

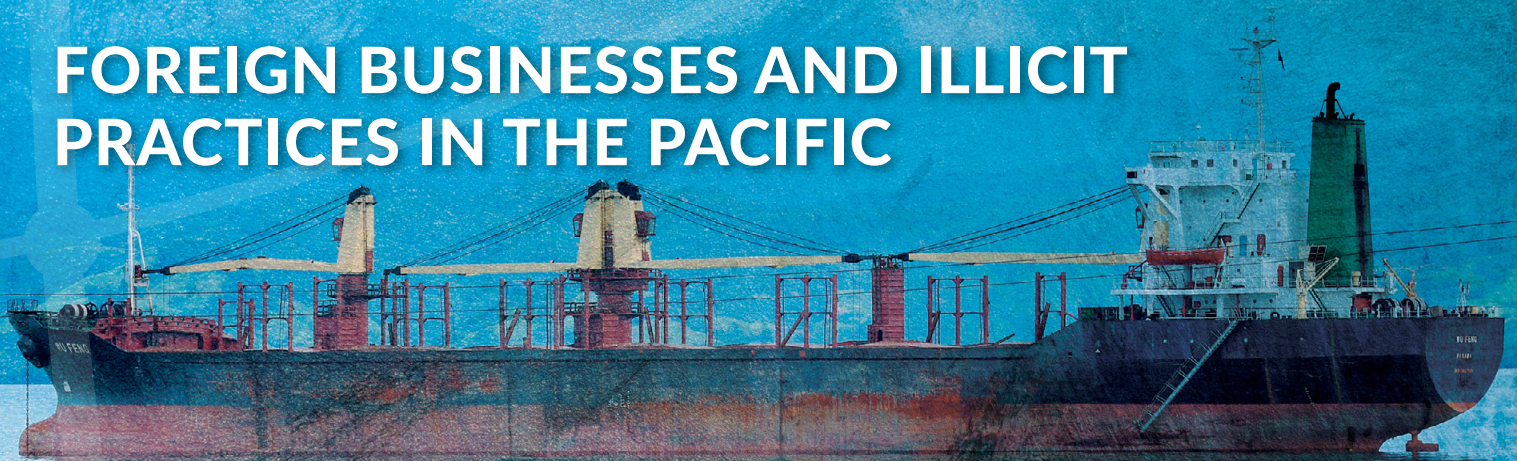
TRANSNATIONAL ORGANIZED CRIME
AND THE PACIFIC ISLANDS SERIES



**GLOBAL
INITIATIVE**
AGAINST TRANSNATIONAL
ORGANIZED CRIME

AN INDUSTRY OF CRIME

FOREIGN BUSINESSES AND ILLICIT
PRACTICES IN THE PACIFIC



Virginia Comolli

APRIL 2024

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FROM VISION TO ACTION: A DECADE OF ANALYSIS, DISRUPTION AND RESILIENCE

The Global Initiative Against Transnational Organized Crime was founded in 2013. Its vision was to mobilize a global strategic approach to tackling organized crime by strengthening political commitment to address the challenge, building the analytical evidence base on organized crime, disrupting criminal economies and developing networks of resilience in affected communities. Ten years on, the threat of organized crime is greater than ever before and it is critical that we continue to take action by building a coordinated global response to meet the challenge.

ACRONYMS AND ABBREVIATIONS

APGML	Asia–Pacific Group on Money Laundering
CNMI	Commonwealth of the Northern Mariana Islands
COFA	Compact of Free Association
DAO	Decentralized Autonomous Organization
DEA	Drug Enforcement Administration
EEZ	Exclusive economic zone
EU	European Union
FBI	US Federal Bureau of Investigation
FFA	Pacific Islands Forum Fisheries Agency
FIU	Financial Intelligence Unit
FSM	Federated States of Micronesia
IMO	International Maritime Organization
IOM	International Organization for Migration
IRS	US Internal Revenue Service
IUU	Illegal, unreported and unregulated (in relation to fishing)
MI5	UK Security Service
PIC	Pacific island country
PIF	Pacific Islands Forum
PNG	Papua New Guinea
RMI	Republic of Marshall Islands
SEZ	Special economic zone
SFA	Solomon Islands Forestry Association
WCPFC	Western and Central Pacific Fisheries Commission



EXECUTIVE SUMMARY

Organized crime in Pacific island countries (PICs) and territories has undergone a transformation in the 21st century, driven by a number of global and regional factors. At present, natural resource crimes, financial crimes, and human and drug trafficking are the most prominent forms of organized illegal activity in the region. Perpetrators include figures in the criminal underworld as well as in business, and it is the latter who are often the most serious offenders in terms of sheer scale.

Foreign companies and entrepreneurs from different sectors and backgrounds have been deepening their involvement in the islands. Legitimate business activities are often conducted in parallel with illicit ones, which in some cases amount to the bulk of revenues generated. These businesses, many of which are of Asian origin, have been able to exploit favourable tax regimes, limited monitoring and enforcement capabilities and, in certain cases, corrupt local partners and enablers, to increase their profits through illicit means. Diplomatic relations between their countries of origin and the Pacific countries in which they operate, can grant a high level of political access to these businesses and result in preferential treatment.

There are four broad categories into which private sector criminal actors (see Annex) in the Pacific can be grouped:

- **Fishing, logging and mining companies:** Fish, timber and minerals are among the most precious natural resources in the region, but the related industries are marred by widespread illegality at the hands of international fishing, logging and mining companies. Their activity has a corrupting effect on local political elites, harms the environment and is linked to various forms of exploitation, afflicting both the workers employed in these industries (most of whom are Asian) and local communities, especially women and girls who suffer sexual exploitation. Besides these three dominant sectors, the Pacific islands have attracted a multitude of companies and businesspeople operating in real estate, retail, tourism, gambling and the financial sector.
- **Embedded diaspora:** Individuals living in PICs with well-established networks in the local business and political communities. They are engaged in anything from bribery and money laundering to human trafficking, in parallel with their legitimate business activities in the retail, construction and gambling sectors.
- **Absentee residents:** A hybrid category that comprises different entities and individuals, including those with a chequered past, who do not necessarily engage in crime in PICs themselves but take advantage of golden passport schemes and offshoring opportunities in those countries to facilitate illicit activities elsewhere.
- **Schemers and scammers:** A range of entrepreneurs who have descended on PICs eager to promote new business ideas ranging from crypto-currency schemes to more traditional real-estate projects, which have often proved to be fraudulent.

Methodology

There is limited to no consolidated information on criminal actors across the Pacific as this is an understudied area. This is partly a result of the limited number of prosecutions happening in PICs. Filling this gap is crucial in order to develop a sounder understanding of criminal patterns in the region as well as to build the Global Organized Crime Index.

The information presented in this report is based on over 100 in-person interviews conducted across the Pacific in 2023, as well as remote interviews with law enforcement, government officials, multilateral organizations, NGOs, journalists and academics. Owing to the sensitivity of the issues discussed and the size and close-knit nature of most Pacific communities, the majority of those interviewed for this project have asked to remain anonymous.

This research has also benefited from the data collection, analytical work and expert consultations conducted for the Global Organized Crime Index 2023 in 2022 and 2023. The Index results show that foreign actors are the most prevalent criminal actors in PICs (see figures below) and as such warrant a dedicated study.

Country	Foreign actors	State-embedded actors	Criminal networks	Private sector actors	Mafia-style groups
Tonga	7	5.5	4.5	1.5	1
Solomon Islands	6.5	7	4.5	6.5	1
Papua New Guinea	6.5	8.5	8	6.5	1
Fiji	5.5	3	5	5.5	1
Federated States of Micronesia	5.5	2.5	4.5	1.5	1
Vanuatu	4	3	1.5	1.5	1
Palau	4	2	4	1.5	1
Republic of the Marshall Islands	3	3	2.5	2	1
Kiribati	3	1.5	4	2	1
Samoa	2.5	2.5	2.5	1	1
Nauru	2.5	3.5	1.5	1	1
Tuvalu	1.5	1.5	1	1.5	1
Average	4.29	3.63	3.63	2.67	1

FIGURE 1 Criminal actors' scores in Pacific island countries.

NOTE: Definitions of the different criminal actor types can be found in Annex 1.

SOURCE: GI-TOC, Global Organized Crime Index 2023, <https://ocindex.net>

1	2	3	4	5	6	7	8	9	10
NON-EXISTENT TO LITTLE INFLUENCE			MODERATE INFLUENCE		SIGNIFICANT INFLUENCE		SEVERE INFLUENCE		

FIGURE 2 Scoring thresholds.

SOURCE: GI-TOC, Global Organized Crime Index 2023, <https://ocindex.net>

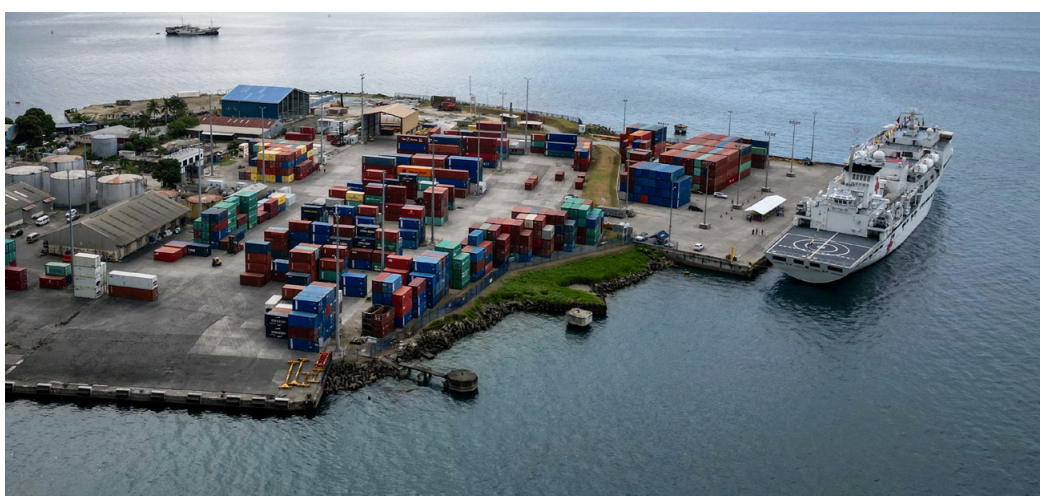


INTRODUCTION

As he walked the bustling streets of Vanuatu's capital, Port Vila, in early 2020, Anglo-American art dealer Inigo Philbrick probably thought he had got away with it. Little did he know, the seemingly ideal hiding place for a fugitive – a small island country in the South Pacific – would become the site of his arrest later that year.¹ Two years later, he was given a seven-year sentence by an American court for one of the most significant frauds in art market history, having conned buyers out of US\$86 million.²

Philbrick is only one among many foreign entrepreneurs from different sectors who have made their way to PICs and territories. The Pacific region has become a magnet for those with a chequered past seeking a hiding place or trying to expand their business operations – both legitimate and illegitimate. Perhaps surprisingly, and though hard to quantify precisely, foreign private sector actors appear to be driving most of the transnational criminal activity in the Pacific islands – rather than 'professional' organized crime groups such as drug cartels and triads.

PICs have a relatively limited number of economic sectors, but the most prominent, namely the exploitation of natural resources, has a very substantial illicit component in the form of illegal, unreported and unregulated (IUU) fishing, and illegal mining and logging. In some cases, illegally extracted



A Chinese naval ship moored in the Solomon Islands' capital, Honiara. Foreign actors are increasing their presence throughout the Pacific islands. © Pringi Charley/AFP via Getty Images



FIGURE 3 Pacific island countries and territories.

and exported commodities make up the bulk of exports, with obvious repercussions for the tax revenues of Pacific countries.³ Meanwhile, these activities and related illicit proceeds also have a corrupting effects on authorities, sometimes at the highest level.

Resource crimes are in fact the most prominent type of organized crime in the Pacific, according to the 2023 Global Organized Crime Index. They are followed, in terms of prevalence, by financial crime, which has been increasingly enabled by technology; human trafficking, which often occurs in connection with the extractive industries; and drug trafficking, which is transforming the Pacific from a purely transit region into a consumer one.⁴

In the 21st century, regional patterns of criminality have been shaped by an array of factors that include global trends such as globalization, technological advances and China’s economic, political and security expansion, as well as trends specific to the region, including an explosion in demand for drugs in Australia and New Zealand and the influx of criminal deportees and outlaw motorcycle gangs to the islands.

This report maps the illegality connected to the operations of foreign companies across a multitude of business sectors and highlights the different types of actors involved – from those deeply embedded in the PICs to others who exploit what is often a conducive environment for illegality without ever setting foot on one of the islands.

Of course, none of this occurs in a vacuum. Diplomatic relations between PICs and companies’ countries of origin are crucial in determining the level of access granted to businesses and the preferential treatment they might enjoy. This might include, for instance, the ease with which they can obtain licences or the degree of impunity they are afforded. This has become particularly evident with some Chinese private sector actors who, though not alone, tend to dominate several industries in the Pacific region.



ENVIRONMENTAL SECTOR

PICs possess a number of key natural resources, which are central to their economies. Fishing, logging and mining are among the most lucrative markets in the region and, as a result, have fuelled government corruption and ultimately fallen foul of the so-called 'resource curse', whereby countries with abundant natural assets have weak economies.⁵ As observed in parts of Africa and Latin America, local communities often miss out on the financial and developmental benefits that derive from such riches. Instead, environmental degradation and human exploitation have become synonymous with the extractive industries, the main beneficiaries of which are elites and foreign companies.⁶ Meanwhile, locals are left with the consequences in the form of poisoned water sources, reduced agricultural productivity and depleted seas and rivers.

Concerningly, stories abound about the trafficking of people to work in these sectors, their effective enslavement, the appalling conditions in which they are kept and the sexual exploitation of women and girls by fishermen, miners and loggers. In other words, fishing vessels, mining and logging sites are conduits for multiple forms of human exploitation, even when those business activities are conducted in accordance with national and international standards. Yet these industries are also plagued by illegality, with foreign companies engaging in illicit mining, logging and IUU fishing, which results in widespread harm across the Pacific islands. These negative forces are exacerbated by limited governmental capability and capacity.

Fishing companies

Fish, particularly tuna, is one of the most crucial sources of revenue and livelihoods in the Pacific. However, IUU fishing is also the most widespread and significant form of organized crime in Kiribati, Republic of the Marshall Islands (RMI), the Federated States of Micronesia (FSM) and Palau, as well as a major challenge for the likes of Vanuatu, Tonga, American Samoa, Guam and Hawaii.⁷ The estimated loss of state revenues resulting from IUU fishing decreased by approximately 50% between 2016 and 2021 to around US\$330 million, largely due to improved regional cooperation on monitoring, control and surveillance.⁸ Nevertheless, the vastness of the Pacific Ocean, the extensive exclusive economic zones (EEZs) of individual countries, and the limited human and technological resources at the disposal of local law enforcement make the detection of vessels a particularly arduous task – something that is exploited by a few foreign fleets and vessels.⁹ The use of flags of convenience and shell companies registered in tax havens make it difficult to track offenders,¹⁰ but the most widespread offence, according to the Pacific Islands Forum Fisheries Agency (FFA), is the misdeclaration of catches.¹¹



Seized illegal fishing boats in the capital of Vanuatu, Port Vila. Illegal, unreported and unregulated fishing is a major challenge for Pacific island nations. © GI-TOC

Once dominated by American and Japanese fleets, the early 21st century has seen Chinese vessels become the principal actors in industrial-scale fishing in the Pacific, both within EEZs and on the high seas (international waters), making China's the largest distant fishing fleet in the world.¹² Indeed, state-owned and private Chinese fishing companies are the most cited for IUU fishing offences (although they are not the only ones, with South Korean, Taiwanese,¹³ Japanese¹⁴ and Vanuatu-flagged vessels also regularly implicated). Incident data compiled by the Environmental Justice Foundation has shown that between 2015 and 2019, most of the illegal fishing incidents involving Chinese-flagged or -owned longliners occurred in waters beyond the country's national jurisdiction, including areas governed by the Western and Central Pacific Fisheries Commission (WCPFC), Vanuatu, Cook Islands and French Polynesia. The most common offences included shark finning, non-compliance with reporting requirements, the fishing of protected species and non-authorized fishing.¹⁵

Most of the offences involving longline vessels in WCPFC waters were linked to fleets from Zhejiang province in eastern China. Indeed, the most frequent offenders were ships from the Zhejiang Ocean Family Co. Ltd and the Zhejiang Ocean Fisheries Group Co. Ltd/Zhoushan Pacific Tuna Pelagic Fishery Co. Ltd – companies that are under a partly state-owned Zhejiang-based conglomerate.¹⁶ It is alleged that thanks to a secretive deal between the governments of China and Kiribati to secure fishing rights in Kiribati's EEZ, Zhejiang Ocean Family and other Chinese companies have reported record catches while other foreign fleets have effectively been pushed out.¹⁷ In this context, it has to be noted that Kiribati ended its diplomatic recognition of Taiwan in 2019 (just days after Solomon Islands had taken the same path).¹⁸ Meanwhile, the privately owned Fuzhou Honglong Ocean Fishing Company Ltd, from Fujian province, has also engaged in IUU fishing in WCPFC waters.¹⁹

In addition to commercial fishing fleets, another foreign actor involved in IUU fishing is so-called 'blue boats'. These wooden fishing vessels, up to 24 metres in length, from South East Asia and especially Vietnam,²⁰ have become a growing problem in Pacific waters and have been caught fishing illegally in Palau, FSM, PNG, New Caledonia and Australia.²¹ Vietnamese boats have also been known to enter Solomon Islands waters to harvest sharks (for their fins) and sea cucumbers.²²

Both fishing fleets and blue boats have been linked to human trafficking and worker exploitation. In early 2023, Fiji's immigration authorities identified victims of modern slavery and abuse on a Fiji-flagged Chinese vessel. Once rescued, all the victims bar one decided to go back on board, instead of returning to their native Indonesia, in order to pay off debts they had incurred.²³ Human trafficking experts concur that, despite the large number of victims from South East Asia (especially Indonesia and the Philippines) as well as some PIC nationals,²⁴ most trafficking cases involve Chinese victims aboard Chinese vessels. This has been the case in several countries, including Fiji, Solomon Islands

and RMI.²⁵ Reports from Solomon Islands also reveal instances where local families would bring girls to the port to meet the arrival of fishing vessels for prostitution (prostitution is illegal or partially illegal in PICs). It is believed that, in the case of domestic vessels, some girls may be kept onboard.²⁶

In a particularly egregious case of modern slavery, the Indonesian crew of the Taiwan-owned, Vanuatu-flagged *Tunago No. 61* murdered their captain while fishing east of the Pitcairn Islands in 2016. The men then headed to Fiji's capital, Suva, where they confessed to the crime. They were later jailed in Vanuatu, where they are serving 18-year sentences. Critically, they claimed that they had been brutalized and forced to work for 16 months, 20 hours a day, seven days a week.²⁷ This was neither the first nor the last labour and exploitation controversy involving the *Tunago*. In 2019, US customs blocked imports from the same vessel because it was carrying tuna caught by crew under forced labour conditions. This was the first ever withhold order issued by US customs against a fishing vessel.²⁸

Logging companies

Timber is another vital natural resource for PICs and is exported primarily to China and other Asian markets such as Japan, Malaysia and South Korea.

PNG and Solomon Islands are, respectively, the largest and second largest timber suppliers to China in the world.²⁹ Data released in June 2023 indicated that PNG (as well as neighbouring Indonesia) was among the top 10 countries in the world for forest area loss in 2022. This of course is a worrying trend, given the importance of forests for carbon capture and biodiversity, as well as the livelihoods of indigenous populations.³⁰

As with the fishing industry, it is foreign companies that dominate the timber scene in the Pacific, especially those from Malaysia and China. Many of these are known to engage in opaque operations in PNG and have developed close ties to political figures. Usually, they obtain regular logging concessions but fail to abide by their restrictions, underreport timber exports, evade taxes and launder the proceeds of their sales.³¹



A logging truck heads through the village of Vanimo, Papua New Guinea, en route to a log camp for eventual export to China by sea. © Pete Souza/Chicago Tribune/Tribune News Service via Getty Images

Illegality also pervades the timber trade in Solomon Islands, where the bulk of timber exports is believed to be the result of illegal logging.³² For about four decades, logging had been the main industry for the Melanesian country and, although diminishing, it still accounts for approximately 15% of national revenue.³³ Like in PNG, the logging industry and political system go hand in hand. According to local anti-corruption specialists, 25% of logging revenue, which is paid into the government's coffers and should be used to provide public services and reforestation, is 'lost' in the Consolidated Development Budget.³⁴ The budget has long been identified as a concern. Specifically, members of parliament have been accused of using constituency development funding from the budget to pay kickbacks to their supporters and families, fuelling cronyism and nepotism in the islands.³⁵ As in other Melanesian societies, the *wantok* system – a social kinship structure that links people from certain areas or with shared linguistic and social associations – has become a vector for this kind of corruption within government.³⁶

Corruption in the logging industry, however, is not limited to formal government structures and has also infiltrated traditional societies. In interviews, local civil society activists highlighted the corruption of tribal chiefs. Although land belongs to tribes collectively, there have been instances where chiefs have, without consultation, accepted payments from foreign loggers for the use of tribal land.³⁷ Notwithstanding the environmental devastation and other human vulnerabilities that will be discussed later, the behaviour of foreign logging companies undermines community cohesion, resulting in the perverse scenario of communities taking their own chiefs to court.³⁸

Given the lucrative nature of the logging business, it is no surprise that the Solomon Forestry Association (SFA) is a very influential body, not least because only SFA members (most of whom appear to be Asian companies) are entitled to felling licences. The SFA is also the target of numerous allegations of illegality and impropriety.³⁹ According to a former senior government official, the SFA has close links to the Solomon Islands Chinese Business Council, which was established in 2021. The council is in the process of signing memoranda of understanding with all provinces in the country to ensure that trade is channelled through it and, according to critics, is creating an effective monopoly.⁴⁰ These arrangements are likely to benefit the SFA, which is trying to reinvent itself as forests are diminishing.⁴¹ Similarly, as timber is being depleted, logging companies are looking to acquire mining licences. This has been the case in Choiseul province, where there was local outcry over an influential Filipino businessperson, Johnny Sy, being granted a licence to mine nickel despite allegations of questionable practices by his logging company, Bulacan.⁴²

For completeness, it should be noted that the SFA has taken some positive action against illegal logging. Villagers' discontent, and a 2021 exposé by a local investigative journalist, shed light on the activities of the Malaysian logging companies Sunrise Investment Ltd and Mas Solo Investment Ltd. The investigative report finds that the companies in question had been granted licences to fell non-protected species within concession areas in Isabel province. However, they started illegally harvesting *Xanthostemon* (locally known as Tubi), a rare and protected tropical timber. As a result of the investigation, the SFA suspended the companies' licences.⁴³

In the absence of adequate oversight, the presence of foreign companies heightens certain risks to vulnerable local communities. Specifically, the logging industry appears to drive human trafficking, a phenomenon that is relatively new in Solomon Islands.⁴⁴ Men from Indonesia, the Philippines, Malaysia and China have been trafficked to work in the logging industry, often having made payments to a recruiter, which results in debt bondage.⁴⁵ In turn, labourers in logging and mining communities have been known to seek out young girls and boys in nearby villages for sexual exploitation, often making

illegal deals with their guardians. Furthermore, some loggers from Solomon Islands have brought their families to the logging sites, meaning that their wives and children can also become vulnerable to this threat.⁴⁶

Lastly, a new illicit drug trend is emerging in the logging industry. According to an ongoing law enforcement investigation (as of October 2023), it appears that logging camps in Solomon Islands are being used as conduits for the methamphetamine trade. Chinese entrepreneurs are believed to be importing the drugs that are then sold in small quantities to local Chinese businesspeople, land owners, nightclubs in Honiara and loggers, which is leading to the emergence of a domestic consumer market for illicit drugs.⁴⁷

Mining companies

The extractive industry, which is dominated by Asian companies (mostly Malay and Indonesian companies, some with ties to China), represents yet another legitimate business sector that is now emmeshed with illegality in the region, particularly in the resource-rich PNG and Solomon Islands. Like the other industries already described, it is characterized by widespread informality, in this case involving local communities engaging in unlicensed artisanal mining. The crackdown on these illicit activities has often been brutal. Companies have deployed private security firms that have reportedly been involved in beatings, gang rapes, and committed a wide range of other human rights violations against locals, as exemplified by the well-documented case of the Porgera gold mine in PNG (operated by Canadian Barrick Gold).⁴⁸ The working conditions of foreign workers are typically poor and might involve withholding wages and mistreatment. Yet these conditions are mostly ignored and not investigated.⁴⁹

There is also a significant social impact, often taking the form of sexual exploitation of women and children in and around mining sites, which goes unreported or unpunished. A local researcher in Solomon Islands, for instance, reported cases of miners (and loggers) requesting young local virgins apparently due to their belief that this would prevent them from contracting sexually transmitted diseases. Prostitution rings and local families have been responsible for supplying girls.⁵⁰ According to law enforcement, there have also been cases of forced marriages and marriages by deception, with local women ending up married to foreign miners who abandon them, and any children, at the end of their contracts, leaving the women destitute and in a compromised social position.⁵¹

The industry also poses a multitude of environmental hazards, such as the illegal use of mercury in gold-mining operations in PNG or the catastrophic spills of bauxite and oil, which have contaminated waters around Solomon Islands' UNESCO-protected Rennell Island. This latter case was linked to the operations of Indonesian company Bintan Mining and Australian company Pacific Bauxite.⁵² Notably, Bintan is a subcontractor of Chinese logging company APID Ltd (which owns the mine in Rennell), which, according to media investigations, has allegedly failed to pay millions of dollars in taxes and royalties on its bauxite exports to the Central Bank of Solomon Islands.⁵³

Mining and financial crimes

Misconduct by mining companies points to a wider issue in the region. The mining sector is marred by widespread illicit financial activities and is linked to high-level corruption, embezzlement and generally opaque resource management. This is in line with global trends, which indicate that organized crime in the minerals sector tends to involve highly influential actors and can be highly sophisticated. In the



The Ok Tedi river in Papua New Guinea has been reduced to a mine tailings drain. The river carries the muddy waste from Ok Tedi gold and copper mine towards the Fly River, where it affects both aquatic life and the people who live along it.

© Auscape/Universal Images Group via Getty Images

words of a foreign law enforcement officer stationed in the region, the links between foreign mining companies and their own governments might afford them certain privileges, favourable treatment and even impunity in some Pacific countries due to close diplomatic relations. One could argue that some of these relationships amount to political interference.

Two cases exemplify this high-level corruption. First, the biggest fraud case ever investigated in PNG involved the misappropriation of 268 million kina (approximately US\$75 million) from a trust fund linked to the controversial Ok Tedi mine, which, over the last few decades, has caused severe environmental damage in the surrounding area. The fund was intended to finance development projects in PNG's Western Province, but was improperly paid to the Ok Tedi Fly River Development Foundation and their Australian law firm. Prominent Australian lawyer Greg Sheppard, who had long been working in PNG (and even represented a former prime minister), was arrested in 2021 on multiple charges relating to the misappropriation of the funds, including money laundering. Alongside him, the directors of the Ok Tedi Fly River Development Foundation were charged with numerous financial crimes.⁵⁴

The second example relates to the Solomon Islands-incorporated Chinese company Win Win Solomon Islands Investment Ltd, which is managed by Chinese national Dan Shi.⁵⁵ In 2021, the company was accused of hiding gold exports from landowners in Guadalcanal, the largest of the Solomon Islands and home to the capital Honiara. The landowners had allegedly learnt from customs officials that the company had exported nearly 79 kilograms of gold while claiming it had not been able to export any since 2019/20.⁵⁶ The following year, the finance ministry announced that the 'attempted' gold smuggling and tax evasion charges (which they said turned out to involve a much smaller quantity of gold) had been settled administratively in light of 'the economic contributions made by the company'.⁵⁷ General Manager Dan Shi was at the centre of further controversy in 2022 for intimidating landowners with a replica gun. He was arrested and later released on bail.⁵⁸ The complainants initially sent letters to the National Criminal Investigation Department to request the matter be settled out of court, only to later change their position. This time they demanded compensation and voiced their disbelief at the number of 'prominent leaders, politicians and lawyers in the Guadalcanal Province' putting pressure on them to withdraw the court case, and questioned why they appeared to be trying to help the foreign investor.⁵⁹



OTHER ENTREPRENEURS AND INVESTORS

Whereas fishing, logging and mining are the three most exploited sectors, international business converges with criminal activities in a number of other industries, from construction to retail.

In June 2023, for the first time, the US Department of Justice indicted the executives of a number of Chinese-based chemical companies for selling precursors used to manufacture fentanyl (a highly addictive synthetic opioid) to the Sinaloa and Jalisco New Generation cartels in Mexico. Using these, the cartels were able to synthesize vast quantities of fentanyl for sale on the US market. According to the US Department of Justice, senior figures from the Wuhan-based Amavel Biotech were arrested in Fiji before being handed over to the US Drug Enforcement Administration after allegedly shipping more than 200 kilograms of precursors to the US over an eight-month period.⁶⁰ No precursors were seized in the arrest itself but principal executive Qingzhou Wang (aka Bruce Wang) and marketing manager Yiyi Chen (aka Chiron Chen) were thought to be in Fiji to arrange further sales.⁶¹ This is just one example of the convergence in the Pacific of international criminal and legitimate actors and the blurred lines that separate them.

Foreign companies and businesspeople have been able to exploit favourable tax regimes, limited monitoring and enforcement capabilities, and corrupt local partners to increase their profits through illicit means.⁶² Travelling across the Pacific islands, it is common to hear tales of shady individuals from Russia, Vietnam, Australia, Europe and beyond, who had got into trouble abroad and sought refuge in that part of the world, and who may or may not still engage in questionable activities. Colourful stories and unverified anecdotes aside, documented incidents point to the presence of three broad categories of actor: the embedded diaspora, absentee residents, and schemers and scammers.

Embedded diaspora

The first category – the ‘embedded diaspora’ – refers to settled individuals who in some cases (but not always) have become part of the social fabric, with well-established networks in the local business and political communities. While many are Chinese, there are also South Koreans, Bangladeshis and others who fit into this category.



The commercial centre of Koror in the Pacific island nation of Palau, where over 160 trafficked Chinese nationals were discovered in 2019. © Mikhail Flores/AFP via Getty Images

Chinese

It is worth noting that there is a distinction between long-established Chinese communities who have, to a certain degree, integrated within PICs, and newer arrivals who may be importing criminal practices. Tensions between the two were described by one interviewee in Vanuatu as ‘an internal war’.⁶³ It is difficult to fully understand (or corroborate) these dynamics owing to the communities’ unwillingness to come forward to local police, which has presented difficulties even when investigating the murders of Chinese nationals.⁶⁴ Remarks made by the Tongan prime minister in 2017 pointed to the high incidence of crime within Chinese communities, including the hiring of hitmen to target rival Chinese businesses.⁶⁵ Indeed, newcomers have also been known to extort money from older generations in various PICs. In all countries visited, though again hard to corroborate, at least some local interviewees suggested that the power accumulated by foreign businesspeople and their political connections had resulted in business proceeds being channelled into the political system, including electoral campaigns and the buying of votes.

One of the most notorious cases of criminality by embedded Chinese businesspeople was in 2019 when over 160 trafficked Chinese nationals were found in Palau’s main city of Koror.⁶⁶ The victims had been brought in by Chinese residents to run illegal online gambling operations targeting Chinese gamblers back home. This model had been tried and tested in Chinese-dominated special economic zones (SEZs) in Cambodia, Laos and Thailand and elsewhere in South East Asia.⁶⁷ Consistent with the Asian cases and human trafficking elsewhere, the individuals had been effectively held hostage, had their passports confiscated and were in a form of debt bondage. According to local journalists, at that time it was not uncommon to see muscular Chinese men jogging on the streets of Koror, giving rise to speculation they were enforcers for the illegal gambling operations.⁶⁸ The case, and the way it was dealt with (the victims were sent back to China and a thorough investigation never took place, with local enablers being charged only with minor property offences), as well as speculation that similar operations might still be running, has helped shed light on the connections between established Chinese business figures, their supporters among the local political elite and even their probably direct connection

to triad organized crime groups and the government back in Beijing. These are explored in more detail in a forthcoming report by the GI-TOC in this series on organized crime in the Pacific islands, in a discussion on the alleged involvement of 14K triad boss Wan Kuok-koi (aka Broken Tooth) in Palau.⁶⁹

A more recent case concerning the activities of the business diasporas came to the fore with the arrest of Chinese-born Mei Lin in early 2024. Lin had lived in PNG for over a decade, where she had built a business empire in the real-estate and retail sectors. Details of her background are murky and believed to have been partly falsified, but she was able to acquire PNG citizenship in 2016. Her arrest in the Australian city of Brisbane in January was the culmination of a joint investigation between Australian and PNG police, which identified Lin as the prime suspect in facilitating the smuggling of over 70 kilograms of methamphetamines using a so-called black flight from an airstrip in PNG to Australia in 2023.⁷⁰ Importantly, Lin, who is alleged to have used her business premises to store the drugs, had nurtured high-level connections in PNG among the business and political elites. Through those links, she had been appointed manager in a family investment company owned by a former deputy prime minister. The company in question, Chatswood PNG, is itself under investigation for the alleged abuse of Australian government funding (this case is not linked to the methamphetamine investigation).⁷¹

In March 2024, another prominent case came to light. It emerged that Australian authorities had secretly placed prominent businessman Zhao Fugang on the registry of Australian Priority Organization Targets in 2023. The list contains the names of those who pose 'the most significant threats' to Australia.⁷² Zhao – who has never been charged (and it is not the intention of this report to accuse him of any crime) – owns a business empire in Fiji, including a hotel in the capital that also serves as an official service centre for Chinese nationals. He is believed to be at the forefront of promoting China's influence in Fiji and the wider region, and has built up high-level connections. Zhao's alleged involvement in money laundering, human trafficking and large-scale drug trafficking to Australia led to his designation – the first time a political actor has been designated.⁷³

Another area that has seen a deep involvement from the Chinese business diaspora is casinos. Casinos around the world have long been used as conduits for illicit financial flows, as well as acting as a nexus for an array of other crimes, so it is no surprise that they have become a source of concern in the Pacific. Their legal status varies from country to country, with many grey areas and exceptions. Gambling establishments can be found in Guam, Samoa, Vanuatu, Solomon Islands, French Polynesia and New Caledonia, among others. Early in 2023, the US Federal Bureau of Investigation (FBI) and the US Internal Revenue Service (IRS) uncovered a long-running tax evasion, money laundering and wire-transfer scheme in connection to the Imperial Pacific Casino in Saipan (Commonwealth of the Northern Mariana Islands, CNMI).⁷⁴ As documented by the FBI/IRS investigation, at the centre of the scheme was Marianas Consultancy Service, or MSC, and its sole member, Alfred Yue, whose bank accounts were used to receive the illicit transactions. MCS' parent company is Imperial Pacific International (IPI) Holdings Ltd, a Chinese company headquartered in Hong Kong and registered in Bermuda. IPI is also the only casino licensee in CNMI. The investigation also uncovered illegal contributions made to senior political figures in CNMI.⁷⁵

The first phase of a new casino resort is seen under construction in the South Pacific island of Saipan. The gambling sector in the Pacific Islands is a conduit for significant volumes of illicit financial flows. © Farah Master/Reuters



Bangladeshis

Other business sectors seem to have attracted other diasporas. The first human trafficking prosecution in the history of Vanuatu concluded with the sentencing of four Bangladeshis for trafficking, slavery and money laundering offences in 2022.⁷⁶ Sekdah Somon, the owner of Vanuatu-based Mr Price, according to one review site 'the biggest manufacturer/exporter and wholesaler/retailer of affordable, quality clothing, furniture and homeware in Vanuatu',⁷⁷ had with his wife and their associates masterminded the trafficking of 101 fellow Bangladeshi men under the false pretence of good jobs and an eventual move to Australia. Once they arrived in the Pacific country in 2018, the victims were subjected to forced labour in construction and domestic service and were kept in crowded conditions, without water or electricity, and were beaten and abused.⁷⁸ Interviews with local NGOs raised the possibility that Somon had been able to operate with the complicity of some Ni-Vanuatu (Vanuatuan) government officials.⁷⁹

Similar stories involving Bangladeshis exploiting their fellow nationals have emerged elsewhere in the Pacific. Palau introduced a moratorium to curb the arrival of Bangladeshi workers in the mid-2010s, which some believe was motivated by anti-Muslim sentiment and was only lifted in 2023. Although the International Organization for Migration (IOM) has said that labour disputes in the construction and agriculture sectors, rather than trafficking, make up most of the cases crossing their desk in Palau,⁸⁰ other sources have suggested that small-time Bangladeshi operators, even families, could be involved in trafficking their fellow nationals into the Micronesian country.⁸¹ In Fiji too, it was flagged that resident Bangladeshi nationals were known to have facilitated the arrival of Bangladeshi workers by issuing them with fraudulent visa letters. Once in the country, the men are exploited on construction sites.⁸² In Solomon Islands, Bangladeshi migrants tend to marry locals, which is useful for securing visas, and they arrive with the help of agents who may provide fake documentation along with promises that Solomon Islands will be a stop-off point en route to Australia or Canada.⁸³

South Koreans

Fiji is also home to another diaspora that has been linked to illicit activities, specifically South Korea's Grace Road Church. Members of the eschatological Christian group believe in the imminent possibility of a nuclear war and identified Fiji as a safe haven, which prompted the sect to relocate there in 2014. Their leader, Reverend Ok-joo Shin, was later arrested in South Korea in 2017 and jailed for six years on charges of fraud, child abuse, violence and forced labour committed against her 400 captive followers in Fiji.⁸⁴ Notably, the Grace Road Church still owns multiple businesses across Fiji, which are now run by Shin's son, Daniel Kim, who is subject to a South Korean arrest warrant.⁸⁵ In 2022, a team of investigative journalists revealed that the thriving Grace Road businesses had seemingly benefited from the support of the Fijian government under former prime minister Frank Bainimarama, including loans from the Fiji Development Bank.⁸⁶ To date, the Church's business activities include the country's largest chain of restaurants, roughly 400 hectares of farmland, eight supermarkets and mini marts and five Mobil petrol stations. Its businesses also provide services such as dentistry, events catering, heavy construction and Korean beauty treatments.⁸⁷ Aside from government loans, reliance on forced labour and 'donations' from members have propelled Grace Road's business growth. After new prime minister Sitiveni Rabuka launched an investigation into the Church in February 2023,⁸⁸ Daniel Kim was taken into custody in September, where he remains at the time of writing, awaiting his deportation.⁸⁹ Conversations with Fijian immigration officials reiterated the exploitative conditions for workers in Grace Road's businesses, and said that although Fijians and other nationals were poorly paid, Koreans would not receive any compensation for their labour.⁹⁰

Absentee residents

'Absentee residents' are a hybrid category of different entities and individuals, including those with a chequered past, who do not necessarily aim to engage in criminality in PICs but who, in taking advantage of what Pacific countries can offer, facilitate illicit activities.

Seeking citizenship

The first notable example is individuals purchasing so-called golden passports from PICs – citizenship by investment. These are legitimate schemes that make up a considerable proportion of PICs' revenues; in Vanuatu, for instance, they make up around 30% of national income.⁹¹ Critics lament that it is only the usual suspects, the political elite rather than average citizens, who benefit from passport revenues. Among many of the latter interviewed by the GI-TOC in 2023, there was also a strong feeling of resentment towards the schemes. According to interviewees, the selling of passports to people who had, in most cases, never even visited the country, cheapened the concept of citizenship. This is something that is particularly dear to those who lived through colonial times and treasured the moment they were finally able to obtain national passports post-independence (as opposed to British or French documents). There was also resentment in neighbouring countries that have to grant entry to those holding golden passports.

Given their lucrative nature, these schemes are magnets for corruption and misuse, as was infamously highlighted in the early 2000s, when al-Qaeda operatives obtained Nauru passports.⁹² This issue affects a number of Pacific countries such as RMI, Tonga and Samoa. One of the best known and most open schemes, however, is the Vanuatu Citizenship Program, through which applicants can become citizens of the Melanesian country for US\$130 000, without facing any residency requirements.⁹³ The appeal of these schemes is that they allow the passport holder to travel visa-free to more than 100 countries, including, until recently, the UK and the EU. Disgraced businesspeople, US-sanctioned individuals and others fleeing their countries after being charged with corruption, money laundering and extortion offences, are among Vanuatu's new citizens.⁹⁴ Over the years, Vanuatu's scheme has come under scrutiny leading to the imposition of some restrictions.⁹⁵

The problems associated with the programme became even more evident in April 2023, when UK newspaper *The Times* published remarks by the head of the UK Security Service (MI5) revealing that Chinese spies had used Vanuatu (as well as Namibia and Timor-Leste) passports to enter Britain.⁹⁶ The news alone provoked anger from the Ni-Vanuatu prime minister, but within days another embarrassing story had made front page news in the island country.

It emerged that the Indian-born Gupta brothers – who are accused of syphoning 25 million rand (US\$1.6 million) from South Africa's state funds, and are currently fugitives in the UAE – had acquired Ni-Vanuatu citizenship.⁹⁷ Putting the notoriety of the individuals aside, a further revealing aspect of the story is the fact that Vanuatu's Financial Intelligence Unit (FIU) had twice flagged the Guptas and advised the citizenship office to reject their application.⁹⁸ Although the FIU's recommendations are not binding, it is difficult not to suspect foul play and a troubling lack of oversight of the programme.

The Gupta brothers, whose businesses have been linked to state capture in South Africa, acquired citizenship of Vanuatu. *Source: Photo supplied, 14 April 2023*



Interviews with researchers, journalists and foreign law enforcement on the ground point to malpractice and illegality linked to the scheme. Specifically, it has been alleged that foreign-born long-term residents of Vanuatu with significant business interests and local political connections have been inserting themselves into the process. Through a company set up in Dubai, these individuals advertise the citizenship scheme and offer package deals to create fake identities to be used for the application. This arrangement is particularly useful for the citizens of countries that are barred from obtaining Ni-Vanuatu citizenship, namely Syria, Iraq, Iran, Yemen and North Korea, unless they can prove they have lived out of the particular country for at least five years.⁹⁹

In addition to visa-free travel and other legitimate benefits resulting from the scheme, once a foreigner obtains Ni-Vanuatu citizenship, they can change their name through Vanuatu's registry. This is illegal, but GI-TOC researchers were told it has happened in the past and 'can be done'.¹⁰⁰ This is certainly appealing for anyone with a criminal past seeking to reinvent themselves.

Apart from those who obtain PIC passports with no intention of residing in the countries, the schemes have also created a way for a number of (predominantly Chinese) business owners to move to the likes of Tonga and RMI, and set up legitimate operations there.¹⁰¹

Offshore businesses

The second type of absentee residents are companies and individuals who register in the Pacific to take advantage of the company laws that make some PICs ideal destinations for offshoring and hiding assets. Notably, the Asia Pacific Group on Money Laundering (APGML) has flagged that the corporate anonymity afforded to RMI-registered companies makes the country vulnerable to being used for money laundering. It added that 'there is no mandatory requirement for legal persons to provide information either on the legal or beneficial ownership of shareholders, and there is no supervision of company formation service providers based offshore'.¹⁰² In Fiji, despite efforts to further regulate beneficial ownership, a local anti-corruption specialist alleged that approximately 3 000 Australian shell companies worth US\$1.8 billion were active in the country as of 2023.¹⁰³ The expert also suggested that many did not have any actual premises in Australia but simply owned an empty plot of land or office, and in fact the companies belonged to Chinese entities.¹⁰⁴

In 2022, as part of US efforts to seize the assets of sanctioned Russian individuals, Fiji seized two superyachts (total value of over US\$1 billion). The investigation brought to light the extensive web of shell companies and trusts registered in RMI, the British Virgin Islands, Switzerland and elsewhere that had been built to hide the identity of the true owner, gold-sector billionaire Suleiman Kerimov, who had been under US sanctions since 2018 and is reportedly linked to President Vladimir Putin.¹⁰⁵

RMI's business and trade appeal also derives from its open maritime registry, which can be used by those who wish to reflag their vessels to a flag of convenience – a long-standing and widespread legitimate practice. Indeed, together with Panama and Liberia, RMI is among the top three flag states in the world by registered tonnage. Flags of convenience are chosen because of the more favourable tax regimes and less stringent controls and regulations imposed by the particular flag countries. However, as identified by the International Maritime Organization (IMO) and the European Union, flags of convenience have been misused to avoid sanctions.¹⁰⁶ Since the US and European countries banned Russian vessels from their ports following the Russian invasion of Ukraine, there has been an increase in the reflagging of Russian vessels with the RMI flag.¹⁰⁷



The seizure of a yacht belonging to Russian billionaire Suleiman Kerimov in 2022 exposed a web of Pacific island-registered shell companies and trusts built to hide Kerimov's identity. *Photo: Office of Public Affairs, US Department of Justice*

Lastly, the GI-TOC's conversations with financial crime investigators highlighted a further source of concern. In December 2022, RMI passed the Decentralized Autonomous Organizations (DAO) Act, allowing both profit and non-profit legal entities to adopt DAO structures and register in the country as limited liability companies.¹⁰⁸ A DAO is 'a blockchain-based system that enables people to coordinate and govern themselves mediated by a set of self-executing rules deployed on a public blockchain, and whose governance is decentralized (i.e., independent from central control)'.¹⁰⁹ Although these are early days, there are concerns that these company structures could be used for money laundering purposes and as cover for criminal transactions in the future.¹¹⁰

Schemers and scammers

The final category of foreign business actors is 'schemers and scammers'. In recent years, entrepreneurs, mainly from Asia, have descended on PICs, eager to promote new business ideas ranging from carbon credit schemes in PNG to cryptocurrencies.¹¹¹ These entrepreneurs have often found a receptive audience among local decision-makers intent on diversifying their countries' economies and attracting investors. At present, Fiji, RMI, Tuvalu, Palau and Vanuatu have crypto-related initiatives, which have raised concerns among citizens, institutions and experts over the actual benefits for PICs, the lack of sufficient domestic technical expertise to evaluate projects, the robustness of the legislative, regulatory and compliance framework to guide these projects, and the opportunities for criminal exploitation.¹¹² The arrest of six Chinese nationals in Vanuatu in 2019 in connection with the US\$2.9 billion PlusToken Ponzi scheme is just one example of the risks for the region associated with digital currencies. This case was also notable in so far as Chinese law enforcement officials conducted a joint raid alongside Ni-Vanuatu officers. The six suspects were allegedly first held without legal counsel at a hotel before being deported to China. Four of them had acquired Ni-Vanuatu citizenship, of which they were later stripped.¹¹³

Furthermore, although some PICs still have limited internet access, an ever-growing number of citizens, especially the youth, are connected, and this trend will continue with new submarine cable projects offering more powerful internet connections at lower costs. This exposes users to the new risk of cyber scams. In Solomon Islands, for instance, this has involved foreign fraudsters posing as immigration agents and contacting people through Facebook to offer visas for Australia and New Zealand.¹¹⁴

These scammers do not only operate in the digital world, and old fashioned bricks and mortar ventures are still in vogue. This was shown in the case of Jason Liu Tao (serving a prison sentence in the US at the time of writing), who has been alleged to have unsavoury connections with cartels and Asian syndicates.¹¹⁵ Tao had fallen foul of authorities in his native China after scamming thousands of investors in his Hong Kong-based Skyline Group. Yet, in the mid 2010s, he signed agreements with the governments of Fiji and Solomon Islands to build a fruit factory, resorts and 5 000 homes for civil servants – none of which ever materialized and resulted in his company being ‘red-marked’ by Fijian authorities.¹¹⁶

A final case is worth mentioning, which exposes some serious and ambitious scheming. In late 2022, two Chinese nationals, formerly the heads of a New York-based NGO who had become naturalized Marshallese citizens, pleaded guilty to bribing elected officials in the Micronesian country. The two individuals were behind a multi-year bribery scheme that sought to pass legislation for a proposed semi-autonomous tax-free region called the Rongelap Atoll Special Administrative Region.¹¹⁷ Among other features, the tax haven would have had its own legal system, its own cryptocurrency and the ability to issue passports. Notably, Marshallese citizenship grants visa-free travel to the US. Unsurprisingly, the Special Administrative Region would have welcomed the registration of offshore companies.¹¹⁸



CONCLUSION

One immediate observation that can be made is that no business activity in the Pacific (or indeed elsewhere), regardless of sector and its longevity, is immune from criminality.

Local leaders are faced with a dilemma. On the one hand, they wish to attract investors and consumers to generate wealth, diversify their economic base and promote prosperity. This has led them to implement competitive tax regimes and company law structures, among other tools, in order to entice foreign investment. On the other hand, regional leaders must contend with the inherent vulnerabilities of this system – from environmental degradation to human exploitation, and the whole gamut of financial crimes.

These vulnerabilities are made more acute by the limited capability and capacity to counter them. This capability gap, including a lack of technical expertise to identify and investigate more sophisticated, cyber-enabled crimes, is partly a result of limited resources. But it is also linked to wider structural factors such as governance issues, which lower countries' resilience to crime. Some of the most lucrative industries are marred by corruption involving senior government officials. This, in turn, puts into question the political will to counter illicit activities from which government officials are profiting.

Geopolitical dynamics only compound the situation. Close bilateral relationships between Pacific countries and foreign powers, which often feature trade and security agreements, influence the degree of freedom and impunity enjoyed by certain 'private sector' actors such as foreign state-owned companies and state-backed entrepreneurs. This is particularly relevant where there is a marked imbalance in the relationship (such as those with an economic superpower such as China) and an absence of robust mechanisms to ensure standards and accountability in industry practices.

These dynamics, and how they impact responses to crime, are explored in another policy brief in this series.



ANNEX

Definitions of criminal actors

The GI-TOC's Global Organized Crime Index adopts the following definitions of criminal actors:

Foreign actors	Refers to state and/or non-state criminal actors operating outside their home country. This can include not just foreign nationals, but also various diaspora groups that have created roots in the country over multiple generations.
State-embedded actors	Refers to criminal actors that are embedded in, and act from within, the state's apparatus.
Criminal networks	Refers to a loose network of criminal associates engaging in criminal activities. This also includes relatively small groups that do not control territory and are not widely known by a name or with a known leader. Criminal networks are involved in illicit trafficking of commodities but do not have territorial control or any of the other defining features of mafia-style groups. In essence, criminal networks and entrepreneurs are defined by their failure to meet the defining characteristics of mafia-style groups.
Private-sector actors	Refers to profit-seeking individuals and/or entities who own, manage and control a segment of the legal economy free from state ownership or control, that collaborate and/or cooperate with criminal actors (as the driving force, wilfully, through coercion, or neglect). This includes, but is not limited to, the laundering of illicit proceeds, acting as informants and legal representation through unethical means.
Mafia-style groups	Refers to clearly defined organized criminal groups. This typology also includes militia and guerrilla groups that are primarily funded by illicit activities. There are four defining features of a mafia-style group: a known name, a defined leadership, territorial control and identifiable membership.

SOURCE: GI-TOC, Global Organized Crime Index 2023, <https://ocindex.net>



NOTES

- 1 Eileen Kinsella, 'He didn't hide who he was': locals describe disgraced art dealer Inigo Philbrick's carefree life on the Lam on a South Pacific Island, *Art Net*, 17 June 2020, <https://news.artnet.com/art-world/how-inigo-philbrick-spent-his-final-days-on-vanuatu-1887746>; Eileen Kinsella, What did Inigo Philbrick do? How one precocious dealer allegedly swindled the art market's savviest players out of millions, *Art Net*, 12 March 2020, <https://news.artnet.com/art-world/inigo-philbrick-intelligence-report-2020-1800972>.
- 2 David Jenkins, 'Serial swindler' Inigo Philbrick sentenced to seven years in prison for outlandish art crimes, *Tatler*, 24 May 2022, <https://www.tatler.com/article/inigo-philbrick-art-dealer-arrested-vanuatu-south-pacific-art-fraud>.
- 3 GI-TOC, Global Organized Crime Index 2023, <https://ocindex.net>.
- 4 Ibid.
- 5 See, for instance, Grant Walton and Sinclair Dinnen, 'Crime and corruption', in Stephen Howes and Lekshmi N Pillai (eds), *Papua New Guinea: Government, Economy and Society*, Canberra: ANU Press, 2022.
- 6 Ibid.
- 7 GI-TOC, Global Organized Crime Index 2023, <https://ocindex.net>; Joseph Hammond, Chinese fishing fleet poses threat to Pacific island economies, *Indo-Pacific Defense Forum*, 21 June 2021, <https://ipdefenseforum.com/2021/06/chinese-fishing-fleet-poses-threat-to-pacific-island-economies>.
- 8 MRAG Asia Pacific, The quantification of illegal, unreported and unregulated (IUU): Fishing in the Pacific islands region – a 2020 update, October 2021, <https://mragasiapacific.com.au/wp-content/uploads/2021/12/ZN2869-FFA-IUU-2020-Update-final.pdf>.
- 9 Interview with a senior officer in the Department of Fisheries, Vanuatu, April 2023.
- 10 Michael Field, Why the world's most fertile fishing ground is facing a unique and dire threat, *The Guardian*, 13 June 2021, <https://www.theguardian.com/world/2021/jun/14/why-the-worlds-most-fertile-fishing-ground-is-facing-a-unique-and-dire-threat>.
- 11 Interview with a senior representative from the Pacific Islands Forum Fisheries Agency, Honiara, June 2023.
- 12 Miren Gutierrez et al, China's distant-water fishing fleet: scale, impact and governance, ODI, June 2020, https://cdn.odi.org/media/documents/chinesedistantwaterfishing_web.pdf.
- 13 Natalie Fiertz, Sally Yozell and Tracy Rouleau, CORVI risk profile: Tarawa, Kiribati. Findings from a CORVI Rapid Assessment, Stimson, 4 August 2022, <https://www.stimson.org/2022/corvi-risk-profile-tarawa-kiribati/>; and Ian Urbina, Palau vs. the Poachers, *The New York Times*, 17 February 2016, <https://www.nytimes.com/2016/02/21/magazine/palau-vs-the-poachers.html>.
- 14 Japanese company charged with removing shark fins, *Pacific Daily News*, 24 June 2021, https://www.guampdn.com/money/japanese-company-charged-with-removing-shark-fins/article_a9b29a4e-08f8-5fa2-9df3-89c3b54e0a03.html.
- 15 Environmental Justice Foundation, The ever-widening net: Mapping the scale, nature and corporate structures of illegal, unreported and unregulated fishing by the Chinese distant-water fleet, March 2022, <https://ejfoundation.org/resources/downloads/The-Ever-Widening-Net-2022-final.pdf>.
- 16 Ibid.
- 17 Mark Godfrey, China tuna firm boasts 'record' catches in Pacific waters lured from US skipjack fleet, *Seafood Source*, 18 December 2015, <https://www.seafoodsource.com/news/supply-trade/china-tuna-firm-boasts-record-catches-in-pacific-waters-lured-from-us-skipjack-fleet>.
- 18 Melissa Clarke, Kiribati cuts ties with Taiwan to switch to China, days after Solomon Islands, *ABC News*, 20 February 2019, <https://www.abc.net.au/news/2019-09-20/kiribati-to-switch-diplomatic-ties-from-taiwan-to-china/11532192>.
- 19 Environmental Justice Foundation, The ever-widening net: Mapping the scale, nature and corporate structures of illegal, unreported and unregulated fishing by the Chinese distant-water fleet, March 2022, <https://ejfoundation.org/resources/downloads/The-Ever-Widening-Net-2022-final.pdf>.
- 20 Georgina Alonso and Melissa Marschke, Blue boats in deep waters: how aspects of IUU policy impact Vietnamese fish workers, *Maritime Studies*, 22, 14.
- 21 Iwao Fujii, Yumi Okochi and Hajime Kawamura, Promoting cooperation of monitoring, control, and surveillance of IUU fishing in the Asia-Pacific, *Sustainability*, 13, 18; Sinking illegal 'blue boats' not enough of a deterrent – advisor, *Radio New Zealand*, 18 January 2017, <https://www.rnz.co.nz/international/pacific-news/322590/sinking-illegal-blue-boats-not-enough-of-a-deterrent-advisor>.

- 22 'Send them to jail': Fisheries minister on blue boats' captains, Solomon Islands Broadcasting Corporation, 12 April 2017, <https://sibconline.com.sb/send-them-to-to-jail-fisheries-minister-on-blue-boats-captains>.
- 23 Interview with a senior immigration officer, Fiji, April 2023.
- 24 Danielle Watson et al, *Policing in the Pacific Islands*, Switzerland: Palgrave Macmillan, 2023, p 63.
- 25 Interviews with human trafficking experts, Fiji, April 2023, and Solomon Islands, May 2023.
- 26 Interviews with migration specialists, Solomon Islands, May 2023.
- 27 Michael Field, Why the world's most fertile fishing ground is facing a 'unique and dire' threat, *The Guardian*, 13 June 2021, <https://www.theguardian.com/world/2021/jun/14/why-the-worlds-most-fertile-fishing-ground-is-facing-a-unique-and-dire-threat>; Greenpeace, Tunago No.61 crew member in East Asia, <https://media.greenpeace.org/archive/Tunago-No-61-Crew-Member-in-East-Asia-27MZIFJXBAZW8.html>.
- 28 Steve Bittenbender, US Customs claims Vanuatu tuna vessel used forced labor, *Seafood Source*, 7 February 2019, <https://www.seafoodsource.com/news/supply-trade/us-customs-claims-vanuatu-tuna-vessel-used-forced-labor>.
- 29 How to tackle the illegal timber trade? New rules on implementing China's Forest Law could hold the key, *Global Witness*, 6 August 2020, <https://www.globalwitness.org/en/blog/how-to-tackle-the-illegal-timber-trade-new-rules-on-implementing-chinas-forest-law-could-hold-the-key>.
- 30 World Resources Institute, Forest pulse: the latest on the world's forests, June 2023, https://research.wri.org/gfr/latest-analysis-deforestation-trends?utm_campaign=treecoverloss2022&utm_medium=bitly&utm_source=PressKit.
- 31 Global Witness, A major liability: illegal logging in Papua New Guinea threatens China's timber sector and global reputation, August 2018, <https://www.globalwitness.org/en/campaigns/forests/major-liability-illegal-logging-papua-new-guinea-threatens-chinas-timber-sector-and-global-reputation>.
- 32 Jeremy Gwao, Josh Nicholas and Kate Lyons, Lush forests laid to waste: how Pacific Islands got hooked on logging, *The Guardian*, 31 May 2021, <https://www.theguardian.com/world/2021/jun/01/lush-forests-laid-to-waste-how-pacific-islands-got-hooked-on-logging>.
- 33 Interview with a member of parliament, Solomon Islands, May 2023.
- 34 Interview with a local anti-corruption specialist, Solomon Islands, May 2023.
- 35 Marie Chêne, Solomon Islands: Overview of corruption and anti-corruption, U4 Anti-corruption Resource Centre, 23 January 2017, <https://www.u4.no/publications/solomon-islands-overview-of-corruption-and-anti-corruption.pdf>.
- 36 Gordon Nanau, The Wantok System as a socio-economic and political network in Melanesia, *The Journal of Multicultural Society*, 2, 1, pp 31–55.
- 37 Interview with the head of civil society group, Solomon Islands, May 2023.
- 38 Ibid.
- 39 Interview with a foreign diplomat, Solomon Islands, May 2023.
- 40 For instance: Fredrick Kusu, Guadalcanal Province signs MOU with China's Guangdong Province, SIBC, 30 January 2023, <https://www.sibconline.com.sb/guadalcanal-province-signs-mou-with-chinas-guangdong-province>.
- 41 Interview with a former senior government and security official, Solomon Islands, May 2023.
- 42 Forum Against Mining On Choiseul (FAMOC) strongly opposes nickle mining on Choiseul Island, Lauru (Choiseul) Puqo Kuili Forum (Facebook group), 3 September 2020, https://www.facebook.com/groups/387969048024140/permalink/1782012585286439/?paipv=0&eav=AfZSAVJ6miSyNnrMZupcYh3NKAwD0BGUmFBecaoOFHOBXYSnjBZpDMLcpbp3sAne1mQ&_rdr.
- 43 Ofani Eremae, Loggers defy protections to take Solomon Islands' rare Tubi trees, *Earth Journalism Network*, 15 March 2021, <https://earthjournalism.net/stories/loggers-defy-protections-to-take-solomon-islands-rare-tubi-trees>; Imelda Abano, Logging exposé in the Solomon Islands leads to companies' suspension, *Internews*, 22 September 2021, <https://internews.org/story/logging-expose-in-the-solomon-islands-leads-to-companies-suspension>.
- 44 Interview with senior law enforcement, Solomon Islands, May 2023.
- 45 US Department of State, 2023 trafficking in persons report: Solomon Islands, 2023, <https://www.state.gov/reports/2023-trafficking-in-persons-report/solomon-islands>; Interview with the head of local NGO in Solomon Islands, March 2023, by phone.
- 46 Interview with a local NGO, Solomon Islands, May 2023.
- 47 Interview with the Transnational Crime Unit, Honiara, October 2023.
- 48 Human Rights Watch, Gold's costly dividend, 1 February 2011, <https://www.hrw.org/report/2011/02/01/golds-costly-dividend/human-rights-impacts-papua-new-guineas-porgera-gold-mine>.
- 49 Interview with a Honiara-based multilateral organization, Solomon Islands, May 2023.
- 50 Interview with a Honiara-based researcher, Solomon Islands, May 2023.
- 51 Interview with a senior officer, Ministry of Police, National Security and Correctional Services, Solomon Islands, May 2023.
- 52 Environmental Justice Atlas, Oil spills project KH and JMA ICTA-UAB, 29 July 2020, <https://ejatlas.org/conflict/oil-spill-solomon-islands>.
- 53 Charley Piringi, Mining operation allegedly owes millions in taxes and royalties in Solomon Islands, *The Guardian*, 20 November 2021, <https://www.theguardian.com/world/2021/nov/10/mining-operation-allegedly-owes-millions-in-taxes-and-royalties-in-solomon-islands>.
- 54 Rebecca Kuku, Australian lawyer arrested for third time in Papua New Guinea over alleged \$100m fraud, *The Guardian*, 29 July 2021; <https://www.theguardian.com/world/2021/jul/29/australian-lawyer-arrested-for-third-time-in-papua-new-guinea-over-alleged-100m>.
- 55 Win Win Solomon Islands Investment Ltd, Environment Impact Statement for a proposed mining operation in Tuarana, Vulolo ward, Central Guadalcanal Constituency, Guadalcanal Province, May 2018, p. 34, <https://solomonislands-data.sprep.org/index.php/system/files/Winwin%20Investment%20Solomon%20Ltd%20EIS.pdf>.
- 56 Alfred Pagepitu, Secret gold export: Landowners accuse WinWin mining company of lying, seeking \$2m compensation, *Island Sun*, 12 May 2021, <https://theislandsun.com.sb/secret-gold-export/?fbclid=IwAR2eGrWP0E8oGJfIb2XbPHF0r2gLDQV-qUZsBrXfrJikuNuRY4FWe0FftY4>.

- 57 Win Win's Attempted Gold Smuggling and Tax Evasion Settled: Kuma, *Solomon Times*, 11 August 2022, <https://www.solomontimes.com/news/win-wins-attempted-gold-smuggling-and-tax-evasion-settled-kuma/12082>.
- 58 RSIPF, Police charge Win Win boss for two counts of intimidation, 21 October 2022, <https://solomons.gov.sb/police-charge-win-win-boss-for-two-counts-of-intimidation>.
- 59 Eddie Osifelo, New twist in Win Win case, *Island Sun*, 22 November 2022, <https://theislandsun.com.sb/new-twist-in-win-win-case>.
- 60 US Department of Justice, Justice department announces charges against China-based chemical manufacturing companies and arrests of executives in fentanyl manufacturing, 23 June 2023, <https://www.justice.gov/opa/pr/justice-department-announces-charges-against-china-based-chemical-manufacturing-companies>.
- 61 Exchange with the Fiji police, June 2023.
- 62 Giff Johanson, Marshall Islands officials upset at EU tax blacklisting, *Radio New Zealand*, 24 February 2023, <https://www.rnz.co.nz/international/pacific-news/484795/marshall-islands-officials-upset-at-eu-tax-blacklisting>.
- 63 Interview with a Port Vila-based researcher, Vanuatu, April 2023.
- 64 Ibid.
- 65 Cleo Paskal, Are there Chinese hitmen in the Kingdom of Tonga?, *Diplomat*, 17 April 2017, <https://thediplomat.com/2017/04/are-there-chinese-hitmen-in-the-kingdom-of-tonga>.
- 66 Bernadette Carreon, Aubrey Belford and Martin Young, Pacific gambit: Inside the Chinese Communist Party and Triad push into Palau, OCCRP, 12 December 2022, <https://www.occrp.org/en/investigations/pacific-gambit-inside-the-chinese-communist-party-and-triad-push-into-palau>.
- 67 Lindsey Kennedy and Nathan Paul Southern, Modern slavery in the Mekong's casinos, *GI-TOC*, July 2022, <https://globalinitiative.net/analysis/modern-slavery-mekong-casinos>.
- 68 Interview with a local journalist, Palau, March 2023.
- 69 See also Martin Thorley, Partners in crime prevention? China's new model of global governance and its impact on the fight against organized crime, *GI-TOC*, forthcoming.
- 70 Julie Badui Owa et al, China-born businesswoman charged over meth flight built a web of influence in Papua New Guinea, OCCRP, 26 January 2024, <https://www.occrp.org/en/investigations/china-born-businesswoman-charged-over-meth-flight-built-a-web-of-influence-in-papua-new-guinea>.
- 71 Tim Swanston and Rory Callinan, 'Forensic investigation' launched after woman charged with drug importation linked to companies that reportedly received Australian and PNG government funds, *ABC News*, 23 January 2024, <https://www.abc.net.au/news/2024-01-24/png-refugee-fund-australian-government-alleged-black-flight/103381134>.
- 72 Chinese Communist Party-backed businessman in Fiji is a top Australian criminal target, OCCRP, 24 March 2024, <https://www.occrp.org/en/investigations/chinese-communist-party-backed-businessman-in-fiji-is-a-top-australian-criminal-target>.
- 73 Ibid; Power in Paradise, 60 Minutes: Episode 8, *Nine media outlet*, March 2024, <https://www.9now.com.au/60-minutes/season-2024/episode-8>.
- 74 Kimberly Bautista Esmores, FBI, IRS allegedly uncover money laundering scheme, *Saipan Tribune*, 3 January 2023, <https://www.saipantribune.com/index.php/fbi-irs-allegedly-uncover-money-laundering-scheme>.
- 75 Bryan Manabat, Money laundering case uncovers shady deals involving Saipan casino, *Pacific Island Times*, 9 January 2023, <https://www.pacificislandtimes.com/post/money-laundering-case-uncovers-shady-deals-involving-saipan-casino>.
- 76 US Department of State, Office to monitor and combat trafficking in persons, 2021 trafficking in persons report: Vanuatu, <https://www.state.gov/reports/2021-trafficking-in-persons-report/vanuatu/>.
- 77 World Places – Vanuatu, Directory, <https://vanuatu.worldplaces.me/view-place/71348872-mr-price.html>.
- 78 Glenda Willie, 'Mr. Price' associates released on parole and deported, *Daily Post*, 11 January 2023, https://www.dailypost.vu/news/mr-price-associates-released-on-parole-and-deported/article_a78e4ed1-102e-5a45-bde5-c75b3db33f94.html; Justice for Mr Price's human trafficking victims, *Daily Post*, 24 June 2022, https://www.dailypost.vu/news/justice-for-mr-price-s-human-trafficking-victims/article_cb83166b-d9ea-5b9e-aadb-dfa1cd5ab764.html.
- 79 Interview with a human rights organization, Vanuatu, April 2023.
- 80 Interview with International Organization for Migration representatives, Palau, March 2023.
- 81 Interview with a local journalist, Palau, March 2023.
- 82 Interview with a senior immigration officer, Fiji, April 2023.
- 83 Remote interview with a Solomon Islands-based researcher, 19 December 2023.
- 84 Kate Lyons, South Korean cult leader who held 400 people captive in Fiji jailed for six years, *The Guardian*, 2 August 2019, <https://www.theguardian.com/world/2019/aug/02/south-korean-cult-leader-who-held-400-people-captive-in-fiji-jailed-for-six-years>.
- 85 Jamie Tahana, While Korean cult leader is jailed, her Fiji businesses are humming, *Radio New Zealand*, 5 August 2019, <https://www.rnz.co.nz/international/pacific-news/395744/while-korean-cult-leader-is-jailed-her-fiji-businesses-are-humming>.
- 86 Aubrey Belford, Pacific, Hyein Kang and Myungju Lee, Korean doomsday sect gets rich in Fiji with government help, OCCRP, 25 July 2022, <https://www.occrp.org/en/investigations/korean-doomsday-sect-gets-rich-in-fiji-with-government-help>.
- 87 Ibid.
- 88 Arieta Vakasukawaqa, Grace Road on the radar – Probe into church and its dealings with FijiFirst, *Fiji Times*, 11 February 2023, <https://www.fijitimes.com/grace-road-on-the-radar-probe-into-church-and-its-dealings-with-fijifirst>.
- 89 Grace Road cult leader on Interpol red notice remains in Fiji immigration custody, *Radio New Zealand*, 18 September 2023, <https://www.rnz.co.nz/international/pacific-news/498266/grace-road-cult-leader-on-interpol-red-notice-remains-in-fiji-immigration-custody>.
- 90 Interview with a senior immigration officer, Fiji, April 2023.
- 91 Zlata Erlach, Vanuatu citizenship by investment: program results from January to June 2022, *Immigrant Invest*, 6 September 2022, <https://immigrantinvest.com/insider/vanuatu-program-statistics-2022-en>.

- 92 Nauru to probe terrorist passport claims, ABC News, 16 April 2003, <https://www.abc.net.au/news/2003-04-16/nauru-to-probe-terrorist-passport-claims/1837596>.
- 93 Citizenship Invest, Vanuatu citizenship by investment, <https://www.citizenshipinvest.com/en/programs/vanuatu>.
- 94 Euan Ward and Kate Lyons, Who's buying Vanuatu's passports? Crypto moguls, disgraced business people and wanted men, *The Guardian*, 15 July 2021, <https://www.theguardian.com/world/2021/jul/15/whos-buying-vanuatus-passports-crypto-moguls-wanted-men>.
- 95 Anthony van Fossen, Passports a ticket to corruption in the Pacific Islands, East Asia Forum, 13 October 2018, <https://www.eastasiaforum.org/2018/10/13/passports-a-ticket-to-corruption-in-the-pacific-islands>.
- 96 Matt Dathan and Fiona Hamilton, Chinese spies buying citizenship to third countries and slipping into UK, *The Times*, 11 April 2023, <https://www.thetimes.co.uk/article/chinese-spies-uk-visa-restrictions-khqlb88>.
- 97 UAE court dismisses S Africa request to extradite Gupta brothers, Al Jazeera, 7 April 2023, <https://www.aljazeera.com/news/2023/4/7/uae-court-dismisses-s-africa-request-to-extradite-gupta-brothers>; Suthentira Govender, Guptas are now citizens of Vanuatu, Times Live, 7 April 2023, <https://www.timeslive.co.za/news/south-africa/2023-04-07-guptas-are-now-citizens-of-vanuatu>.
- 98 Interview with the Financial Intelligence Unit, Vanuatu, April 2023.
- 99 Euan Ward and Kate Lyons, Who's buying Vanuatu's passports? Crypto moguls, disgraced business people and wanted men, *The Guardian*, 15 July 2021, <https://www.theguardian.com/world/2021/jul/15/whos-buying-vanuatus-passports-crypto-moguls-wanted-men>.
- 100 Interviews with law enforcement and journalists, Vanuatu, April 2023.
- 101 Anthony Van Fossen, Passports a ticket to corruption in the Pacific Islands, East Asia Forum, 13 October 2018, <https://www.eastasiaforum.org/2018/10/13/passports-a-ticket-to-corruption-in-the-pacific-islands>.
- 102 Asia Pacific Group on Money Laundering, Anti-money laundering and combating the financing of terrorism – Republic of the Marshall Islands, Mutual evaluation report, July 2011, <https://apgml.org/members-and-observers/members/member-documents.aspx?m=38e5eb19-a643-4bfd-bf13-15838814df87>.
- 103 Interview with an anti-corruption specialist, Fiji, April 2023.
- 104 Ibid.
- 105 Stephanie Baker and Jonathan Browning, 'Straw owner' hides \$1 billion worth of Russian yachts, US says, Bloomberg, 14 May 2022, <https://news.bloomberglaw.com/white-collar-and-criminal-law/straw-owner-hides-1-billion-worth-of-russian-yachts-us-says>.
- 106 Frederik Scholaert and Karin Smit Jacobs, Addressing ship reflagging to avoid sanctions, European Parliament Research Service, March 2023, [https://www.europarl.europa.eu/RegData/etudes/ATAG/2023/745686/EPRS_ATA\(2023\)745686_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/ATAG/2023/745686/EPRS_ATA(2023)745686_EN.pdf).
- 107 Russian vessels getting rid of their flags to steer clear from sanctions, Marine Insight, 7 April 2022, <https://www.marineinsight.com/shipping-news/russian-vessels-getting-rid-of-their-flags-to-steer-clear-from-sanctions>.
- 108 Republic of the Marshall Islands, Decentralized Autonomous Organizations Act 2022, December 2022, <https://rmicourts.org/wp-content/uploads/2022/12/PL-2022-50-Decentralized-Autonomous.pdf>.
- 109 Samer Hassan and Primavera De Filippi, Decentralized Autonomous Organization, *Internet Policy Review*, 10, 2.
- 110 Interviews with foreign financial crime investigators, Australia, April 2023.
- 111 Rachel Donald, PNG suspends new carbon deals, scrambles to write rules for the schemes, Mongabay News, 4 April 2022, <https://news.mongabay.com/2022/04/png-suspends-new-carbon-deals-scrambles-to-write-rules-for-the-schemes>.
- 112 Pita Ligaiula, Concerns raised as Vanuatu, Palau explore crypto projects, Pacific News Service, 12 April 2022, <https://pina.com.fj/2022/04/12/concerns-raised-as-vanuatu-palau-explore-crypto-projects>.
- 113 Dan McGarry, Who are the PlusToken six?, *Daily Post*, 17 July 2019, https://www.dailypost.vu/news/who-are-the-plustoken-six/article_df1f863f-a763-52e9-8cba-eea51c77cde0.html.
- 114 Interview with foreign law enforcement, Solomon Islands, May 2023.
- 115 Interview with Fiji law enforcement, Fiji, April 2023.
- 116 Stella Moresio, New investment In Fiji for the new year, *Fiji Sun*, 15 February 2015, <https://fijisun.com.fj/2015/02/15/new-investment-in-fiji-for-the-new-year>; Aataj John, Skyline 'remarked' in Fiji, *Solomon Star*, 22 February 2016, <https://www.solomonstarnews.com/skyline-remarked-in-fiji>.
- 117 US Department of Justice, Former heads of New York-based non-governmental organization plead guilty to conspiring to bribe elected officials of the Marshall Islands, Press Release, 1 December 2022, <https://www.justice.gov/opa/pr/former-heads-new-york-based-non-governmental-organization-plead-guilty-conspiring-bribe>.
- 118 Pete McKenzie, Bribes, booze and bombs: The brazen plan to create a Pacific tax haven, *The Washington Post*, 15 February 2023, <https://www.washingtonpost.com/world/2023/02/14/china-united-states-marshall-islands-rongelap>.



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