



3rd Follow-Up Report

Mutual Evaluation of Samoa

September 2018



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APG members and observers are committed to the effective implementation and enforcement of internationally accepted standards against money laundering and the financing of terrorism, in particular the Forty Recommendations of the Financial Action Task Force on Money Laundering (FATF).

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SAMOA: 3rd ENHANCED (EXPEDITED) FOLLOW-UP REPORT 2018

I. INTRODUCTION

1. The mutual evaluation report (MER) of Samoa was adopted in July 2015. This FUR analyses the progress of Samoa in addressing the technical compliance deficiencies identified in its MER. Re-ratings are given where sufficient progress has been made. This report does not analyse any progress Samoa has made to improve its effectiveness. Progress on improving effectiveness will be analysed as part of the 5th year follow-up assessment and, if found to be sufficient, may result in re-ratings of Immediate Outcomes at that time.

2. The 2018 assessment of Samoa's request for technical compliance re-ratings and the preparation of this report was undertaken by the following experts:

- *Ms Fiona Leonard, Parliamentary Counsel Office, New Zealand*
- *Ms Caroline Pickering, Financial Intelligence Unit, Fiji*
- *Mr Ismael Aguon, Narcotics Enforcement Agency, Palau*
- *Ms Melissa Sevil, APG Secretariat*

3. The draft FUR was distributed to the global network for review on 20 June 2018 prior to its consideration by the APG Mutual Evaluation Committee on 21 July 2018 and adoption by the APG Plenary on 26 July 2018.

4. Section III of this report summarises the progress made to improve technical compliance. Section IV contains the conclusion and a table illustrating Samoa's current Technical Compliance ratings.

II. FINDINGS OF THE MUTUAL EVALUATION REPORT

5. The MER rated¹ Samoa as follows:

IO 1	IO 2	IO 3	IO 4	IO 5	IO 6	IO 7	IO 8	IO 9	IO 10	IO 11
Mod	Sub	Low	Mod	Mod	Low	Low	Mod	Mod	Mod	Low

R 1	R 2	R 3	R 4	R 5	R 6	R 7	R 8	R 9	R 10
PC	PC	PC	LC	PC	PC	NC	PC	C	PC

¹ There are four possible levels of technical compliance: compliant (C), largely compliant (LC), partially compliant (PC), and non-compliant (NC).

R 11	R 12	R 13	R 14	R 15	R 16	R 17	R 18	R 19	R 20
C	PC	PC	C	PC	PC	PC	LC	NC	LC
R 21	R 22	R 23	R 24	R 25	R 26	R 27	R 28	R 29	R 30
C	PC	LC	C						
R 31	R 32	R 33	R 34	R 35	R 36	R 37	R 38	R 39	R 40
LC	LC	LC	PC	PC	PC	LC	LC	LC	LC

6. Given these results, Samoa was placed in enhanced follow-up (expedited)².

7. In Samoa's 2017 follow-up report it requested re-ratings for Recommendations 2 and 36. The review team concluded that progress to largely compliant (LC) had been made on Recommendation 2. Recommendation 36 remained at partially compliant (PC).

III. OVERVIEW OF PROGRESS TO IMPROVE TECHNICAL COMPLIANCE

8. This section summarises the progress made by Samoa to improve its technical compliance by:

- a) Addressing the technical compliance deficiencies identified in the MER, and
- b) Implementing new requirements where the FATF Recommendations have changed since the MER was adopted (R.5 and R.8).

3.1. Progress to address technical compliance deficiencies identified in the MER

9. Samoa reported progress to address the technical compliance deficiencies identified in the MER in relation to Recommendations: 3, 5, 6, 8, 10, 12, 16, 22, 23, 28 and 35 (which were rated PC); and 29 and 32 (which were rated LC).

10. As a result of this progress, Samoa has been re-rated on Recommendations 3, 5 and 10. The APG welcomes the steps that Samoa has taken to improve its technical compliance with Recommendations 6, 8, 12, 16, 22, 23, 18 and 35, however, insufficient progress has been made to justify a re-rating of these Recommendations.

Recommendation 3 (Originally rated PC, re-rated to LC)

11. In its 2015 MER, Samoa was rated PC with R.3. The main technical deficiencies were: several of the 21 designated categories of offences were not predicate offences for ML or were not sufficiently covered; the definition of "property" did not provide wide enough coverage; the maximum penalty for ML for a natural person was not proportionate and the maximum penalty for a legal person was not dissuasive.

12. The definition of property in the POCA has been amended by the MLP Amendment Act 2018. The definition of property now includes documents evidencing title to, or interest in, property and broadly meets the requirements of the Vienna and Palermo Conventions.

13. Samoa has amended the Tax Administration Act 2012 to include tax evasion as an offence. The maximum penalty is a fine of \$100,000 SAT (USD 40,000) or imprisonment for 10 years, or both. This is an important addition, given the risks of tax evasion through the offshore sector discussed in the 2015 MER. There is, however, no further information in relation to other serious tax offences, and offences of counterfeiting and piracy of products still do not meet the threshold of serious offence

² There are three categories of follow-up based on mutual evaluation results: regular, enhanced and enhanced (expedited). For further information see the APG Mutual Evaluation Procedures.

and are not considered predicate offences. Accordingly, Samoa does not have full coverage of all 21 FATF designated categories of predicate offences, however, these outstanding predicate offences are not considered to be high risk.

14. The ML offence has been moved from the POCA (section 11 POCA) to the Crimes Act (new section 152A). New section 152C of the Crimes Act provides for penalties. The penalty for a natural person has been increased from \$100,000 SAT (USD 40,000) or imprisonment for a period not exceeding seven years or more to \$1,000,000 SAT (USD 400,000) or to imprisonment for a period not exceeding 15 years, or both. A person acting on behalf of a legal person (whether as director, manager, secretary or other similar officer) is liable to the same increased penalty level as a natural person and the maximum fine for a legal person is increased from \$100,000 SAT (USD 40,000) to \$1,000,000 SAT (USD 400,000).

15. Samoa has addressed the deficiencies with respect to penalty levels for ML for both natural persons and legal persons and the definition of property is now sufficiently wide and in line with the Conventions. While there is still not full coverage of the 21 designated categories of ML predicate offences, those outstanding predicate offences are not considered to be high risk. The inclusion of tax evasion as a predicate for ML is a welcome development in light of the risks of tax evasion through the offshore sector. On this basis R.3 is re-rated to LC.

Recommendation 5 (Originally rated PC, re-rated to LC)

16. In its 2015 MER, Samoa was rated PC with R.5. The main technical deficiencies related to a lack of a fault element in the TF offence, non-coverage of individual terrorists and the absence of coverage of offences relating to aircraft safety, nuclear material, and fixed platforms in the definition of “terrorist act”, coverage of ancillary offences (other than attempts) and the maximum penalty for legal persons was not sufficiently proportionate or dissuasive.

17. The MLP Amendment Act 2018 made several amendments to the Counter-Terrorism Act 2014 (CT Act), in which TF is criminalised. The substituted TF offence meets the requirements of Article 2(1) of the TF Convention. The elements of the offence now include a fault element with respect to the provision or collection of funds (intention and knowledge). The definition of “terrorist act” has been amended to include offences relating to aircraft safety, nuclear material, fixed platforms, and weapons of mass destruction. The provision or collection of funds is not limited to provision or collection for a terrorist entity. It is sufficient that the provision or collection was done with the intention that the funds be used, or knowing that the funds are to be used, to carry out terrorist acts. Samoa allows for the intentional element of criminal offenses to be inferred from objective factual circumstances as per existing case law. Section 12(2) of the MLP Amendment Act amends section 23(2)(b) to increase the maximum penalty from \$100,000 SAT (USD 40,000) to \$1,000,000 SAT (USD 400,000). However, the liability of directors for a TF offence is not clear. It is still not clear whether the ancillary offences (other than attempt which is provided for in section 24 of the CT Act) require the TF offence to be committed.

18. The CT Act also contains two new offences prohibiting anyone from dealing with the property of a designated terrorist entity or making property or related financial services available to a designated terrorist entity. The definition of “entity” in section 2 includes a person, and accordingly the offences cover individual terrorists. The offences, however, refer to a “*designated* terrorist entity”. It is not clear what this expression is intended to refer to. Elsewhere in the CT Act reference is made to a “specified entity” which is defined.

19. In relation to the new obligation set out in 5.2^{bis}, the CT Act does not include offences relating to the financing of travel or individuals for the purpose of the perpetration, planning, or preparation of,

or participation in, terrorist acts or the providing or receiving of terrorist training. The risk of foreign terrorist fighters is considered to be low in Samoa.

20. Samoa has addressed most of the deficiencies, however there are a few minor deficiencies remaining, including criterion 5.2^{bis} relating to foreign terrorist fighters which are considered to be low risk in Samoa. On this basis, R.5 is re-rated to LC.

Recommendation 6 (Originally rated PC)

21. In its 2015 MER, Samoa was rated PC with R.6. The main technical deficiencies were: no mechanism for proposing individuals and entities for designation under UNSCR 1267/1989 and 1988; no legal framework to deal with designation requests from foreign countries in accordance with UNSCR 1373; and the ability to freeze without delay the funds and assets of declared individuals or entities was limited.

22. The CT Act has been amended to include in the definition of specified entities, those entities, past and present, listed by the UN as terrorist entities and addresses concerns regarding reference to the Consolidated List of Individuals and Entities belonging to or associated with the Taliban and Al-Qaida Organisations (Consolidated List) which no longer exists under that name. Also covered are any other entities (which include persons) listed by the UN as terrorist entities. Given that the Consolidated List referred to in the CT Act no longer exists under that name, the definition of “specified entities” in section 4 of the CT Act needs to be amended to reflect the current version of the Consolidated List and the wider coverage of entities under the definition of specified entities (eg. there is no provision for making available to the public the names of terrorist entities that were not included in the Consolidated List).

23. The definition of “terrorist property” has been amended but it does not address the deficiency as identified in paragraph 111 of the 2015 MER Technical Compliance Annex (‘terrorist property’ is defined, relevantly, as property that ‘has been, is being, or is likely to be used’ to commit a terrorist act or by a terrorist group”, which is much narrower than the definition funds and assets required under the UNSCRs). The MLP Amendment Act also amended the CT Act to enable the Prime Minister to “extend the specified entity or de-list under this Act only upon reasonable and lawful grounds, as well as taking into consideration the procedures of the United Nations”. This amendment lacks clarity and transparency and does not meet criteria 6.1 and 6.2 as it does not provide any detail of the mechanism/s by which a target for designation may be identified or the process to be followed. The amendment merely refers to taking consideration of the procedures of the UN. The requirement for countries to have a legal framework to deal with cross border designation requests under UNSCR 1373 is also not sufficiently provided for by the amendment. The amendment merely states that “Foreign countries may submit an application to the Prime Minister on any issue” regarding the CT Act.

24. The POC Act 2007 has been amended to provide for both the freezing and unfreezing of property and assets of entities that are specified entities under the CT Act 2014 (this includes both entities on the UN “Consolidated List” and entities declared by the Prime Minister under section 5). The property and assets that can be frozen are not required to be tied to a particular terrorist act or plot. Provision is also made for bona fide third parties to seek the removal of a freezing order. It is unclear, however, how this provision and section 39 of the CT Act (which applies all the provisions of the POC Act 2007 to the UN “Consolidated List” entities but not the specified entities declared by the PM under section 5) are intended to work. The current freezing regime lacks coherence and further consideration needs to be given as to how the CT Act 2014 and the POC Act 2007 freezing and de-listing schemes, with their conflicting definitions of ‘terrorist property’, are intended to work.

25. Samoa has not sufficiently addressed the deficiencies identified in the 2015 MER. On this basis R.6 remains PC.

Recommendation 8 (Originally rated PC)

26. In its 2015 MER, Samoa was rated PC with R.8. The main technical deficiencies were: no domestic review of its NPO sector had been conducted (although the sector did form part of the 2012 National Risk Assessment); there was no targeted approach and only limited outreach to the NPO sector on AML/CFT matters, there was little or no oversight or monitoring of the sector's compliance with AML/CFT requirements and sanctions available to the supervisor were limited. R.8 has been amended since the adoption of the 2015 MER.

27. A review of the NPO sector was included in Samoa's 2014 NRA but did not comprehensively examine the sector and identify the subset of NPOs which are considered to be higher risk and meet the definition of NPOs under the revised R.8.

28. The MLP Amendment Act 2018 includes activities of NPOs in Schedule 1 of the MLPA, capturing NPOs as financial institutions under the MLPA. Although Samoa has enhanced its ability to provide oversight and monitoring of compliance with AML/CFT by including NPOs as financial institutions, this does not promote a risk-based approach as all NPOs are subject to the requirements of the MLPA regardless of risk. Other deficiencies identified in the 2015 MER remain, in particular, there continues to be no targeted approach and little outreach to the sector on AML/CFT issues, and monitoring of registration and annual reporting requirements under the Incorporated Societies Ordinance (ISO) and the penalties under the ISO remains inadequate. Although there are a range of sanctions for breaches of the MLPA (including breaches of CDD and record keeping requirements), the sanctions are not considered proportionate and dissuasive (refer R 35).

29. Deficiencies also exist in Samoa's technical compliance with the revised R.8. These deficiencies include a lack of clear policies to promote transparency, integrity and public confidence in the administration and managing of all NPOs, targeted risk-based supervision of NPOs, and no procedures in place to respond to international requests for information-gathering regarding NPOs suspected of TF abuse.

30. Samoa has addressed some of the deficiencies identified in the 2015 MER. However, a significant number of deficiencies remain, as well as deficiencies in meeting the requirements of the revised R.8. On this basis R.8 remains PC.

Recommendation 10 (Originally rated PC, re-rated to LC)

31. Samoa was rated PC with R.10 in its 2015 MER. The major deficiencies related to: CDD requirements of occasional customers and existing customers, verification of beneficial owners, CDD of beneficiaries of life insurance policies, requirements for enhanced CDD and tipping off provisions.

32. The MLP Amendment Act 2018 introduces the following requirements, which address some of the key deficiencies identified in the MER:

- (i) CDD of all occasional customers (regardless of transaction value);
- (ii) CDD of existing customers on the basis of risk in certain circumstances. This provision however is limited and does not fully meet the requirements of c.10.16;
- (iii) Verifying the identity of a beneficial owner. This amendment, in conjunction with MLP Regulations s6 and s9 and the requirement to take reasonable measures to verify beneficial ownership under the MLPA Act addresses c.10.5 to a large extent;
- (iv) CDD of any person acting on behalf of a customer.

33. The MLP Act amendments also set out requirements to conduct enhanced CDD in certain circumstances.

34. Some of the deficiencies identified in the MER are yet to be addressed. These include:

- (i) There are no specific provisions to prohibit FIs from pursuing the CDD process if it will tip-off the customer when there is reasonable group of suspicion of a ML/TF activity;
- (ii) There is no requirement to include the beneficiary of a life insurance policy as a relevant risk factor in determining whether enhanced CDD measures are applicable, as well as to apply the same to a beneficiary who is a legal person or a legal arrangement when such beneficiaries present higher risk;
- (iii) There is no requirement for risk management procedures concerning the conditions under which a customer may utilise the business relationship prior to verification;
- (iv) Provisions related to the conduct of ongoing due diligence and monitoring of customers do not include materiality as a consideration in the CDD process.

35. Samoa has addressed some of the key deficiencies related to R.10 in its MER. Although some deficiencies remain, including the coverage of beneficiaries of life insurance policies and tipping-off provisions, these are considered to be minor, given Samoa's risk and context. On this basis R.10 is re-rated to LC.

Recommendation 12 (Originally rated PC)

36. Samoa was rated PC with R.12 in its 2015 MER. The main technical deficiencies were that obligations regarding PEPs did not apply to domestic and international organisation PEPs and there were no requirements for approval from senior management to continue business relationships with customers who become PEPs during the business relationship. There were no requirements to determine whether life insurance beneficiaries (and/or their beneficial owners) are PEPs.

37. The MLP Amendment Act includes an amended definition for PEPs, but it continues to capture only foreign PEPs and not domestic or international organisation PEPs. It does however require senior management approval when establishing a business relationship or continuing (for existing customers) with a PEP.

38. Samoa has not addressed the key deficiencies in the MER. On this basis, the rating for R.12 remains at PC.

Recommendation 16 (Originally rated PC)

39. Samoa was rated PC with R.16 in its 2015 MER. The major technical deficiencies related to the absence of requirements relating to beneficiary information and no requirements for FIs to have risk-based policies and procedures for determining when to execute, reject or suspend a wire transfer lacking required originator or beneficiary information.

40. The MLP Amendment Act 2018 introduces a provision requiring FIs to have risk-based policies and procedures on how to execute, reject or suspend a wire transfer lacking required originator or beneficiary information. The other key deficiencies from the MER remain. On this basis, the rating for R.16 remains at PC.

Recommendation 22 (Originally rated PC)

41. In its 2015 MER, Samoa was rated PC with R.22. The main technical deficiencies were that the ability of Samoan TCSPs to conduct ongoing due diligence of IBCs was limited and that the deficiencies identified in R.10-12, 15 and 17 applied equally to DNFbps. The Trustee Companies Act 2017 (TCA) requires TCSPs to identify and verify beneficial owners (s.30 (b)(i)) and to remain responsible for obtaining this information when reliance is placed on a third party (s.30 (g)). The MLP Amendment Act requires TCSPs to conduct CDD as a requirement of being listed as a 'financial institution' in Schedule 1 but their ability to conduct ongoing due diligence of IBCs remains limited. Deficiencies noted in R.12 above, and in Recommendations 15 and 17 in the MER, also continue to apply to R.22.

42. While the TCA 2017 requires TCSPs to institute a number of important practices to improve compliance with AML/CFT requirements, moderate deficiencies remain. On this basis, and the remaining deficiencies in Recommendations 12, 15 and 17 as they apply to all DNFbps, R.22 remains PC.

Recommendation 23 (Originally rated PC)

43. In its 2015 MER, Samoa was rated PC with R. 23. The main technical deficiencies were that the ability of Samoan TCSPs to detect and report STRs was limited and the deficiencies identified in R.18-21 applied equally to DNFbps.

44. The MLP Amendment Act requires STR reporting by TCSPs as a financial institution and the provision of other information by TCSPs upon a direction made by SIFA. The MLP Amendment Act also requires financial institutions to conduct enhanced CDD on non-resident customers from higher risk jurisdictions (s.16C(ii)(b)).

45. The Trustee Companies Act requires TCSPs to have policies to ensure full compliance with AML/CFT requirements (s.30 and s.34) and requires the regulator to ensure TCSPs maintain adequate policies and procedures for "know your customer" and anti-money laundering (Schedule 6(b)). Despite these requirements, it is unclear whether the ability of Samoan TCSPs to detect and report STRs has improved.

46. Samoa has addressed some of the deficiencies identified in the 2015 MER. However, a number of key deficiencies in relation to R. 18-21 remain across all DNFbps, as do the limitations on the ability of Samoan TCSPs to detect and report STRs. On this basis, R.23 remains PC.

Recommendation 28 (Originally rated PC)

47. In its 2015 MER, Samoa was rated PC with R. 28. The main technical deficiencies were that supervision of DNFbps was not performed on a risk-sensitive basis, nor was the risk-based approach used when assessing the adequacy of the AML/CFT internal controls, policies, and procedures. DNFbps, other than TCSPs, were also not subject to systems for monitoring compliance with AML/CFT requirements.

48. The MLP Amendment Act amends the Samoa Institute of Accountants Act 2006 and provides for sanctions for breaching ML/TF misconduct by accountants but the other deficiencies identified in the MER regarding sanctions for DNFbps remain.

49. SIFA has conducted supervision of TCSPs but the supervision of other DNFbps on a risk-sensitive basis has not occurred nor are DNFbps, other than TCSPs, subject to systems for monitoring compliance with AML/CFT requirements.

50. Samoa has addressed some of the deficiencies identified in the 2015 MER. However, a number of key deficiencies remain. On this basis, R.28 remains PC.

Recommendation 29 (Originally rated LC)

51. In its 2015 MER, Samoa was rated LC with R. 29. The main technical deficiencies were that the SFIU had not performed any strategic analysis, nor was the basis on which the SFIU disseminated information on request by a competent authority clear.

52. The MLP Amendment Act requires additional reporting by FIs to the SFIU but does not address the deficiencies noted in the MER.

53. Samoa has not sufficiently addressed the deficiencies identified in the 2015 MER. On this basis R.29 remains LC.

Recommendation 32 (Originally rated LC)

54. In its 2015 MER, Samoa was rated LC with R.32. The main technical deficiencies were the coverage of Samoa's declaration system and the lack of integration between the Customs and Immigration databases on incoming passengers. There was also no explicit power for competent authorities to request and obtain further information from the carrier with regard to the origin of the currency or BNIs, and their intended use upon discovery of a false declaration or disclosure of currency or BNIs or a failure to declare.

55. The MLP Amendment Act extends the coverage of Samoa's declaration system to include cargo and mail and increases the penalty for failure to declare.

56. Samoa has addressed some of the deficiencies identified in the 2015 MER. However, a number of other deficiencies remain. On this basis, R.32 remains LC.

Recommendation 35 (Originally rated PC)

57. In its 2015 MER, Samoa was rated PC with R. 35. The main technical deficiencies were: the reliance on criminal sanctions to deal with natural or legal persons who fail to comply with the MLP Act and that the range of sanctions available was not considered proportionate and dissuasive. The only amendment to the Crimes Act contained in the MLP Amendment Act relates to the ML offence (refer new sections 152A, 152B and 152C). The liability of parties and those acting on behalf of a legal person were previously provided for in the section 11 ML offence in POCA and this has been carried over to the new ML offence (refer section 152A). This new offence provides for significantly higher penalties and would be considered to be proportionate and persuasive. However, R. 35 is concerned with sanctions available to deal with natural or legal persons that fail to comply with the AML/CFT requirements of recommendations that relate to targeted sanctions for terrorism financing (R.6), NPOs (R.8) and preventative measures relating to financial institutions and their activities (Rs.9-23). Section 38 of the Trustee Companies Act 2017 provides a range of administrative sanctions for TCSPs that contravene the MLP Act or any other law. Sanctions include revocation of licences and removal or replacement of any controller, director, officer or manager of the TCSP. As noted in R. 8, NPOs are now included as financial institutions and are subject to the AML/CFT requirements in the MLP Act and the sanctions provided in that Act. However, while there are a range of administrative sanctions applicable to TCSPs, there are no changes to the range of sanctions available to other financial institutions which continue to be largely criminal sanctions under the MLP Act with limited administrative sanctions. These sanctions are not considered to be proportionate and dissuasive.

58. The deficiencies in the 2015 MER remain unchanged. On this basis R. 35 remains rated PC.

3.2. Progress on Recommendations which have changed since adoption of the MER

59. Since the adoption of Samoa’s MER, Recommendations 5 and 8 have been amended. The above analysis considers Samoa’s compliance with the new requirements of these Recommendations.

3.3. Brief overview of progress on other recommendations rated NC/PC

60. Samoa did not report progress on other recommendations rated NC/PC for which it has not sought a re-rating.

IV. CONCLUSION

61. Overall, Samoa has made progress in addressing the technical compliance deficiencies identified in its MER and has been re-rated on three Recommendations.

62. The MLP Amendment Act amends a number of pieces of legislation which has improved Samoa’s technical compliance with Recommendations 3, 5 and 10. The increase in scope of the term ‘property’ in the POCA, increase in the sanctions associated with the ML offence in the Crimes Act and inclusion of tax evasion as an offence in the Tax Administration Act have improved Samoa’s technical compliance with R.3 to a level of largely compliant. The amendments to the CT Act to include a fault element broaden the scope of TF and increased sanctions have improved Samoa’s technical compliance with R.5 to a level of largely compliant. The amendments to the MLPA Act include a definition of “beneficial owner” consistent with international standards and improve obligations for CDD of new and existing customers and improve Samoa’s technical compliance with R.10 to a level of largely compliant.

63. The MLP Amendment Act makes progress on the legal framework elements of Recommendations 6, 8, 12, 16, 22, 23, 28, 29, 32 and 35. However, a number of the deficiencies in these Recommendations, as noted in the 2015 MER, relate to procedural and policy requirements on which Samoa has not reported any progress. Samoa is encouraged to continue working through its AML/CFT National Strategy in order to address the remaining deficiencies.

64. Samoa requested re-rating on Recommendations 5 and 8 which were amended after the MER was adopted. Samoa has addressed most of the deficiencies in R.5, with the exception of criterion 5.2^{bis}, which has been weighted in light of the low risk of TF in Samoa, and been re-rated to LC. Samoa has not addressed the requirements of the revised R.8 and remains at PC.

65. Overall, in light of the progress made by Samoa since its MER was adopted, its technical compliance with the FATF Recommendations is now as follows:

R 1	R 2	R 3	R 4	R 5	R 6	R 7	R 8	R 9	R 10
PC	LC	LC	LC	LC	PC	NC	PC	C	LC
R 11	R 12	R 13	R 14	R 15	R 16	R 17	R 18	R 19	R 20
C	PC	PC	C	PC	PC	PC	LC	NC	LC
R 21	R 22	R 23	R 24	R 25	R 26	R 27	R 28	R 29	R 30
C	PC	LC	C						
R 31	R 32	R 33	R 34	R 35	R 36	R 37	R 38	R 39	R 40
LC	LC	LC	PC	PC	PC	LC	LC	LC	LC

66. At the 2018 APG Annual Meeting members adopted the Samoa FUR and decided that Samoa will exit enhanced follow-up (expedited) and will be placed on enhanced follow-up. Samoa nevertheless still meets the criteria for enhanced follow-up (i.e. eight or more NC/PC ratings, low/moderate for seven or more of 11 immediate outcomes, or low for five or more of the 11 immediate outcomes). It will not be able to exit enhanced follow-up until the onsite visit five years after adoption of the MER (i.e.2020), as re-rating on effectiveness is permitted only at that time.

August 2018