



Republic of Vanuatu
Office of the Attorney General

Financial Intelligence Unit

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To AML&CTF Compliance Officer

Guidance Note No. 1 of 2026

OBLIGATIONS UNDER THE UNITED NATIONS FINANCIAL SANCTIONS ACT NO. 6 OF 2017 (UNFSA) – DESIGNATION PROCESS

I refer to the above subject.

The United Nations Financial Sanctions Act No. 6 of 2017 ('UNFSA') was established to give effect to article 41 of the Charter of the United Nations (UN) by imposing prohibitions arising from UN security council resolutions.

Under section 17 and 18 of the UNFSA, the sanctions secretariate is established within the Vanuatu Financial Intelligence Unit ('VFIU') and its function is to provide secretarial and administrative support to the National Sanctioning Committee or the National Security Advisory Committee ('NSAC') and the Prime Minister to assist them in the exercise of their powers and functions under the UNFSA. As such, the VFIU through its sanctions secretariate role which is administered by its Sanctions Officer ('SO') executes the provisions of the UNFSA.

The NSAC is established under section 23B of the Government Act [CAP 243] and includes the following members;

- The Director General of the office of the Prime Minister;
- The Director General of the Ministry of Finance and Economic Management;
- The Director General of the Ministry of Internal Affairs;
- The Director General of the Ministry of Foreign Affairs;
- The Attorney General;
- The Commissioner of Police; and

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- The Chief Information Officer.

One of the core functions of the committee as provided for under section 23D of the government Act is to advise the Prime Minister on the designation of a person or entity under the UNFSA or an extension or revocation of such a designation. Under section 4 of the UNFSA, the Prime Minister is responsible for designating a person or an entity within Vanuatu upon receiving and considering the advice from the NSAC.

In light of the above, the sanctions secretariate function (to provide secretarial and administrative support to NSAC) includes the roles/responsibilities in relation to the designation process as stated below.

- Developing statements of case for consideration by the NSAC to inform its decision on whether to advise the Prime Minister to make or extend a designation, including in relation to requests from foreign governments;
- Assisting the NSAC to review all domestic designations annually to determine whether the grounds for designation continue to be satisfied;
- Assisting the NSAC to notify reporting entities and any other person considered necessary of a designation, expiration or revocation;
- Preparing the notice of designation, expiration or revocation to be published in the Official Gazette;
- Assisting the NSAC to notify a designated person or entity of their designation, expiration or revocation; and
- Preparing sanction listing requests to submit to the United Nations Security Council ('UNSC') and its Committees upon direction by the NSAC.

The designation process is illustrated below.

Step 1	Financial intelligence gathered by relevant intelligence authorities in Vanuatu. Intelligence authorities will alert the sanctions secretariate if there is sufficient evidence to designate a person.
Step 2	Sanctions Secretariat prepares statement of case for NSAC
Step 3	NSAC reviews the statement of case submitted by the sanctions secretariate and consider whether there are sufficient grounds to designate and whether to recommend a designation. If there are sufficient grounds, the NSAC advises the Prime Minister of its recommendations.
Step	Prime Minister considers NSAC's advice and considers whether the grounds for

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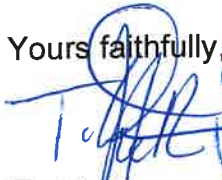
4	designation are satisfied and decides whether to make a designation. The Prime Minister's designation has immediate effect in Vanuatu.
Step 5	If a designation is made, reporting entities or any other person or entity are notified about the designation by email.
Step 6	NSAC publishes notice of designation in the Official Gazette
Step 7	NSAC provides written notice to designated person or entity

Additionally, there had been no designations made by the Prime Minister since the UNFSA came into effect.

Find attached, a copy of the UNFSA or you can access a copy in the VFIU website via the link; <https://fiu.gov.vu/un-financial-sanctions-act>.

Should you require further information please do not hesitate to contact Ms. Denzelle Tigona this office.

Yours faithfully,




Teddy Garae LULUMELE
Director

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