

CRMC Strategy on Coordination and Cooperation

Introduction

The Inter-Agency Committee for Coordination, Review and Monitoring of Implementation and Enforcement (CRMC) was established in August 2018. In line with Pakistan's National Strategy and Roadmap, the Pakistan Government affords priority to pursuing strong and robust policy reviews, greater coordination and broader implementation of measures to detect and prevent proliferation financing (PF) within Pakistan.

In particular, countering PF in Pakistan is highlighted under the themes "risk, policy and coordination" and "prevention" with a focus on assisting reporting entities to identify and report potential PF activities and monitoring compliance with UN Sanctions and domestic laws. More broadly, the National Strategy focuses on implementing superior risk assessments, understanding and mitigating approaches in a coordinated way and supporting genuine businesses and financial institutions against those risks. More specific items are contained in Pakistan's Roadmap as to how Pakistan will fulfil this key strategy. For example, one action in the Roadmap is focused on expanding the work of the CRMC and increasing its role and impact on implementing a robust countering PF framework in Pakistan.

In line with the above, the CRMC has developed a strategy to steer and guide its functions for seamless coordination and cooperation at the national level with regard to countering PF, in line with Pakistan's national priorities and objectives.

Vision and Scope

Identifying, assessing, and understanding PF activities, on a regular basis, is essential in strengthening the ability to require and share information among authorities and as necessary, promote Public-Private collaboration to ensure effective implementation of Targeted Financial Sanctions (TFS) related to PF pursuant the UNSCRs. The CRMC vision is:

"To provide a platform for coordination, review and monitoring at the national level with a view to elicit effective inter-agency and intra-agency cooperation for enhancing understanding on TFS for PF, promote information/experience sharing and optimal utilization of resources and efforts for implementing best international practices."

Framework of the Strategy

- Pursue a multi-pronged approach on national coordination, at the policy and operational level between ministries/departments, regulators and law enforcement agencies.
- Optimal utilization of existing resources to achieve greater coordination and cooperation for contributing to meet the national mission.

- No one-size-fits-all approach and therefore there is no restriction on the authorities or private sector in taking additional measures, in accordance with their frameworks and policies for effective cooperation/coordination.
- Comprehensive outreach and capacity building programs will enable the stakeholders to build sound processes and internal regulatory controls for better coordination.
- Routine review shall be conducted as per departmental procedures using the already established coordinating settings.

Coordination and Communication Mechanisms

Co-ordination and information. The CRMC shall serve as a platform to ensure that AML/CFT and CPF authorities can communicate with each other and respond to requests for assistance where needed, according to their institutional framework. In addition, CRMC shall review and monitor the measures as required by the Government.

Points of Contact. All departments represented at CRMC shall designate focal persons and replacement and their contact details shall be available with the CRMC Secretariat and its members. Focal person shall respond to CRMC requests promptly and initiate internal processes for providing the requisite feedback/views after necessary departmental approval/authorization.

Regular capacity building and awareness raising on PF-TFS obligations and risks. The authorities will conduct outreach to the private sector to explain key elements of national CPF strategy and enhance understanding of their obligations. Internal arrangement to harmonize outreach and capacity building programs of respective entities.

Public-Private collaboration: Effective sharing of information and a coordinated approach in communicating with the private to identify and assess potential PF activities as well as cases of evasion of TFA. Setting up public-private dialogue at various forums will be useful in encouraging the private sector to comply with its obligations.

Harmonized programs and policies: AML/CFT Regulatory authorities shall harmonize the outreach and capacity building programs of respective entities. In addition, AML/CFT Regulatory authorities should ensure that reporting entities incorporate the CRMC guidelines, including the red flags into the CPF policies and implemented into the business processes.

Evaluation and follow up: Develop tracking sheets to monitor implementation of outreach activities, including calling for post event reports and feedback. A comprehensive review shall be undertaken at least once a year.
