development goals. • Support capacity building activities for sustainable development so that all APEC Economies are able to maximise the benefits and minimise the impacts from minerals resource development. 	<ul style="list-style-type: none"> • Land Management; • Supply of permits and/or licences; • Environment pollution linked to government inaction; • Facilitation payments; • Procurement.

POTENTIAL LINKAGES BETWEEN THE ACT AND OTHER APEC WORK GROUPS AND TASK FORCES

WG	Agricultural Technical Cooperation	<p>To enhance the contribution of agriculture to improve economic growth and social well-being by promoting agricultural technical cooperation between APEC members.</p> <p>This work contributes to APEC's trade facilitation agenda by reducing business transaction costs, enhancing marketing capacity and improving the implementation of agriculture-related provisions in free trade agreements (FTAs).</p>	<ul style="list-style-type: none"> • Corruption in land management; • Facilitation payments linked to transaction costs; • Licencing and associated permits; • Counterfeit or tampered soil enhancement products; • Stockpiling of nitrates (links to Counter Terrorism)
WG	Emergency Preparedness	<p>The group provides a constructive role in enabling the region to better prepare for and respond to emergencies and disasters by helping to reduce the risk of disasters and building business and community resilience.</p>	<ul style="list-style-type: none"> • Disbursement of disaster relief monies; • Procurement; • Re-building;
WG	Energy	<p>APEC energy cooperation is conducted under the framework of the Energy Security Initiative (ESI). The objective of the ESI is to prepare the region for potential energy supply disruptions and subsequent impacts on economic activities.</p> <p>The ESI covers a range of issues including the Monthly Oil Data Initiative, maritime security, real-time emergency information sharing, oil supply emergency response, energy investment, natural gas trade, nuclear power, energy efficiency, renewable energy, hydrogen, methane hydrates, and clean fossil energy.</p>	<ul style="list-style-type: none"> • Maritime security – corruption within industry to provide information to interested parties (pirates, sabotage); • Access to nuclear technology and by-products
WG	Health	<p>Focus is on health-related threats to economies' trade and security, concentrating mainly on emerging infectious diseases, including naturally occurring and fabricated diseases.</p>	<ul style="list-style-type: none"> • Counterfeit medicines (ACT 2011); • Border protection.

POTENTIAL LINKAGES BETWEEN THE ACT AND OTHER APEC WORK GROUPS AND TASK FORCES

WG	Experts Group on Illegal Logging and associated trade	<p>Role of Work Group:</p> <ul style="list-style-type: none"> • Strengthening political commitment in support of sustainable forest management, forest conservation and forest rehabilitation; Facilitating the implementation of forest-related agreements and fostering a common understanding on sustainable forest management; • Strengthening international cooperation on sustainable forest management; • Strengthening the coordination and cooperation among APEC economies on forest policies and management; • Enhancing practical cooperation to conserve, rehabilitate and sustainably utilize forest resources; • Encouraging APEC economies to enhance afforestation, reforestation and tree planting programmes and avoid further deforestation and forest degradation; • Promoting the development of forest-related industries, create employment, and build the capacity of indigenous and rural communities to manage forests sustainably. 	<ul style="list-style-type: none"> • Land Management; • Allocation of permits/licences; • Facilitation of transport of illegal logging; • Displacement of population
WG	Industrial Science and Technology	<p>Role of the Work Group</p> <ul style="list-style-type: none"> • Enhanced economic growth, trade and investment opportunities in harmony with sustainable development, through policies, innovative R&D and technologies, and knowledge sharing; • Better quality of life and a cleaner environment; • <i>Safe and secure society, emphasizing the importance of measures for infectious diseases and natural disasters;</i> • Human resource capacity building; • Enhanced international science and technology networks; • Improved level of connection between research and innovation, involving and encouraging the potential of SMEs; and • Strengthened technological cooperation and achievement of best practices in strategic planning for IST projects and programs. 	<ul style="list-style-type: none"> • Counterfeit medicines (ACT 2011)

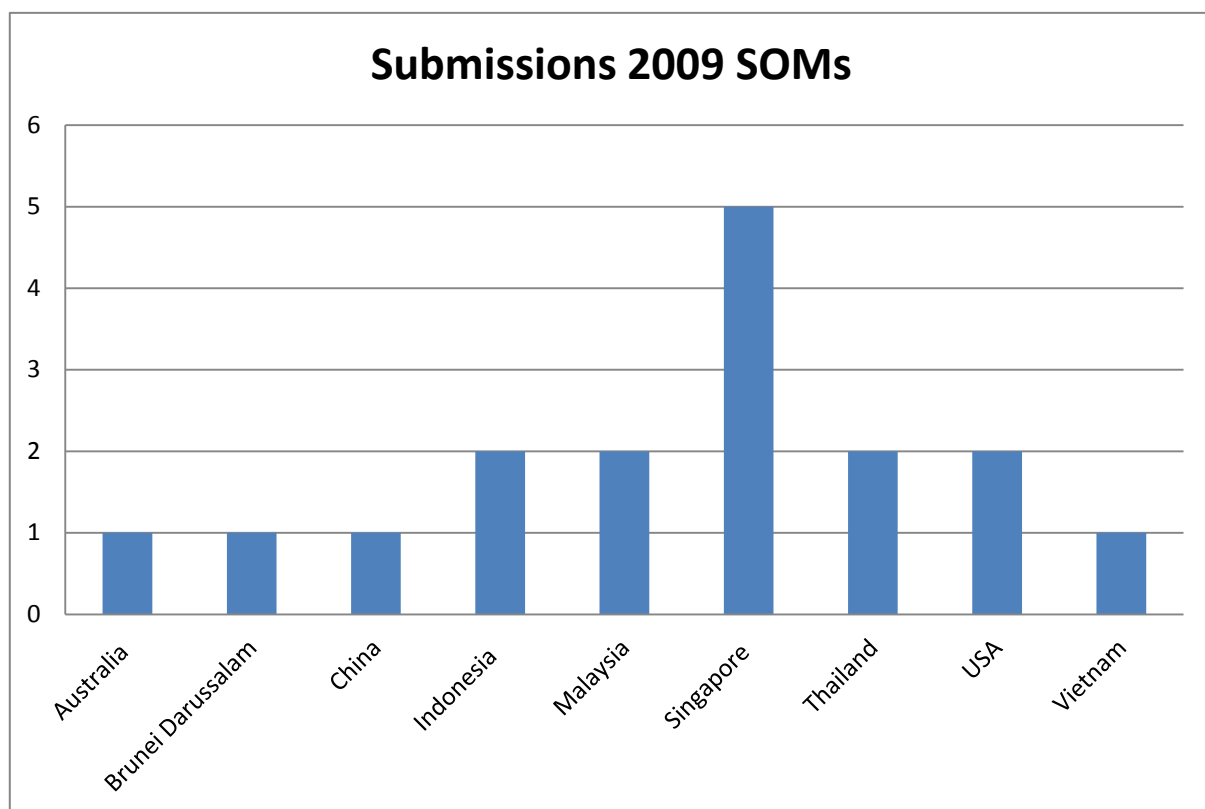
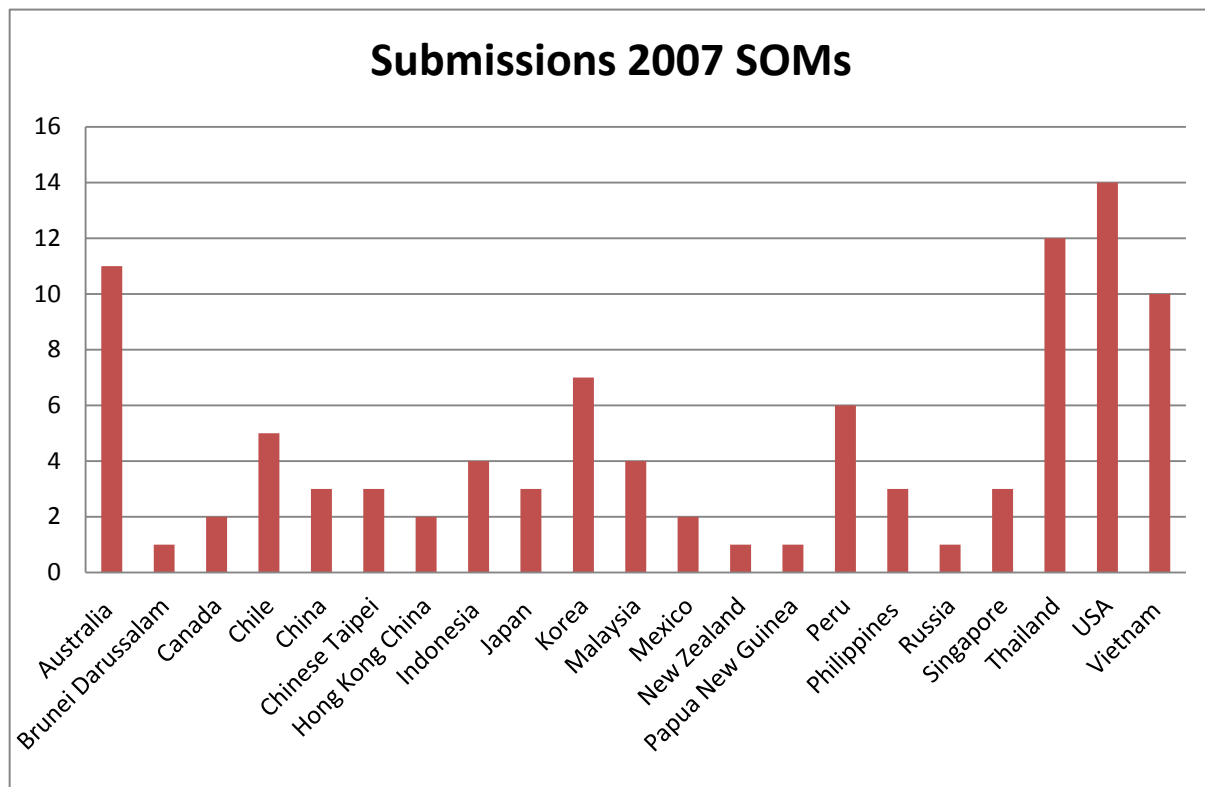
POTENTIAL LINKAGES BETWEEN THE ACT AND OTHER APEC WORK GROUPS AND TASK FORCES

WG	Ocean and Fisheries	<p>Focus of Work Group:</p> <ol style="list-style-type: none"> 1. Sustainable Development and Protection of the Marine Environment by focusing their attention on <ol style="list-style-type: none"> i. Understanding of the Marine Environment ii. Sustainable Management of the Marine Environment iii. Pollution 2. Impact of Climate Change on the Oceans 3. Promote Free and Open Trade and Investment 4. The Role of Oceans in Food Security 	<ul style="list-style-type: none"> • Corruption in allocation of fishing rights, permits and licences; • Industrial and chemical pollution through corrupt officials ignoring breaches and/or false licences
WG	Policy Partnership on Women and the Economy	<p>Policy Partnership on Women and the Economy (PPWE) provides a mechanism to integrate gender considerations into APEC activities. It also provides policy advice on gender issues and supports gender equality where relevant to the APEC process</p>	<ul style="list-style-type: none"> • Potential issues re sex slavery; • Inequitable work practices facilitated through corrupt officials ignoring work conditions.
WG	Small and Medium Enterprises	<p>Focus of Work Group:</p> <ul style="list-style-type: none"> • Business environment; • Building management capability and promoting entrepreneurship; • Market access and internationalization; • Innovation; • Financing; • Raising awareness of sustainable business practices; and • Youth, women and minorities 	<ul style="list-style-type: none"> • Corruption linked to issue of licences and permits; • Facilitation payments; • Loan sharking linked to organised criminal enterprises; • Corruption within work place practices – Occupational Health and Safety issues; • Exploitation of workers
WG	Tourism	<p>Four key policy areas:</p> <ul style="list-style-type: none"> • Removal of impediments to tourism business and investment • Increase mobility of visitors and demand for tourism goods and services • Sustainable management of tourism outcomes and impacts • Enhance recognition and understanding of tourism as a vehicle for economic and social development 	<ul style="list-style-type: none"> • Facilitation payments at border access; • Facilitation payments re travel documentation • Corruption within land management practices; • Procurement corruption; • Licencing and/or permits relative to tourism developments

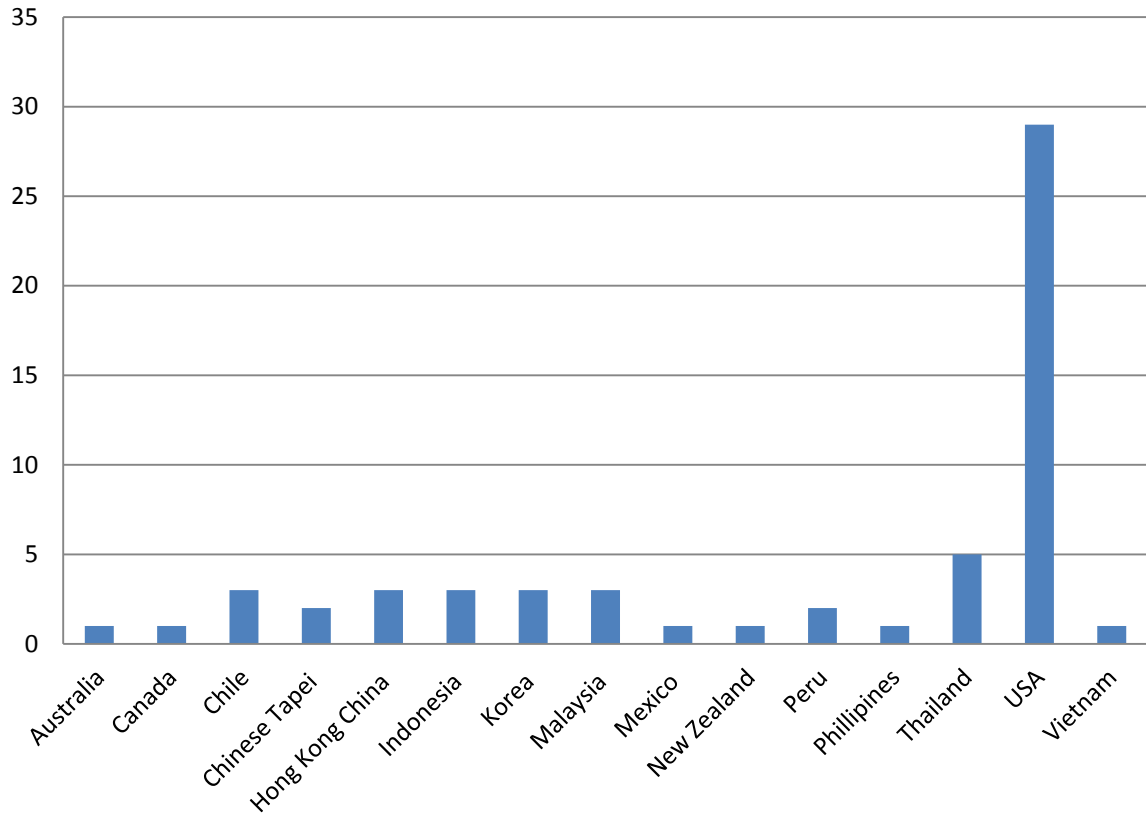
POTENTIAL LINKAGES BETWEEN THE ACT AND OTHER APEC WORK GROUPS AND TASK FORCES

WG	Transportation	<p>Goals of Work Group:</p> <ul style="list-style-type: none"> • Aggressive road safety strategies tailored to the special circumstances of each economy. • Prioritise the harmonisation of security measures, noting that differences in security processes across the region have implications for both passengers and industry, and in particular to work together on mass transit security measures. • Help developing economies comply with global security requirements such as the International Ship and Port Facility Security Code. • Develop timetables and strategies to work towards the liberalisation of air services. • Work together on a balanced package of options for addressing greenhouse gas emissions from aviation. 	<ul style="list-style-type: none"> • Corruption linked to licencing of contractors for construction of roads; • Corruption linked to issue of drivers' licences • Corruption at border access re movement of persons and/or goods;
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Appendix 5: Graphical representation of the involvement of ACT Member Economies for 2007.2009.2011



Submissions SOMs 2011



Attachment 6 - Acronyms and Abbreviations

ABAC	APEC Business Advisory Council
ACT	Anti-Corruption and Transparency Task Force/Work Group
APEC	Asia-Pacific Economic Cooperation
ASEAN	Association of Southeast Asian Nations
ECOTECH	Economic and Technical Cooperation
ESI	Energy Security Initiative
FOTC	Friends of the Chair (ACT)
GRECO	Group of States Against Corruption
ICC	International Chamber of Commerce
IPEG	Intellectual Property Experts Group
LSIF	Life Science Innovation Forum
MLA	Mutual Legal Assistance
OECD	Organisation for Economic Cooperation and Development
PPWE	Policy Partnership on Women and the Economy
SCE	SOM Steering Committee on ECOTECH
SEA-PAC	South East Asian Parties Against Corruption
TF	Task Force (APEC)
UNCAC	United Nations Convention Against Corruption
WG	Work Group (APEC)