Forensic Accounting: Hidden Balance of Payments of the Philippines

Edsel Beja, Jr.

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ABSTRACT An examination of the available data between 1990 and 2005 reveals that the balance of payments of the Philippines does not record large amounts of international transactions. Unrecorded international transactions for this period amount to US$ 192 billion (in 1995 prices). The results suggest a serious problem in the government’s macroeconomic management of the Philippines, and expose a weak or weakening capacity in the governance of international transactions.

JEL Classification B40, B50, C82, F40, O53
Key Words Balance of Payments, Unrecorded Transactions, Philippines

INTRODUCTION
The balance of payments (BOP) records the official international transactions of a country with the rest of the world for a given year. It presents an accounting of the inflows and outflows of foreign exchange. However, studies show that some international transactions are either unrecorded or systematically mis-recorded in the BOP, including that of the Philippines’ (see, e.g., Boyce and Zarsky 1988; Boyce 1993; Vos 1992; Beja 2006a; Beja 2006b). For example, capital flight – funds that flee a country to avoid risks, uncertainties, or social controls – is unrecorded in the BOP, even though it implies an outflow of foreign exchange. Trade misinvoicing and smuggling are also unrecorded in the BOP. Unrecorded international transactions make the BOP inaccurate and have policy implications.

This paper investigates the unrecorded (or hidden) components of the BOP of the Philippines for the period 1990-2005. The results show that the unrecorded international transactions have been increasing since 1990 and have reached US$ 192 billion (in 1995 prices) by 2005. As Beja (2005) demonstrates these unrecorded transactions actually have nontrivial negative impacts on a country’s macroeconomic performances. He argues that the result in the case of the Philippines has been a lost and arguably an unrecoverable, opportunity to take off to a higher economic growth path, which ultimately means lower social welfares of the Filipinos. Nevertheless, the Philippines remains to be the weakest economic performer among the emerging East Asian economies.¹
The rest of the paper expounds on the hidden components of the BOP of the Philippines. The next two sections discuss the framework and the methodology, then the results are discussed, followed by their implications. The last part concludes the paper.

**UNHIDING THE HIDDEN**

The paper follows the standard BOP accounting procedures, wherein official inflows of foreign exchange are recorded as credit items (i.e., additions) and official outflows are recorded as debit items (i.e., subtractions). Because the BOP employs a double-entry approach, inflows (outflows) of foreign exchange have corresponding outflows (inflows). Unaccounted flows are recorded as errors and omissions (EO). Therefore, the annual international transactions have an overall net balance of zero.

The standard BOP presentation has three main components: the current accounts (CA), the capital and financial accounts (KA), and the EO; or algebraically,

\[
(1) \quad CA + KA + EO = \text{Overall Balance}.
\]

A positive overall balance is called a BOP surplus; the reverse is a BOP deficit. Both cases need counterpart adjustments to arrive at the overall net balance of zero, specifically adjustments in the official settlement accounts. A BOP surplus means a net decrease in the financing accounts, with similar adjustments for a BOP deficit. Thus,

\[
(2) \quad CA + KA + EO – Financing = \text{Overall Balance} – Financing = 0.
\]

Since the motivations behind the unrecorded international transactions are hidden, calculating the figures involves forensic accounting. Once obtained, the estimated amounts for the unrecorded transactions are then incorporated into the BOP following the standard BOP accounting procedures. With the adjustments, the BOP must still have an overall net balance of zero.

There are three sets of adjustments for the BOP. The first set concerns CA – trade misinvoicing, for instance. Import overinvoicing and export underinvoicing are the typical avenues for unrecorded outflows of foreign exchange. Import underinvoicing and export overinvoicing occur as unrecorded inflows of foreign exchange. Import underinvoicing is typically done to evade customs duties and trade regulations on imported goods. Export overinvoicing occurs when, for instance, there are incentives on export performances of industries like income rebates on export revenues, which result in invoice padding. In any
of these four cases, the trade balance is inaccurate, and hence the CA as well.

Three steps are followed to estimate trade misinvoicing (MIS). First compute the export misinvoicing (DX) and import misinvoicing (DM) in the Philippines’ trade with its key trade partners using the equations:

\[
\begin{align*}
(3a) \quad DX &= PX - CIF*X; \\
(3b) \quad DM &= M - CIF*PM,
\end{align*}
\]

where PX is trade partners import (i.e., Philippine exports as recorded by trade partners) and PM is trade partners export (i.e., Philippines imports as recorded by trade partners); X and M, respectively, represent Philippines exports to and imports from trade partners, as recorded by the Philippines; and CIF is the adjustment for freight and insurance.\(^6\) Positive DX and DM mean export underinvoicing and import overinvoicing, respectively; while negative DX and DM mean export overinvoicing and import underinvoicing, respectively.

Next calculate the global export and import trade misinvoicing (MISX and MISM) by multiplying the DX and DM above with the reciprocal of the trade partners’ shares to the Philippines’ total exports (X_INDUS) and imports (M_INDUS), respectively:

\[
\begin{align*}
(4a) \quad MISX &= \frac{DX}{X_{\text{INDUS}}} \\
(4b) \quad MISM &= \frac{DM}{M_{\text{INDUS}}}
\end{align*}
\]

MIS is obtained as the sum of MISX and MISM.

There is another adjustment in CA, which is for unrecorded income remittances (UNR). This adjustment is particularly relevant for the Philippines because of increasing income remittances (REM) from the expanding overseas Filipino workers. If the informal remittances are large, the unrecorded flows of foreign exchange are also large, so CA is inaccurate. UNR is obtained by extrapolating the amount using REMIT and a measure for unrecorded flows (UNR Index). Thus,

\[
(5) \quad UNR = REM \times UNR \text{ Index.}
\]

A second set of adjustments concerns KA (in Equation 1 above). For instance, the adjustments in total indebtedness due to a discovery of misrecorded or unrecorded debts and/or adjustments due to debt forgiveness and other relief measures are needed to obtain
accurate estimates of net additions to external indebtedness (CDET). Also, the impact of exchange rate fluctuations on debt flows is needed. Long-term debts (LTDEBT), for instance, are denominated in a mix of hard currencies, but exchange rate fluctuations affects the United States dollar (US$) valuation of debts. CDET is likewise inaccurate if exchange rate fluctuations are ignored. As in Boyce and Ndikumana (2001), beginning-of-year adjusted debt (ATTD) that accounts for exchange rate fluctuations is obtained as:

\[ ATTD_{t-1} = \sum_i \alpha_i \cdot LTDEBT_{t-1} \cdot \frac{FX_{i,t-1}}{FX_{i,t-1}} + \sum_j \beta_j \cdot LTDEBT_{t-1} 
+ IMF_{t-1} \cdot \frac{SDR_{t-1}}{SDR_{t-1}} + STDEBT_{t-1}, \]

where \( \alpha_i \) is the proportion of the long-term debts in Euros (EU), British pounds (UK), French francs (FF), German marks (DM), Japanese yen (Yen), and Swiss francs (SF); \( \beta_i \) is the proportion of LTDEBT in US$, multiple, and other currencies; FX is the exchange rate between the hard currencies and US$; IMF means the use of IMF Credits; SDR is the exchange rate between Special Drawing Rights and US$; and STDEBT means short-term debts. All things the same, an appreciation of the hard currencies relative to US$ reduce \( FX_{i,t-1} \) and \( ATTD_{t-1} \).

The adjustment factor (ADEBT) for the impact of exchange rate fluctuations on DEBT is calculated as: \( ADEBT = ATTD_{t-1} - DEBT_{t-1} \). Appreciation of the hard currencies relative to US$ make \( ATTD_{t-1} \) less than \( DEBT_{t-1} \), such that ADEBT is negative. Thus, the adjusted annual flow of external debt (CDET\textsubscript{ADJ}) is

\[ CDET_{ADJ} = CDET - ADEBT. \]

Since \( CDET = DEBT - DEBT_{t-1} \), it follows that

\[ CDET_{ADJ} = DEBT - ATTD_{t-1}. \]

\( CDET_{ADJ} - CDET \) gives an estimate for unrecorded flows of foreign exchange.

Another adjustment in KA is for the discrepancies in the non-debt capital inflows (NKI), comprising of foreign direct investments (FDI) and portfolio equities investments plus other investment assets (PORT). The procedure is basically the same as the one described for \( CDET_{ADJ} \). First, the discrepancies in FDI (PORT) data between the source country and the Philippines are obtained; then, the impacts of the foreign exchange fluctuations on the US$ valuation of FDI (PORT) are computed. Adjusted FDI (FDI\textsubscript{ADJ}) and adjusted PORT (PORT\textsubscript{ADJ}) are obtained, such that \( FDI_{ADJ} - FDI \) and \( PORT_{ADJ} - \)
*PORT* give the estimates for the unrecorded investment flows.\(^8\)

Using CDET\(_{ADJ}^\), FDI\(_{ADJ}^\), and PORT\(_{ADJ}^\), the unrecorded flows of foreign exchange called financial flight (KF) is calculated as the residual between the adjusted recorded sources and the uses of funds. The sources of funds are CDET\(_{ADJ}^\) and net non-debt capital inflows (NKI\(_{ADJ}^\)), the latter including FDI\(_{ADJ}^\) and PORT\(_{ADJ}^\). The uses of funds are the current account deficits (CAD) and net additions to international reserves (plus other uses of foreign exchange) (CRES).\(^9\) The EO is subtracted because it gives the official statistics for unrecorded international transactions; thus,

\[
KF = CDET_{ADJ}^ + NKI_{ADJ}^ - CAD - CRES - EO. \tag{9}
\]

From Equations 4, 5, and 9, the estimated unrecorded international transactions are then recorded as adjustment entries in the BOP. It is initially necessary to assume that EO, the overall balance, and the official settlements accounts in the BOP remain constant to obtain estimates for other unrecorded international transactions called other counterpart adjustments. This latter amount is used for the third set of adjustments on EO, wherein the estimates of other counterpart adjustments are added to EO to obtain the adjusted EO (EO\(_{ADJ}^\)).\(^10\)

Raw data are taken from the World Bank’s *Global Development Finance* and the IMF’s *International Financial Statistics* and *Direction of Trade Statistics*.

**RECORDING THE UNRECORDED**

The (official) balance of payments (BOP) of the Philippines is presented in Table 1, together with the estimated unrecorded international transactions. Table 1 shows a current account (CA) deficit of US$ 2.7 billion in 1990. The estimated unrecorded international transactions include US$ 1.5 billion for trade misinvoicing (MIS) and US$ 732 million for unrecorded remittances (UNREMIT), with a total of US$ 2.2 billion. After accounting for these amounts, the adjusted CA (CA\(_{ADJ}^\)) in 1990 still registers a deficit of US$ 456 million (Table 2), smaller than the official statistics. Hence, the CA is underestimated by about US$ 2.2 billion.

Table 1 also shows a financial account (FA) surplus of US$ 2.1 billion in 1990. The estimated unrecorded international transactions for financial flight total US$ 1.1 billion. The adjusted FA (FA\(_{ADJ}^\)) in 1990 is still a surplus, but at a smaller amount of US$
972 million (Table 2). The official FA is therefore overestimated by more than US$ 1 billion. Other counterpart adjustments of US$ 1.2 billion lead to the adjusted errors and omissions (EO_ADJ) if US$ 562 million. Total unrecorded international transactions for 1990 is US$ 4.8 billion (in 1995 prices), covering US$ 1.6 billion of trade misinvoicing, US$ 786 million of unrecorded remittances, US$ 1.2 billion of financial flight, and US$ 1.2 billion of other unrecorded international transactions.

Results indicate that by the mid 1990s, total unrecorded international transactions soared to extraordinary amounts (Table 2). As the Asian financial crisis started to impact the Philippines in 1997, financial flight and the other unrecorded international transactions reached a US$ 28 billion. In 1996, the two accounts already amounted to US$ 19 billion. In fact, the trend for financial flight suggests an increasing from 1993, when the country regained access to the international capital markets. The trend of unrecorded international transactions indicates the same direction as that of financial flight, especially after 1995. As the results in Table 1 indicate, trade misinvoicing increased in 1997, reaching US$ 2.8 billion from US$ 858 million the previous year. The unrecorded remittances, however, has remained stable at around US$ 2 billion each year, which is expected because income remittances to the Philippines are relatively steady flows regardless of what happens in the domestic economy.

The results for the succeeding years are interpreted in the same way. Again, with Table 1, the CA is at a US$ 2.4 billion surplus in 2005. The estimated unrecorded transactions include US$ 2.7 billion for MIS and US$ 3.1 billion for UNREMIT, with a total of US$ 5.8 billion. The CA_ADJ reports of an even bigger surplus at US$ 8.2 billion (Table 2). The CA in 2005 is therefore underestimated by about US$ 6 billion. The FA is also at a surplus of US$ 820 million in 2005. The estimated unrecorded international transactions for financial flight total US$ 1.9 billion, so FA_ADJ becomes a deficit at US$ 1.1 billion (Table 2). Thus, FA in 2005 is overestimated by US$ 1.9 billion. With other counterpart adjustments of US$ 4 billion, EO_ADJ for 2005 is US$ 4.7 billion. In 2005 alone, total amount of unrecorded international transactions is US$ 11 billion (in 1995 prices), covering US$ 2.6 billion of trade misinvoicing, US$ 2.9 billion of unrecorded remittances, US$ 1.8 billion of financial flight, and US$ 3.7 billion of other unrecorded international transactions.
TABLE 1: Balance of Payments of the Philippines, 1990-2005 (US$ Millions)

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<td>8,105</td>
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Table 1 continued…

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<td>79</td>
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Sources of raw data: Global Development Finance; International Financial Statistics; Direction of Trade Statistics
Note: Calculations of the author.
### TABLE 2: Balance of Payments of the Philippines, Adjusted, 1990-2005 (US$ Millions)

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</table>

Note: Calculations of the author.
For the period 1990-2005, total unrecorded transactions is US$ 192 billion, of which US$ 34 billion is trade misinvoicing, US$ 32 billion is unrecorded remittances, US$ 81 billion is financial flight, and US$ 45 billion is other unrecorded international transactions. Thus, on the average, the Philippines experiences US$ 2 billion of trade misinvoicing and unrecorded remittances, US$ 5 billion of financial flight, and another US$ 2.8 billion of other unrecorded flows each year. From Table 2, the trend in total unrecorded international transactions since 2000 is in the range of US$ 10 to US$ 14.5 billion each year. In any case, the results reveal that large amounts remain unrecorded in the BOP. If these are employed in the Philippines, they can contribute to enlarging the productive activities in the country.

**IMPLICATIONS**

Tables 1 and 2 reveal that large amounts of unrecorded international transactions remain hidden from the balance of payments (BOP) of the Philippines. The tables also show that unrecorded international transactions are large and have been increasing since the 1990s. The deregulation and liberalization of the economy, coupled with the weak or weakening capacity in the governance of international transactions, create opportunities for trade misinvoicing, unrecorded remittances, financial flight, and other unrecorded transactions. Along with the weak or weakening capacity, are the increasing volumes and volatilities of trade and finance that not only contribute to enlarging the unrecorded international transactions, but also further undermine what was left of the government’s capacity to regulate the international transactions. Moreover, the current situation shows the severity of unrecorded international transactions as they are not only destabilizing the domestic macroeconomy, but are also posing as threats to government actions aimed at reinstituting measures to manage resource flows. These opportunities for unrecorded transactions are consequently well-exploited and ignored by the government.

The results point to some fundamental problems with regard to the government’s capacity to manage the macroeconomy, especially its capability to regulate international transactions. As such, it is difficult to direct, say, investments into productive domestic endeavors to enlarge output and create more employment, thereby supporting domestic industrialization and realizing broad-based macroeconomic performances. In addition, the
unrecorded international transactions point to other fundamental problems that remain unaddressed by the government, among of which are: a prevailing disinterest to undertake domestic investments, large underutilized domestic productive capacities, malfunctioning bureaucracy, widespread corruption, unending domestic political crises, quick reversals in policies, and the absence of an autonomous political base to carry out the government’s programs. Such issues reinforce prevailing concerns that current political survival has compromised the direction of policies; at the same time, they strengthened doubts about the Philippines’ ability to sustain macroeconomic recovery and, in the end, improve the social conditions of the Filipinos. Thus, resource flows are likely to be short-term and to be going into speculative (e.g., stock market and real estate) and non-productive activities (e.g., consumption binges), which fuel financial and asset bubbles, encourage risky investment behavior, and produce economic crises like the 1997-98 Asian crisis. Additionally, more funds end up being misallocated as resource flows increase to take advantage of the situation. Given the nature of the crises, macroeconomic conditions are further undermined, worsening the reductions in domestic investments, intensifying the domestic uncertainties, and so on. Crises are extended in such a case and the social costs are magnified.

Even when the macroeconomic conditions indicate that robust performances can be maintained, increasing resource flows end up contributing to increasing the unrecorded international transactions. The bigger amounts of unrecorded transactions are more difficult to control. In fact, the government misjudges the increasing resource flows as a vote of confidence to the state-of-affairs or fails to notice the increasing unrecorded international transactions. More seriously, the government concludes that its withdrawal from macroeconomic management and disregard of unrecorded international transactions are on the right direction. Getting rid of existing governance mechanisms and rules over international transactions must be reconsideration and adjustments on them must be made with prudence considering that the unrecorded transactions have serious consequences on the domestic economy.

There is therefore a need to rethink the direction of policies in the Philippines – to reconsider macroeconomic management and regulation of international transactions. An important step in this direction is a reappplication of capital management and related
techniques designed to strengthen the government’s capacities, including its administrative capabilities for managing the macroeconomy and regulating resource flows (see, e.g., Rodrik 1998; Palma 2000; Stiglitz 2002; Epstein et al. 2005). Such techniques must not be seen as a return to economic repression; rather, they must be seen as mechanisms that enable the government to regain its control over the direction of policies, especially in disciplining speculative and unproductive activities. Such techniques provide the needed space for the government to design programs that are appropriate given the domestic realities and characteristics, especially in pursuing robust macroeconomic performances, in enlarging opportunities, and in raising the social welfares of people. Concerns such as an unsustainable current account deficit, an unsound fiscal deficit and debt management, an unstable inflation, uncompetitive foreign exchange rates, interest rates that discourage savings intermediation, an environment that is unfavorable for domestic investments, and so on, still remain to be important concerns and have to be addressed by the government. Accompanying them must be crucial programs that strengthen the government’s macro-organizational fundamentals, covering aspects like enhanced institutional capacities to negotiate internal and external challenges to policy making, sound structures for effective implementation of programs, availability of reliable economic information, and so on. In other words, in a context where deregulation and liberalization programs have been introduced, it is imperative that the government introduce compensating policies to catch up with the rapid changes in the economic setting, the innovations brought about by information technology, and so on, with building up of the capacities of the bureaucracy. The enhanced capacities in both the collection and processing of economic information, for example, is the same as tightening regulatory mechanisms of the government and it sustains the trend towards increasing prudential macroeconomic management. Therefore, re-regulatory actions are needed. Effective governance means that the government is in the center of macroeconomic management and policy making.

Philippine policy makers must therefore reconsider the implications posed by large unrecorded international transactions and introduce appropriate measures to reverse the situation. It is important that policy makers are made aware of what is happening in the country – even though there are no apparent signs of an economic crisis, for instance, or even if they do not like what they hear. Philippine policy makers have to realize that
there are serious consequences if they do not act or if they act incorrectly. Indeed, an important lesson from past crises is that policy mistakes have serious negative consequences on the country and that it is more sensible to take a precautionary stance even when the macroeconomy is doing well. Recent strong macroeconomic performances can mislead policy makers to think that their under or non-regulation of international transactions is vindicated by the increasing resource flows, so the government must continue to withdraw from managing the macroeconomy and regulating international transactions. Renewed confidence on the Philippines after years of being passed over by international finance can also propel policy makers to a mania of catching up, which is dangerous, given that the economy has been largely deregulated and liberalized and that the government’s capacity is weak or has been weakened. With a liberalized economy, and given a weak regulatory capacity, crises are inevitable regardless how policy makers respond to increased resource flows (see, e.g., Jomo 1998; Montes 1998; Palma 2003). Interestingly, policy makers do not or cannot see the problem or they do but incredibly fail to address the problem. The weak or weakened governance capacity means that unrecorded international transactions are going to be tolerated or disregarded by the government. Unless there are fundamental changes in the way the government sees the problems, and acts on them, the situation will remain unaddressed.

CONCLUSION
An examination of the Balance of Payments (BOP) of the Philippines was undertaken to determine the magnitude of unrecorded international transactions. Using available data from the World Bank’s and the IMF’s databases, the results show that large amounts of resources flows remain hidden from the BOP of the Philippines, amounting to US$ 192 billion (in 1995 prices) for the period 1990-2005. Results also show that the magnitude of unrecorded international transactions has been increasing, and they point to a problem in the direction of the government’s macroeconomic management of the country. The results point to a weak or weakening capacity in the governance of international transactions.

After the Philippines embarked on deregulation and liberalization programs, the government failed to strengthen its regulatory apparatus. The ensuing resource flows are seen as a vote of confidence on the macroeconomy and a vindication of the government’s
withdrawal from macroeconomic management and regulation of international transactions. As a result, policy makers are encouraged to carry out further deregulation and liberalization and to remove the government from being pro-actively involved in the economy. With a weak or weakened capacity to regulate international transactions, more opportunities are available for trade misinvoicing, unreported remittances, financial flight, and other unrecorded transactions, and indeed they have been exploited quite well. Crises of course can reinforce this trend. It is now necessary to revisit capital management and related techniques to strengthen the government’s capacities to regain its control of the macroeconomy and to regulate international transactions.

Lastly, it is important to challenge the government with unsympathetic criticisms, even to the extent of condemning the current direction of policies and governance to “open its eyes” to the need to have sound governance of resource flows but not revert to economic repression. It is also important to challenge the government to rethink about reforms to reduce internal and external shocks vulnerabilities, establish its autonomy, and maintain an effective political base to carry out its programs. Such an advocacy is needed towards a more careful analysis of the alternatives for the Philippines. Unless the government responds pro-actively to consider the alternatives, it is condemning the Philippines to the perpetuity of crises: the continuity of narrow, shallow, and hollow macroeconomic performances, and the permanence of poverty of the Filipinos.

REFERENCES


ENDNOTES

1 Emerging East Asian economies comprise the Newly Industrializing Economies (NIEs). Taiwan (Province of China), Hong Kong SAR, Singapore, and South Korea comprise the first tier NIEs; Indonesia, Malaysia, the Philippines, and Thailand comprise the second tier NIEs; and Vietnam and China comprise the third tier NIEs.


3 “In practice [ ], the accounts frequently do not balance. Data for balance of payments [are] often derived independently from different sources; as a result, there may be a summary of net credits or net debits (i.e., net errors and omissions in the accounts). […] Because inaccurate or missing estimates may be offsetting, the size of the [errors and omissions] cannot be taken as an indicator of the relative accuracy of the balance of payments [ ]” (IMF 1996; p. 6). Errors and omissions can occur in the process of compilation. If that is the case, the size of errors and omissions will be stable or minimal and will not exhibit any pattern.

4 The current accounts refer to “transactions (other than those in the financial items that involve economic values and occur between resident and nonresident entities. Also covered are of sets to economic values provided or acquired without a quid pro quo. Specifically, major classifications [are:] goods and services, income, and current transfers” (IMF 1996; p. 38). The capital accounts include the following items: “(i) capital transfers and (ii) acquisition or disposal of nonproduced, nonfinancial assets” (IMF 1996; p. 77). Capital account items are different from current transfers. Financial accounts include items like “financial assets [and investments] including the claims of nonresidents [; that is, the foreign liabilities of the economy or] indebtedness to nonresidents (IMF 1996; p. 78). “The convention [is that] ownership of some nonfinancial assets [is] construed as ownership of financial assets” (IMF 1996; p. 78). Note that “the reinvested earnings of a direct investment enterprise (which accrue to a direct investor in proportion to participation in the equity of the enterprise) are recorded in the current accounts […] as paid to the direct investor as investment income on equity and in the financial accounts as being reinvested in the enterprise” (IMF 1996; p. 78).

5 BOP Financing covers the following items: Use of International Foreign Reserves, Exceptional Financing, Short-term External Borrowings, and/or the Use of the International Monetary Fund (IMF) Credits.

6 Trade data between the Philippines and its industrialized-country trading-partners are used in all the calculations. The rationale of this approach is that information from industrialized countries is expected to be more reliable compared to the data from the developing-countries-trading-partners.

7 Because the currency composition of MULT, OTHER, and STDEBT are not available, their dollar valuations remain unadjusted.

8 Because the currency composition of FDI and PORT are not available, their dollar valuations remain unadjusted.

9 CRES includes the foreign exchange adjustments on currency and other asset holdings.

10 Calculations do not cover all types of unrecorded international transactions. Illegal transactions (e.g., money laundering) are not covered in the calculations. It can be argued that the adjustments introduced in the BOP are minimum adjustments.