



Asia/Pacific Group
on Money Laundering

APG Strategic Plan

1 July 2009 – 30 June 2012

Adopted by Members at 12th Annual Meeting
Brisbane, Australia, 7 July 2009

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APG STRATEGIC PLAN 2009-2012



Asia/Pacific Group
on Money Laundering

APG Strategic Plan 1 July 2009 – 30 June 2012

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**APG Strategic Plan
1 July 2009 – 30 June 2012**

APG Co-Chairs' Statement

On behalf of the APG membership and in accordance with the APG's Terms of Reference (**Annex A**) we endorse this document as the 4th Asia/Pacific Group on Money Laundering Strategic Plan for the three year period 1 July 2009 to 30 June 2012.

Dated: 7 July 2009.



Commissioner Mick Keelty
Co-Chair
Australia



Mr Ong Hian Sun
Co-Chair
Singapore

APG Strategic Plan

1 July 2009 – 30 June 2012

APG CO-CHAIRS' FOREWORD



Commissioner Mick Keelty



Mr Ong Hian Sun

It is with pleasure that we have endorsed this Strategic Plan on behalf of the membership of the APG, which has grown from a small regional body originally consisting of 13 founding members in 1997 to the world's largest FSRB and a leader among them.

The APG has substantial responsibilities, including for implementing the global anti-money laundering (AML) and combating the financing of terrorism (CFT) standards among our 40 members and for the coordination of technical assistance and training. We actively participate in global AML/CFT standard setting and policy formulation through the Financial Action Task Force (FATF) as part of our Associate Membership status. Globally, our activities are monitored, and our reports used, by a variety of international organisations and by many countries.

We have worked hard to develop forward-thinking initiatives in a number of areas including in the conduct of mutual evaluations and our new mechanisms to peer review evaluation reports; pre-mutual evaluation training for domestic coordination agencies; AML/CFT strategic implementation planning; and the coordination of technical assistance and training.

This plan outlines the broad strategic direction of the APG for the next three years. It builds on the strengths of our previous plans, the lessons learned in implementing those plans, as well as a number of new initiatives developed over the last three years (including mutual evaluation training and the Strategic Implementation Planning Framework). This Strategic Plan also incorporates in one larger and more focussed framework the substance of the APG's separate Strategic Technical Assistance and Training Framework.

The APG's current term (coinciding with FATF's term) expires in 2012. With FATF initiatives already underway towards a fourth round of FATF mutual evaluations after 2012, we need to start thinking of the challenges ahead and what an APG third round of evaluations will mean after 2012. These are important issues and how we respond to FATF and other global and regional developments during the next three years, while this plan is in effect, will shape what we do in the years afterwards.

This plan has four principal components:

- **Vision** a statement of what we want to achieve as an organisation
- **Mission** the strategic outcome of the APG
- **Goals** specific activities to achieve our mission in the next three years, and
- **Strategies** what business we need to conduct to meet our goals.

Each year the APG will agree on an Annual Business Plan to give effect to the strategies stated in this document. The Secretariat will inform members of the APG's progress against this Strategic Plan and against each Annual Business Plan, and it will assist members to agree on specific operational priorities for the ensuing 12 month period. The activities designed to implement these

priorities will be reported in the APG's Annual Report as a formal update of the progress we are making with our strategic objectives and programmes.

We are confident that, as the APG moves forward over the next three years, our individual members and the Asia/Pacific region as a whole will benefit greatly from the programmes and activities planned within this document.

Dated: 7 July 2009



Commissioner Mick Keelty
Co-Chair
Australia



Mr Ong Hian Sun
Co-Chair
Singapore

APG MEMBERS AND OBSERVERS

The APG is an autonomous, voluntary and co-operative international body established in February 1997 at the 4th Asia/Pacific Money Laundering Symposium in Bangkok, Thailand by agreement among its members.

As of July 2009, the APG consists of 40 members divided into five sub-regions (**Annex B**), three observer jurisdictions and 20 observer organisations as follows:

MEMBERS

- | | | |
|--------------------------------|------------------------|----------------------|
| 1. Afghanistan | 15. Korea, Republic of | 28. Palau |
| 2. Australia | 16. Lao PDR | 29. Papua New Guinea |
| 3. Bangladesh | 17. Macao, China | 30. Philippines |
| 4. Brunei Darussalam | 18. Malaysia | 31. Samoa |
| 5. Cambodia | 19. Maldives | 32. Singapore |
| 6. Canada | 20. Marshall Islands | 33. Solomon Islands |
| 7. China, People's Republic of | 21. Mongolia | 34. Sri Lanka |
| 8. Chinese Taipei | 22. Myanmar | 35. Thailand |
| 9. Cook Islands | 23. Nauru | 36. Timor Leste |
| 10. Fiji Islands | 24. Nepal | 37. Tonga |
| 11. Hong Kong, China | 25. New Zealand | 38. United States |
| 12. India | 26. Niue | 39. Vanuatu |
| 13. Indonesia | 27. Pakistan | 40. Vietnam |
| 14. Japan | | |

OBSERVERS

Jurisdictions:

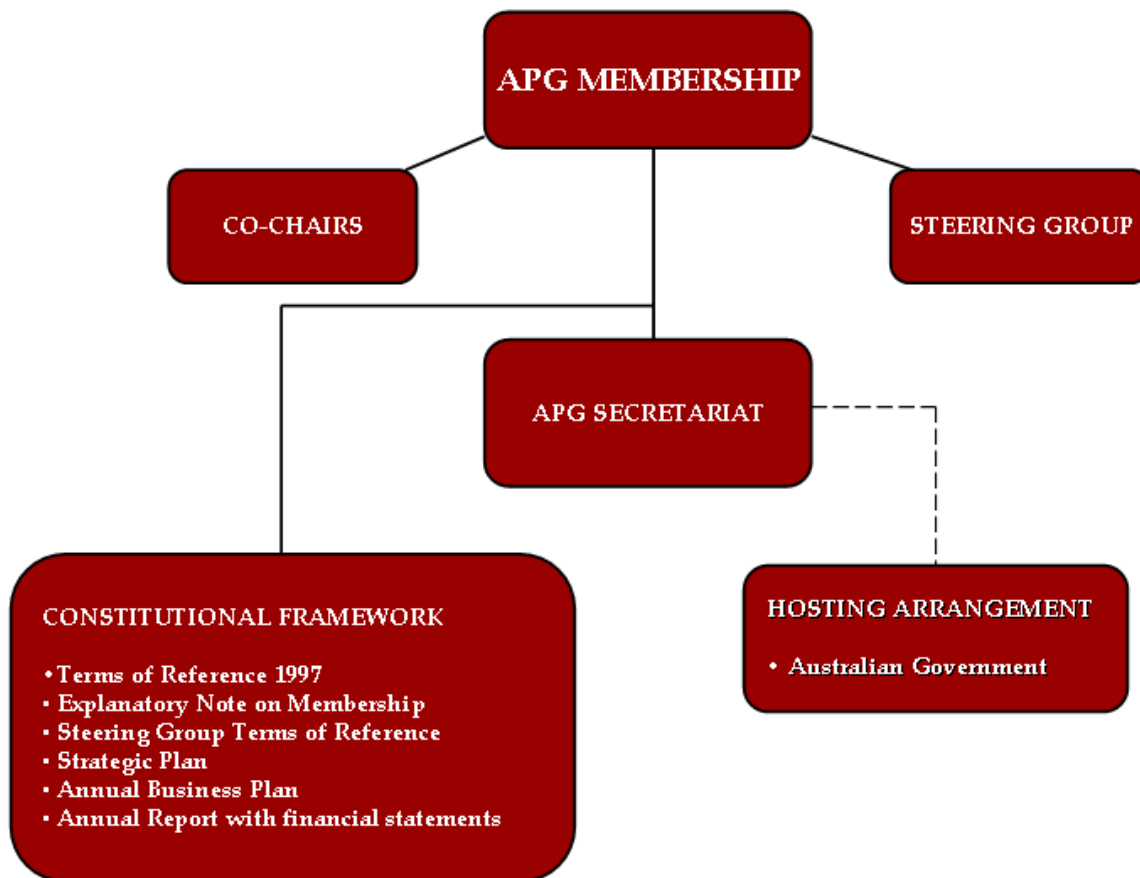
1. France
2. Kiribati
3. United Kingdom

Organisations:

- | | |
|--|---|
| 1. Asia Pacific Economic Cooperation Secretariat | 11. Interpol |
| 2. Asian Development Bank | 12. MENAFATF - Middle East & North Africa FATF-style body |
| 3. ADB/OECD Anti-Corruption Initiative for Asia-Pacific | 13. MONEYVAL - Council of Europe, AML Group |
| 4. Associations of Southeast Asian Nations (ASEAN) Secretariat | 14. Oceania Customs Organisation |
| 5. CFATF - Caribbean Financial Action Task Force | 15. Offshore Group of Banking Supervisors |
| 6. Commonwealth Secretariat (London) | 16. Pacific Islands Forum Secretariat |
| 7. Egmont Group of Financial Intelligence Units | 17. Pacific Financial Technical Assistance Centre |
| 8. FATF | 18. UN Office on Drugs and Crime |
| 9. GAFISUD - South American FATF-style body | 19. World Bank |
| 10. International Monetary Fund | 20. World Customs Organisation |

APG CONSTITUTIONAL ARRANGEMENTS

The following diagram outlines the basic constitutional and governance structure of the APG:



Co-Chairs: Two Co-Chairs (one permanent and one rotating) are responsible for chairing APG meetings and providing strategic advice and direction to the membership. Australia, as host of the Secretariat, retains the permanent Co-Chair.

Steering Group: Pursuant to the Steering Group's Terms of Reference, this body consists of one representative from each sub-regional group (**Annex B**), the current Co-Chairs, the previous rotating Co-Chair, and (when known) the incoming rotating Co-Chair. The Steering Group considers governance and other issues of strategic importance referred by the Co-Chairs and membership; engages and consults with APG members in their sub-regional groups to obtain input on key issues; provides advice to the Co-Chairs and members through the Secretariat; and influences all APG members to effectively participate in APG activities, including leading or sponsoring specific APG projects.

APG Secretariat: The Secretariat acts as a focal point for the APG and provides support to the Co-Chairs, Steering Group and membership. The Secretariat organises mutual evaluations; coordinates technical assistance and training; prepares financial statements, annual budgets, annual business plans and policy papers; and reports against all such activities to the membership including expenditure of APG funds. The Secretariat is hosted by the Australian Government in Sydney, Australia.

**APG Strategic Plan
1 July 2009 – 30 June 2012**

ORGANISATIONAL STATEMENTS

VISION	A pro-active APG contributing to a reduction in the economic and social impacts of serious crime in the Asia/Pacific region.
MISSION	To combat money laundering and terrorist financing in the Asia/Pacific region through effective participation in the FATF's standard-setting process, and full and effective implementation of those standards in APG member jurisdictions.
GOALS	<p>To achieve the APG's Mission, the APG will:</p> <ol style="list-style-type: none">1. Provide a strong, cohesive and autonomous regional body for APG members and observers.2. Actively participate in, and co-operate with, the global AML/CFT network.3. Assess APG members' compliance with the global AML/CFT standards.4. Carry out education, research and analysis activities to enhance understanding of the money laundering and terrorist financing environments and the effectiveness of AML/CFT efforts.5. Provide assistance to APG members to implement the global AML/CFT standards through implementation planning and the provision of guidance.6. Provide coordination, advisory services and information-sharing for technical assistance and training.



Asia/Pacific Group
on Money Laundering

APG STRATEGIC GOALS AND STRATEGIES

GOAL 1	STRATEGIES
<p>PROVIDE A STRONG, COHESIVE AND AUTONOMOUS REGIONAL BODY FOR APG MEMBERS AND OBSERVERS</p>	<ol style="list-style-type: none"> 1. Undertake a process to decide whether to renew the APG’s mandate beyond the end of 2012 and, if so, for how long. 2. Conduct, support and participate in: (i) APG plenary meetings; (ii) an annual APG Forum on Technical Assistance and Training; (iii) a minimum of six compliance assessments of APG members per year; (iv) APG Typologies Workshops; and (v) targeted APG training activities. 3. Support and expand the resources of the APG Secretariat to continue to provide an effective focal point for regional AML/CFT activities; and for liaison between APG members and observers, including the FATF and other regional and international organisations. 4. Support the APG Steering Group, including maintaining representation from sub-regional areas of the APG, to strengthen APG governance arrangements. 5. Maintain and enhance the level of active participation by APG members in the APG’s work program and conduct outreach missions to targeted jurisdictions to support active membership of, and participation in, the APG. 6. Enhance relationships with strategically important regional and international organisations and jurisdictions to encourage their participation as observers in the APG.

GOAL 2	STRATEGIES
<p>ACTIVELY PARTICIPATE IN, AND CO-OPERATE WITH, THE GLOBAL AML/CFT NETWORK</p>	<ol style="list-style-type: none"> 1. Maintain APG’s Associate Membership of the FATF and actively participate in global standard setting and related FATF activities. 2. Provide AML/CFT policy, implementation and assessment advice to APG members. 3. Share Asia/Pacific regional experience of AML/CFT implementation and assessment issues with the FATF and other international organisations. 4. Further enhance APG mechanisms for working with the FATF, other FATF-style regional bodies and strategically important regional and international organisations and jurisdictions.

GOAL 3	STRATEGIES
<p>ASSESS APG MEMBERS' COMPLIANCE WITH THE GLOBAL AML/CFT STANDARDS</p>	<ol style="list-style-type: none"> 1. Ensure that a minimum of six APG members are assessed each year against the AML/CFT international standards. 2. Complete the APG's Second Round of Mutual Evaluations and prepare for and commence a third round of mutual evaluations. 3. Provide training in the international AML/CFT standards and Assessment Methodology for APG evaluators. 4. Provide preparation support and training in the global AML/CFT standards and Assessment Methodology for APG members undergoing evaluation. 5. Contribute to the refinement of the standard AML/CFT Assessment Methodology and update the APG Mutual Evaluation Procedures as required. 6. Maintain and enhance mechanisms to ensure the quality and consistency of APG mutual evaluation reports. 7. Maintain and enhance mechanisms to monitor action taken by evaluated APG members in response to their mutual evaluation reports.

GOAL 4	STRATEGIES
<p>CARRY OUT EDUCATION, RESEARCH AND ANALYSIS ACTIVITIES TO ENHANCE THE UNDERSTANDING OF THE MONEY LAUNDERING AND FINANCING OF TERRORISM ENVIRONMENT AND THE EFFECTIVENESS OF THE AML/CFT EFFORTS</p>	<ol style="list-style-type: none"> 1. Maintain and enhance the APG’s program of collection, analysis and dissemination of typologies information to identify and analyse priority AML/CFT typologies issues, case studies and jurisdictional risks. 2. Conduct an annual APG Typologies Workshop to identify and explore key AML/CFT typologies issues in the Asia/Pacific region. 3. Support and promote the work of APG Working Groups to explore and address specific AML/CFT typologies issues in depth. 4. Cooperate with global typologies partners, including the private sector, and contribute to joint typologies work by participating in FATF typologies activities. 5. Cooperate with global research partners, including the private sector, to address specific AML/CFT-related research issues. 6. Share the findings of identified key typologies and research issues through education and information exchange.

GOAL 5	STRATEGIES
<p>PROVIDE ASSISTANCE TO APG MEMBERS TO IMPLEMENT THE GLOBAL AML/CFT STANDARDS THROUGH IMPLEMENTATION PLANNING AND THE PROVISION OF GUIDANCE</p>	<ol style="list-style-type: none"> 1. Support and promote the work of APG Working Groups and Project Groups to explore and address specific AML/CFT implementation issues in depth. 2. Provide in-country, and regional, advice to assist APG members to develop AML/CFT implementation plans that reflect the priorities of individual member jurisdictions and the Asia/Pacific region using the Strategic Implementation Planning (SIP) Framework, and working in collaboration with global partners. 3. Provide advice and assist members to implement and integrate the AML/CFT global standards with their existing legal, financial and law enforcement systems of each jurisdiction. 4. Develop and share comprehensive information resources to assist APG members with AML/CFT implementation.

GOAL 6	STRATEGIES
<p>PROVIDE A COORDINATION, ADVISORY AND INFORMATION-SHARING FORUM FOR TECHNICAL ASSISTANCE AND TRAINING</p>	<ol style="list-style-type: none"> 1. Conduct an annual APG Technical Assistance and Training Forum to facilitate identification of technical assistance and training needs of targeted jurisdictions and to coordinate the delivery of those needs by members of the APG’s Donors and Providers (DAP) Group. 2. Support and expand the APG’s DAP Group to facilitate the sequenced and coordinated identification of technical assistance and training needs and the coordinated delivery of technical assistance and training to APG members. 3. Support the development of an AML/CFT coordination mechanism(s) in each APG member jurisdiction. 4. Conduct and support technical assistance and training needs analyses in targeted APG jurisdictions. 5. Facilitate cooperation in, support the design, development and delivery of, and, where appropriate, provide technical assistance and training that meets the needs of APG members and the APG region. 6. Cooperate with APG DAP Group members and other global partners to address specific AML/CFT technical assistance and training issues. 7. Recognise, and support, the role of the private sector in AML/CFT technical assistance and training.

APG TERMS OF REFERENCE*

RECOGNISING IN BANGKOK ON 27 FEBRUARY 1997 THAT:

- Money laundering is a significant international issue which requires global action;
- The Asia/Pacific region needs to address this issue as part of the global response;
- The capacity of individual jurisdictions to deal with the issue is limited because of its nature, complexity and international scope;
- Close co-operation between jurisdictions is necessary and much can be gained by increasing understanding of the problem and its solutions;
- There are accepted international standards (the Financial Action Task Force's 40 Recommendations) but the best way to apply the standards within the region needs to be reviewed;
- There is an increasing risk of vulnerability to money laundering in the Asia/Pacific region as other regions introduce anti-money laundering measures; and
- A plan of action should be developed to address regional co-operation, the adoption of standards and to provide assistance to jurisdictions in tackling the problem,

JURISDICTIONS ESTABLISHED THE ASIA/PACIFIC GROUP ON MONEY LAUNDERING.

NOTING THAT:

The Working Party, established by the APG met in Beijing 7-9 July 1997 and agreed that:

The 40 Recommendations are the guiding principles for action for the creation of an effective anti-money laundering framework. Member jurisdictions will implement the 40 Recommendations according to their particular cultural values and constitutional frameworks thus allowing them a measure of flexibility rather than prescribing every detail.

RECOGNISING THAT:

- The United Nations Security Council has adopted a number of Resolutions dealing with terrorist financing; and
- The Financial Action Task Force on Money Laundering has adopted Eight Special Recommendations on Terrorist Financing.

NOTING THAT:

- APG member jurisdictions adopted a new APG Strategic Plan 2001 – 2004 which included a commitment to combat terrorist financing.

* The Terms of Reference for the APG were agreed and adopted in 1997. The Terms of Reference have been revised and approved at each of the APG's annual meetings – Tokyo, March 1998, Manila, August 1999, Sydney, June 2000, Kuala Lumpur, May 2001 and Brisbane, June 2002 and Manila 2006.

THE ASIA/PACIFIC GROUP ON MONEY LAUNDERING AGREED IN JUNE 2002 THAT:

- All member jurisdictions will implement in accordance with their own constitutional arrangements the United Nations Security Council Resolutions dealing with terrorist financing; and
- All member jurisdictions will implement in accordance with their own constitutional arrangements the Eight FATF Special Recommendations on Terrorist Financing.

NOTING THAT:

- On 22 October 2004, the Financial Action Task Force on Money Laundering adopted a Ninth Special Recommendation in relation to cash couriers;
- APG member jurisdictions have been assessed against this Special Recommendation since early 2006 as part of APG mutual evaluations; and
- APG member jurisdictions are implementing Special Recommendation IX in accordance with their own constitutional arrangements.

THE ASIA/PACIFIC GROUP ON MONEY LAUNDERING AGREED IN JULY 2006 TO FORMALLY ENDORSE FATF SPECIAL RECOMMENDATION IX.

PURPOSE

The APG:

1. Provides a focus for co-operative anti-money laundering and anti-terrorist financing efforts in the region;
2. Provides a forum in which:
 - (a) regional issues can be discussed and experiences shared,
 - (b) operational co-operation among member jurisdictions is encouraged;
3. Facilitates the adoption and implementation by member jurisdictions of internationally accepted anti-money laundering and anti-terrorist financing measures;
4. Enables regional and jurisdictional factors to be taken into account in the implementation of international anti-money laundering and anti-terrorist financing measures;
5. Encourages jurisdictions to implement anti-money laundering and anti-terrorist financing initiatives including more effective mutual legal assistance; and
6. Co-ordinates and provides practical support, where possible, to member and observer jurisdictions in the region which request it.

NATURE

The APG is voluntary and co-operative in nature. The APG is established by agreement among its members and is autonomous. It does not derive from an international treaty. It is not part of any international organisation. However, it will need to keep itself informed of action taken or formal agreements made by relevant international and regional organisations or bodies in order to promote a consistent global response to money laundering and terrorist financing.

The work to be done by the APG and its procedures will be decided by consensus agreement among its members.

MEMBERSHIP

Membership of the APG is open to any jurisdiction within the Asia/Pacific region which:

1. Recognises the need for action to be taken to combat money laundering and terrorist financing;
2. Recognises the benefits to be obtained by sharing knowledge and experience;
3. Has taken or is actively taking steps to develop, pass and implement anti-money laundering and anti-terrorist financing legislation and other measures based on accepted international standards;
4. Subject to its domestic laws, commits itself to implementing the decisions made by the APG;
5. Commits itself to participation in the mutual evaluation programme;
6. Contributes to the APG budget in accordance with arrangements agreed by the APG.

It is not a precondition for participation in the APG that anti-money laundering or anti-terrorist financing laws are already enacted.

Each jurisdiction will decide on the particular steps it will take to combat money laundering and terrorist financing. The response by individual jurisdictions will, however, be significantly assisted by participation in the APG.

The APG will welcome new members from the Asia/Pacific region. Smaller jurisdictions whose direct involvement may be difficult may wish to participate in the APG through an appropriate sub-regional forum. To those jurisdictions not yet ready to assume all the requirements of full membership, the APG offers a form of participation in its activities through observer status.

OBSERVER STATUS

The APG recognises that there are significant benefits for member jurisdictions from continuing contact with non-member jurisdictions. As such, the meetings of the APG will also serve to provide opportunities for regular consultation with non-member jurisdictions from within and outside the region who could be invited to attend as observers.

The APG also recognises that many international organisations have a strong interest in anti-money laundering and anti-terrorist financing initiatives. The APG welcomes the support and co-operation from international organisations and other, non-member jurisdictions that may be willing to provide resources to assist the work of the APG.

Observers are:

- (i) jurisdictions which are considering membership of the APG and which are prepared to meet the first three requirements for membership of the APG;
- (ii) organisations which actively support or otherwise are interested in the objectives of the APG;
- (iii) any other jurisdiction or organisation invited by the Co-Chairs and to which no APG member objects.

In addition to the FATF, the organisations which attended the inaugural meeting (ASEAN Secretariat, Asian Development Bank, International Monetary Fund, International Organisation of Securities Commissions, INTERPOL, Offshore Group of Banking Supervisors, United Nations Crime Prevention and Criminal Justice Division, United Nations International Drug Control

Programme and World Customs Organisation) and any other international organisation with an interest in effectively combating money laundering will be encouraged to participate in future meetings of the APG as observers.

The participation (and the nature of such participation) of non-member jurisdictions and international organisations will be determined by the APG on a case-by-case basis.

MEETINGS

The APG will meet at least once each year. At APG meetings decisions will be made. All APG member jurisdictions should ensure that their delegations to APG meetings have full instructions to participate in the meetings. All decisions at APG meetings shall be by consensus.

Meetings will normally be held in member jurisdictions. In addition to an annual meeting of the APG, meetings may be conducted to coincide with money laundering methods meetings. Some meetings may be limited to APG member jurisdictions only.

Invitations to the annual meeting may be extended to non-member jurisdictions to attend as observers.

While meetings will generally be open to observers some parts of a meeting may be limited to member jurisdictions only to enable the APG to conduct formal consideration of issues which require the agreement of its members.

To ensure a global approach to anti-money laundering and anti-terrorist financing, member jurisdictions of the APG will work closely with the Financial Action Task Force (FATF) and other FATF-style regional bodies. The FATF President and FATF Secretariat will attend APG meetings on the same basis that the APG Co-Chairs and Secretariat attend FATF meetings.

Meetings should be held at the same time each year.

STRATEGIC PLAN AND BUSINESS PLAN

Consistent with these Terms of Reference, the APG will:

- develop a Strategic Plan every three years, to be endorsed by all members, which will set out the APG's mission and goals for each three year period; and
- develop an annual Business Plan, to be endorsed by all members, which will set out in greater detail the work programme of the APG.

SECRETARIAT

Secretariat services will be provided by the Asia/Pacific Group on Money Laundering Secretariat. The APG Secretariat is located in Sydney, Australia. The APG Secretariat will provide a similar service to that provided by Secretariats of other anti-money laundering bodies.

WORKING PARTIES

To enable the work of the APG to be addressed between meetings, Working Parties may be formed. Member jurisdictions may participate in all APG Working Parties, Typologies Workshops and ad hoc committees established in response to specific issues.

CHAIRING OF THE APG

There will be two co-chairs of the APG. During the formative stage of the APG, one co-chair position will be held by Australia which will host the annual meeting in alternate years. The other co-chair position will be rotated every two years amongst member jurisdictions. The rotating co-chair position will be decided every second year at an annual meeting and will carry with it the

responsibility of hosting the following annual meeting.

RESOURCES

The APG recognises that the ongoing work of the APG, and in particular the capacity of the Secretariat to assist jurisdictions, will depend on the resources available to it. APG member jurisdictions will determine the budget required for the APG to carry out its work programme on an annual basis according to a fair and equitable budget formula which will be revised and agreed from time to time.

CONTACT POINTS

Each member jurisdiction is required to nominate a person to act as the central contact point for the APG Secretariat. In addition, each member will nominate an appropriate contact point for the three relevant money laundering sectors: legal, financial and law enforcement.

Non-member jurisdictions and organisations will be requested to nominate a person or persons who will be the central point of contact in relation to money laundering matters and the work of the APG.

ENDORSED BY:

Australia
Bangladesh
Chinese Taipei
Hong Kong, China
Japan

New Zealand
People's Republic of China
Philippines
Singapore
Sri Lanka

Thailand
United States of America
Vanuatu

BANGKOK, THAILAND
27 FEBRUARY 1997

* * * * *

APG GEOGRAPHICAL (SUB-REGIONAL) AREAS

SUB-REGION	PARTICIPATING MEMBERS (with effect: July 2009)	OTHER JURISDICTIONS (includes non-observers)
NORTH ASIA	<ol style="list-style-type: none"> 1. China, People's Republic of 2. Chinese Taipei 3. Hong Kong, China 4. Japan 5. Macao, China 6. Mongolia 7. Republic of Korea 	<ul style="list-style-type: none"> • North Korea
PACIFIC ISLANDS	<ol style="list-style-type: none"> 8. Cook Islands 9. Fiji 10. Marshall Islands 11. Nauru 12. Niue 13. Palau 14. Papua New Guinea 15. Samoa 16. Solomon Islands 17. Tonga 18. Vanuatu 	<ul style="list-style-type: none"> • Kiribati • Tuvalu • Federated States of Micronesia • Northern Marianas Islands
SOUTH ASIA	<ol style="list-style-type: none"> 19. Afghanistan 20. Bangladesh 21. India 22. Maldives 23. Nepal 24. Pakistan 25. Sri Lanka 	<ul style="list-style-type: none"> • Bhutan
SOUTH EAST ASIA	<ol style="list-style-type: none"> 26. Brunei Darussalam 27. Cambodia 28. Indonesia 29. Lao PDR 30. Malaysia 31. Myanmar 32. Philippines 33. Singapore 34. Thailand 35. Timor Leste 36. Vietnam 	
OTHER	<ol style="list-style-type: none"> 37. Australia 38. Canada 39. New Zealand 40. United States of America 	