Programmatic Evaluation of the Oceania Customs Organisation
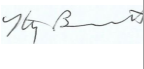
Evaluation Report

Ministry of Foreign Affairs & Trade

18 March 2025

The Power of Commitment

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→ **The Power of Commitment**

Glossary of Terms:

ABF	Australia Border Force
ADD	Activity design document
ASYCUDA	Automated system for customs data
EU	European Union
FJD	Fiji dollars
FFA	Forum Fisheries Agency
FRCS	Fiji Revenue and Customs Service
GFA	Grant Funding Arrangement (New Zealand)
HS	Harmonised System
ICT	Information and Communication Technology
IDC	International Development Cooperation (New Zealand)
IMPACT	Improving Pacific Islands Customs and Trade (funded by the EU)
IPR	Intellectual property rights
IUU	Illegal, unreported, and unregulated (IUU)
KEQs	Key Evaluation Questions
KPIs	Key performance indicators
ILO	International Labor Organisation
MDA	Maritime domain awareness
MOU	Memorandum of Understanding
MFAT	Ministry of Foreign Affairs and Trade, New Zealand
M&E	Monitoring and evaluation (term used by OCO)
MERL	Monitoring, evaluation, research and learning (term used by MFAT)
NZCS	New Zealand Customs Service
NZD	New Zealand dollars
OECD DAC	The Organisation for Economic Co-operation and Development's Development Assistance Committee
OCO	Oceania Customs Organisation
OPSF	OCO Professional Staffing Framework, including a master trainer network
OPSCA	OCO Pacific Small Craft Application
PACER Plus	Pacific Agreement on Closer Economic Relations, expanded programme
PACREG	Pacific Regional Division of MFAT's Pacific and Development Group (PDG)
PACHS	Pacific Harmonized Commodity Description and Coding System

PCA	Post clearance audit
PICTs	Pacific Island countries and territories
PICP	Pacific Islands Chiefs of Police
PFTAC	Pacific Islands Financial Technical Assistance Centre
PIDC	Pacific Immigration Development Community
PIFS	Pacific Islands Forum Secretariat
PITTA	Pacific Islands Tax Administrators Association
PLP	Pacific Leadership Programme
RKC	Revised Kyoto Convention
SoW	Statement of Work
SMA	Small member administrations
SINCB	Secretariat of the International Narcotics Control Board
SPC	The Pacific Community, formerly the Secretariat for the Pacific Community
TNCU	Transnational Crime Unit
TRS	Time Release Studies
ToT	Train the trainer
TFA	Trade facilitation agreements
VAT	Value-added tax
UNEP	United Nations Environment Programme
UNCTAD	United Nations Trade and Development
US	United States
WCO	World Customs Organisation
WTO	World Trade Organisation

Executive summary

GHD has been contracted by the New Zealand Ministry of Foreign Affairs and Trade (MFAT) to undertake a programmatic evaluation of the Oceania Customs Organisation (OCO). The OCO has a membership of 23 countries and territories from the Pacific region, and its principal activity is facilitating and where appropriate helping member administrations align with customs international standards and best practice, leading to greater economic prosperity and increased border security within the Oceania region. The funding of the OCO is around two thirds from core funding accounts (New Zealand and Australia), with the final third being a combination of member fees and other donor contributions. New Zealand funds the OCO through the MFAT International Development Cooperation (IDC) programme[1] via a tri-annual Grant Funding Arrangement (GFA).

Evaluation purpose

The overall purpose of this evaluation was to assess that the organisational operation, programme direction and resourcing of the OCO is such that it is well placed to support members to address the complex regional security environment and challenges facing Pacific customs agencies.

The findings of the evaluation were reported to MFAT for its own use and decision-making and shared with OCO and the New Zealand Customs Service (NZCS) to take into consideration.

Evaluation objectives

The objectives of the evaluation are set out below.

- **Objective 1:** to examine alignment between the outcomes outlined in the MFAT/OCO GFA 2021-2024; and in the OCO Strategic Plans 2017-2022, and 2022-2027
- **Objective 2:** to assess the effectiveness and impact of the OCO's support to Members in line with these outcomes, including in support of regional cooperation and information sharing
- **Objective 3:** to assess the extent to which the OCO Secretariat is resourced and has the necessary skills and expertise to deliver on the outcomes in their 2022 – 2027 Strategic Plan and associated Monitoring and Evaluation (M&E) Framework 2022-2025
- **Objective 4:** *Lessons learned for improvement* – to identify the key learnings to increase the effectiveness and impact on national and regional security and governance of the activity

This report is subject to, and must be read in conjunction with, the limitations set out in section 1.3 and the assumptions and qualifications contained throughout the Report.

Evaluation approach

A hybrid approach of in-person and video conference interviews, along with a document review were used by the evaluation team (the Team) to answer the Key Evaluation Questions (KEQs). Forty stakeholders participated in the evaluation and involved 25 separate interviews during October and November 2024. In-country visits were undertaken in Fiji, Palau, Solomon Islands and Tuvalu as well as interviews in Australia and New Zealand. The Team also interviewed the head of customs in Guam, the current chair of the OCO, virtually.

Overall Key Findings

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[1] Working with the New Zealand IDC programme | New Zealand Ministry of Foreign Affairs and Trade - https://www.mfat.govt.nz/en/aid-and-development/working-with-the-new-zealand-idc-programme & https://www.treasury.govt.nz/publications/estimates/vote-foreign-affairs-external-sector-estimates-appropriations-2024-25

– The OCO is operationally sound but could improve clarity in its delivery modalities and work programme prioritisation processes

– The OCO has overcome major challenges in its internal management and has moved past legacy integrity management issues over the past 3 years, though there is still work to be done to improve its overall governance

– The OCO has demonstrated a strong understanding of member needs but could improve by challenging donor initiatives that are not fit-for-purpose

– The OCO is growing into its regional security role, offering significant opportunities to contribute through the regional declaration of partnership.

Priority Recommendations

OCO to:

1. Clarify the criteria for selecting delivery modalities against member priorities and apply consistently. This includes 'pushing back' and reframing development partner opportunities that do not meet member needs and providing stronger advocacy for members.

2. Review, consolidate and prioritise the work programme, based on agreed criteria, distribution of funding, small member needs, and where OCO versus partner organisations are best placed to lead.

3. Enhance strategic communications and reporting to build better a coherent narrative around its work programme and ability to demonstrate impact.

4. Continue to operationalise new policies and processes, namely, to rationalise travel and cement good management practices day-to-day.

5. Make improvements at a governance level and allow the Secretariat to effectively manage and be held accountable for implementation of the Strategic Plan's work programme.

6. Adopt a more flexible approval process to re-allocate funds between priority areas to respond to emerging needs in a timely manner.

7. Engage early in developing new strategic plans, that are co-designed with members and include a M&E Framework from the outset.

8. Provide sufficient resourcing incentives to support staff recruitment and retention, professional development and working conditions based on agreed staffing levels (including office).

9. Grow and support member interests in regional security as per the Declaration of Partnership, notably small craft vessels and drug identification.

10. Localise training and programmes where possible to best support member needs based on actual issues/member maturity and ensure sustainable, tailored and relevant implementation.

11. OCO to continue to expand both formal and informal information sharing mechanisms between members and partners.

MFAT to:

1. Continue funding the OCO to enable it to implement its strategic plan and mandate.

2. Consider providing the core funding via NZCS, rather than via a GFA directly with the OCO.

3. Engage and share information directly with the OCO as part of supporting increased regional security engagement.

NZCS to:

1. Strengthen its governance role as the implementing partner for the Memorandum of Understanding (MOU) with MFAT in conjunction with the other tier 1 members – the Australian Border Force (ABF) and the Fiji Revenue and Customs Service (FRCS).

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1.   Programme Context

1.1   Background

1.1.1   Oceania Customs Organisation

The Oceania Customs Organisation (OCO) was established by the Heads of Oceania Customs Administrations in August 1998 to promote efficiency and effectiveness in all aspects of Regional Customs Administrations. It is the only Pacific owned regional agency focused on customs, with the core business of coordinating and facilitating regional cooperation, information sharing and capacity development for customs officials and administrations.

The OCO's constitution states its purpose is as follows:

1. *The OCO will, through its activities, performance and actions strive to promote effectiveness and efficiency of Customs administrations in the harmonisation and simplification of Customs procedures, facilitation of trade, law enforcement and building the capacity of members in meeting the development objectives of their Governments*

2. *The OCO will continue to coordinate and foster international and regional cooperation, communication and assistance between its Members on all Customs issues to ensure that individual interests and concerns are highlighted to Governments, regional organisations, non-Government organisations, private sector bodies and international organisations such as the World Customs Organization (WCO) and the World Trade Organization (WTO)*

The OCO's mission[2] and purpose[3] is to promote international and regional cooperation, communication, and assistance to address shared interests and challenges. This includes working with regional and global partners to coordinate and deliver high-quality training and advice that helps members improve customs procedures, trade facilitation, law enforcement, and their ability to achieve revenue and broader governmental objectives.

The OCO's 23 members are American Samoa, Australia, Cook Islands, Federated States of Micronesia, Fiji, French Polynesia, Guam, Kiribati, Marshall Islands, Nauru, New Caledonia, New Zealand, Niue, Northern Mariana Islands, Palau, Papua New Guinea, Samoa, Solomon Islands, Timor-Leste, Tonga, Tuvalu, Vanuatu and Wallis and Futuna.

The OCO plays a pivotal role in aligning and coordinating initiatives across its network of partners and member countries. However, its role is not to independently initiate or lead projects that lack broader member and development partner support.

New Zealand and Australia have provided core funding to the OCO since inception, as well as providing guidance and oversight as permanent members of the OCO Steering Committee (which also includes a representative from each of Polynesia, Melanesia and Micronesia[4], usually on two-year terms and which form their own sub-committees. Core funding accounts for around two thirds of the OCO's income, with the final third being a combination of member fees and other donor contributions. In Australia, the Australian Border Force (ABF), is the representative on the steering committee and in New Zealand, New Zealand Custom Services (NZCS) is the representative. Separate to its support to the OCO, NZCS also runs the Pacific Leadership Programme (PLP) which interacts with many of the same PICs but is separately funded. The PLP is a nine-month program designed to develop leadership skills among customs officials in various Pacific Island Countries (PICs)

The highest decision making body of the OCO is the annual Conference of the Customs Heads of Administration. The conference is where the nomination of the Chair of the OCO steering committee is nominated. The Steering Committees' primary role is to ensure clear governance responsibilities and accountabilities between the OCO Members the Secretariat, which sits beneath the Steering Committee.

The primary function of the Secretariat is to provide policy advice, technical assistance, coordination and implementation of project interventions and assistance in implementing the decisions of the Conference within Member administrations.

At present, the OCO is comprised of the following organisational structure, noting that the two project coordinator roles are vacant i.e. for IMPACT[5] and the USPTO Project :

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[2] Stated in the current OCO Strategic Plan as *'to facilitate and where appropriate help administrations to align with customs international standards and best practice leading to greater economic prosperity and increased border security within the Oceania region'*.
[3] Set out in Article II of the Constitution
[4] Currently Tuvalu, Solomon Islands and Palau
[5] Improving Pacific Islands Customs and Trade (IMPACT) project which is a European Union (EU)-funded initiative designed to improve trade and customs processes in the Pacific
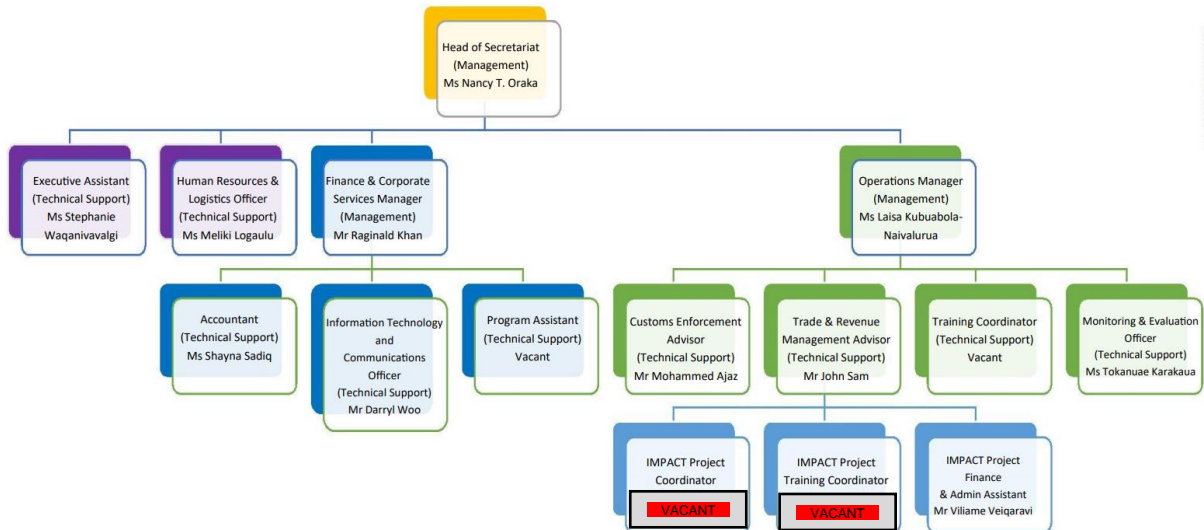
Figure 1.1   *OCO Organisational structure*

The **IMPACT program** is a United Nations Conference on Trade and Development (UNCTAD) initiative designed to improve trade facilitation and customs management in the Pacific Islands region. By focusing on border management, customs technology (principally trade single windows), harmonising customs procedures, and enhancing trade efficiency, the program assists Pacific countries in complying with the WTO's Trade Facilitation Agreement. Key activities include establishing National Single Window systems in countries like Fiji, Papua New Guinea, Timor-Leste, and Vanuatu, deploying the Automated System for Customs Data (ASYCUDA[6]), and improving Electronic Data Interchange between traders and customs. Partnering with the European Union (EU), Pacific Community (SPC), Pacific Island Forum (PIFS), and OCO through staff, the program operates from 2021-2025 with a budget of €10,000,000, targeting countries such as Cook Islands, Fiji, Kiribati, Marshall Islands, Papua New Guinea, Samoa, and Solomon Islands.

1.1.2   OCO Strategic Plan

The OCO has a Strategic Plan in place for the period 2022-2027; it follows previous strategic plans[7]. Annual workplans are prepared by the OCO and approved by its governing OCO Steering Committee[8] made of permanent members (Australia and New Zealand and representatives who serve two-year terms representing Melanesia, Micronesia and Polynesia) and endorsed by the annual conference[9]. A monitoring and evaluation (M&E) Framework was prepared separately by external consultants on behalf of the OCO and is dated 14 March 2023.

The strategic plan has six priority areas, namely:

– Customs leadership

– Law enforcement and border security

– Trade management and facilitation

– Revenue management and compliance

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[6] **ASYCUDA** is a computerised customs management system that covers most foreign trade procedures. It handles manifests and customs declarations along with accounting, transit and suspense procedures. It also generates trade data that can be used for statistical economic analysis. It was designed by UNCTAD.

[7] Approved at the mid 2022 annual conference, held virtually.

[8] Meets quarterly, with one of the meetings per year being in-person.

[9] Usually held mid year (June/July), hosted by the country that is the chair, this rotates broadly in alphabetical order.

– Institutional strengthening of small member administrations (SMA)
– Institutional strengthening of the OCO Secretariat[10].

1.1.3   New Zealand funding support

The goal of New Zealand's support is to assist Pacific customs administrations to align with international customs standards and best practice leading to greater economic prosperity and increased border security within the Pacific.

The most recent funding partnership through MFATs International Development Cooperation (IDC) Programme is for New Zealand dollar (NZD) 2 million over three years (October 2021 to December 2024) to implement the activity and deliver the outputs detailed in the MFAT/OCO Grant Funding Arrangement (GFA). The GFA that guides this funding partnership is designed to provide flexible funding that allows the OCO to deliver on its core priorities and work programme. The goal of the GFA is that Pacific Island countries and territories (PICTs) make progress in addressing development challenges and achieving aspirations by supporting the following:

– Customs leadership
– Law enforcement and border security
– Trade management and facilitation
– Revenue mobilisation.

The previous GFA (for the three-year period to 2021) also allocated funding to an output covering the institutional strengthening of the OCO Secretariat.

The current GFA is not supported by a monitoring, evaluation research and learning (MERL) Framework, so there is no theory of change or results table to monitor and/or report progress to New Zealand against. However, there is an OCO Monitoring and Evaluation (M&E) Framework[11].

1.1.4   This Programmatic Evaluation

GHD has been contracted by the New Zealand Ministry of Foreign Affairs and Trade (MFAT) to undertake a programmatic evaluation of the OCO. The objectives of the evaluation are set out below:

– **Objective 1:** to examine alignment between the outcomes outlined in the MFAT/OCO GFA 2021-2024; and in the OCO Strategic Plans 2017-2022, and 2022-2027
– **Objective 2:** to assess the effectiveness and impact of the OCO's support to Members in line with these outcomes, including in support of regional cooperation and information sharing
– **Objective 3:** to assess the extent to which the OCO Secretariat is resourced and has the necessary skills and expertise to deliver on the outcomes in their 2022 – 2027 Strategic Plan and associated M&E Framework 2022-2025
– **Objective 4:** *Lessons learned for improvement* – to identify the key learnings to increase the effectiveness and impact on national and regional security and governance of the activity

1.2   Purpose of this report

The overall purpose of this report is to present the findings and recommendations of the evaluation around the organisational operation, programme direction and resourcing of the OCO so that it, and

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[10] The last priority area is an addition to the previous strategic plan.
[11] As OCO uses the term M&E Framework, this report also uses that term unless referring to MERL in the context of MFAT.

MFAT by virtue as one its principal funders, is well placed going forward to support members to address the complex regional security environment and challenges facing Pacific customs authorities.

1.3 Scope and limitations

The scope of the report is contained to assessing how well MFATs funding programme, and by virtue the OCO under it, is progressing its work programme against the prior stated evaluation objectives.

While there may be commentary on the contribution of other funding parties, other New Zealand government agency involvement, and the respective maturity of OCO members, this is only in reference to how well the OCO's own efforts have intersected or benefited those measures of assistance and is not an appraisal of their independent efforts. More widely, the report assesses whether the OCO Strategic Plan 2022-2027 takes into account the role and contribution of Pacific customs authorities to regional stability, prosperity and resilience. The following disclaimers also apply:

This report: has been prepared by GHD for Ministry of Foreign Affairs & Trade and may only be used and relied on by Ministry of Foreign Affairs & Trade for the purpose agreed between GHD and Ministry of Foreign Affairs & Trade as set out in section 1.2 of this report.

GHD otherwise disclaims responsibility to any person other than Ministry of Foreign Affairs & Trade arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report. GHD disclaims liability arising from any of the assumptions being incorrect.

GHD has prepared this report on the basis of information provided by Ministry of Foreign Affairs & Trade and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

2. Key Evaluation Questions and Design Approach

2.1 Key Evaluation Questions

The Team used the evaluation objectives (see section 1.1.4) to develop Key Evaluation Questions (KEQs) presented in Table , and prepare questions/sub-questions for interviews. These questions were adapted to the different stakeholder groups, for example, development partner officials, OCO, Members and other regional stakeholders.

Please refer to Appendix B for a table setting out the Evaluation Matrix, with questions, and assessment criteria against the Evaluation objectives and using the Organisation for Economic Co-operation and Development's Development Assistance Committee (OECD DAC) Evaluation Criteria presented in Figure .

Figure 2.1   OECD DAC Evaluation Criteria

Table 2.1   Key Evaluation Questions and its alignment to OECD-DAC criteria

KEQ	Question	OECD-DAC criteria
KEQ1	To what extent has MFAT support for OCO (through GFAs) been strategically aligned?	Relevance and coherence
KEQ2	To what extent has the OCO been effective at providing support to Members based on the six (6) objectives set out the OCO Strategic Plan, with particular consideration of the supporting regional cooperation and information sharing?	Effectiveness and Impact
KEQ3	To what extent has the support had tailored impact across the region as per the annual OCO workplans?	Efficiency
KEQ4	How well resourced is the OCO Secretariat (in terms of both funding and skills/expertise) to deliver on the objectives set out in the OCO Strategic Plan's monitoring and evaluation (M&E) Framework?	Efficiency
KEQ5	What are the key learnings that would increase the effectiveness and impact of the work of the OCO on national and regional security and the governance of the OCO Strategic Plan?	Sustainability and lessons learned

2.2   Evaluation Design Approach

Effective evaluations are used to inform decisions and to improve performance; in this case MFAT, OCO, implementing partners and other stakeholders are looking to the findings and recommendations. Therefore, the Team adopted an approach to this evaluation design to enhance the credibility and likely use of the findings to inform future directions.

Criteria for determining priority engagement

As the evaluation could not directly cover all of the 23 member administrations directly; criteria and supporting rationale were agreed to determine the (eight) member countries selected for engagement:

– **Criteria 1: Level of Customs Maturity:** Assessing the agreements that members are a party to and the customs modernisation initiatives completed/underway in each jurisdiction – with outliers which are high and low maturity for representativeness.

– **Criteria 2: Remoteness and Level of Support:** How isolated is the member in question and what support have they received to date? Do they arguably need increased resourcing, training and engagement due to distance to stay consistent with wider OCO initiative progress?

– **Criteria 3: Volume of Trade:** As based on the latest WTO statistics around volume of imports and exports.

– **Criteria 4: Border Risk Profile and Emerging Threats:** Considering the risk exposure of each member and whether they are particularly vulnerable to both current and emerging border security and biosecurity threats.

– **Criteria 5: Regional representative on Steering Committee:** For Melanesia, Micronesia and Polynesia.

Table 2.2   Country Selection Criteria Rationale

Country	Rationale
Australia	The ABF has the highest-ranking customs maturity in the OCO, and a key joint core-funder alongside New Zealand.
New Zealand	Key joint OCO funder through MFAT, and NZCS has the second highest customs maturity in the OCO.
Fiji	Headquarters of the OCO, essential for in-country engagement. Fiji provides in-kind support through office space and utilities. Also displays a high level of customs maturity (i.e. 2023 work to progress a National Single Window system). Also experiences significant illicit goods trade risk, especially food fraud and other contraband.
Palau	Comparatively lower maturity and only recently joining the WCO in February 2024, only having implemented ASYCUDA. Also partial status of post-clearance audits. Represents Micronesia on the OCO Steering Committee.
Solomon Islands	Moderate customs maturity and high trade volumes place the Solomon Islands as a prime candidate for in-country engagement. Represents Melanesia on the OCO Steering Committee.
Tuvalu	Lower customs maturity and smaller profile, also important from a geostrategic perspective. Represents Polynesia on the OCO Steering Committee.
Guam	Current chair of the OCO Steering Committee

2.3   Methodology

The evaluation design and phased approach to implementing the evaluation ensures adherence to the following guiding principles:

– Ensuring triangulation of data – achieved through a review of the background documents, interviews, and discussions with relevant stakeholders, and if appropriate including a review of monitoring data and relevant reports to assess progress to date

– Working collaboratively with the MFAT Steering Group (refer to Section 2.4) and seeking their input and guidance at key stages of the evaluation

– Using participatory approaches to encourage active engagement from stakeholders at all levels

– Acknowledging and respecting stakeholder views and experiences through a well-designed approach and ensuring both M&E and subject matter expertise and capability within the evaluation team

– Keeping a utilisation-focused approach uppermost in mind to inform the instrumental use of the findings for MFAT, NZCS and other stakeholders. This entails working closely with MFAT to ensure the evaluation provides findings and recommendations to make evidence-based decisions for future support.

The evaluation collected and analysed a combination of qualitative and quantitative information and data to increase the reliability and validity of data, the findings and recommendations.

Desk-based review

Appendix A sets out the key documents that the evaluation drew on. MFAT provided some documents in time to complete the Evaluation Plan, other documents and information came to hand during the implementation of this evaluation, notably by the OCO during the Team's visit to Suva, Fiji.

Semi-structured interviews

The location of stakeholders, the number of people (and organisations) to be interviewed and the time available, meant that the process needed to be flexible, adaptable, rationalised and detailed feedback truncated, especially as key themes emerged. The key focus of the interviews was to balance listening to stakeholders to gain an appreciation of the key issues, and also to get answers to the KEQs. Having the Team located in both Australia and New Zealand enabled face-to-face meetings by at least one of the team members. After spending time together doing interviews in Suva (where a number of relevant regional stakeholders are located), the Team was able to divide up and visit member countries separately (but using Virtual calls) to improve the efficiency of the evaluation process. For further reference around the organisations consulted, please refer to Appendix C.

Ethical considerations

Participation was voluntary and consent was provided verbally before interviews commencing. Participants were briefed about the scope and objectives of the work prior to each interview. All stakeholders were told that their responses would remain confidential to the Team, and they would not be identified in the report.

Interview responses have been used only for this evaluation and are being securely stored once analysed. On finalisation of this evaluation report, the completed data will be destroyed.

Analytical framework

An analytical framework was developed to identify what information would be useful for analysis and was structured for the analysis to have tangible outcomes. It provided a systematic approach to facilitate sense making by the Team and understanding to answer the KEQs and assess the findings against the OECD DAC criteria. This approach ensured there is rigour through triangulation to ensure that insights emerging from data analysis are valid and credible and align with qualitative information received during interviews.

2.4 Governance

MFAT established a Steering Group to oversee the evaluation. This Steering Group ensured that the evaluation was fit-for-purpose and was delivered in line with the agreed plan and the ToR. Key responsibilities of the Steering Group were to confirm the KEQ, approve the Evaluation Plan, participate in a sense-making workshop, approve the draft and final Evaluation Report, and provide consolidated feedback and comment on outputs at key stages of the evaluation process so as to support the delivery of a high-quality product.

MFAT also sent a formal message to the Post (or equivalent) of member countries and signed off the letter of introduction that GHD prepared and was shared with all stakeholders during the scheduling of interviews.

2.5 Assumptions

The Team did not engage with all members, rather MFAT identified the members by the above-mentioned rationale and who were regional representatives (Melanesia, Micronesia and Polynesia) to be the focus. It was agreed that in-country fieldwork would be restricted to Fiji, Palau, Solomon Islands, and Tuvalu; and also, Australia and New Zealand who are core-funders. Guam was interviewed in their capacity as current Chair of the OCO.

MFAT also funds NZCS directly to deliver the New Zealand Customs Sector Development in the Pacific (2017-21)[12] and a subsequent phase of support known as the Pacific Leadership Programme (PLP) (see section 1.1) The evaluation does not cover this separate, but complementary programme.

3.   Findings

This section of the report presents the key findings from the data collected and explores their implications for MFAT's future investments supporting the OCO. The findings are organised around the OECD DAC evaluation criteria: relevance and coherence, effectiveness, impact, efficiency, and sustainability.

Proposed actions are optional steps OCO, MFAT and NZCS may wish to take to fully implement the priority recommendations presented in the executive summary. They serve as supporting steps to realise the management response depending on the level of ambition and forward implementation appetite. They are all aligned to the overarching and mutually supportive of the priority recommendations.

3.1   Relevance & Coherence (RC)

KEQ 1 To what extent has MFAT support for OCO (through GFAs) been strategically aligned?

> **Q. How well is the GFA (past and current) aligned to the OCO strategic plans?**
>
> ➤ *The GFAs are broadly aligned with the OCO strategic plans.*

For the 2021 to 2024 period, the GFA is funding four of the six strategic priorities from the 2022-2027 Strategic Plan (as aforementioned). However, funding is not allocated to the strategic priorities of institutional strengthening for SMA or the OCO Secretariat (priorities 5 and 6). The rationale for omitting funding for these areas was unclear.

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[12] https://www.mfat.govt.nz/assets/Aid-Prog-docs/Evaluations/2022/Evaluation-Report-of-the-NZ-Customs-Sector-Development-in-the-Pacific-Program-2017-2021.pdf

Additionally, there is no detailed reporting required by MFAT on how funds are distributed (or utilised) across the strategic priorities that have been allocated funding. While the funding is used in line with the strategic plans and reported in the OCO's annual reports, no separate reporting on outputs or outcomes specific to MFAT's allocation is required. This effectively means alignment is achieved by default not by design and does not necessarily reflect what New Zealand is seeking to achieve from this funding. To address this gap, the GFA should include additional detail around any complementary New Zealand funding objectives and that these should be mutually agreed with the OCO.

New Zealand remains the largest contributor to OCO funding[13], with Australia providing untied core funding and Fiji offering in-kind support, such as office space via the FRCS. Members' fees are also not linked to specific strategic priorities.

> **Proposed Actions:**
> _RC1: MFAT to continue providing funding aligned with the OCO's strategic plan. However, the GFA should include additional detail around any complementary New Zealand funding objectives to be mutually agreed with the OCO._

> **Q. To what extent is the current Strategic Plan M&E Framework fit-for-purpose? Are there more effective ways to measure progress in Pacific customs?**
>
> ➢ _The Strategic Plan's M&E Framework plays an essential role in tracking progress towards the OCO's goals. However, its development process and implementation reveal opportunities for improvement._

The Strategic Plan M&E Framework was developed independently by Eco-Consult Pacific[14] after the Strategic Plan, with the framework finalised on 14 March 2023. The strategic plan had been approved at the annual conference (virtual) on 6 September 2022. Best practice recommends developing an M&E Framework alongside a Strategic Plan to ensure consistency in language and alignment with the theory of change. The separate development of these documents has created a disconnect, resulting in retrospective baseline mapping and reverse-engineered key performance indicators (KPIs) and targets[15].

Additionally, the M&E Framework lacks annual targets, a work plan, and a budget allocation for implementing M&E activities.

An effective M&E Framework should also include a theory of change narrative with key assumptions and a risk matrix, and with regular updates as part of the Steering Committee agenda. This approach would help distinguish internal and external factors when progress does not align with expectations.

While earlier in 2024, the OCO recruited a dedicated M&E Officer, no budget has been allocated for essential M&E tasks such as designing surveys, verifying information through site visits, and conducting independent evaluations. Although the officer has experience with customs-related work in the Pacific, she lacks formal M&E qualifications but has shown initiative in operationalising the framework and is currently undertaking an International Labour Organisation (ILO) M&E course in Turin, Italy[16].

To date, the M&E Officer has made commendable progress implementing the M&E framework developed by Eco-Consult. This includes establishing data collection systems using trip reports, participant surveys, and training provider reports.

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[13] While Australia's core funding is less than New Zealand's, Australia overall provides more assistance to the OCO and its members through training and other projects
[14] https://www.ecoconsultpacific.com/
[15] The M&E Framework, March 2023 and discussions with M&E officer in Suva
[16] https://www.itcilo.org/

Quarterly staff meetings are used to validate and analyse this information before it is presented to the Steering Committee. Feedback from Steering Committee members indicates that the quality of M&E reporting has steadily improved over the past year, with continued efforts to refine and streamline information presentation.

Measuring progress remains challenging due to factors such as qualitative indicators and issues of 'causal contribution' versus 'causal attribution'. While OCO provides high-quality training and subject matter expertise, it is ultimately up to members to adopt and apply the knowledge and skills provided. The OCO also uses feedback from training surveys to inform improvements, though responses often lack substantive detail.[17]

Some regional stakeholders highlighted ad hoc practices, such as meeting with senior officials to clarify training goals and ensure plans for implementing new practices are in place. These practices could be formalised and expanded into peer-to-peer support initiatives or communities of practice.

> **Proposed Actions:**
>
> *RC2: OCO to develop a theory of change narrative with assumptions and risks at the outset of its new Strategic Plan to guide strategic priorities and facilitate progress monitoring.*
>
> *RC3: OCO to ensure that the M&E Framework is developed concurrently with the new Strategic Plan for better alignment.*
>
> *RC4: OCO to explore ways to present M&E results that effectively highlight key achievements, such as enhanced use of executive summaries and growth narratives.*
>
> *RC5: OCO to consider options to support members in developing and taking ownership of work plan initiatives post-training, with regular follow-ups to track progress.*
>
> *RC6: OCO to allocate resources for M&E activities beyond the salary of the M&E Officer in the budget starting 1 July 2025.*

> **Q. To what extent are the Strategic Plan's outputs and interventions appropriate given sectoral developments (as stated in the Strategic Plan), and is the OCO (Secretariat) able to be responsive to emerging challenges?**
>
> ➤ *The Strategic Plan's priority areas are recognised as valuable and relevant. However, the OCO's ability to reallocate funds limits its ability to adapt to emerging challenges.*
>
> ➤ *Members indicated that better support and alignment with their needs could enhance the annual conference planning process.*

Stakeholders strongly endorse the four technical priority areas of the Strategic Plan—customs leadership, law enforcement and border security, trade management and facilitation, and revenue management and compliance—as essential and valuable. Additionally, institutional strengthening is widely seen as a critical investment[18].

Each of the six priority areas contains three to five outputs and form the basis of the M&E framework which is used to track progress against targets.[19] While these priority areas are considered crucial, some members believe OCO should 'prioritise the priorities' to optimise outcomes, given its ambitious work programme. An example of the ambitious work programme was given by attendees at the annual conference; they noted the agenda was overly packed, with some content not directly relevant. Grouping agenda items to address subject-matter or sub-regional issues—for instance, transnational crime risks or similar trade modernisation challenges—was suggested. Members involvement in

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[17] Note that most participants responded with favourable but non-specific feedback
[18] Evaluaton team Stakeholder interviews
[19] Note comments elsewhere about the need to provide progress reporting in the annual plan.

annual conference agenda planning, particularly through regional sub-committees would likely better address the members specific needs and support prioritisation of outputs.

The current three-year budget cycle, running from 1 July 2022 to 30 June 2025, has limited flexibility to reallocate funds between and within priority areas. The budget is approved at the OCO's annual conference, the budget for July 2025 to June 2027 (i.e. until the end of the current Strategic Plan) will be set at the mid 2025 annual conference.[20] This rigidity hinders the organisation's capacity to effectively address emerging challenges, prioritise work streams, and streamline its comprehensive work programmes. In 2022 the OCO adopted a financial policy and regulations manual and revised its administrative policies. However, this manual does not allow for the re-allocation of funds between priority areas. Further, the current Charter requires updating to align with these newer documents.

> **Proposed Actions:**
>
> *RC7: OCO to enhance avenues for member involvement in annual conference agenda planning, particularly through regional sub-committees (Melanesia, Micronesia, and Polynesia), to better address their specific needs.*
>
> *RC8: OCO to develop a transparent approval process for the Steering Committee to reallocate funds between and within priority areas to respond to emerging needs as part of the charter. While the steering committee session annual conference will retain the authority to approve multi-year budgets, these budgets should reflect rolling, adaptive work plans aligned with the Strategic Plan.*
>
> *RC9: OCO to update its Charter to better align with the new regulations manual and revised administrative policies.*

> **Q. To what extent does the MFAT GFA funding continue to be relevant to the OCO, the wider New Zealand Aid Programme (IDC), and member countries/regional development priorities?**
>
> ➢ *At the time of signing the MFAT GFA funding was relevant and well aligned to the previous PACREG Plan, the broader New Zealand Aid Programme (IDC), and the development priorities of members and the wider region. However, it has not been assessed against the new PACREG plan or new IDC strategic goals.*

Without New Zealand's core funding, the OCO would likely face significant challenges to its viability, needing to either seek alternative funding from other development partners, significantly increase member contributions, or charge for its services. Reliance on other development partners could raise concerns for Australia, which views New Zealand as a 'like-minded' partner with an already well-established working relationship.

New Zealand's role as a core funder grants it a permanent seat on the OCO Steering Committee, ensuring it has a 'voice at the table.'

When established New Zealand's support for the OCO aligned with MFAT's Pacific Development Group's Pacific Regional (PACREG) Four- Year Plan. The following outcomes included in that Four-Year Plan highlight the relevance of GFA funding:

MO1: Regional agencies are valued for their support for improved economic and social development, political governance and security.

➢ **STO1:** Stronger regional agency and organisation performance delivers results for members in their agreed priority areas.

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[20] Effectively there are two budgets for the life of the current 5-year Strategic Plan; for the 3 years and the other for the remaining 2 years

MO3: A strong, coordinated regional architecture enables the Pacific region to deliver its own solutions to regional priorities, including those set out in the 2050 strategy[21].

➤ **STO3:** Pacific regional organisations are relevant to, and representative of, the whole region, and organised in the most efficient and effective manner, with adequate funding.

Consistent feedback from members, particularly regional representatives in Polynesia, Melanesia, and Micronesia, has underscored the value and importance of New Zealand's funding. Its financial support is highly appreciated across the region.

Furthermore, New Zealand's investment in organisations like the OCO aligns with international commitments. The Addis Ababa Action Agenda (2015)[22] reinforced donor commitments to double the allocation of development assistance to domestic revenue mobilisation. By supporting the OCO and other regional customs initiatives, New Zealand actively honours these agreements while meeting regional development priorities.

While this evaluation does not include the scope of OCO Secretariat staffing structures, staff resourcing levels, or remuneration, it is noteworthy that staff expenses constitute approximately 32 percent of total costs[23].

New Zealand's financial support for the OCO has also shown modest growth over time. During the 2017/18 to 2020/21 Strategic Plan period, annual funding amounted to FJD 830,000. This increased to FJD 845,000 per year for the 2021 to 2024 Strategic Plan, reflecting a 1.8% increase over six to seven years; this does not account for inflation adjustments.

> **Proposed Actions:**
> *Refer to recommendation RC 1.*

> **Q. To what extent has MFAT's funding under the current Strategic Plan (2022–27) successfully built on previous support under the 2017–22 Strategic Plan and incorporated member feedback from that period?**
>
> ➤ *There is no evidence to suggest that MFAT's funding under the current Strategic Plan (2022–27) has effectively built on previous support or directly incorporated member feedback.*

Under the 2017–22 Strategic Plan, MFAT developed Activity Design Documents (ADDs), which included M&E frameworks. However, this practice was discontinued for the provision of funding under the 2022–27 Strategic Plan. Support under the current strategic plan was not accompanied by an ADD, and there has been no requirement for OCO to provide progress reports specific to MFAT's funding. Instead, tranche payments have been based on the OCO's annual report, which includes audited accounts. Without a requirement for separate reporting on the results achieved with New Zealand's core funding for the OCO, there is no evidence that the funding is being strategically utilised or that OCO has been required to manage any associated expectations. Therefore, there is no evidence to suggest that MFAT's current funding has effectively built on previous support.

That said, New Zealand remains informed about key member concerns through the Steering Committee, which helps tailor the advisory and other support New Zealand provides. However, this does not directly extend to the deployment of core funding, and therefore, specific feedback from OCO regarding the views of key regional partners on customs-related issues to cohesively tailor wider New Zealand bilateral support would be beneficial. Specific feedback from OCO to MFAT regarding the views of key regional partners on customs-related matters would cohesively tailor wider New Zealand

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[21] The 2050 Strategy for the Blue Pacific Continent was approved by the Pacific Island Forum in 2022 and is on their website.
[22] https://en.wikipedia.org/wiki/Addis_Ababa_Action_Agenda
[23] OCO Annual Report, July 2023 to June 2024.

bilateral support around regional security, trade facilitation and other domains which have customs interface.

Although the staffing profile of the OCO was beyond the direct scope of this review, the following observations were made about potential staffing needs to address member needs and the OCO's growing role in regional security:

− **Training Coordinator**: This role is currently a key absence, particularly given the OCO's forward work programme for member capability support. It should be backfilled as a priority.

− **Project Manager**: A dedicated role for short- to medium-term donor-driven projects would be very helpful, especially considering the significant responsibilities are currently managed by the operations manager who oversees the cohort of specialist advisors.

− **Additional Roles**: Consider splitting Communications and IT roles and appointing a second advisor to support workloads in each of the two specialist areas.

The need for the above roles and how they could be funded requires assessment.

> **Proposed Actions:**
>
> *RC10: MFAT to request specific feedback from OCO regarding the views of key regional partners on customs-related issues to cohesively tailor wider New Zealand bilateral support around regional security, trade facilitation and other domains which have a customs interface.*
>
> *RC11: OCO to explore the need for additional staff positions (as above) and develop a business case outlining how these roles could be funded, principally considering the underspend.*

3.2 Effectiveness (EFV)

KEQ 2 To what extent has the OCO been effective at providing support to Members based on the (6) objectives set out the Strategic Plan, with particular consideration of the supporting regional cooperation and information sharing?

> **Q. To what extent are the Strategic Plan's M&E Framework output/outcome indicators and targets being achieved?**
>
> ➤ *The information is not clearly presented, making it difficult to determine whether the output indicators and targets of the OCO Strategic Plan's M&E Framework are being met.*
>
> ➤ *It is too early to assess the outcomes, as this is only the second year of implementing the current Strategic Plan.*

Across the priority areas, there is moderate progress against the M&E Framework output/outcome indicators or KPIs. However, the M&E Framework is newly introduced and was not initially designed with a theory of change, and there is a lack of alignment and consistency in the use of terminology. The language in the Strategic Plan does not flow seamlessly into the M&E Framework, budget, and workplans. This includes confusion between outcomes and objectives, which needs to be addressed.

*Note, given the performance indicators are not always comparable, proxies have been taken to help ascertain progress.

Priority Area 1: Customs Leadership

The KPIs and 2027 targets for Priority Area 1 – Customs Leadership, are set out in Table :

Table 3.1   Priority Area 1 KPIs and Targets – Customs Leadership

	KPI	2022 Baseline	2027 Target[24]
1.a	Status of implementation of the current implementation OCO Professional Staffing Framework (OPSF) by individual OCO members.	10 states implementing OPSF.	1.a.1 All states are implementing OPSF by 2027.
1.b	Status of the development of adoption of National Customs Gender Equality Plan for OCO members.	5 countries have adopted the plan.	1.b.1 Plan adopted by >75% of members by 2027.
1.c	Status of implementation of Pacific Women Professional Development Program.	a) 0 Women trained b) 20% of Executive Management (Level 1 and 2) positions are occupied by women.	1.c.1<150 women graduating with potential for promotions by 2027. 1.c.2 40% of Executive Management (Level 1 and 2) positions are held by women in 2027.

Priority Area 1: Overall Progress Observations

The core elements of the OCO Professional Standard Framework (OPSF) include the Certificate III and Certificate IV in Regional Customs Administration. Both programs exceeded their annual attainment targets for 2023/24. Specifically, 73 individuals completed Certificate III, and 46 completed Certificate IV during this period.

In terms of leadership representation, there are now four female heads of customs agencies as of 2024. While it remains challenging to assess the level of support provided to these leaders in a traditionally male-dominated sector, interviews indicate they feel empowered to perform their roles effectively.

Priority Area 2: Law Enforcement and Border Security

The KPI's and 2027 targets for Priority Area 2 – Law Enforcement and Border Security, are set out in Table :

Table 3.2   Priority Area 2 KPIs – Law Enforcement and Border Security

	KPI	2022 Baseline	2027 Target
2.a	# joint operations/exercises successfully implemented at regional and/or sub-regional level.	1 exercise/ operation conducted in 2022.	**2.a.1** 5 exercises conducted between 2022-2027 with participation of at least 3 countries.
2.b	# collaborative activities with regional and international partners.	3 collaborative activities with partners in 2022.	> 10 collaborative activities held between 2022-2027 with participation of at least 4 countries.

Priority Area 2: Overall Progress Observations:

The OCO network conducted a variety of joint customs exercises, including several larger-scale activities:

–   Vessel Boarding, Search, and Seizure: This operation involved 23 enforcement officers (5 from customs, 9 from immigration, and 9 fisheries officers)

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[24] Note that ideally the baseline and target figure should be comparible – both as absolute numbers or both as percentages.

–   Regional Operation on Trade Risk Enforcement: Involved 10 members
–   IORIS Training: Attended by 14 customs officers representing 9 member nations[25]
–   Drug Identification Training with NZCS: Included 17 participants from 17 members
–   OCO Intel Contact Points and Pacific Small Craft Coordinators Meeting: Brought together 20 participants from across the membership.

These activities reflect strong collaboration on critical border security priorities. They cover all border pathways and include practical components tackling key issues such as drug trafficking and illegal, unreported, and unregulated (IUU) fishing. Importantly, the operations extend beyond customs agencies, involving other key stakeholders such as fisheries departments to enhance multi-agency cooperation.

Priority Area 3: Trade Management and Facilitation

The KPI's and 2027 targets for Priority Area 3 – Trade Management and Facilitation are set out in Table :

Table 3.3   Priority Area 3 KPIs – Trade Management and Facilitation

	KPI	2022 Baseline	2027 Target
3.a	#of members fully acceded to the Revised Kyoto Convention (RKC).	11 members (Australia, Cook Islands, Fiji, French Polynesia, Kiribati, New Caledonia, New Zealand, PNG, Samoa, Tuvalu, Vanuatu).	**3.a.1** At least 3 more members have acceded to the RKC by 2027.
3.b	Customs Clearance Times (as indicator of Customs Service's efficiency in clearing cargo).	2022 Customs clearance times for each country.	**3.b.1** Customs clearing times reduced in all OCO members by 2027.
			3.b.2 Customs Clearing Times in at least 4 Medium and SMA reduced by 20% by 2027 from 2022 Baseline.

Priority Area 3: Overall Progress Observations:

The primary trade facilitation initiative for the OCO has been the IMPACT project (refer to section 1.1.1 for more detail), supplemented by in-country training co-delivered with the WCO. Alongside the rollout of ASYCUDA, these efforts have supported the adoption of both existing and new trade facilitation agreements (TFA), such as the RKC. Notably, Palau and Tuvalu have recently become signatories to the RKC, with Palau also formally joining the WCO. This development is an encouraging indicator for achieving the target of three additional members adopting the RKC by 2027. The introduction of ASYCUDA has also led to significant efficiency improvements in Palau, reducing clearance times from 2–3 days to just 1–2 hours.

To assess progress on the treaties and conventions already ratified, the OCO engaged an expert consultant to evaluate such outcomes (referred to herein as the 'gap analysis').[26] While some initial concerns were raised regarding the completeness of these assessments, these issues have since been satisfactorily resolved. An excerpt of the gap analysis shown in Figure highlights significant alignment with TFA requirements, which are the same as RKC requirements with some new additions.

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[25] **crimario.eu/wp-content/uploads/2023/04/IORIS_Factsheet_A4_V4.pdf**
[26] OCO Gap Analysis
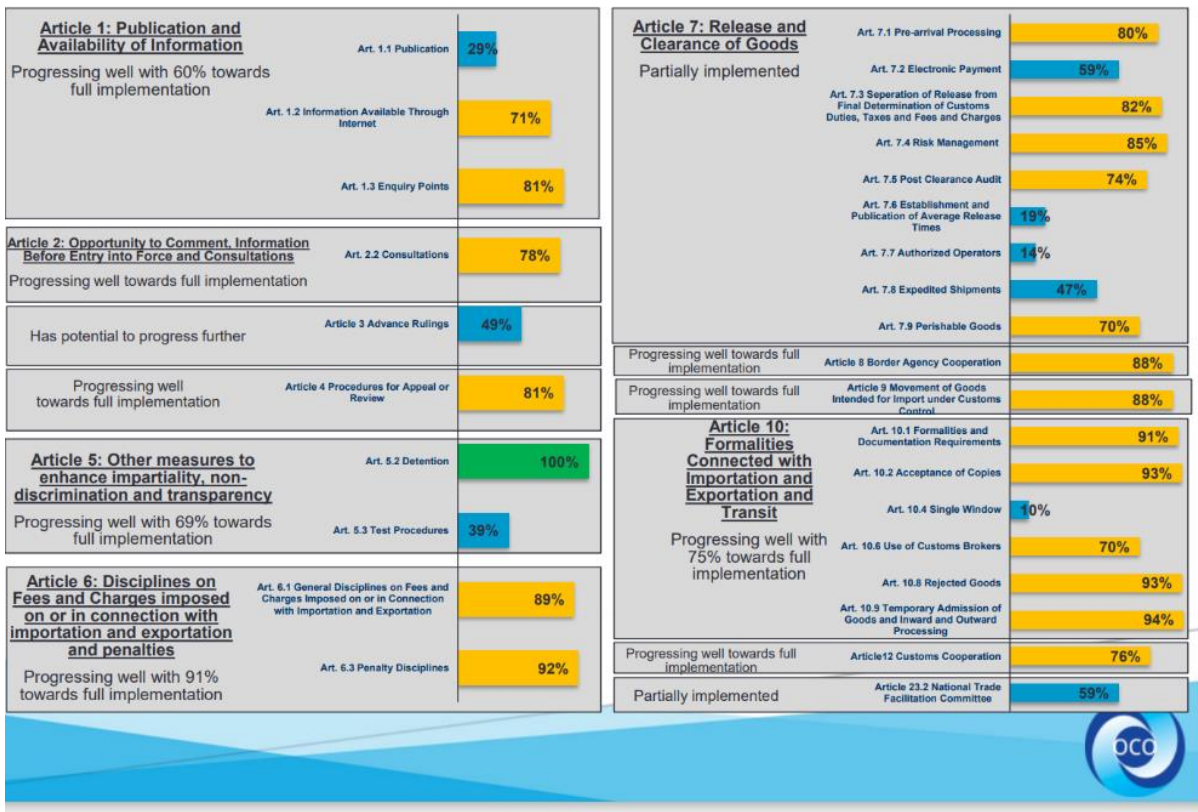
Figure 3.1   *OCO Gap Analysis (23rd September 2024) showing alignment with TFA*

Priority Area 4: Revenue Management and Compliance

The KPI's and 2027 targets for Priority Area 4 – Revenue Management and Compliance, are set out in Table :

Table 3.4   *Priority Area 4 KPIs - Revenue Management and Compliance*

	KPI	2022 Baseline	2027 Target
4.a	Status of adoption of PCA[27], HS[28] System, WTO valuation and PACHS2022 by member states[29]	-11 countries have adopted PCA -19 countries have adopted HS system -15 countries have adopted WTO valuation - 0 countries have adopted PACHS2022	4.a.1 5 countries have adopted PCA 4.a.2 At least 4 more member countries adopt HS system by 2027 4.a.3 At least 3 more member countries adopt WTO valuation by 2027 4.a.4 At least 6 countries adopt PACHS2022 by 2027

Priority Area 4: Overall Progress Observations:

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[27] Post clearance audit
[28] Harmonized Tariff Classification System
[29] Pacific Harmonized Commodity Description and Coding System

Since 2022, nine members of the OCO have made significant progress by implementing post-clearance audits. This has provided a much clearer understanding of issues such as reporting accuracy, documentation processing times, compliance, and risk management.

Additionally, 17 members have now adopted PACHS2022—a highly effective guidance tool that offers more relevant commodity groupings for tax and tariff determinations, for example for specific items like tuna, coconut products, and ginger.

Efforts to address undervaluation and revenue concerns have also been strengthened through workshops, such as the Pacific Agreement of Closer Economic Relations (PACER) Plus[30] mobilisation workshop. For referencePACER is a landmark trade and development agreement designed to raise living standards, create jobs and increase exports from Pacific Island countries, while also lowering barriers and providing greater certainty for businesses operating in the Pacific. These sessions have been well-received by key regional bodies such as the Pacific Islands Tax Administrators Association (PITAA) and the Pacific Islands Financial Technical Assistance Centre (PFTAC), who highlighted their value to tax and tariff operations.

Priority Area 5: Institutional Strengthening of Small Member Administrations (SMA)

The KPI's and 2027 targets for Priority Area 5 – Institutional Strengthening of SMA, are set out in Table :

Table 3.5   Priority Area 5 KPIs – Institutional Strengthening of SMA

	KPI	2022 Baseline	2027 Target
5.a	# SMA countries with appropriate modern Customs-related legislative and regulatory frameworks.	5 SMAs (Cook Islands, FSM, Kiribati, Nauru, Tuvalu).	5.a.1 At least 2 more SMA countries have adopted appropriate modern customs-related legislative and regulatory frameworks by 2027.
5.b	# SMA countries with adequate institutional capacity to manage Customs reforms.	8 SMAs (Cook Islands, CNMI, FSM, Kiribati, Nauru, Niue, Palau and Tuvalu).	5.b.1 At least 9 SMA where ASYCUDA World is functional.

Priority Area 5: Overall Progress Observations:

The gap analysis revealed that customs-related legislation and legal compliance are areas of strength, particularly due to the recent adoption of modern customs treaties and instruments. Notably, there is a high level of adherence to the legal provisions of the TFA, as highlighted during the gap analysis conducted by OCO.

A good example is the Guam modernisation project, where a legal expert was engaged to draft a Customs Bill, providing the framework for Guam Customs to put the provisions into practice.

Additionally, ASYCUDA World remains operational in most member countries, with the Marshall Islands successfully implementing it in 2021. This achievement supports the OCO's progress towards its 2027 target. The below figure shows a range of activities the OCO conducted to support legal harmonisation within its member states.

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[30] https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/pacer-plus

State of Play – Legal Review

Figure 3.2 **Legal Review Conducted Under the IMPACT Project**

Priority Area 6: Capability of OCO Secretariat

The KPI's and 2027 targets for Priority Area 6 – Capability of OCO Secretariat, are set out in Table :

Table 3.6 **Priority Area 6 KPIs – Capability of OCO Secretariat**

	KPI	2022 Baseline	2027 Target
6.a	Efficiency and effectiveness of implementation of activities outlined in annual work plans.	Baseline not provided	6.a.1 All Annual Work plans approved by OCO Steering Committee before the start of the OCO fiscal year.
			6.a.2 >75% of OCO Annual Work Plans implemented each year.
6.b	Status of management of OCO financial resources as verified by annual independent audit.	Baseline not provided	6.b.1 Independent Annual Audits confirm OCO financial resources are managed accountably during the period of the SP (2022-2027).

Priority Area 6: Overall Progress Observations:

Not all work plans within this priority area are approved by the steering committee before the start of the fiscal year, and actual progress against these plans is currently delivering above 75%. This remains a focus area for OCO to improve on delivery, though it's worth noting there is continued momentum in some of the signature initiatives.

The OCO Secretariat has also received 'clean' audits from Ernst & Young over FY23-FY24. Additionally, the newly developed financial policy shared with the Team provides reassurance that accountability measures are now formally documented and being increasingly implemented.

Overall Progress and KPI Observations

The effectiveness of the current M&E Framework in capturing meaningful member outcomes and desired changes appears unclear. Many indicators are output-focused (for example, participant numbers, training frequencies) rather than outcome-driven (i.e. the efficacy or impact of those outputs). Often, these measures seem to rely on arbitrary proxies designed to present positive reporting optics through a 'checkbox' approach. For example, while KPIs around member travel often surpass targets, there is little analysis of how this travel translates into operational improvements or functional benefits for members.

Similarly, while various training activities are reported, there are no KPIs to evaluate critical factors such as:

‒ Post-training application or operationalisation of knowledge

‒ Evidence of knowledge retention and its impact on improving processes

‒ The extent of knowledge sharing among participants with their local and regional peers.

Feedback from several development partners further highlights these issues. Their understanding of progress across various initiatives has been partial, often requiring clarification via discussions with OCO at different forums. However, this understanding isn't consistently conveyed in the current annual reports, which limits insight for new partners. Without clear reporting, new collaborators may struggle to identify how best to contribute or determine areas where OCO requires additional support.

For future reporting, OCO could include information that demonstrates how it assists partners in aligning their strategies with broader regional security goals. Highlighting cross-agency collaboration and cross-cutting outcomes across priority areas—such as the work led by regional entities through the Declaration of Partnership[31] and the Pacific Community (SPC)—can better showcase the OCO's added value, including for regional security. For reference, the Declaration of Partnership, signed by the respective Chairs Fiji (PIDC), the Commonwealth of Northern Mariana Islands (OCO) and Guam (PICP) on behalf of the Members of their organisations, provides a formal foundation for collaboration to combat transnational and organised crime and enhance border security in the Pacific.

> **Proposed Actions:**
> _EFV1:_ _OCO to consider designing more outcome-focused KPIs that clearly demonstrate the logic and significance of outputs, have comparable baseline and target metrics and align efforts with the next strategic plan._
>
> _EFV2: OCO to create a concise progress reporting template to highlight key achievements for broader external communication and improved stakeholder engagement._

> **Q. What is working well, and what isn't, in terms of providing support to achieve the six objectives in the Strategic Plan? Are there any unintended positive or negative consequences?**
>
> ➢ _The Memorandum of Understanding (MOU) among PICP, PIDC, OCO, and FFA supports effective discussions and the implementation of initiatives like information sharing._
>
> ➢ _The long-standing partnership with Charles Sturt Centre continues to strengthen Priority Area 1 (Leadership)._
>
> ➢ _Collaborations with NZCS and the ABF strongly support Priority Areas 2 and 4._
>
> ➢ _The working relationship between UN Trade and Development (UNCTAD) and OCO has not been conducive to supporting the Strategic Plan's Priority Area 3. However, the partnership with WCO has benefited the OCO's members through the availability of training manuals._

Overall, stakeholders and implementing partners conveyed satisfaction with the documented and informal partnerships facilitated by OCO. These partnerships enhance customs maturity both for individual members and across the Pacific region. There is widespread recognition that supporting the OCO's role in member coordination and delivery of services is critical as the organisation navigates transition, succession planning, and resource challenges. Joint delivery efforts[32], formalised through

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[31] Signed by the Pacific Islands Chiefs of Police (PICP), Pacific Immigration Development Community (PIDC), OCO and the Forum Fisheries Agency (FFA) has recently joined

[32] Discussed in below on the modalities that OCO uses (in-house, out-sourcing to Suppliers and using regional partners)

MOUs and agreements, acknowledge that regional agencies and development partners play a pivotal role in helping OCO deliver on its Strategic Plan.

Priority Area 1 – Customs Leadership[33]**:** OCO has made significant progress in this area, highlighted by the Gender Equality in Customs initiative that aims to increase female participation in training programs and customs leadership roles. Partnership with the Charles Sturt Centre for Customs and Excise Studies[34], under the **OCO** Professional Standards Framework (OPSF), has led to the certification of several trainers at Certificate III and IV levels.[35] Developing diploma programmes remains an area of interest, though funding limitations hinder progress. While visibility of these resources has been an issue, interviews confirmed efforts are underway to make them more widely known and accessed by members and development partners.

Priority Area 2 – Law Enforcement and Border Security: This area is led by ABF, PICP, New Zealand Transnational Crimes Unit, and NZCS. Stakeholders recognise and welcome ABF's leadership, particularly in the deployment of the OCO Pacific Small Craft Application (OPSCA) for improved maritime domain awareness. Progress has been made in formalising terms of reference for the Information Sharing Working Group, which will foster cross-border intelligence sharing and address existing concerns about data exchange.

Priority Area 3 – Trade Management and Facilitation: UNCTAD provides expertise on WTO best practices as well as collaborative projects like the IMPACT initiative for regional trade agreements. Stakeholders noted, however, that delivery partners have needed to re-validate the OCO gap analysis for this priority area. Outsourcing these tasks has limited the OCO's oversight and quality assurance capabilities, highlighting a need to improve in-house resources and staff involvement. Differences of opinion on relevant benchmarks against which to conduct the gap analysis despite in-principle initial agreement that it was to be the WCO RKC rather than the WTO TFA led to UNCTAD requesting revisions from the OCO, emphasising the need for improved collaboration.

Priority Area 4 – Revenue Management and Compliance: Support in this area is driven by ABF, which advises on valuation and data analytics for revenue collection, complemented by PFTAC's expertise in value-added tax (VAT) development. OCO has conducted training on PACHS2022[36], promoting regional harmonisation in the classification of goods under the Harmonised Tariff System. However, further localisation may be needed to address unique national commodity classifications beyond the regional framework.

Priority Area 5 – Institutional Strengthening of Small Member Administrations: UNCTAD's ASYCUDA World team works closely with smaller member states, supporting their national project teams. Additionally, the WCO Regional Offices for Capacity Building helps with non-WCO members' accession to key Trade Facilitation Agreement (TFA) clauses. OCO has facilitated member requests, but stakeholders flagged the need for better triaging of small member needs. Despite some initial concerns about the absence of a needs analysis, evidence shows OCO has been producing tools like a member needs heatmap for structured decision-making[37].

Priority Area 6 – Institutional Strengthening of the OCO Secretariat: OCO has taken the lead on institutional strengthening, with Tier 1 members providing governance best practices and mentoring to the secretariat. These contributions have improved the OCO's operations and helped it better collaborate with other. NZCS has also supported this work through its customs leadership programme. Stakeholder feedback highlights an increasing recognition of roles and responsibilities within the OCO secretariat, which has fostered improved cross-organisational outcomes.

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[33] Note that New Zealand's direct support through NZCS for the Customs Leadership programme is out of scope.

[34] https://bjbs.csu.edu.au/centres/cces/home

[35] In 2023/24: 46 people attained a Cert 4 and 73 people attained a Cert 3 under OPSF.

[36] See PACHS2022 and https://www.spc.int/resource-centre/publications/2022-pacific-harmonized-commodity-description-and-coding-system

[37] OCO Member Gap Analysis and Shared Risk Outlook

Proposed Actions:

EFV3: OCO to better define where it is best placed to a) directly deliver an initiative b) play a coordinating role or c) delegate delivery to partners where an area is well-covered (i.e. trade modernisation).

EFV4: OCO to clearly attribute its contributions to coordination and delivery actions, ensuring transparency and clarity in how interventions are developed and executed.

Q. To what extent has New Zealand's role effectively contributed to the management of the OCO Secretariat?

➢ *New Zealand's approach to its involvement in the OCO Steering Committee has supported the improved management of the OCO Secretariat.*

Since the OCO's inception, New Zealand has played a crucial role as a steering committee member, focusing its governance and management efforts through this platform. The NZCS has applied an effective balance by providing thorough oversight and constructive questioning of the Secretariat's activities, while maintaining a respectful, non-interventionist approach. [38]

Additionally, New Zealand has acted informally as an intermediary during key forums such as the OCO Annual Conference. Through these interactions, it has supported improvements in the Secretariat's financial accountability and reporting systems. New Zealand is also interested to extend its leadership program principles to benefit the OCO Secretariat. [39] This initiative aligns well with similar efforts by Australia and Fiji, who aim to enhance the Secretariat's operations, including plans to co-locate OCO with the Fiji Revenue and Customs Service (FRCS) and improve reporting standards.

However, there are some gaps in communication. MFAT does not directly engage with the OCO Secretariat regarding capability needs. Instead, MFAT largely relies on NZCS to channel information. The OCO Secretariat has indicated a lack of clarity around MFAT's expectations, particularly regarding reporting on funding utilisation. Furthermore, OCO lacks a platform for direct communication with MFAT to discuss constructive ways to strengthen their partnership.

Proposed Actions:

EFV5: NZCS to continue supporting Australian and Fijian coordination efforts to provide a unified and consistent support structure across Tier 1 members.

EFV6: MFAT to establish more regular, direct dialogue with the OCO Secretariat to receive capability requests or make offers of support.

Q. How well has OCO been able to respond to changes (listed in the Strategic Plan) – this speaks to adaptability and good management?

➢ *OCO acknowledges the need to adapt to changes and address emerging issues but faces limitations due to governance processes.*

➢ *While mechanisms such as the **Declaration of Partnership** and traditional practices like **Talanoa** are effectively utilised to advance strategic priorities, challenges remain in consolidating efforts and improving flexibility.*

Regional cooperation through the Declaration of Partnership and the informal Talanoa[40] has been instrumental in fostering collaboration. The Talanoa process allows Pacific members to engage in

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[38] Stakeholder interviews #1 and #2
[39] For example, the OCO staff team-building exercise that took place in November 2024.
[40] Used here to describe a process of inclusive, participatory, and transparent dialogue.

open, meaningful discussions in a safe and informal atmosphere, creating an environment where they feel more comfortable sharing ideas and concerns compared to formal settings. Additionally, the Declaration has established formal links to the Transnational Crime Unit (TNCU) through PICP, enhancing regional coordination. Outside formal steering committees, Talanoa is also used informally to discuss and address emerging issues. OCO's work programme and multiple priority areas require regular attention to emerging challenges.

OCO has limited flexibility in reallocating funds between priority areas, which can delay responding to emerging issues. While too much flexibility in budget adjustments could lead to underfunding key programs, there remains an opportunity to better / fully utilise underspends. For example, funds from completed programmes that have met their objectives or become outdated could be reallocated more effectively to pressing priorities.

A notable governance issue is the approval processes requiring OCO chair endorsement. This additional layer of bureaucracy can slow decision-making, limiting the Head of Secretariat's ability to take timely action and steer the organisation in adaptable ways. While this is manageable to some extent, it is inconsistent with best practices and creates inefficiencies for a body that already has finance and administration policies (albeit recently introduced and still in their early stages of operational use).

Further complicating matters, the Head of Secretariat often inherits a Strategic Plan that they may not have been involved in designing. This can result in a mismatch between the existing framework and their vision for the organisation, creating challenges in efficiently implementing changes or new strategic priorities.

> **Q. What external factors may impact OCO's ability to meet outcomes and targets as set out in the Strategic Plan's M&E Framework?**
>
> ➢ *External factors, such as geo-political regional security considerations, have the potential to derail the OCO's ability to meet Strategic Plan targets and therefore need to be well-managed. Identifying and managing priorities within the work plan has room for improvement.*

The OCO has been observed to accept most proposed donor requests, rather than practice a level of pushback where their broader awareness gives them a credible view that the request may not be well-suited to the members' actual needs and maturity. This has potentially led to a proliferation of non-focussed development partner activity and secondary requests, some of which are unrelated to actual KPI's and goals. This has the potential to distract the OCO from delivering and/or coordinating a well-focussed core programme of support.

Another key complexity the OCO faces is how customs agencies are structured across its membership base, with some also including immigration and biosecurity, two areas that sit outside the OCO's formal mandate, but which OCO still needs to have awareness of (hence its inclusion in the MOU with PIDC, PICP and more recently FFA).

Development partner support can often be surplus to requirements, and this may act as a diversion to OCO efforts in meeting existing KPIs where there may be better opportunities to align with what members really need. This is apparent in trade modernisation where some members did not have the necessary IT infrastructure, nor accompanying processes and systems to move to paperless trading systems and away from more manual processes. This also manifests in training requests which can take OCO staff away from delivering on planned work streams and may double up with past efforts.

> **Proposed Actions:**
> _EFV9: OCO to develop delivery risks and assumptions alongside the M&E framework so that if progress is not as anticipated there is clear attributability between internal and external factors._
>
> _EFV10: OCO to develop a criteria-based approach to filter donor requests in order of relevance and priority._

3.3 Impact (IMP)

KEQ3: To what extent has the support had tailored impact across the region as per the annual OCO workplans?

> **Q. What are examples of some successful joint customs initiatives that have been advanced under the work program? Would an expansion of these approaches be well-received?**
>
> ➢ _The OCO has coordinated several impactful initiatives to support member interests and strengthen regional cooperation._

Examples of successful joint customs initiatives advanced under the OCO work programme include:

- **OCO & the Secretariat of the International Narcotics Control Board (SINCB) Intelligence Training & Operation "ZODIAC":** This four-week joint information collection operation, conducted alongside the SINCB and nine member countries, led to the seizure of suspicious shipments of non-medical benzodiazepines. It serves as a key example of successful collaboration in customs intelligence sharing.
- **Vessel Boarding, Search and Seizure Training:** This multidisciplinary training provided an overview of vessel boarding practices, bringing together customs, fisheries, and immigration agencies. It highlighted the intersection and handoff of roles in search and seizure procedures. While an OCO initiative, it was coordinated by the United Nations Office on Drugs and Crime (UNODC)
- **Regional Operation on Trade Risk and Enforcement:** This initiative was supported by the ABF and NZSC, addressing key areas like data cleansing, analysis, and comparison—enhancing members' enforcement capabilities. The operation included data exchange, followed by data auditing to uncover suspicious undervaluation and trade-based money laundering activities.

These initiatives illustrate the potential benefits of collective approaches, which, if expanded, could further improve regional customs capabilities and cooperative enforcement efforts.

> **Proposed Actions:**
> _IMP1: OCO to continue to pursue multi-agency initiatives to amplify training benefits across key regional stakeholders._

> **Q. What mechanisms and forums exist for sharing information and customs best practice between members. How could this be enhanced?**
>
> ➢ _The OCO has been effective in sharing information among members, particularly within the constraints of data privacy relating to security data._

While the OCO has been willing to share information between members, there is potential to strengthen action-driven cooperation and consensus-building efforts between members. Existing mechanisms such as sub-regional and ad hoc sub-committees are valuable but could be more

formally and effectively leveraged. For instance, regional sub-committees do not always meet quorum and are not always held to schedule. There may be more opportunities to hold special sessions of regional sub-committees to address specific and pressing regional customs issues as they arise – such as addressing a localised transnational crime issue.

Informal information sharing, such as through the Declaration of Partnership between OCO, PIDC, PICP, and now FFA, has proven more dynamic and productive. These informal forums provide a relaxed and secure setting to address challenges, discuss opportunities, and identify duplication in partner offerings (the latter raised as a concern by the OCO). Through this channel, partners such as PIDC and PICP have encouraged OCO to take on a more active role in managing development partner coordination issues. Additionally, these discussions are fostering a shared understanding of the OCO's role within the broader regional security framework.

Stakeholders have highlighted the opportunity for OCO to move beyond facilitating dialogues into an advocacy role for its members' interests, strengthening regional influence through the Declaration of Partnership and reducing duplication of offering by various partners.

The Annual Conference remains a central forum for information exchange between OCO, members, and regional partners. While stakeholders value the scale and inclusiveness of these meetings, the packed agenda has limited the depth of discussions on priority issues. Feedback suggests that working sessions should aim for actionable decisions rather than merely noting agenda items.

Additionally, while the OCO's detailed reports are appreciated, stakeholders have noted the need for a more strategic communication approach. High-level summaries highlighting progress and outlining future priorities would improve transparency and engagement.

Sub-regional working groups from Micronesia, Melanesia, and Polynesia play an essential role in addressing representative issues and avoiding the regional conflation of topics. While not highly active, these groups have proven effective in tailoring content and training to specific needs, such as providing non-WCO members with access to relevant WCO materials. Expanding the use of these sub-regional working groups for ad hoc topics is promising but there is a need to consider the already significant workload of customs directors.

Greater emphasis on peer-to-peer information sharing among members presents significant potential. A notable example is the ASYCUDA deployment, where members have shared standard operating procedures, such as was the case with Vanuatu sharing implementation manuals with Palau. Expanding such initiatives will further enhance mutual learning and knowledge dissemination.

> **Proposed Actions:**
> *IMP2: OCO to optimise the use of ad hoc subject matter groups to share knowledge and build the secretariats awareness of sub-regional issues.*
>
> *IMP3: OCO to strengthen collaboration on data sharing between members and partner agencies, with ABF support, particularly through the OSCA platform.*

Customs Leadership

> **Q. How well has the OCO supported governance and accountability, as consistent with the Arusha Declaration?**

The OCO has actively facilitated efforts to promote integrity in customs across member states, primarily by developing a customs code of conduct and assisting both WCO and non-WCO members in adopting the Arusha Declaration[41].

However, the OCO has limited visibility over the governance practices of member administrations and plays a minimal role in influencing their management and organisational structures. Despite this, it can support the implementation of best practices where applicable.

No Proposed Actions.

> **Q. How well have the OCO training programs and initiatives contributed to reduced administrative clearance times in member states (OCO Professional Standard Framework?)**
>
> ➤ *There is clear evidence that OCO initiatives, such as the IMPACT team under the ASYCUDA implementation, have significantly reduced clearance times and improved revenue mobilisation across participating member states.*

Recognising the importance of time release studies, the OCO is currently conducting two such studies in the Cook Islands and Palau to identify administrative barriers to clearance. These comprehensive diagnostic tools complement the existing gap analysis report by providing an in-depth view of member strengths and weaknesses. While still in progress, initial feedback highlights their value in identifying inefficiencies and assessing clearance rates. For instance:

– Palau and Tuvalu have reported a 20 percent increase in revenue collection since implementing ASYCUDA.

– Clearance times in Palau have decreased from 1–2 days to just 1–2 hours. [42]

Member feedback has also highlighted improved staff capabilities as a direct result of OCO training programs. However, a challenge remains in sustaining these improvements, as staff often move on to other opportunities after being upskilled, potentially impacting succession planning efforts.

> **Proposed Actions:**
> *IMP4: OCO to enhance external communication efforts to publish findings from time release studies and other diagnostic measures, ensuring this valuable data is widely accessible.*

> **Q. How well has the OCO promoted gender equality measures in customs?**
>
> ➤ *The OCO has a clear vision for Gender Equality in Customs, though the impact of its initial programmes under the Gender Equality Plan remains unquantified.*

Progress has been made in increasing female representation within customs training and leadership roles. For example, 24 of the 37 customs officers who recently completed a 10-month virtual course under the OPSF were women. Furthermore, there are now more female deputy heads of customs across the OCO, with four member countries—Cook Islands, Republic of Marshall Islands, Samoa, and Tuvalu—having female heads of customs. Additionally, women hold key leadership positions

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[41] Signed in 1993 and revised in 2003, 13 of OCO members were reported as signatories in the strategic plan. It covers best practice ethics in customs.
[42] https://asycuda.org/en/digitalization-of-customs-processes-in-three-pacific-island-countries-achieved/

within the OCO Secretariat, including Head of Secretariat and Operations Manager, serving as inspiring role models.

While the OCO enjoys a strong internal gender balance, the Gender Equality Plan is still in the process of being fully implemented across all member organisations. However, there is limited evidence to demonstrate the long-term outcomes of these programs—such as improved career prospects post-training, and whether the observed improvements in gender balance can be directly attributed to the plan.

> **Proposed Actions:**
> *IMP5: OCO to conduct a survey of training participants 12 months (and annually thereafter) post qualification attainment to evaluate the real-world impact of training programs.*

Trade Management and Facilitation

> **Q. How well has the OCO supported major trade modernisation measures, namely AYSCUDA and the WCO e-commerce program?**
>
> > *The OCO has played a key role in designing trade modernisation measures across the region.*

Since 2017, OCO has partnered with UNCTAD to support the deployment of ASYCUDA. This began with small-scale proof-of-concept projects, such as the initiative in Kiribati [43]. A formal partnership was established in 2019 through an MOU, starting with an assessment of automation in PACER Plus countries. Given the discontinuation of PC Trade and CusMod support by NZCS and Statistics New Zealand, OCO and UNCTAD co-designed the ASYCUDA rollout to address the unique needs of each member. OCO contributed significantly to this design phase, providing crucial inputs through UNCTAD to the EU. However, OCO was not involved in the rollout itself due to the lack of EU Pillar Assessment compliance as a delivery partner.

Stakeholders highlighted concerns about the absence of locally based ASYCUDA experts for technical fixes and future capability upgrades. Establishing a pool of such experts, separate from IMPACT project funding, could address this gap moving forward.

Concerns around potential conflations in IMPACT and core funding streams were raised. However, a review of OCO's budget and financial statements confirms these streams have remained distinct.

Questions about the technical accuracy of OCO's gap analysis of trade modernisation progress were addressed with UNCTAD's support. A near-final version of the analysis is now available.

However, going forward, the OCO could better utilise time-release studies (TRS)[44] to gain a more objective and comprehensive diagnostic on trade facilitation progress. While high effort, TRS offers immense value in diagnosing bottlenecks and measuring performance.

Reinstating the two-prior planned TRS initiatives could provide valuable insights beyond trade facilitation.

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[43] ASYCUDA conducted a Proof-of-Concept study in Kiribati to develop a specific approach for the deployment of ASYCUDAWorld in Small Island Developing States' and smaller Customs administrations - https://asycuda.org/wp-content/uploads/2020/ASYCUDA%20Compendium%202020%20-%20Kiribati.pdf

[44] Note that TRS can measure the exact time required for each stage of goods clearance; estimate time between consignment arrival and release into the economy; break down complex processes into measurable phases; identify bottlenecks across constraints affecting goods release, inefficiencies in information, document, and financial flows and specific delays in different stages of the customs process; Assist in measuring whole of customs stakeholder ecosystem performance through evaluating newly introduced policies and procedures and comparing results across different time periods.

Proposed Actions:

IMP6: OCO to maintain its strong advisory and coordination role in trade facilitation but leave the deployment of IMPACT to UNCTAD.

IMP7: OCO to work with UNCTAD to establish a pool of regional ASYCUDA experts.

IMP8: OCO to reinstate previous TRS projects to better measure and enhance overall trade facilitation impacts.

Q. How well has the OCO supported treaty implementation – namely the Revised Kyoto Convention (RKC)?

➢ *OCO has provided a valuable localisation role for treaty implementation.*

The OCO has played a pivotal role in supporting the implementation of treaties, particularly the RKC. By providing localisation support, the OCO has shown a deep understanding of its members' progress in implementing the RKC. Through detailed benchmarking, it has worked to guide further legislative harmonisation, positioning the RKC as a key measure of success. This is especially important when compared to newer trade agreements, like the WTO TFA, which often include advanced provisions unsuitable for member needs or recognition.

The OCO has also acted as a bridge for non-WCO members, such as Tuvalu, aiding their accession to significant treaties like the RKC. Its efforts have contributed to members such as Palau and the Solomon Islands joining the WCO. Additionally, members including Samoa, Timor-Leste, Tonga, and Vanuatu have benefited from OCO's distribution of WCO learning materials.

Refer to

Figure 3.3, which highlights the benchmarking exercise of the Member Customs Administration Profiles outlined in the Strategic Plan 2022–2027.

Appendix 1.b. Member Customs Administration Profile

Member	HCS	Revised Kyoto Convention	WTO Valuation Agreement	Risk Management	Automation	Arusha Declaration	Post Clearance Audit
American Samoa	X	No	No	X	X	No	No
Australia	2022	Yes	Yes	Yes	ASYCUDA World	Yes	Yes
Cook Is	2017	Yes	Yes	Yes	CusMOD	Yes	Yes
CNMI	2022	No	No	No	INA	No	No
Fiji	2022	Yes	Yes	Yes	ASYCUDA World	Yes	Yes
FSM	2017	No	No	No	PC Trade	No	No
French Polynesia	2007	Yes	Yes	No	INA	Yes	N/A
Guam	X	No	No	X		No	N
Kiribati	2017	Yes	Yes	Yes	ASYCUDA	Yes	Yes
Nauru	2017	Partial	No	No	ASYCUDA	No	No
New Caledonia	2007	Yes	Yes	No	INA	Yes	X
New Zealand	2022	Yes	Yes	Yes	ASYCUDA World	Yes	Yes
Niue	2017	No	No	No	PC Trade	No	No
Palau	2017	No	Yes	Yes	CIS	No	No
PNG	2022	Yes	Yes	Yes	ASYCUDA World	Yes	Yes
RMI	X	X	No	No	No	No	No
Samoa	2017	Yes	Yes	No	ASYCUDA World	Yes	No
Solomon Is	2017	Partial	Yes	Yes	ASYCUDA World	Yes	Yes
Timor Leste	2017	No	No	X	ASYCUDA	Yes	Yes
Tonga	2017	Partial	Yes	Yes	CMS	Yes	Yes
Tuvalu	2017	Yes	Yes	Yes	ASYCUDA World	No	Yes
Vanuatu	2022	Yes	Yes	Yes	ASYCUDA	Yes	Yes
Wallis & Futuna	X	No	Yes	No	INA	No	No

X - Not implemented ; INA - Informaton Not Avalaible

Figure 3.3   *Member Customs Administration Profiles (OCO Strategic Plan 2022-2027)*

Proposed Actions:
IMP9: OCO to continue to advocate for treaty implementation that aligns with the needs and maturity and progress of its members.

Law Enforcement and Border Security

Q. How well has the OCO supported capability joint member risk and interception exercises (i.e. Movement of Small Craft Strategy)?

> *The OCO has improved its understanding of its role in regional security and identified areas where it can provide value, such as intercepting small vessels.*

One notable example of capability enhancement in risk and intelligence management is the OPSCA. Developed by the ABF and deployed collaboratively by the OCO, OPSCA has been rolled out to its members. The following outlines the progress and challenges associated with this initiative so far.

OCO Pacific Small Craft Application (OPSCA)

The OPSCA app, developed in 2022 by the ABF in collaboration with the OCO, enhances regional maritime domain awareness among members. It provides real-time visibility of small vessels, enabling efficient information sharing between customs agencies. The app has become a vital, long-term tool for OCO members.

Goal:

The app supports the Boe Declaration[45] and the Pacific Fusion Centre[46] by fostering a comprehensive approach to security and intelligence gathering. It also encourages collaboration by breaking down traditional silos through discussions with agencies beyond customs to explore diverse use cases. For reference, **The Boe Declaration on Regional Security,** adopted in 2018 by Pacific Islands Forum leaders in Nauru, represents a significant shift in how security is conceptualized in the Pacific region. It expands the definition of security to include not only traditional aspects like military defense but also human security, environmental security, transnational crime, and cybersecurity. The **Pacific Fusion Centre** (PFC), established as a response to the Boe Declaration, aims to enhance regional security through strategic analysis and information sharing. Located in Port Vila, Vanuatu, and supported by the Australian government, the PFC plays a crucial role in addressing security priorities identified by Pacific Island Forum leaders.

Impact:

The app has been instrumental in facilitating training and knowledge-sharing through key events such as the Intel Contact Points meeting with the WCO, the Pacific Law Enforcement Conference (PRLEC)[47], and PIDC's profiling workshop.

Ongoing Challenges:

While there is strong interest in sharing data more broadly between members and regional partner agencies, complex privacy regulations remain a key obstacle that must be addressed.

Next Steps:

Further training on app usage is planned for November 2024. Periodic meetings, starting from 25 October 2023, aim to strengthen professional relationships and intelligence collaboration among the 20 recent member participants.

The OCO has also implemented a shared risk intelligence outlook tool for its members, developed by a third party. This tool connects various risk detection capabilities across member customs operations into a unified framework. It uses a traffic light system to track progress in areas such as supply chain security, documentary assessment, examination, seizure, and targeting as shown in Figure 3.4. While outsourced, the tool has the potential to serve as a valuable evidence base—provided it is actively used in internal strategy sessions, steering committee meetings, regional sub-committees, and the annual conference. This will ensure it remains a practical and dynamic resource.

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[45] https://forumsec.org/sites/default/files/2024-03/BOE-document-Action-Plan.pdf
[46] https://www.pacificfusioncentre.org/
[47] Held in Fiji and online in August 2022, the conference discussed the issue of transnational crime in the Pacific region
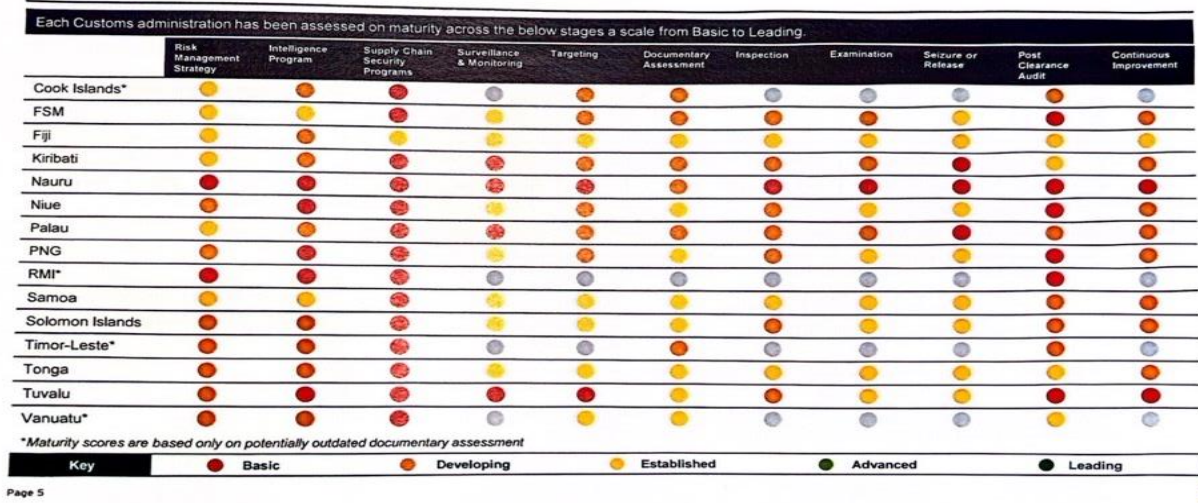
Executive Summary

Each Customs administration has been assessed on maturity across the below stages a scale from Basic to Leading.

	Risk Management Strategy	Intelligence Program	Supply Chain Security Programs	Surveillance & Monitoring	Targeting	Documentary Assessment	Inspection	Examination	Seizure or Release	Post Clearance Audit	Continuous Improvement
Cook Islands*	●	●	●	●	●	●	●	●	●	●	●
FSM	●	●	●	●	●	●	●	●	●	●	●
Fiji	●	●	●	●	●	●	●	●	●	●	●
Kiribati	●	●	●	●	●	●	●	●	●	●	●
Nauru	●	●	●	●	●	●	●	●	●	●	●
Niue	●	●	●	●	●	●	●	●	●	●	●
Palau	●	●	●	●	●	●	●	●	●	●	●
PNG	●	●	●	●	●	●	●	●	●	●	●
RMI*	●	●	●	●	●	●	●	●	●	●	●
Samoa	●	●	●	●	●	●	●	●	●	●	●
Solomon Islands	●	●	●	●	●	●	●	●	●	●	●
Timor-Leste*	●	●	●	●	●	●	●	●	●	●	●
Tonga	●	●	●	●	●	●	●	●	●	●	●
Tuvalu	●	●	●	●	●	●	●	●	●	●	●
Vanuatu*	●	●	●	●	●	●	●	●	●	●	●

*Maturity scores are based only on potentially outdated documentary assessment

Key	● Basic	● Developing	● Established	● Advanced	● Leading

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Figure 3.4   Integrated Risk and Intelligence Management – Current State Report (22nd August 2024)

Proposed Actions:

<u>IMP10:</u> *OCO to continue to refresh gap analysis and risk intelligence outlook tool for members to ensure it remains closely abreast of member needs.*

Revenue Management and Compliance

Q. How well has the OCO supported issues around undervaluation in trade (i.e. through training?)

➢ *The OCO acknowledges the prevalence of undervaluation issues among its members and has conducted several workshops supported by the ABF and the PACER Plus Implementation Unit.*

OCO's workshops have included sessions on proper Harmonised System (HS) coding using its OPSF master trainer network, in response to significant revenue under-collection faced by many members[48].[i] For reference, the Oceania Customs Organisation (OCO) Master Trainer Network is a strategic initiative aimed at enhancing the training capacity of customs administrations across the Pacific region. This network is part of the Master Trainer Programme (MTP), which focuses on developing a pool of well-qualified trainers and tailored training materials to support customs modernisation and capacity building in member countries.

While the training has been well-received, the OCO's role has largely been one of coordination rather than direct delivery. While this approach is suitable for facilitating training, greater visibility and integration of the revenue and compliance advisor into the process could enhance follow-up and continuity efforts. Additionally, there was an expressed need for refresher training by those interviewed and for more regional commodity specific guidance beyond PACHS2022.

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[48]https://www.ocosec.org/master-trainer-program-on-customs-valuation-and-hs-classification-held-for-pacific-customs-officers-2/

> **Proposed Actions:**
>
> *IMP11: OCO's Compliance and Revenue advisor (and other in-house advisors) to be more closely involved in training design and delivery.*
>
> *IMP12: OCO to offer additional HS refresher training to reduce undervaluation issues.*
>
> *IMP13: OCO to assess the value of developing sub-regional HS guidance tailored to commodity volume data beyond PACHS 2022.*

3.4 Efficiency (EFY)

KEQ4: How well resourced is the OCO Secretariat (in terms of both funding and skills/expertise) to deliver on the objectives set out in the Strategic Plan's M&E Framework.

> **Q. Is the budget sufficient to adequately resource the OCO Secretariat? What are the key gaps and shortfalls?**
>
> ➢ *The current budget covers staff salaries, the existing team structure, and operating costs.*
>
> ➢ *However, there is inefficient use of the work program budget, with significant underspends each year. These funds are not being redirected to prioritise outstanding tasks in the work plan.*
>
> ➢ *While in theory, underspends could be reallocated to fully support the work plan and meet KPIs, the current staff structure and remuneration are limiting factors.*

The OCO's budget has not significantly increased over recent strategic plans, despite rising costs, inflation, higher staff salaries, and growing expectations from members and development partners. Even so, underspends of work program budget have led to a pool of accumulated funds over recent years. OCO income and accumulated funds are presented in Table .

Table 3.7   OCO Income and Accumulated Funds (FJD)

Year	Total Income (Core and External Project Funding)	Income Without External Project Fundings	Accumulated Funds
2020-21	2,635,918	2,256,410	3,275,332
2021-22	2,518,198	1,413,500	3,143,237
2022-23	3,248,590	2,223,966	2,612,237
2023-24	3,808,865	2,186,093	2,357,686

There are staffing limitations in the Operations Section; with only two subject matter advisers and an Operations Manager, which means that achieving the workplan is at risk. Vacant positions, such as the training officer role, further strain resources and can disrupt training, especially when staff need to take leave or are out of country for training.

When managing the IMPACT project, OCO did have dedicated staff using non-core funding to manage this. While there were transparency concerns about non-core funded resources, like those assigned for IMPACT, being used for core funding activities, this was found not to be the case on investigation.

Splitting key corporate services roles, such as Information and Communication Technology ICT and external communications, and human resources and logistics, would ensure operations run smoothly during staff absences and meet growing expectations for the OCO.

The OCO Secretariat is relocating to the FRCS main headquarters. However, funds have not been allocated to fully cover relocation and 'set-up' costs.

> **Proposed Actions:**
>
> *EFY1: OCO to recruit two additional technical advisers to bolster workplan delivery, organise training, and provide follow-up support. This would better meet member needs and reduce risks posed by understaffing.*
>
> *EFY2: OCO to appoint a dedicated project officer to implement non-core funding activities efficiently and maintain transparency.*
>
> *EFY3: OCO to allocate additional resources for role specialisation to enhance overall efficiency and reliability.*
>
> *EFY4: OCO to allocate sufficient resources to ensure the new office premises are properly established.*
>
> *EFY5: OCO steering committee to establish a finance sub-committee to address underspend issues and oversee the new office establishment.*
>
> *By addressing these key areas, OCO can maximise its resources, meet stakeholder expectations, and ensure the successful execution of its workplans.*

> **Q. Noting the ratio of core funding versus project funding, what is the distribution of funding between the priority areas. Is there a view this may be more strategically allocated?**
>
> > *Currently, the distribution of funding across priority areas is set in the budget approved during the OCO Annual Conference.*

The following provides a funding overview of the income distribution between core versus project funding from 1 July 2023 to 30 June 2024 (FJD):

– **Revenue from core grants and members contributions:** $2,186,093 – Used for OCO operations and all six priority areas. (57.4%)

– **Revenue linked to specific project:** $1,622,772 – Allocated to work program projects within priority areas (42.6%)

– **Total income:** $3,808,865

Table presents the Strategic plan core and project funding allocation for ach priority area across the 2023 – 2026 period.

Table 3.8   Strategic Plan Funding Allocations for Three-Year period:

Priority Area	Core Funds (2023-24)	Project Funds (2023-24)	Core Funds (2024-25)	Project Funds (2024-25)	Core Funds (2025-26)	Project Funds (2025-26)
Customs Leadership	$258,550	$93,960	$306,550		$366,620	
Law Enforcement	$830,000	$328,500	$750,000	$110,000	$501,590	$60,000

Priority Area	Core Funds (2023-24)	Project Funds (2023-24)	Core Funds (2024-25)	Project Funds (2024-25)	Core Funds (2025-26)	Project Funds (2025-26)
Trade Management	$94,700	$192,400	$184,700		$411,400	$325,400
Revenue Management	$32,000	$187,100	$275,000		$330,000	
OCO Internal Operations	$181,000		$418,000		$61,000	
Guam Project (US Govt)		$223,127		$401,141		$118,859
EDF (EU) 11 IMPACT	$1,287,279	$1,433,196				
UNEP Project[49]				$84,830		
Total	$1,396,250	$1,025,087	$1,934,250	$1,883,250	$1,670,610	$1,937,455

Approximately 40 percent of the total budget for the three-year period is allocated to *Strategic priority area 2: Law Enforcement.* The other priority areas are allocated between 10%–19% of the total budget. Because the workplan is approved at the annual conference there is no flexibility to move funding between the priority areas to respond to changing or emerging priorities. This inflexibility makes it difficult to manage budget 'unders' and 'overs'.

Currently, there is minimal insight into work plan progress beyond numerical reporting of how much money has been spent. Short narrative reporting on the progress against workplans would help to inform steering committee meeting discussions.

Proposed Actions:

See RC 8 for recommendation around efficient funding re-allocation. This added flexibility would allow OCO to better respond to changing or emerging priorities.

Q. What growth has occurred in terms of needs and expectations of OCO members? How well has OCO responded to this change in needs?

➢ *There has been growth in the level of expectations by members and by development partners in the region.*

➢ *OCO has played an active role through the Declaration of Partnership in to respond to the expectations of its members.*

➢ *OCO has been hampered in responding to changing needs due to internal staff resourcing and non-use of the underspends.*

Both members and development partners have grown in expectations in terms of their support required and respective priorities. This has primarily occurred in trade modernisation around needs for better cross-border data collection sharing (namely ASYCUDA), intellectual property rights and ever-increasing security threats (including biosecurity).

The OCO operates as a member-based organisation and must carefully balance offering and coordinating strategic and relevant support from external resources and partners. As the OCO

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[49] United Nations Environment Programme funding

Secretariat grows in confidence and resources, it can play an influential role to rationalise offerings from other partners and thus improve its ability to prioritise initiatives that align with members' interests

The OCO has acted to adapt international customs conventions and requirements to the needs of its members. As a key example, OCO was instrumental in helping develop the PACHS2022[50] to allow a more accessible and tailored version of HS codes in the region for specific, high-volume commodities (i.e. tuna). OCO has also provided non-WCO members with training modules and facilitated in training via the WCO's-JICA[51] joint programme. There will likely be a growing request to support legislative development as members look to codify various trade conventions into law.

Biosecurity has emerged as a critical issue for customs departments across both domestic and international borders, as evidenced by SPC's working group on biosecurity. Regional engagement highlights variability in preparation levels. For instance, Tuvalu utilises a scanner[52] for biosecurity inspections under its Department of Agriculture, while the Customs Department relies on manual luggage checks. Tuvalu is a potential transit point on the Latin America-Oceania drug route, and its customs department is working closely with the Police Service and Immigration to enhance surveillance.

There is a notable disparity in the preparedness of pathways at various ports of entry. Airports are typically more advanced but handle lower volumes of goods. Conversely, seaports manage higher volumes with less developed systems, creating gaps in capacity for addressing threats such as biosecurity and flow of illegal drugs. Similarly, mail has not been a large area of focus, though some work has independently been undertaken in Palau around mail screening and electronic advance data.

> **Proposed Actions:**
>
> *EFY6: The OCO to develop more specific guidance material and realistic trade modernisation initiatives as tailored around Pacific commodities and IT infrastructure maturity. This should ensure efficient and strategic use of available resources.*
>
> *EFY7: OCO to build on its current efforts by exploring collaboration opportunities with key stakeholders such as SPC's biosecurity working group as biosecurity becomes increasingly significant.*
>
> *By addressing these areas, the OCO can continue to meet the growing needs of its members while ensuring its resources are applied strategically and effectively.*

> **Q. How does OCO Secretariat assess itself in terms of skills (e.g. human resources development plan and training needs analysis – or similar) and do they see themselves on the continuum of professional development, and what can be done to better support staff?**
>
> ➢ *The OCO Secretariat has made significant efforts to evaluate its existing skillsets and address skill gaps effectively.*

Internal Policies

Over the past two years and following feedback from the Steering Committee regarding the need for stronger internal policies, OCO at both governance and management levels, has introduced and implemented various policies in areas such as finance, administration, IT, whistleblowing, and travel.

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[50] PACHS2022 is a product-specific rule for the OCO. Here are some of the rules in the PACER Plus Schedule of Product Specific Rules Annex 3-B (2022)

[51] Japan International Cooperation Agency, as partnered with the WCO to support customs development in emerging economies https://www.wcoomd.org/en/topics/capacity-building/activities-and-programmes/cooperation-programmes/the-wco-jica-joint-project.aspx

[52] Donated by the Pacific Community (SPC) who provide support regarding international inbound biosecurity and pest management; this is an example of the importance of inter-agency coordination and information sharing.

These documents are outlined below in Table , along with explanations from the Team of their content and organisational value.

Table 3.9   OCO Internal Policies and areas for improvement

Strengths	Areas for Improvement
Charter of the Steering committee	
The Charter effectively builds on the constitution by providing more detailed guidance on roles and responsibilities across all levels of the organisation. It also clearly outlines ethics, conflicts of interest, and the code of conduct, reinforcing the commitments established in the constitution.	Discrepancies in Role Descriptions: To ensure clarity and consistency, the Charter and Constitution should be reconciled to address ambiguities regarding specific roles and responsibilities. This is particularly important for the Head of Secretariat position and the associated levels of approvals and authority.
Administrative policy	
Comprehensive Coverage: The policy encompasses a broad range of administrative matters, such as responsibilities and obligations, job classifications, salaries and allowances, employment and redeployment procedures, official working hours, leave entitlements, retirement benefits, medical insurance, travel and relocation, staff grievances, and termination protocols. **Clear Guidelines:** It offers precise and structured directions for various administrative procedures, promoting transparency and consistency in their application. **Employee Benefits:** The policy outlines a variety of employee benefits, including housing, education, and vehicle allowances, designed to enhance job satisfaction and support employee retention.	**Complexity:** The document's length and level of detail may pose a challenge for employees trying to quickly locate specific information. **Potential for Ambiguity**: Certain sections, particularly those addressing financial responsibilities and external activities, could benefit from clearer examples or scenarios to reduce any potential ambiguity.
Remuneration policy	
Detailed Salary Breakdown: The policy provides a clear breakdown of base salary, banding structures, compensation incentives, promotion criteria, and guidelines for exceptional salary determinations. **Competency and Merit Frameworks:** The policy outlines salary considerations based on competencies and skills, outlining performance measures and descriptions for each level.	Conducting salary benchmarking can provide transparency in explaining how pay bands are determined. Additionally, it is recommended to investigate aligning base salaries with those of regional CROP[53] agencies for consistency.
Financial policy	
Financial Regulations: The policy outlines comprehensive financial regulations and procedures, including guidance on budget preparation, expenditure approval, fund management, and audit protocols. **Accountability and Transparency:** It prioritises accountability and transparency in all financial transactions to uphold financial integrity. **Travel Approvals:** Specific provisions for travel approvals are included, addressing previous challenges in the secretariat's financial management practices.	The policy requires that the budget submission include a supporting narration document. This document should clearly outline the rationale for spending and provide a well-articulated narrative. Budget transfers are permitted only within the same priority area pillars and cannot be moved between different priority areas, even if needed.

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[53] Council Regional Organisations Pacific - https://forumsec.org/council-regional-organisations-pacific-crop

Strengths	Areas for Improvement
Broad Scope: The policy encompasses various financial activities, such as procurement, travel, foreign exchange, and cash management, aligning with industry best practices.	
Delegation of Authority Policy	
Clear Framework: The policy provides a well-defined structure for delegating authority, ensuring all decision-making processes are accompanied by clear accountability and responsibility. **Transparency:** It prioritises transparency and easy access to delegation information, fostering trust and clarity among employees. **Conflicts of Interest:** The policy includes measures to address conflicts of interest, ensuring the organisation upholds the highest ethical standards.	Detailed case studies could enhance the policy by providing clear examples of how delegations are applied in practice, offering greater clarity and practical insight.
Performance Management System Evaluation Policy	
Structured Evaluation: The policy provides a clear and systematic framework for performance evaluation. It outlines specific performance measures, targets, and evaluation processes, accompanied by a standardised template to assess progress and ensure consistency. **Incentives:** Provisions for performance bonuses and salary increases are included, offering employees tangible motivation to meet and exceed their targets. **Transparency:** The policy prioritises fairness and clarity throughout the evaluation process, fostering employee trust and enhancing overall satisfaction.	There is some overlap with the remuneration policy. While cross-referencing can be beneficial, it may be more appropriate for the remuneration policy to address distinct remuneration considerations separately.

While efforts to enhance current and future internal workflows, approval processes, and transparency are evident, substantial work is still required to effectively implement the policies in practice.

To support team cohesion and leadership, the Secretariat has benefitted from training provided by NZCS. The Head of Secretariat has also focused on fostering leadership and improving workplace culture. During an in-country visit and subsequent follow-up interactions, the OCO Secretariat staff demonstrated productivity and helpfulness.

Efforts to enhance performance management have resulted in the allocation of budgets specifically for staff development initiatives. For example, the Accountant has successfully completed professional accounting exams, and the M&E Officer has participated in a course at the ILO training centre.

The Secretariat is also exploring mentoring opportunities for the Head of Secretariat. The Steering Committee, held in November 2024, approved support from the ABF to provide mentoring. However, further clarity is required regarding the substance of this support, the structure of the mentoring programme, and how its effectiveness will be monitored (refer to comments in the following section on mentoring).

> **Proposed Actions:**
>
> *EFY8: OCO's Secretariat to continue assessing skill gaps and ensure staff have access to professional development opportunities, coupled with the means to apply those skills effectively in the workplace. This could be achieved with mentoring.*

Q. What are the key achievements in the capability building space, and key gaps – that informs capability building going forward?

As aforementioned, the OCO's key achievements in the capability building space have been primarily around revenue and compliance training, regional security with respect to small vessel detection and support for trade modernisation through the IMPACT project

In terms of improvement in filling capability gaps, stakeholders noted OCO's advisors could be more closely involved in the delivery of training and in delivering follow up sessions to drive ownership of training. Filling the training coordinator vacancy would help with this substantially, both through being able to organise more targeted training and to allow OCO to take more of an active leadership role in training delivery.

Additionally, stakeholders had varied views on how well the OCO was developing and deploying its own OPSF regional pool of experts. While there was consensus that there was the appropriate level of expertise within this pool, a number noted they were not widely known or that they didn't know how to access them. Increasing the visibility and availability of this pool would likely help address capability gaps, especially given the experts are situated locally. Continuing to expand the OCO professional framework and the relationship with Charles Sturt University in delivering it was also favourably suggested.

Proposed Actions:

Please refer to IMP 9.

Q. What are the barriers to sustainability of skills enhancement of capability and capacity building?

> *Barriers to sustainability of skills enhancement include staff recruitment and retention and are linked to salaries.*

The OCO must attract and retain staff across all essential roles to maintain capacity, capability and long-term institutional knowledge. Barriers to sustaining skills development include challenges in staff recruitment and retention, which are often tied to salary levels and organisational culture.

Historically, staff turnover within OCO has hindered the long-term success of capacity-building efforts. Under the current Head of Secretariat, maintaining a stable workforce will be crucial. To achieve this, staff need to feel professionally valued through professional development opportunities and respected through positive management relationships. While remuneration remains an important factor, employees often remain in roles where they feel supported and engaged.

Small organisations, such as OCO, face unique challenges. Staff are more vulnerable to burnout due to limited resources and the absence of a critical mass for sharing professional insights and experiences. Increasing the number of roles within the Secretariat could alleviate these pressures, enabling smoother workplan delivery, better leave coverage, and improved capacity for tasks like communications and M&E. Additionally, having understudies for key roles enhances workforce sustainability by ensuring operational continuity when staff leave.

The Team identified significant staff travel demands for meetings and training facilitation with suppliers or regional partners. These absences affect office culture and reduce the time available for good planning and for professional development. It is recommended that travel be streamlined and aligned strictly with business needs, rather than being treated as a performance indicator in itself.

The location of training also influences the long-term enhancement of skills for both the OCO Secretariat and for its members. Centralised training at regional hubs and in-country training for

specific needs both offer benefits and limitations. Evidence indicates that training conducted close to the point of implementation supports better skill retention and practical application. However, high staff turnover and internal promotions within member organisations can dilute the long-term impact of such training – though not reducing its inherent value per se. On-site, coalface training allows multiple staff members to benefit, reinforcing the sustainability of skill development.

Feedback also suggests that both OCO Secretariat staff and regional steering committee representatives may sometimes favour a 'home-country' perspective, addressing issues primarily through the lens of their own jurisdictions. This highlights the need for stronger governance and management to ensure that OCO maintains its focus as a 'regional agency,' fostering a broader and inclusive perspective.

Proposed Actions:

EFY10: OCO to rationalise travel to ensure it is well-targeted and tailored to address specific member needs.

EFY11: OCO to explore further opportunities for in-country or regionally based training to minimise travel time.

Q. To what extent does the OCO Secretariat and its members 'own' the Strategic Plan, and use the M&E Framework to make decisions on future costed workplans?

  ➢ *The level of ownership of the Strategic Plan by the OCO Secretariat and its members is moderate.*

The current Strategic Plan was developed externally during the COVID-19 pandemic, which limited opportunities for collaborative input due to travel restrictions. Additionally, due to staff turnover within the OCO, the Team could not determine the extent of input from senior personnel involved back in 2021/22. There has also been turnover within the steering committee. There is no evidence to suggest a robust co-design approach was used.

This limited sense of ownership is reflected in comments from stakeholders regarding a lack of clear prioritisation within the plan and concerns that it may be overly broad. While member feedback was inconsistent, there is consensus that a future Strategic Plan would benefit from a co-design approach. This could include priority mapping by members and mechanisms for revising the plan on a justified, needs basis.

The current Strategic Plan is set to conclude in mid-2027, meaning preparations for a new plan should commence by the end of 2025, with implementation during 2026, so that the new strategic plan is ready in a timely manner. Future costed workplans and the corresponding budget (from 1 July 2025) will provide useful evidence regarding the ongoing application of the Strategic Plan principles.

The M&E Framework remains in its early stages, currently in its second year, and is a relatively new concept for the organisation. It was not referenced or reported on in the Annual Report for the period ending 30 June 2024. While the framework includes baseline metrics starting in 2022 and end-of-plan targets for 2027, annual targets should have been included to strengthen the ability to track progress and measure success.

Performance against KPIs should be consistently reported on in Annual Reports, with these insights informing resource allocation and the prioritisation in future workplans. This process would enhance the organisation's ability to align decisions with evidence-based data from the M&E Framework.

Proposed Actions:

EFY12: OCO to begin planning a co-design process for the next Strategic Plan well in advance of the current plan's conclusion in mid-2027. This will ensure member input and alignment with priority areas.

EFY13: OCO to demonstrate the integration of M&E information into decision-making processes, particularly for the development of costed workplans and budgets.

By addressing these areas, OCO can enhance ownership of the Strategic Plan and maximise the utility of the M&E Framework to drive informed decisions and promote organisational success.

Q. What modalities has OCO used to deliver on the work plan? Are they well-targeted at members requests and emerging needs?

> *The OCO employs a hybrid model to deliver on its workplan. This approach includes internal implementation, outsourcing specific tasks to suppliers, and collaborating with development partners and regional bodies.*

> *For the most part, the workplan is well-aligned with member requests and emerging needs. However, the primary issue lies in the workplan's incomplete implementation despite funding availability.*

The OCO delivers some workplan activities directly, such as train the trainer (ToT[54]) for law enforcement. It also outsources to external subject-matter experts or suppliers for specific initiatives. For example, HS1 initial training under Priority Area 4 was effectively delivered through outsourcing. Another example was the outsourced assessment of shared border integrated risk and intelligence management. This task required datasets unavailable in-house and even included biosecurity considerations, providing the OCO with a broader perspective beyond its core mandate.

OCO also collaborates with regional partners to conduct joint exercises (for example, small vessel/craft operations and drug identification) and provide contextual training. This approach enhances cost-effectiveness while broadening the scope of support for members. However, there is room for OCO to play a stronger coordination role here to ensure that interventions are practical and aligned with members' realities. For instance, training on intellectual property rights (IPR) offered by the United States (US) was considered too advanced for many members, as they lack the necessary legislative framework.

OCO has demonstrated a clear understanding of and responsiveness to members' needs, both current and emerging. For example, their focus on maritime domain awareness (MDA) training has been well-received. Discussions with members and regional agencies highlight that OCO need not deliver everything in-house. What matters most to members is receiving the support they require—whether delivered by OCO or other partners. As such, OCO should outsource specialist tasks to help it address these needs while it continues to build in-house capability to do so.

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[54] ToT is a programme that teaches people how to teach others. It's a structured framework that helps people develop the skills needed to deliver effective training sessions.

> **Proposed Actions:**
>
> *EFY14: OCO to continue leveraging the hybrid model by implementing select aspects of the workplan internally, outsourcing specialised tasks to external experts, and collaborating with regional partners.*
>
> *EFY15: OCO to take a stronger leadership and coordination role to ensure that interventions are well-targeted, aligned with members' priorities, and strategically adapted to limited resources, using its existing gap analysis.*
>
> *By maintaining this adaptive and strategic approach, OCO can continue to fulfil its role as a responsive and effective partner for its members.*

3.5   Sustainability

KEQ5: What are the key learnings that would increase the effectiveness and impact of the work of the OCO on national and regional security and the governance of the Strategic Plan>

> **Q. What learnings have been identified which could help OCO better contribute to regional security management?**
>
> ➢ *The OCO could better build autonomous risk detection capability and further support data sharing within members.*

While members value the OCO's support, they would like additional support to be able to recognise risks independently and be able to contribute to the OCO's regional intelligence partnership network, rather than solely rely on updates or a centralised coordination mechanism. Tailored training has already been well-received success, such as providing support for small craft vessel identification. This balances the needs of areas with high volumes of small craft traffic while accommodating those with fewer such vessels.

Another area of interest is improving advanced risk data capabilities and data sharing, particularly around passenger and vessel pathways. Presently, vessel-related risk detection capabilities are more developed compared to passenger data systems. Members and OCO alike agree that greater focus could be placed on enhancing advanced passenger information systems to close this gap.

The MDA work continues to evolve rapidly, with emerging threats such as transnational crimes, including drug smuggling and IUU fishing. OCO must stay vigilant and agile to address these complex challenges as they arise.

> **Proposed Actions:**
>
> *SUS1: OCO to help facilitate reciprocal data-sharing requests between customs agencies. This would include support from the ABF to address privacy concerns around such exchanges.*

> **Note:** This evaluation excludes explicit geopolitical interference as a regional security consideration and focusses on maritime security from a criminal perspective. By focusing on these above issues, OCO can further strengthen its role in fostering regional security and empowering member nations to collaboratively address maritime risks.

> **Q. What are the learnings that have an impact on the current management and governance of this activity?**

Key Learning 1: *There is a lack of clarity and consistency in management and governance functions.*

The roles and responsibilities assigned to the Head of the OCO Secretariat lack clarity and consistency across key governance documents. Both the charter and the constitution outline these roles, but the Head of Secretariat is not given sufficient authority, at least on paper, to actively shape the organisation's strategic direction between annual conferences.

This misalignment is evident in the constitution, which frames the Head of Secretariat's role as primarily administrative. This contrasts with the wider, advisory functions of the Secretariat, which include influencing the organisation's strategic path in alignment with conference and steering committee decisions. The current structure creates a tension that limits the Head of Secretariat's capacity to fully utilise the position's potential as a strategic leader.

Further complicating the issue, the steering committee chair—who usually engages on a monthly basis — does not have the same level of visibility or time commitment as the Head of Secretariat. This difference in availability can hinder the organisation's ability to execute its long-term strategy effectively. Notably, the OCO charter defines a more strategic role for the Head of Secretariat, such as "*developing and recommending the long-term strategy and vision of the OCO*." However, the constitution reduces the role to "*coordinating all logistical and administrative arrangements."*

Regional representatives on the OCO Steering Committee manage a variety of important responsibilities. They act as key members of the OCO Steering Committee, providing governance and leadership to the organisation. Simultaneously, they serve as advocates for their respective island regions and hold senior management roles as Directors of their Customs agencies. These overlapping roles demand significant time and effort, requiring members to juggle governance, management, and advocacy effectively.

Given the extensive responsibilities already placed on these members, it would be unrealistic to add further demands on their time. Instead, providing governance training could be a constructive step. Such training would help committee members better understand their role as OCO governors, ensuring clarity and efficiency in their contributions.

The Steering Committee also plays a critical role in setting policies, making strategic and impactful decisions, and overseeing the organisation's operations. It is vital that the committee allows the Head of Secretariat to take charge of management decisions related to the work of the Secretariat. Striking this balance between governance and management is essential for the organisation's smooth functioning.

Additionally, there is an opportunity for regional leaders like Fiji, which operates advanced customs systems, to guide smaller member states in enhancing their capabilities. This could involve providing templates or models for operational implementation or supporting legislative development—an area where many OCO members are still building capacity.

> **Proposed Actions:**
>
> *SUS2: OCO to tap into Fiji Customs capabilities to help develop local training guidance and governance support.*
>
> *SUS3: The OCO to review, update, and align both the constitution and charter.*
>
> *Consideration should be given to empowering the Head of Secretariat with a clearer mandate to drive the organisation's strategic direction, while maintaining alignment with steering committee and conference decisions.*
>
> *SUS4: OCO to define and clearly separate functions related to governance and management within OCO, supported by appropriate delegation of responsibilities.*

Key Learning 2: *The OCO has not fully accounted for the effort to move to FCRC's offices*

The OCO acknowledges the need for the FRCS to repurpose the current office space near the port in Suva for other business operations. They appreciate FRCS offering alternative office space within their main headquarters. While this co-location presents both opportunities and challenges, it will be essential to ensure that the OCO's day-to-day operations remain independent and free from any unnecessary interference.

Relocating will naturally involve additional costs, so it is important to establish clear, written agreements upfront. Key considerations include provisions for fit-outs, utilities, parking, and office security to ensure a smooth transition and sustained functionality in the new space.

> **Proposed Actions:**
>
> *SUS 5: OCO to ensure that the move is adequately resourced and work closely with Fiji Customs on this.*

Key Learning 3: *Separately funded projects are hard to sustain, especially given core funded secretariat staff are already resource constrained.*

Managing and resourcing projects effectively can be complicated, especially due to overlapping coordination efforts and unclear implementation strategies. One prominent example is the IMPACT project (EU-funded), which was a joint initiative between the OCO and UNCTAD. A key challenge arose from differing opinions on who held ultimate responsibility for shaping the outputs, including their format and content, within their shared resource pool. While the OCO had a project management framework in place for its IMPACT team, UNCTAD also provided its own directives. This led to conflicting approaches and, ultimately, extended timelines. At the heart of the issue was a divergence in interpreting policy inputs. UNCTAD followed the latest EU trade instruments, while OCO adapted these same instruments through a regional lens, tailored to the readiness of member countries.

Striking the right balance is crucial. On one hand, there is a need to align with emerging global standards and encourage compliance with best practices. On the other, projects must avoid overwhelming PICTs with new trade and customs obligations before they have had the opportunity to fully adopt prior agreements, such as the RKC.

> **Proposed Actions:**
>
> *SUS6: The OCO should streamline and optimise its work plan to reduce duplication and enhance collaboration with partners like UNCTAD.*

Key Learning 4: *There is no evidence of the value of GFA funds being tagged to priority areas. Targeting GFA funding to 1-2 priority areas is unlikely to deliver cross-cutting change and the partially discretionary nature of NZ's funding is appropriate for the purposes of retaining flexibility.*

The Team was unable to identify any value in MFAT's decision to tag GFA funds to priority areas. This tagging is neither guiding resource allocation decisions nor contributing to reporting on progress, results, or impact.

Key Learning 5: *Annual conferences have an overcrowded agenda, with many members reflecting the focus could have been more action oriented and focused.*

The Team heard evidence of the annual conference agenda being 'overcrowded', with many stakeholders sharing suggestions for how it could be more effective. These include circulating documents ahead of time, setting clear action points for agenda items, incorporating workshops or side meetings for observers, and scheduling presentations on key topics of interest. Balancing the needs of members, development partners, and regional agencies in a single event is complex and requires specialised expertise.

Striking the right balance between informal and formal channels is essential. Informal channels are frequently used by the OCO, its members, and partners outside of formal sessions to share findings and observations. These informal discussions serve as valuable safe spaces for preparatory conversations ahead of more structured, agenda-driven meetings. However, it's important to maintain a balance, ensuring that formal channels—where decisions can be officially ratified and actionable steps outlined—are also prioritised.

This need is particularly significant given recent member feedback highlighting a lack of action-oriented discussions at the annual conference. This event should play a key role in finalising and endorsing the OCO's forward work program.

> **Proposed Actions:**
>
> *SUS7: OCO to develop a more focused and achievable agenda, ensuring clear action points rather than just "noted" items.*
>
> *SUS8: OCO to consider including targeted side meetings and workshops catering to observers at the annual conferences.*
>
> *SUS9: OCO to consider hiring a professional event planner to streamline the conference and provide value for all attendees.*

Key Learning 6: *There is need for well-targeted and timely support for the Secretariat.*

It is important to ensure that well-targeted and timely support is provided to the Secretariat, especially when it comes to mentoring. The Team emphasised the importance of offering mentoring to the Head of Secretariat (HoS) to address the demands of the role and help the individual appointed in 2023 succeed.

For mentoring to be effective, it must have a clear structure and purpose. A mentor should deliver guidance and share experiences in a way that is easy to understand and directly addresses areas of improvement. Good mentoring is not just about providing advice—it requires the ability to answer questions, give constructive feedback, and empower the mentee to develop their own solutions.

While discussions highlighted the need to support the new HoS through mentoring, the process will only be effective if approached as a constructive partnership with measurable progress.

Proposed Actions:

SUS10: OCO Steering Committee to clearly define the purpose of mentoring for the Head of Secretariat and monitor its impact to ensure its effectiveness.

4.   Conclusion

On balance, the OCO has significantly matured on a relative basis over the last three years as compared to an organisation that was facing serious lack of transparency about both its governance and delivery management efficiencies, particularly on claims of not best serving member interests. While there is still substantial effort to streamline the work program and to implement its new suite of accountability policies, there is demonstrated commitment to reform operationalisation. On this front, key efforts as attested to in this report have included more targeted gap analysis, regional customs expertise development, a growing presence in regional security and continued willingness to coordinate with regional partners to triage the demands on its members.

The key findings and recommendations across the DAC criteria are presented below:

Overall Key Findings

– The OCO is operationally sound but could improve clarity in its delivery modalities and work programme prioritisation processes

– The OCO has overcome major challenges in its internal management has moved past legacy integrity management issues, though there is still work to be done to improve its overall governance

– The OCO has demonstrated a strong understanding of member needs but could improve by challenging donor initiatives that are not fit-for-purpose

– The OCO is growing into its regional security role, offering significant opportunities to contribute through the regional declaration of partnership.

Overarching Recommendations

The overarching recommendations were developed on the basis of the feedback in the sensemaking workshop and where the highest impact was identified across the DAC criteria

OCO to:

1. Clarify the criteria for selecting delivery modalities against member priorities and apply consistently. This includes 'pushing back' and reframing development partner opportunities that do not meet member needs and providing stronger advocacy for members.

2. Review, consolidate and prioritise the work programme, based on agreed criteria, distribution of funding, small member needs, and where OCO versus partner organisations are best placed to lead.

3. Enhance strategic communications and reporting to build better a coherent narrative around its work programme and ability to demonstrate impact.

4. Continue to operationalise new policies and processes, namely, to rationalise travel and cement good management practices day-to-day.

5. Make improvements at a governance level and allow the Secretariat to effectively manage and be held accountable for implementation of the Strategic Plan's work programme.

6. Adopt a more flexible approval process to re-allocate funds between priority areas to respond to emerging needs in a timely manner.

7. Engage early in developing new strategic plans, that are co-designed with members and include a M&E Framework from the outset.

8. Provide sufficient resourcing incentives to support staff recruitment and retention, professional development and working conditions based on agreed staffing levels (including office).

9. Grow and support member interests in regional security as per the Declaration of Partnership, notably small craft vessels and drug identification.

10. Localise training and programmes where possible to best support member needs based on actual issues/member maturity and ensure sustainable, tailored and relevant implementation.

11. OCO to continue to expand both formal and informal information sharing mechanisms between members and partners.

MFAT to:

1. Continue funding the OCO to enable it to implement its strategic plan and mandate.

2. Consider providing the core funding via NZCS, rather than via a GFA directly with the OCO.

3. Engage and share information directly with the OCO as part of supporting increased regional security engagement.

NZCS to:

1. Strengthen its governance role as implementing partner for the MOU with MFAT in conjunction with the other tier 1 members – the ABF and the Fiji Revenue and Customs Service (FRCS).

Appendices

Appendix A

Relevant source documents

The key relevant document provided to the Team include:

– The OCO Strategic Plan 2017 – 2022
– The OCO Strategic Plan 2022 – 2027
– OCO M&E Framework, 14 March 2023
– Grant Funding Arrangement, 2017-2020
– Grant Funding Arrangement, 2021-2024
– Monitoring and Evaluation and progress reports
– MFAT AMAs and ACAs
– MFAT PACREG 4-year plan (A3 summary)
– MFAT Partner Risk Assessment for Oceania Customs Organisation (OCO), 2014, 2016, 2017, 2020
– OCO annual work programmes
– OCO financial and budget reports
– OCO Annual Reports, including audit reports
– MFAT's Operational Evaluation Policy
– Boe Declaration on Regional Security
– Pacific Regional Trade Facilitation Strategy, 2024 (PIFS)
– OCO Constitution
– Charter of OCO Steering Committee, June 2018
– OCO Regional Overview of GAP Analysis Framework, IMPACT Team, 23 September 2024
– OCO integrated risk and intelligence management adviser, Current State Assessment, dated 22 August 2024
– OCO Secretariat policies and manuals
  • Delegation of Authority Policy (effective date 31 July 2024)
  • Administration Policy (revised October 2022)
  • Remuneration policy
  • Management systems evaluation policy
  • Financial policy and financial regulations manual, 2022
  • Whistle Blower Policy (effective date 31 July 2024)
  • Policy Framework (effective date 31 July 2024)
  • Draft ICT policies (awaiting conference endorsement)
  • Draft Travel Policy (awaiting conference endorsement)
– Gender guidance notes, community of practice and action plan (documents prepared by Capital Human:
  • How to effectively engage women traders and women's groups in trade dialogue
  • Mainstreaming gender in National Trade Facilitation Committees (NTTC)
  • Launch of gender equality and social inclusion in customs and trade
  • Gender equality and social inclusion action plan for OCO

Appendix B

Oceania Customs Organisation: Evaluation Matrix with Key Evaluation Questions (KEQ)

Table B.1   *KEQs*

Evaluation Objectives	Key Evaluation questions	Sub-questions	Assessment Criteria (DAC)	Data (Qualitative and Quantitative)
Objective 1: To examine **alignment** between the outcomes outlined in the MFAT/OCO Grant Funding Arrangement (GFA) 2021-2024; and in the OCO Strategic Plans 2017-2022, and 2022-2027.	KEQ1: To what extent has MFAT support for OCO (through GFAs) been strategically aligned?	1.1 How well is the GFA (past and current) aligned to the OCO strategic plans? 1.2 To what extent is the current Strategic Plan M&E Framework fit-for-purpose? Are there more effective ways to measure the overall 'improvements' in Pacific customs? 1.3 To what extent are the Strategic Plan's output interventions appropriate given sectoral developments (as stated in the SP) and is the OCO (Secretariat) able to be responsive to emerging challenges? 1.4 To what extent does the MFAT GFA funding continue to be relevant to the OCO, the wider New Zealand Aid Programme (IDC) and member countries/ regional development priorities? 1.5 To what extent has MFAT's funding under the current Strategic Plan (2022-27) successfully built on previous support under the 2017-22 Strategic Plan and incorporated member feedback from that period?	Alignment[55] (also covers Coherence - how does the intervention fit?) Relevance (is the intervention doing the right things?)	MFAT documents, especially the GFAs OCO strategic plans and M&E Framework
Objective 2: to assess the **effectiveness and impact** of the OCO's support to Members in line with these outcomes, including in support of regional cooperation and information sharing.	KEQ2: To what extent has the OCO been effective at providing support to Members based on the (6) objectives set out in the Strategic Plan, with particular consideration of the supporting regional cooperation and information sharing? KEQ3: To what extent has the support had tailored impact across the region as per the annual OCO workplans?	2.1 To what extent are the Strategic Plan's M&E Framework output/outcome indicators and targets being achieved? 2.2 What is working/ not working well in terms of providing support as per delivering on the (6) objectives set out in Strategic Plan? And why? Are there any unintended consequences (positive or negative)? 2.3 To what extent has New Zealand's role effectively contributed to effective management of the OCO secretariat? 2.4 How well has OCO been able to respond to changes (listed in the Strategic Plan) – this speaks to adaptability and good management. 2.5 Do members feel supported by OCO Secretariat to improve regional security 2.6 What external factors may impact OCO's ability to meet outcomes and targets as set out in the Strategic Plan's M&E Framework? Regional Cooperation and Information Sharing: 3.1: What are examples some successful joint customs initiatives that have been advanced under the work program? Would an expansion of these joint approaches be well-received? 3.2: What mechanisms and forums exist for sharing information and customs best practice between members. How could this be enhanced? Customs Leadership: 3.3 How well has the OCO supported treaty implementation – namely the Revised Kyoto Convention and the WTO Valuation Agreement? 3.4 How well has the OCO supported governance and accountability, as consistent with the Arusha Declaration? 3.5 How well has the OCO training programs contributed to reduced administrative clearance times in member states (OCO Professional Standard Framework?)? Trade Management and Facilitation: 3.6 How well has the OCO supported major trade modernisation measures, namely AYSCUDA and the WCO e-commerce program? Law Enforcement and Border Security: 3.7 How well has the OCO supported capability joint member risk and interception exercises (i.e. Movement of Small Craft Strategy?)? Revenue Management and Compliance:	Effectiveness (is the intervention achieving the objectives?) Impact (what difference does the intervention make?)	Stakeholder interviews (esp MFAT personnel, OCO and other stakeholders) Documents, e.g. progress reports

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[55] Alignment is another aid effectiveness principle articulated under the Paris Declaration

Evaluation Objectives	Key Evaluation questions	Sub-questions	Assessment Criteria (DAC)	Data (Qualitative and Quantitative)
		3.8 How well has the OCO supported issues around undervaluation in trade (i.e. through training?		
Objective 3: To assess the extent to which the OCO Secretariat is resourced and has the necessary skills and expertise to deliver on the outcomes in their 2022 – 2027 Strategic Plan and associated Monitoring and Evaluation Framework 2022-2025.	KEQ4: How well resourced is the OCO Secretariat (in terms of both funding and skills/expertise) to deliver on the objectives set out in the Strategic Plan's M&E Framework.	4.1 Is the budget sufficient to adequately resource the OCO Secretariat? What are the key gaps and shortfalls? 4.2 Noting the ratio of core funding versus project funding, what is the distribution of funding between the priority areas. Is there view this may be more strategically allocated? 4.3 What growth has occurred in terms of needs and expectations of OCO members? How well has OCO responded to this change in needs? 4.4 How does OCO Secretariat assess itself in terms of skills (e.g. human resources development plan and training needs analysis – or similar) and do they see themselves on the continuum of professional development, and what can be done to better support staff? 4.5 What are the key achievements in the capability building space, and key gaps – that informs capability building going forward? 4.6 What are the barriers to sustainability of skills enhancement of capability and capacity building? 4.7 To what extent does the OCO Secretariat and its members 'own' the Strategic Plan, and use the M&E Framework to make decisions on future costed workplans? 4.8 What modalities has OCO used to deliver on the work plan? Are they well-targeted at members requests and emerging needs?	Efficiency (how well are the resources being used?)	Stakeholder interviews (esp OCO Secretariat and member countries Documents, e.g. annual report and progress reports
Objective 4: Lessons learned for improvement – to identify the key learnings to increase the effectiveness and impact on national and regional security and governance of the activity	KEQ5: What are the key learnings that would increase the effectiveness and impact of the work of the OCO on national and regional security and the governance of the Strategic Plan.	5.1 What learnings have been identified which could help OCO better contribute to regional security management? 5.2 What are the learnings have an impact on the current management and governance of this activity? 5.3 How can MFAT support the implementation of these learnings?	Sustainability (will benefits last?)	Stakeholder interviews (esp. OCO and member countries

Appendix C
Organisations consulted

Table C.1   Organisations consulted

Organisation	Comments
Australia – ABF and DFAT	Interviewed in Canberra / Suva
FFA	Interviewed in Honiara
Fiji Revenue and Customs Service	Interviewed in Suva
Guam Customs and Quarantine Agency	In capacity as OCO chair, interviewed virtually from Wellington
EU	Tbc
New Zealand – NZCS and MFAT	Interviewed in Wellington, Solomon Islands and Tuvalu
Oceania Customs Organisation	Interviewed in Suva
Palau	Interviewed in Kokor
PFTAC	Interviewed in Suva
PICP	Interviewed in Wellington
PIDC	Interviewed in Samoa virtually
PIFS	Interviewed in Suva
PITAA	Interviewed virtually while in Suva, person in Samoa
Solomon Islands Customs and Excise Division	Interviewed in Honiara
Tuvalu Fisheries Department	Interviewed in Funafuti
Tuvalu Customs Service	Interviewed in Funafuti
UNCTAD	Virtual call to Kuala Lumpur and in person in Suva
US Embassy	Interviewed in Suva

Appendix D

OCO Members

Table D.1   OCO members

Member	Agency name and website	Comments
American Samoa	Department of Treasury, Customs & Excise Tax Division https://www.ocosec.org/about/member-directory/american-samoa/	
Australia	Australian Border Force https://www.abf.gov.au/	Interviewed in Canberra / Suva
Cook Islands	Ministry of Finance and economic Management https://www.mfem.gov.ck/customs	
Federated States of Micronesia	Department of Finance and Administration https://www.ocosec.org/about/member-directory/federated-states-of-micronesia-2/	
Fiji	Revenue and Customs Service https://frcs.org.fj/	Interviewed in Suva
French Polynesia	Customs https://www.noonsite.com/place/french-polynesia/view/customs/	
Guam	Customs and Quarantine Agency https://cqa.guam.gov/	Interviewed virtually
Kiribati	Customs Service (Ministry of Finance and Economic Development)	
Marshalls Islands	Customs https://www.visahq.com/marshall-islands/customs/	
New Zealand	Customs Service https://www.customs.govt.nz/	Interviewed in Wellington
Nauru	Customs Service (Ministry of Finance) https://naurufinance.info/nauru-customs-service/	
New Caledonia	Customs Department	
Niue	Ministry of Finance https://mof.gov.nu/customs/	
Northern Marianas	Division of Customs Services https://www.finance.gov.mp/customs-services.php	
Palau	Bureau of Customs and Border Protection https://www.palaugov.pw/executive-branch/ministries/finance/bureau-of-customs-and-border-protection/	Interviewed in Kokor
Papua New Guinea	https://www.customs.gov.pg/	
Samoa	Ministry of Customs and Revenue https://www.revenue.gov.ws/	
Solomon Islands	Customs and Excise Division of Ministry of Finance https://www.customs.gov.sb/index.jsf	Interviewed in Honiara
Timor-Leste	Customs Authority ttps://customs.gov.tl/doing-business/asycuda-world/	
Tonga	Ministry of Revenue and Customs https://www.revenue.gov.to/	
Tuvalu	Tuvalu Revenue and Customs Department, Ministry of Finance https://finance.gov.tv/customs/	Interviewed in Funafuti
Vanuatu	Customs & Island Revenue https://customsinlandrevenue.gov.vu/	

Member	Agency name and website	Comments
Wallis and Futuna	Customs Service https://www.ocosec.org/about/member-directory/wallis-futuna/	

Appendix E
Information sheet and Consent form

Information sheet and consent form

Evaluation of the Oceania Customs Organisation

The Oceania Customs Organisation (OCO) was established in 1998 and is the only Pacific owned regional agency focused on customs, with the core business of coordinating and facilitating regional cooperation, information sharing and capacity development for customs officials and administrations.

The OCO comprises 22 Pacific customs jurisdictions, and Timor-Leste. The members are American Samoa, Australia, Cook Islands, Federated States of Micronesia, Fiji, French Polynesia, Guam, Kiribati, Marshall Islands, Nauru, New Caledonia, New Zealand, Niue, Northern Mariana Islands, Palau, Papua New Guinea, Samoa, Solomon Islands, Timor-Leste, Tonga, Tuvalu, Vanuatu and Wallis and Futuna.

New Zealand and Australia have provided core funding to the OCO since inception, as well as providing guidance and oversight as permanent members of the OCO Steering Committee. Core funding accounts for around two thirds of the OCO's income, with the final third being a combination of member subscriptions and other donor contributions.

The goal of New Zealand's support is to assist Pacific customs administrations to align with international customs standards and best practice leading to greater economic prosperity and increased border security within the Pacific.

The overall purpose of this evaluation is to assess that the organisational operation, programme direction and resourcing of the OCO is such that it is well placed to support members to address the **complex regional security environment and challenges facing Pacific customs authorities.**

WHY is the initiative being evaluated?

The evaluation objectives are:

- **Objective 1:** to examine alignment between the outcomes outlined in the New Zealand MFAT/OCO Grant Funding Arrangement 2021-2024; and in the OCO Strategic Plans 2017-2022, and 2022-2027.

- **Objective 2:** to assess the effectiveness and impact of the OCO's support to Members in line with these outcomes, including in support of regional cooperation and information sharing;

- **Objective 3:** to assess the extent to which the OCO Secretariat is resourced and has the necessary skills and expertise to deliver on the outcomes in their 2022 – 2027 Strategic Plan and associated Monitoring and Evaluation Framework 2022-2025;

- **Objective 4:** *Lessons learned for improvement* – to identify the key learnings to increase the effectiveness and impact on national and regional security and governance of the activity.

The findings of the evaluation will be reported to MFAT for its own use and decision-making and shared with OCO and New Zealand Customs to take into consideration and provide feedback as the program's implementing partners. The documents will also be shared with other key stakeholders.

WHAT will the evaluation entail?

A review of relevant documents, data, key stakeholder interviews and focus groups.

HOW can you contribute to the evaluation?

You and other key stakeholders will be invited to either meet our interviewers in person or via Zoom. The interviewers will use an interview guide and focus on questions relevant to your role and connection with the work undertaken by the OCO.

Do you have to take part?

Participation in the evaluation is voluntary.

You can agree to take part but don't have to; if you agree you still have the option to stop taking part at any time. However, your views and experiences are highly valuable to inform the evaluation and we value your input.

While your name and role will remain confidential to the evaluators, and you won't be identified in the evaluation report, what you say may be used to inform the evaluation findings. Your information will be used for this evaluation only and by the Evaluation Team.

WHO is conducting the evaluation?

The evaluation is being conducted by GHD consulting firm. If you have any questions about the evaluation, please contact either:

Sam Taylor, GHD, Project Manager and Customs Technical Lead, email: **Sam.Taylor@ghd.com**, phone mobile +61 431 745789

Kirsty Burnett, email: **kirsty@futurepartners.co.nz** or phone mobile +64 210672680

Consent

- I have read the information above, and all my questions have been answered.

- My interview responses can be used as part of the Evaluation of the Oceania Customs Organisation report.

- I understand that I will not be identified in the evaluation report.

- I agree to take part in an audio recorded interview.   Yes ☐ No ☐

- I agree to take part in an unrecorded interview.   Yes ☐ No ☐

Name (print): _____

Signature: _____

Date: _____

Appendix F

Letter of introduction

24/10/2024

To whom it may concern

195 Lambton Quay
Private Bag 18-901
Wellington 5045
New Zealand

T +64 4 439 8000

INTRODUCTORY LETTER FOR THE PROGRAMMATIC EVALUATION OF THE OCEANIA CUSTOMS ORGANISATION

We request and value your support and engagement with the GHD Evaluation team on an independent Programmatic Evaluation of Oceania Customs Organisation (OCO).

The New Zealand government, through the Ministry of Foreign Affairs and Trade (MFAT), is currently providing funding to the OCO under a grant funding arrangement for the period of 2021-2024. Previous funding has also been provided. MFAT has commissioned GHD to undertake a Programmatic Evaluation of the OCO to inform decision-making on future support by New Zealand. We encourage you to share honest and constructive feedback to make the most of this opportunity. The Evaluation team will provide the Key Evaluation Questions in advance and set up calls at mutually convenient times.

The Oceania Customs Organisation (OCO) was established in 1998 and is the only Pacific owned regional agency focused on customs, with the core business of coordinating and facilitating regional cooperation, information sharing and capacity development for customs officials and administrations. The OCO comprises 22 Pacific customs jurisdictions, and Timor-Leste. The Members are American Samoa, Australia, Cook Islands, Federated States of Micronesia, Fiji, French Polynesia, Guam, Kiribati, Marshall Islands, Nauru, New Caledonia, New Zealand, Niue, Northern Mariana Islands, Palau, Papua New Guinea, Samoa, Solomon Islands, Timor-Leste, Tonga, Tuvalu, Vanuatu and Wallis and Futuna.

New Zealand and Australia have provided core funding to the OCO since inception, as well as guidance and oversight as permanent members of the OCO Steering Committee. Core funding accounts for around two thirds of the OCO's income, with the final third being a combination of member subscriptions and other donor contributions.

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