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CIVIL SOCIETY OBSERVATORY OF ILLICIT ECONOMIES IN EASTERN AND SOUTHERN AFRICA

RISK BULLETIN

SUMMARY HIGHLIGHTS

1. **Iranian weapons supplied to the Houthis may end up in Somalia.**
   Over the course of almost two weeks, the GI-TOC communicated with an arms dealer based in Sana'a, the capital of Yemen. The dealer provided the GI-TOC with detailed information, including photographs of assault rifles similar to both weapons found in Somalia and those seized by US and partner forces from alleged Iranian arms deliveries to Houthi insurgents in Yemen. Our analysis revealed evidence of illicit-arms smuggling networks, which see Iranian arms intended for Yemen ending up in Somalia – and potentially beyond.

2. **Kenya's recent ban on the export of donkey skins to China faces court challenges.**
   The expanding production of *ejiao*, a Chinese traditional medicine manufactured from donkey skins, has put a strain on donkey populations worldwide. In March 2020, Kenya became the latest African country to ban the export of donkey products, following pressure from farmers' lobbies and animal-rights groups. In the wake of the March ban, three Kenyan slaughterhouses took the government to court, where the cases are ongoing.

3. **Counterfeit and substandard hand sanitizers have flooded markets in eastern and southern Africa during the coronavirus pandemic.**
   When the coronavirus pandemic struck eastern and southern Africa in March 2020, hand sanitizers quickly began disappearing from store shelves. Locally manufactured sanitizers began appearing to meet skyrocketing demand. However, such products have often failed to meet health standards, particularly the minimum 60% alcohol content recommended by the World Health Organization. In South Africa's Eastern Cape province, the supply of substandard sanitizer has been linked to at least one serious outbreak of COVID-19 at a secondary school.

4. **Stricter measures targeting remittance companies risk driving financial flows to Somalia underground.**
   The UK financial regulatory environment is pushing banks to close the accounts of international remittance providers, with companies serving Somalia particularly affected. Banks have already increasingly opted to cease providing services to remittance companies, as the cash-based nature of their transactions render them vulnerable to abuse from those engaging in money laundering or terrorism financing. The timing of the UK regulatory crackdown is particularly unfortunate for Somalia, which is facing the aggregate threat of the coronavirus pandemic, devastating floods and a locust invasion. The crackdown also threatens to drive financial flows to the country further underground.

5. **Kidnappings continue to shake the business community in Mozambique.**
   In recent years, kidnappings in Mozambique have regularly targeted prominent members of the business community, particularly those of Asian descent. Eight such kidnappings have been reported since the start of 2020. Perpetrators appear to operate with impunity. This, together with arrests of police and military officers in connection with some of the attacks, as well as government inaction, has led some to conclude that Mozambique's criminal-justice system has been compromised by criminal networks.

GLOBAL INITIATIVE AGAINST TRANSNATIONAL ORGANIZED CRIME

ABOUT THIS ISSUE

The latest phase of the civil conflict that erupted in Yemen in 2015 has led to a proxy war between Iran and the United States and its allies in the region. Iran's supplies of weapons and ammunition to the Houthi insurgency have been well documented in a series of maritime seizures of dhows dating back to 2015. By tracing assault rifles of likely Iranian origin that have ended up in Somalia, our headline story explores whether the conflict in Yemen may be spilling over into East Africa. The Global Initiative Against Transnational Organized Crime (GI-TOC) will further explore these dynamics in a forthcoming research study on the Yemen-Somalia arms trade.

East Asia plays a key role in the trafficking of high-profile wildlife products, such as ivory and rhinoceros horn. Less known is the trade in donkey skins. The hides are processed in East Asia for use in the traditional Chinese medicine, *ejiao*. Plummeting donkey populations have led many African states to ban the export of these products, with Kenya being the latest to do so. Yet the theft and cross-border smuggling of donkeys in East Africa is still rife, and there seems to be a significant risk of an emerging organized illicit trade that would circumvent the bans now covering much of Africa. A regional approach to combatting donkey smuggling may be necessary to safeguard the animals and the vital role they play in subsistence lifestyles across East Africa and beyond.

The coronavirus pandemic continues to affect patterns of crime and corruption across Africa. In the last Risk Bulletin, the GI-TOC detailed likely corruption in the Somali Federal Government in relation to the diversion of COVID-19 medical donations. A comparable case emerged in the Democratic Republic of Congo in July, with media reports of a 'mafia network' in the Ministry of Health embezzling funds intended for coronavirus relief. In the current issue, however, we explore an example of a more decentralized criminal activity, namely the manufacture and distribution of substandard hand sanitizer across southern and East Africa. While it seems to be the product of small-scale criminal opportunism, the proliferation of substandard and counterfeit sanitizers may have a detrimental impact on public trust in the state's ability to respond to the pandemic. The most salient example of this impact was seen in South Africa in June, where an outbreak of COVID-19 in a secondary school was linked to substandard sanitizer, as well as possible procurement fraud.

In this issue, the GI-TOC also explores how the UK financial regulatory environment is threatening the remittance sector, with potentially significant humanitarian implications to Somalia. The increasing reluctance of banks to provide services to remittance companies also threatens the integrity of Somalia's nascent formal banking sctor, and risks driving fiancial flows further underground. Finally, we look at the ongoing trend of kidnappings of businesspeople in Mozambique, including the worrying involvement of police and military officers. Despite past promises to address the problem, the Mozambican government is yet to enact any meaningful reforms, and it is possible that the appeal of kidnapping for ransoms may attract other organized criminal actors in the country.

1. Iranian weapons supplied to the Houthis may end up in Somalia.

On 24 June 2020, Saudi-led coalition forces seized a dhow carrying Iranian weapons to Houthi insurgents in Yemen. The seized consignment included nearly 1 300 assault rifles, as well as sniper rifles, rocket-propelled grenade launchers, and anti-tank guided missiles.[1] The June seizure was the latest in a number of similar naval interdictions dating back to late 2015.[2] With the UN Security Council arms embargo on Iran scheduled to expire in mid-October, US Secretary of State, Mike Pompeo, used the June interdiction to urge the council to extend the measures.[3]

Such seizures provide compelling evidence for the established illicit movement of weapons from Iran to Yemen. However, evidence has emerged to suggest that some of these Iranian weapons may subsequently be trafficked by criminal networks into the Horn of Africa from Yemen (or even be diverted while en route to Yemen). GI-TOC research has indicated that there may be a plausible link between Iranian arms supplies to the Houthis and weapons smuggled into Somalia. In late June 2020, the GI-TOC contacted Jabir Al-Haadi, an arms dealer based in Sana'a, the capital of Yemen. His name has been changed here. In approaching Al-Haadi, the GI-TOC assumed the persona of an Arabic-speaking Somali national who lived in Nairobi and went by the alias 'Jama'.[4] Jama told Al-Haadi that he was attempting to broker an arms deal on behalf of a (fictitious) South Sudanese client.

Australian naval forces from the HMAS *Darwin* board the Iranian dhow *Samer* in the Arabian Sea, 27 February 2016. © *Australian Navy*

Between 27 June and 5 July, Al-Haadi and Jama exchanged dozens of recorded voice messages on the WhatsApp platform. Over the course of these exchanges, Al-Haadi shared detailed information about his operation, including his current weapons stocks, his associates and preferred means of receiving financial transfers. He also provided several photographs of weapons held at his storehouse in Sana'a, including one showing the serial number and related markings of a recently manufactured Chinese Type 56-1 rifle.

Based on this serial number, the GI-TOC subsequently determined that the rifle shared characteristics with weapons reportedly provided by Iran to the Houthi movement. Moreover, a Type 56-1 rifle with a highly similar serial number sequence had been documented in central Somalia in April 2019. The GI-TOC's research tentatively indicates the existence of illicit-arms smuggling networks that see Iranian arms intended for Yemen end up in Somalia, and potentially beyond.

THE HISTORY OF THE YEMEN–SOMALIA ARMS TRADE

Somalia has been under a UN arms embargo since 1992, making all imports of military equipment into the country (outside of specified Security Council exemptions) violations of international law. Since that time, Somali arms importers have looked to Yemen as their primary source for illicit arms, drawing on the centuries-old cultural and commercial ties between the two countries as well as the widespread availability of small arms and ammunition in Yemen. (Even before the outbreak of the current civil war in 2015, Yemen had the second-greatest per capita ownership of weapons, after the US.)[5]

Puntland, a semi-autonomous region comprising most of the north-eastern corner of Somalia, is the primary point of entry for illicit arms into the country. Illicit-arms imports into Puntland typically consist of light weapons such as pistols, AK-pattern rifles, rocket-propelled-grenade launchers and Soviet-pattern machine guns, together with their respective ammunition.

Arms smuggling into Puntland typically takes one of two forms. The first and more common method involves small-scale shipments being brought by speedboat across the Gulf of Aden from the Yemeni coast, most often from the vicinity of the littoral towns of Mukalla, B'ir Ali, Balhaf and Ash Shihr. The second method is more convoluted and piggybacks off the Iran–Yemen arms connection, in which ocean-faring dhows transport larger weapons shipments – often including surface-to-air missiles and other sophisticated weaponry – from Iran's Makran coast. Seizures of several Iranian dhows by international naval forces since late 2015 have yielded evidence that suggests it may be common practice for light weapons and ammunition to be transhipped to Somalia by criminal networks using smaller vessels before the dhows' arrivals in Yemen.[6]

	DATE	INTERDICTING AUTHORITY	LOCATION	MATERIAL SEIZED
1	24 Sep 2015	HMAS *Melbourne*	Arabian Sea, off the coast of Oman*	75 anti-tank guided missiles (Toophan/ M113 Konkurs/ 9M133 Kornet variants).
2	27 Feb 2016	HMAS *Darwin*	Arabian Sea, off the coast of Oman*	1 989 AK-pattern assault rifles; 49 PKM light machine guns; 100 RPG launchers; 20 60-mm mortars tubes.
3	20 Mar 2016	FS *La Provence*	Gulf of Aden*	1 998 AK-pattern assault rifles; six PKM light machine guns; 64 Hoshdar-M sniper rifles; 100 PRG launchers; 20 60-mm mortars; nine 9M113 Konkurs or 9M133 Kornet variant anti-tank guided missiles.
4	28 Mar 2016	USS *Sirocco*	Persian Gulf or Arabian Sea	1 500 AK-pattern assault rifles; 21 DShK-pattern heavy machine guns; 200 RPG launchers.
5	28 Aug 2018	USS *Jason Dunham*	Gulf of Aden*	Over 2 522 AK-pattern (Type 56-1) assault rifles.
6	25 Jun 2019	HMAS *Ballarat*	Gulf of Oman*	697 bags ammonium nitrate fertilizer; 475 000 rounds small calibre ammunition.
7	25 Nov 2019	USS *Forrest Sherman*	Arabian Sea	21 'Dehlavieh' anti-tank guided missiles; components for the Quds-1 land attack cruise missile, for a C802 anti-ship cruise missile and for a third, unidentified cruise missile; two previously unknown surface-to-air missiles.
8	9 Feb 2020	USS *Normandy*	Arabian Sea	150 'Dehlavieh' anti-tank guided missiles; three 358 surface-to-air missiles.
9	17 Apr 2020	Saudi-led coalition forces	Gulf of Aden	3 002 Type 56-1 rifles, other unknown materiel.
10	24 Jun 2020	Saudi-led coalition forces	Gulf of Aden*	1 293 AK-pattern rifles (Type 56-1s); RPG-29 variants; 'Dehlavieh' anti-tank guided missiles; PKM-pattern light machine guns; DShK-pattern heavy machine guns, optical sights; 12.7x99-mm sniper rifles; Walther air rifles.

FIGURE 1 Smuggling routes from Yemen and Iran, as well as locations of prominent seizures of Iranian/Yemeni dhows.

** Indicates seizures shown on the accompanying map.*

SOURCE: Reports of the UN Panel of Experts on Yemen, US Central Command, Australian Navy, the GI-TOC.

NOTE: The figure was updated on 17 November 2020 to correct an inaccurate seizure location.

THE ANATOMY OF AN (ABORTIVE) ARMS DEAL

Over the course of conducting research for a forthcoming study on the Yemen–Somalia arms trade, the GI-TOC found contact information for Jabir Al-Haadi, an arms dealer based in Sana'a. Using the fictitious identity 'Jama', in late June the GI-TOC contacted Al-Haadi with the aim of better understanding the modalities of the Yemen–Somalia arms trade. Following brief introductions, Al-Haadi proceeded straight to business. He began to inform Jama of the types of weapons in his possession and requested that Jama provide details on the requirements of Jama's (fictitious) South Sudanese client.

In response, Jama sent Al-Haadi a list of small arms and ammunition supposedly requested by his South Sudanese client. The requested consignment – worth upwards of US$5 million – was calibrated to test whether a Yemeni arms dealer would be capable of scaling up his operation to meet higher-than-typical demand. Within two days, Al-Haadi replied with a list of prices for various assault rifles, light machine guns, rocket-propelled grenades and light ammunition. The GI-TOC's research indicates that the figures he quoted were higher than typical wholesale prices in Yemen, though Al-Haadi insisted that he was willing to negotiate.

> Hi Sheikh Jama, Italian or Israeli type [weapons], I have all that... Since you communicated with me, then it means you can trust me. We trust in God and we work together. Write for me what is required, the types and quantities in a list and I'll bring you the prices in two days' time. So if you trust me as a person and deal with me, just tell me the various types you want.

JABIR AL-HAADI'S PRICE LIST

Type 56-1 (AK-pattern) assault rifle	US$1 900/unit
AR-M9F assault rifle	US$2 400/unit
PK-pattern light machine gun	US$6 000/unit
Type 69 rocket-propelled-grenade rounds	US$90/round
7.62×39mm (AK-pattern rifle) ammunition	US$0.70/round
7.62×54mm (PKM) ammunition	US$1.50/round
12.7×108mm (DShk heavy machine gun) ammunition	US$2.30/round

A NETWORK OF SMALL-SCALE SUPPLIERS

Al-Haadi told Jama that he did not personally have the capacity to fill the order and would have to source the materiel from various arms dealers located throughout Yemen:

> Look, the quantities of the equipment are not available, but we can gather them. So, if you're serious, and now that you have the prices, prepare yourself, and send me a deposit tomorrow afternoon... I'll send you the name of the receiver and I'll tell you the *hawala* [money broker] you'll use to send, so that we can start going to the provinces and regions and gather from the traders, giving each of them some deposit, until we get all the quantities. You contact me and I'll tell you where to transfer the money to...

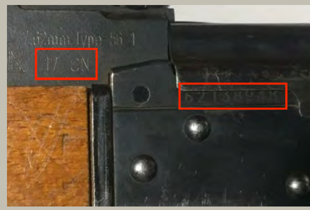
Al-Haadi also told Jama that arms and ammunition were in such demand in Yemen itself that if he hesitated to finalize the order, it would no longer be possible to source the desired quantities. 'Yemen needs weapons more than any other country in the world,' he told Jama. 'These weapons and ammunition are our breakfast, lunch and dinner. We consume them more than food.'

While this assertion may have been a negotiating tactic on the part of Al-Haadi, it is also possible that the ongoing civil war has reduced the excess supply of weapons in Yemen. If so, Al-Haadi's assertion may belie the argument made in some quarters that the conflict has led to a glut of arms available for export.[7]

TYPE 56-1 RIFLES: A TENTATIVE LINK TO IRAN

Al-Haadi also provided Jama with several photographs of his available stock, including images from his storehouse of several AK-pattern rifles with characteristics consistent with Chinese-manufactured Type 56-1s.

The serial number on one of Al-Haadi's rifles – 62138948 – allowed the GI-TOC to uncover a telling connection between Yemen and Somalia. In April



▲ Detailed markings of one Type 56-1 rifle, including '17 CN' (indicating a 2017 date of manufacture), and serial number 62138948. © *GI-TOC*

◀ Type 56-1 rifles photographed in Muriidi Ahmed's Sana'a storehouse, July 2020. © *GI-TOC*

2019, a Type 56-1 rifle with a serial number also beginning with the sequence '621' was documented in the possession of an arms dealer in the central Somali city of Galkayo.[8] The identical three digits of the serial numbers strongly suggest that the two rifles had belonged to the same illicit consignment originating in Yemen.

A small seizure of smuggled weapons in the port city of Bosaso by the Puntland authorities, also in April 2019, provided another clue as to the provenance of the rifles. A photograph of the seizure, seen by the GI-TOC, shows a collection of 19 rifles that included weapons which appeared to be Type 56-1s. It is therefore plausible to speculate that that a certain quantity of Type 56-1 rifles that reached Somalia from Yemen in April 2019 may have may have entered the country at Bosaso before being traded onwards, reaching at least as far as an arms dealer in Galkayo .

How these rifles reached Yemen in the first place is also open to speculation, but there are strong indications that they may have been part of arms deliveries from Iran intended for Houthi insurgents. Type 56-1 rifles bearing the markings CN-17 and CN-18 – such as the one in the photograph provided by Al-Haadi – are frequently documented in Yemen and are believed to originate in Iran.[9] Indeed, the UN Panel of Experts on Yemen, a Security Council body tasked with monitoring the arms embargo on the country, documented that similar Type 56-1 rifles had been seized from a dhow interdicted by the USS *Jason Dunham* in August 2018.[10] Type 56-1 rifles with serial numbers beginning with the sequence '621' were also seized aboard a Yemen-bound dhow interdicted by Saudi-led coalition forces in the Gulf of Aden on 17 April 2020.[11]

The Type 56-1 rifle in Al-Haadi's storehouse in Sana'a provides compelling – albeit very preliminary – evidence

Type 56-1 rifle seized from a dhow interdicted by the USS *Jason Dunham* in August 2018.
© *UN Panel of Experts on Yemen*

Markings of a Type 56-1 rifle seized by the USS *Jason Dunham*. The rifle bears an identical '17 CN' marking, and a similar serial number, to the Type 56-1 photographed in Muriidi Ahmed's storehouse, above.
© *UN Panel of Experts on Yemen*

of the diversion of Iranian arms supplies intended for Yemen to at least as far as central Somalia. Moreover, many arms smuggled from Yemen are also reported to be sold on by middlemen to countries such as Kenya, Mozambique, Tanzania, South Sudan and Central African Republic.[12] It is therefore possible that spillover from the Yemen conflict may have wider security implications for the East Africa region.

THE 'ARMS DEAL' FALLS THROUGH

Al-Haadi requested that Jama facilitate a transfer of US$100 000 from his fictitious South Sudanese client as a down payment for the order. He subsequently transmitted the name of an individual who would collect the funds at a *hawala* money-transfer bureau in Sana'a on his behalf. Over the course of their communications, Al-Haadi became increasingly frustrated that Jama had failed to transfer the down payment. 'Jama… Frankly, we have worked and we got tired,' he said. 'We did our part. Now, the deadline for [the South Sudanese client] is 12 p.m. … if they don't respond, tell them we will cancel and there will be no need to disturb us anymore.'

Ultimately, on 5 July 2020 Al-Haadi informed Jama that he was unable to supply the requested quantities and ceased his communications:

> *Assalamu aleikum* Sheikh Jama. I tried to get the quantities. It was very difficult to get such large quantities. Very difficult to get these quantities in Yemen… So it's impossible to provide your order. Moreover, I was very enthusiastic to work with you, but your people have some kind of fear or something like that and to add to that the quantities are not available. So frankly, we cancel this, the quantity is not available. I would have liked that we work together but I can't. My greetings and may God be with you.

Al-Haadi's willingness to communicate openly over a messenger application and furnish detailed information about the nature of his arms business to a new acquaintance was indicative of the environment of impunity in which he operates. From the GI-TOC's exchanges with Al-Haadi, he appeared to be a small-scale supplier who primarily services domestic requirements in Yemen. However, his possession of assault rifles similar to those documented in Somalia provides an interesting window into the possibility of a common origin in Iran. While far more data is required before any definitive conclusions can be drawn, the Al-Haadi case study suggests interesting avenues for future research.

2. Kenya's recent ban on the export of donkey skins to China faces court challenges.

After licensing its first donkey abattoir in 2016, Kenya became an epicentre in Africa for the multimillion-dollar export of donkey skins to China. In China, donkey skins are processed into *ejiao* gelatin, a Chinese traditional medicine used in anti-ageing beauty products such as face creams. *Ejiao* is also believed to improve blood circulation and address reproductive issues.

But the growing demand for *ejiao* has resulted in a crisis for donkey populations in Kenya, a spike in cases of donkey theft and widespread cross-border smuggling. Between 2016 and 2018, more than 300 000 of Kenya's estimated 1.97 million donkeys were slaughtered – approximately 15% of the population.[13] This drop in donkey populations has had a significant regional impact, as donkeys in East Africa continue to play a critical role in the transport sector and in supporting farming and other livelihoods in rural areas. Women are particularly reliant on donkeys to carry water, firewood and other necessities.

Several countries in Africa, including Kenya's neighbours Ethiopia and Uganda, have banned the trade in donkeys after pressure from local communities. Kenya followed suit in March 2020, when the Agriculture and Livestock Cabinet Secretary banned donkey slaughter for export and revoked the licences of the four donkey abattoirs operating in the country. Three companies have since filed legal challenges to the Cabinet Secretary's order. The courts granted a temporary injunction allowing one company to continue operations, but its licence has not been renewed and operations remain suspended.

RISING DEMAND FOR *EJIAO* PUTS STRAIN ON DONKEY POPULATIONS

According to The Donkey Sanctuary, a UK-based NGO, the *ejiao* industry experienced significant growth between 2013 and 2019, characterized by rising consumer demand and price increases.[14] The industry is, however, not sustainable and has led to collapse in donkey populations across the world. *Ejiao* production is estimated to have consumed 4.8 million donkey skins in 2016 alone, a figure that may well have risen since.[15] The organization notes that if the current rates of donkey slaughter continue, the impact on global donkey populations could be catastrophic, and may also lead to several hundred million people losing part, or all, of their livelihoods. The impact of the global donkey-skin trade is particularly felt by women, children and the elderly.[16]

Until Kenya banned the trade in March, animal-rights advocacy group Brooke East Africa estimated that when at peak capacity the country's four licensed abattoirs slaughtered a combined 1 200 donkeys daily.[17] Research conducted by the Kenya Agricultural and Livestock Research Organization, in partnership with Brooke East Africa, indicates that between April 2016 and December 2018, Kenya slaughtered 301 977 donkeys.[18] A total of 16 544 tonnes of donkey meat and 2 209 tonnes of donkey skins were exported over the same period.[19]

The drastic decline in the Kenyan donkey population has been exacerbated by the low reproduction rate of the species. Donkeys are poor breeders and prone to miscarriages when regularly engaged in strenuous labour, and little research has been done on how to improve donkey reproduction.[20] According to Africa Network for Animal Welfare executive director Josphat Ngonyo, the rate of donkey slaughter prior to the March ban was five times higher than their reproduction rate.[21]

Moreover, donkey prices have also more than doubled since the trade was legalized in Kenya, putting additional strain on local communities who rely on the animals. Before 2016, a donkey cost approximately KES 6 000 (US$60), but heightened demand and scarcity have since driven prices to between KES 12 000 and KES 15 000 (US$120 and US$150).[22]

DONKEY THEFT AND CROSS-BORDER SMUGGLING

In the streets of Naivasha, a city in the heart of Kenya's Rift Valley, donkeys used to be a common sight, dust-bathing and grazing by the roadside. Since commercial donkey slaughter was legalized in 2016, farmers have become more hesitant to let their donkeys roam freely.

John Nduhiu, a donkey owner in Naivasha, told the GI-TOC that with the onset of donkey slaughter came donkey theft.[23] In 2016, Nduhiu owned more than 30 donkeys, which he used to hire out to local farmers and porters at the rate of KES 500 (US$5) per day. When the GI-TOC spoke to him in July, he said that he had only five donkeys remaining. Between 2016 and 2018,

A woman loads a donkey with water in Kenya's Baringo county, July 2019. © *Caroline Chebet/ GI-TOC*

The Star Brilliant slaughterhouse in Naivasha, Kenya, April 2016. © *Caroline Chebet/ GI-TOC*

4 178 donkeys were reported to have been stolen across Kenya.[24] However, many more thefts are believed to go unreported.

Nduhiu's story of stolen donkeys was echoed by Leah Misori, from Monduli district in Tanzania. In 2019, all seven donkeys she owned were stolen on the same night, along with several others in her neighbourhood.[25] Tanzania had banned donkey slaughter for export in June 2017, but re-opened its slaughterhouses less than a year later, following a rise in the number of cases of stolen donkeys that authorities believed were being smuggled into neighbouring countries for slaughter.[26] At the time of writing, Tanzania allows the daily slaughter of 60 donkeys in one licensed abattoir.[27] However, it is believed that this quota is often surpassed.[28] Fred Ochieng, director of Brooke East Africa, told the GI-TOC that Kenya's ban on the donkey trade will result in the increased slaughter of donkeys in Tanzania.[29]

In Uganda, the export of donkey products is illegal. However, the demand for donkeys in neighbouring countries such as Kenya has also fuelled theft and cross-border smuggling. According to Brooke East Africa, the Karamojong people of northern Uganda have borne the brunt of the rise in donkey theft.[30]

Ethiopia, which has likewise banned the donkey trade, also continues to be suffering from cross-border smuggling. Reports suggest that both legally and illegally obtained donkeys are transported as far as 1 100 kilometres across Ethiopia to the Moyale border crossing with Kenya.[31]

KENYAN EXPORTERS BRING COURT CHALLENGES

Following the Agriculture and Livestock Ministry's revoking of the licences of Kenya's four donkey abattoirs in March, three of the four companies proceeded to challenge the ban in court. The Naivasha-based Star Brilliant slaughterhouse filed a judicial review in Naivasha High Court, while two constitutional petitions have been filed at Milimani High Court in the capital of Nairobi.[32] The Naivasha court has since issued a temporary injunction permitting Star Brilliant to continue operations until the case is resolved.[33] However, the slaughterhouse, according to Star Brilliant director John Kariuki, remains shuttered.[34]

East Africa Chamber of Commerce and Industry director Kamau Njuguna accused the department of veterinary services of failing to issue Star Brilliant with a licence to operate, in defiance of the court order.[35] He told the GI-TOC that while the coronavirus pandemic had led to the government temporarily suspending the movement of animals, the slaughterhouse itself should not be prevented from operating. However, Dr Obadiah Njagi, the director of Veterinary Services, told the GI-TOC that no slaughterhouse has been licensed to operate in Kenya since the ban was instituted.[36] The directorate, he said, was not able to issue licences without the express approval of the agriculture ministry.[37]

A source familiar with the situation told the GI-TOC that the delay in Star Brilliant resuming operations was the result of a fall-out between Kariuki and his Chinese partners over alleged unpaid taxes.

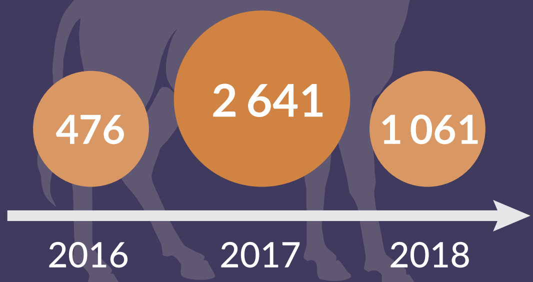
DONKEY SKIN TRADE

1 832 519 Number of donkeys in Kenya in 2009 (Kenya National Bureau of Statistics)

301 977 donkeys were slaughtered in three years (2016–2018)

18 753 tonnes of donkey meat and skin products that were exported between 2016 and 2018

DONKEYS REPORTED STOLEN



EFFECTS OF THEFT

OF DONKEYS TO OWNERS
(multiple responses)

Donkey owners have become poorer	(77.7%)
Reduced income for women	(19.2%)
Increased labour for women	(35.6%)
Children missing school	(15.8%)
Loss of source of transport	(29.1%)

DONKEY THEFT CASES BY KENYAN COUNTY (2018)

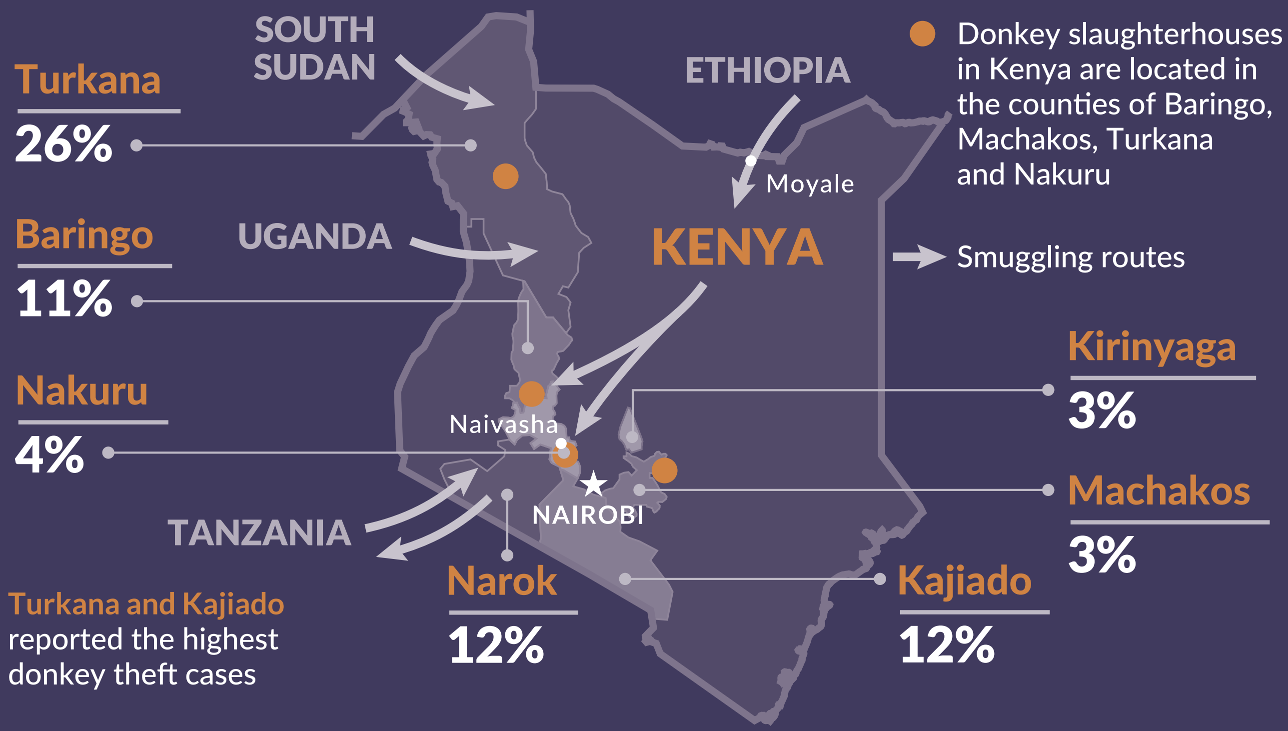


FIGURE 2 Trends in the theft of donkeys; locations of slaughterhouses and cross-border smuggling routes.

SOURCE: Brooke East Africa.

SUSPECTED TAX EVASION, UNDERREPORTING AND SURPASSED QUOTAS

According to the Kenya Agricultural and Livestock Research Organization and Brooke East Africa, the underreporting of exports and tax evasion in the donkey trade is commonplace.[38] While the declared value of donkey-meat exports between 2016 and 2018 was KES 1.72 billion (US$17.2 million), the organizations believe the true figure to be much higher, resulting in significant loss of tax revenue.[39] Exports of donkey skins, moreover, are not subject to taxation at all.[40] Star Brilliant director John Kariuki confirmed to the GI-TOC that underreporting and tax evasion in the industry was rampant.[41]

Brooke East Africa director Fred Ochieng also told the GI-TOC that before the ban it was common for slaughterhouses to surpass their daily licensed quotas, putting further downward pressure on state revenue as well as donkey populations.[42] Chamber of Commerce director Kamau Njuguna told the GI-TOC that members of the donkey-slaughter industry would be willing to address declining donkey populations by sponsoring breeding programmes.[43] But for Ochieng, a regional ban on the trade and cross-border partnerships between countries will be necessary in order to bring donkey slaughter to an outright end.[44] Ultimately, as long as the export of donkey products remains legal within some East African countries, such as Tanzania, the risk is that the theft and cross-border smuggling of donkeys will remain commonplace.

3. Counterfeit and substandard hand sanitizers have flooded markets in eastern and southern Africa during the coronavirus pandemic.

On 6 July 2020, protesters in Kenya's Kisii county set fire to a police station after police shot and killed a hawker accused of selling fake hand sanitizers in an open-air market.[45] The killing was an extreme example of the Kenyan state's efforts to crack down on individuals and companies seeking to profit from the coronavirus pandemic by manufacturing substandard sanitation products.

When Kenya's first case of COVID-19 was recorded on 13 March 2020, hand sanitizers quickly began disappearing from store shelves. In desperation, Kenyans began crossing into Uganda to purchase sanitizers.[46] In response, the Kenya Ports Authority released 18 containers of ethanol to supply the domestic manufacture of sanitizers. The consignment, which totalled 396 000 litres, had been held up at the port of Mombasa and at various container freight stations.[47]

By the following month, independent sanitizer brands had begun appearing in Kenya, but many were quickly revealed as substandard. One individual canvassed by the GI-TOC said that she refused to use the hand sanitizer provided at the entrance of a supermarket in Nairobi's central business district, preferring soap and water instead. She had found an experience with one independent brand particularly unappealing. 'It cost me only KES 50 (US$0.50),' she said, 'but when I used it for the first time, there was a burning sensation on my hands. Its scent was very powerful and irritating. It was also very sticky. I am not sure if it will protect me from COVID-19.'[48] Her experience with hand sanitizers is echoed by many Kenyans who have unknowingly purchased substandard or counterfeit brands.

COUNTERFEIT HAND SANITIZERS PROLIFERATE IN KENYA

On 21 March, the Kenya Bureau of Standards (KEBS) published a list of 36 locally manufactured sanitizers that met Kenyan requirements, including a minimum alcohol content of 60%.[49] Yet counterfeit hand sanitizers are being sold openly on the busy streets of Nairobi, with *matatu* (public minivans) operators and passengers often the target market. These brands typically cost around KES 100 (US$1), and smaller quantities sell for half the price.

A hand sanitizer manufactured by Damajoy Chemicals – a company whose existence the GI-TOC was not able to verify.
© Dorcas Wangira/GI-TOC

The Kenya Bureau of Standards market surveillance team shows the results of a raid on an unlicensed hand-sanitizer manufacturer, Laser Chemicals, in Nairobi, 28 March 2020.

SOURCE: Social media.

In early June, the GI-TOC obtained 12 samples of hand sanitizer from street sellers in Nairobi's city centre. The products were lacking manufacturers' physical addresses, dates of manufacture or expiry, and in some cases all three. The GI-TOC was not able to verify the existence of some of the stated manufacturers, such as 'Damajoy Chemicals.' Only three brands bore the KEBS Standardization Mark (SM), and the lack of proper seals in the packaging also pointed to likely counterfeiting. According to one local sanitizer manufacturer, the KEBS SM is often forged by opportunistic manufacturers.[50]

Companies with no physical address are difficult to track down, so KEBS opted to target retail outlets in a bid to stymy the distribution of the fake sanitizer products.[51] On 8 April, KEBS ordered the immediate withdrawal of 28 sanitizer brands from shop shelves following a crackdown carried out in conjunction with the Kenyan Directorate of Criminal Investigations.[52] On 17 May, KEBS withdrew its quality-assurance markings for eight brands of hand sanitizers that had been assessed as substandard.[53] Senior KEBS official Benard Nguyo told the GI-TOC that the samples companies provided for quality testing were often not of the same composition as the products supplied to retail outlets.[54] When KEBS randomly tested samples of the same brands found on shelves, they discovered lower alcohol contents.[55]

Johnson Adera, deputy director of Legal Affairs at Kenya's Anti-Counterfeit Authority (ACA), told the GI-TOC that fake sanitizers were more common in rural areas due to the reduced presence of ACA agents and police.[56] The GI-TOC's understanding is that the manufacturing of substandard sanitizers and the counterfeiting of known brands primarily takes place on a small-scale, cottage-industry level. Between March and June, the ACA claimed that it had seized KES 13 million (US$130 000) of counterfeit COVID-19-related products, including face masks, testing kits and sanitizers.[57]

UGANDAN AND TANZANIAN HAND SANITIZERS ALSO FAIL TO MEET STANDARDS

In Uganda, the Uganda National Bureau of Standards (UNBS) mandates that alcohol content in sanitizers should be at least 60%. Moreover, labelling must display the manufacturer's name and address, as well as general instructions for use, hazard and toxicity warnings and an expiry date.

The UNBS regularly halts the production of substandard and fake sanitizers and confiscates those being sold. On 19 March, Ugandans Stephen Night and his wife Aisha Namawejje, the owners of Archery Laboratory Supply, were arrested following a tip-off that they were manufacturing fake sanitizers.[58] It was the second time in the span of a few days that Night had been arrested on the same charge.[59] On 2 April, the UNBS asked the public to refrain from purchasing 15 brands because they had failed the alcohol-content and other quality-assurance tests.

Fred Muwema, director of Legal and Corporate Affairs at the Anti-Counterfeit Network (ACN) Africa, told the GI-TOC that the skyrocketing demand for hand sanitizers has led to a proliferation of counterfeit and substandard hand sanitizers on the Ugandan market.[60] 'Illegal trade in hand sanitizers is part of the wider trade in counterfeit [goods], which is both intrastate and cross-border, or transnational. One should still expect a movement of essential fast-moving products like hand sanitizers between the two countries even under COVID-19 lockdown,' Muwema said.[61]

An online survey conducted between 31 March and 10 May by ACN Africa revealed that out of approximately 500 respondents, 40% reported using sanitizers which were not on the UNBS approved list. In response, ACN Africa launched a social-media campaign dubbed 'Fight COVID-19 with genuine products'.

In Tanzania, hand sanitizers must likewise contain an alcohol content of at least 60%. However, according to local media some brands contain alcohol percentages below 40%.[62]

SUBSTANDARD HAND SANITIZERS SUPPLIED TO SOUTH AFRICAN SCHOOLS

While eastern African countries have managed to avoid major public-health incidents from counterfeit COVID-19 products, substandard sanitizers have been linked to the spread of the virus in some South African schools. In June, South Africa was rocked by scandal when Makaula Senior Secondary School in KwaBhaca, Eastern Cape province, was shut down after 204 staff and students tested positive for COVID-19 (out of a total of 330 tested).[63] The principal of the school was airlifted to hospital after he developed serious health complications.[64]

Roderick Walker, a professor of pharmaceutics at Rhodes University in Eastern Cape, tested samples of hand sanitizers supplied to Makaula Secondary and nine other schools in the same district. Walker's laboratory analyses found alcohol contents ranging between 4.1% and 57.6%. While the sanitizer supplied to Makaula Secondary contained the highest alcohol content of those tested (57.6%), it still fell far short of the minimum 70% required under South African regulations.[65]

During parliamentary questions, the cabinet minister for education in the Eastern Cape provincial government disclosed that his department had paid the supplier ZAR 4 665 (US$280) per 25 litres of sanitizer.[66] A member of the provincial legislature responded that this price was five times higher than the standard retail price for sanitizers.[67] As the number of COVID-19 cases continued to rise across South Africa, President Cyril Ramaphosa announced that schools would close down for at least one month from 27 July.[68]

While the manufacture of counterfeit and substandard sanitizers in eastern African countries is not yet known to have resulted in similarly disastrous outbreaks of COVID-19, the developments in South Africa should serve as a cautionary example. Corruption in African states, particularly surrounding tendering and procurement, may have particularly grave public-health consequences during the pandemic.

4. Stricter measures targeting remittance companies risk driving financial flows to Somalia underground.

Remittance companies provide a critically important mechanism for transferring cash to Somalia, where the fledgling formal financial sector remains largely isolated. Despite improvements, Somalia still struggles with weak financial management, a climate of impunity regarding government corruption and the destabilizing threat posed by the homegrown Islamist militant group, Al-Shabaab. As a result, commercial banks in Somalia remain largely cut off from global financial flows and are unable to accept or initiate international transfers.

For the vast majority of individuals and entities living or operating in Somalia, international financial transactions require the use of remittance providers, often, and increasingly misleadingly, referred to as *hawalas*.[69] While traditional *hawala* operations in the UK still exist, major remittance providers serving Somalia are now closely affiliated or have partnered with the recently established Somali domestic banks. As such, the major remittance providers in the UK are increasingly attempting to implement anti-money laundering and counter-terror financing (AML/CTF) protocols and know-your-customer (KYC) measures to meet basic international regulatory requirements and integrate their services into the regional and global economy. However, major challenges remain.

UK REGULATORS CRACK DOWN ON PAYMENT SERVICE PROVIDERS (PSPS)

The majority of remittances received in Somalia are sent from countries with significant Somali diaspora communities. In the UK – which hosts by far the largest Somali diaspora community in Europe – there remain concerns regarding the strength of AML/CTF and KYC systems in place for many authorized Payment Service Providers (PSPs), including all remittance providers. On 9 July 2020, the UK Financial Conduct Authority (FCA) published a 'Dear CEO' letter addressed to all PSPs that outlined a plethora of weaknesses in the industry and concluded with the stark warning that it would 'act swiftly and decisively' if the companies failed to meet their expectations.[70] These weaknesses ranged from a failure to establish sufficient safeguarding measures and implement effective AML procedures to simple record-management and reporting deficiencies.

At the heart of these weaknesses lie the issues of cash, identity and agent integrity. The traditional remittance model depends on a network of multiple agents who are located throughout the UK and deal exclusively in cash, which is collected from customers for processing and onward transfer. The use of cash means that financial flows are difficult to trace, leaving the system open to abuse from those engaging in money laundering or terrorism financing.

While senders of remittances are required to provide identity documents, which are then stored in the providers' transfer systems, the process still ultimately depends on the integrity of the agents involved. A 2019 investigation by the Norwegian Financial Supervisory Authority into an Oslo-based agent of a major Somali remittance provider, Taaj, found several customers had had their identity documentation misused to transfer funds on behalf of other customers seemingly keen to conceal their identities.[71]

'LACK OF RISK APPETITE' AMONG UK BANKS

According to UK FCA regulations, PSPs (including *hawala* remittance providers) which process more than €3 million (US$3.5 million) a month are required to safeguard client funds. This first involves segregating the funds provided by clients for transfer from any associated fees and then securing them, either in a dedicated bank account and/or through insurance. Remittance providers serving Somalia, however, are struggling to achieve either.

Since the early 2010s, starting with the high-street brands and gradually extending to smaller private and specialist institutions, UK banks have withdrawn the provision of many remittance providers' standard business banking facilities and refused to open new accounts, with banks almost always citing 'a lack of risk

Customers wait to collect money at a branch of the Juba Express money transfer company in Mogadishu, Somalia.
© Mohamed Abdiwahab/AFP via Getty Images

appetite'. As the time of writing, only one UK-based insurance broker openly offers safeguarding insurance, but they too have reportedly demonstrated a reluctance to work with remittance providers serving Somalia.

This situation initially prompted the growth of a new industry of consultants and consulting firms offering to leverage their established networks of friendly banks to establish the necessary account facilities. However, according to the manager of one such entity, their options are now also drying up, particularly following the July letter sent by the FCA, which prompted a rapid acceleration of account closures among the last few formal banking institutions willing to serve remittance companies.[72] Banks increasingly present remittance providers with convoluted application processes, which for certain African states ultimately amount to a denial of services.[73]

There have been two major consequences of banks' disengagement from the remittance sector. The first is the inability for many operators to meet FCA requirements of segregating and securing client funds. This inability is ultimately forcing institutions either to cease operations or to spread their operations among a network of Small Payment Institutions (SPIs), which maintain turnovers below the threshold of larger companies. These SPIs each use the original institution's transfer system but are held to lower regulatory and accountability standards.

The second consequence of banks' de-risking is the entrenchment of the cash model. As a result, cash has to be physically transported from agent to courier and onwards to overseas settlement institutions, often based in the Gulf.[74] During the coronavirus pandemic, the suspension of flights by cash couriers to Gulf countries has put particular strain on the ability of remittance companies to maintain financial flows.

THE RECEIVING END OF REMITTANCES

Unsurprisingly, the receiving end of remittances represents the most challenging environment for regulation and the monitoring of effective AML/CTF measures. In theory, the growing prevalence in Somalia of mobile-money platforms – where a mobile phone and associated electronic account is used to transfer funds and make payments – should make it easier to trace the digital path from sender to recipient compared to other cash-dependent economies.

Officially, measures are already in place to register users of mobile-money platforms, but such measures are often ineffective. UN monitors investigating mobile money in 2016 found that accounts with EVC+ (most likely to be the largest mobile-money platform in Somalia, and closely associated with the Taaj remittance platform) could be opened remotely, 'with no physical presence of the user required, nor photo ID'.[75] More recent reporting by the monitors in 2018 demonstrated the extent to which Al-Shabaab relies on the EVC+ platform for its own domestic financial transfers, highlighting the vulnerability of mobile-phone platforms to terrorism financing.[76]

There are legitimate grounds for maintaining a flexible approach to KYC policies and engagement and

FIGURE 3 The mechanics of typical remittance transfers from Europe to Somalia.

SOURCE: GI-TOC.

cooperation with domestic regulatory bodies in Somalia, where there is a humanitarian imperative to maintain the flow of remittances. Remittance-service providers operating throughout rural parts of southern and central Somalia cite the safety of their staff from Al-Shabaab militants – who do not wish to leave a financial footprint – as their rationale for limited compliance and cooperation with domestic regulatory bodies.

KYC procedures in Somalia are also dependent on customers both possessing identity documents and being willing to present them, as well as the willingness and ability of financial agents to verify such documentation. This remains some way off in Somalia, not least because of the scarcity of identity documents among the population and the widespread availability of falsified documents (including passports).

But despite the imperative to keep the remittances flowing, it is inarguable that the lack of a functioning financial-regulatory and national-identification system in Somalia has long made the system vulnerable to abuse by organized-crime groups. A forthcoming study by the GI-TOC will detail how the remittance system underpins the Yemen–Somalia arms trade.

IMPLICATIONS OF RESTRICTIONS ON REMITTANCE PROVIDERS

The increasingly restrictive environment for remittance providers serving the Somali community comes at a time when many are already facing challenges, with a recent fall in business prompted in large part by the coronavirus pandemic. Lockdown measures in the UK led to the temporary closure of many agents' premises and made customers reluctant to venture out, withdraw cash and physically carry it to the nearest agent.

The permanent closure of remittance providers serving Somalia would have a significant and immediate humanitarian impact.[77] Somalia is facing its own coronavirus crisis, with among the world's least-prepared health sectors.[78] Somalia has also experienced severe flooding along river basins and an invasion of desert locusts, raising the prospect of food insecurity and famine conditions which could ultimately claim many more lives than COVID-19.

The economic impact of the restrictions may also have longer-term repercussions. The formal financial sector remains in the early stages of revival in Somalia and trust in it remains limited among the general population. Given the interconnectedness of banks, mobile-money platforms and remittance providers, the collapse of one component is likely to dent faith in the others, and could ultimately result in a cash run on financial institutions.

In the UK, the closure of remittance providers is likely to undermine the broader aims of financial regulation. One foreseeable outcome is that financial flows from the UK to Somalia will be driven futher underground, and that in the absence of affordable formal and regulated remittance services, an informal market for the physical transportation of cash across borders will flourish.

For different reasons – to do with over-regulation at the receiving end – this is already largely the case for remittances sent globally to Eritrea. According to some estimates, at least two-thirds of remittances sent to Eritrea are now made informally. Individuals face severe risks when importing cash for family and friends in suitcases through Asmara International Airport. Yet they are willing to do so to avoid being forced to accept government fees and the official exchange rate, which almost halves the money's purchasing power once converted into local currency.[79]

A WAY FORWARD?

UK-based remittance providers serving Somalia are dangerously close to being permanently shut down, which would leave a vacuum for informal actors to fill. Creative solutions need to be found to protect remittance providers while also strengthening the accountability of transactions.

A shift away from cash to digital transactions – requiring debit/credit card transactions or bank transfers to send remittances – would reduce opportunities to exploit existing weak systems and the loopholes among agents in the UK to send funds anonymously, while strengthening traceability of cross-border financial flows. This would require the re-structuring and modernization of the Somali remittance business model. But it would also require facilitation by UK banking institutions which currently have little, if any, incentive to risk engaging with remittance providers serving Somalia.

5. Kidnappings continue to shake the business community in Mozambique.

On 13 July 2020, businessman Álvaro Massinga, speaking on behalf of Mozambique's main private business organization, told a press conference that 'cases of kidnapping and abductions of businesspeople in our country are multiplying, which makes us think that the world of organized crime has directed its barbarous actions towards the business class'.[80]

Massinga's statement was in response to the shooting of Agostinho Vuma – a prominent businessman, ruling party MP and president of the business association – in broad daylight in the capital Maputo, two days previously.[81] Vuma was seriously injured in the attack. As Massinga's response shows, the business community in Mozambique has both condemned Vuma's shooting and seen it as part of a pattern, whereby businesspeople have become the targets of criminal groups in Mozambique, and the primary target for kidnappings. Few also expect the perpetrators to be brought to justice: Maputo, as one Mozambican commentator said on social media on the same day as Massinga's statement, 'remains the capital of impunity'.[82]

While statistics presented to the Mozambican parliament suggest that the national rate of kidnappings has in fact not so far increased in 2020,[83] Massinga's assertion that the business community is being targeted appears to be correct: the eight kidnappings that occurred in the first half of 2020 all involved prominent businesspeople or their family members.[84] Since 2015, the government has repeatedly promised to bring the situation under control, but to little effect. The kidnapping phenomenon therefore looks set to continue in Mozambique.

KIDNAPPINGS IN MOZAMBIQUE

The first case of kidnapping for ransom in Mozambique was registered in 2008. A 55-year-old Dutch woman was held captive for 18 hours before her husband paid a US$20 000 ransom, negotiated down from US$100 000.[85] After that time, the number of kidnappings grew steadily, from six attacks in 2011 to 17 in 2012 and 37 in 2013, according to official statistics.[86] Kidnapping also spread geographically, starting in the cities of Maputo and Matola (which continue to be the main focus for kidnappers), before reaching other major Mozambican cities such as Beira, Chimoio and Nampula. Following the peak in 2013 and 2014, rates of kidnappings have since declined, ranging between 14 and 19 per year between 2015 and 2020 (measured from April to April each year, as visualized in Figure 5, below).[87] While the figures do give

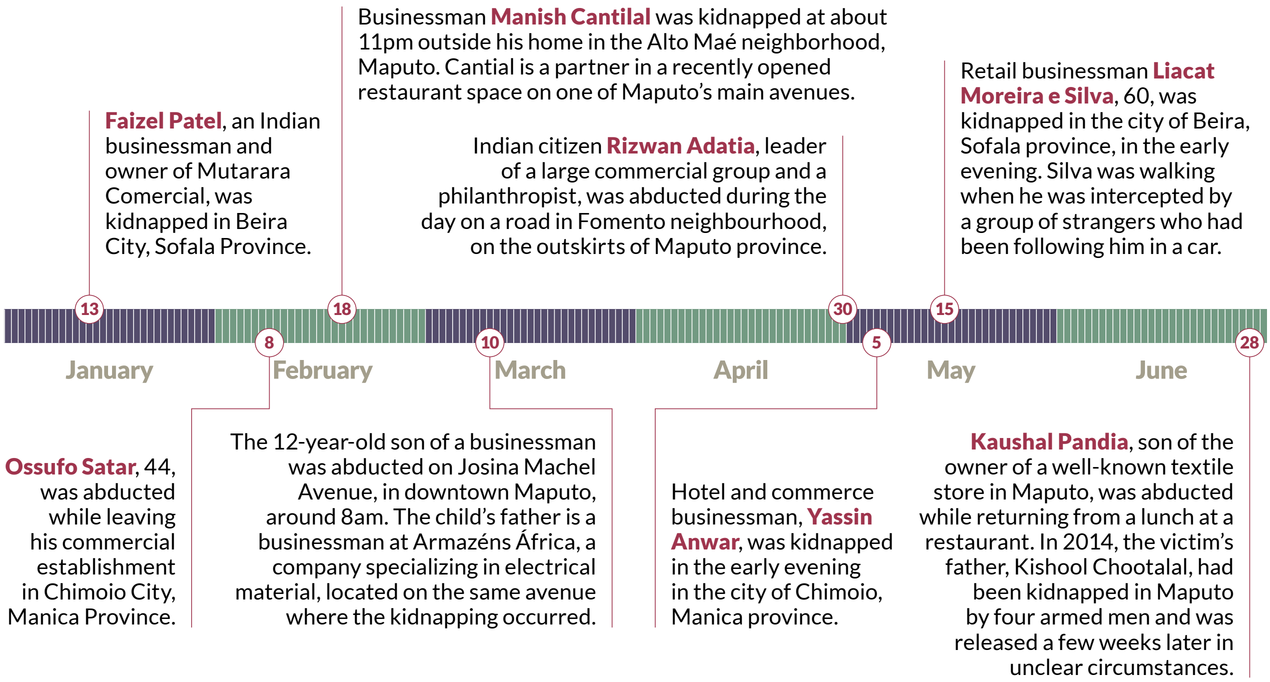


FIGURE 4 Kidnappings of businesspeople in Mozambique, January to July 2020.

SOURCE: Media reports.

an indication of prevailing trends, it is worth noting that many kidnappings may also go unreported to police.

The victims are typically abducted in daylight by armed and masked men driving vehicles without licence plates. The blindfolded victims are subsequently transferred to houses, typically in suburban areas, while the kidnappers negotiate the ransom. There have been instances of kidnappers torturing or threatening to torture their victim to encourage the immediate payment of ransoms. This was reported in the case of Manish Cantilal, who was rescued by police on 20 May 2020.[88]

In earlier years, the attackers communicated with victims' relatives either through SMS texts or phone calls. The Attorney General's Office accordingly told parliament in 2017 that the communications regulator should start enforcing the mandatory registration of SIM cards by mobile-phone companies.[89] The law, which was passed in 2015, obligates users to register their ID when buying a SIM card. However, encrypted-messaging platforms such as WhatsApp, Signal or Telegram have made it difficult for the authorities to link kidnappers to particular phones.

Typically, kidnappings in Mozambique have targeted wealthy businesspeople or their family members. People who 'show ostentatious signs of wealth, such as luxury cars, gold rings or top brand pens' can become targets, according to Rodrigo Rocha, a lawyer and legal- and political-affairs analyst.[90] Kidnappers have disproportionally targeted the Asian community, 'as there is a perception that this community owns a lot of businesses and a lot of wealth revolves within it,' said Maputo-based journalist and businessman Fernando Lima. There is a perception that the Asian community is 'closed', and that they live well due to their wealth. This view is shared even among educated people and those with senior positions in government, a businessman based in Maputo, who wished to remain anonymous, told the GI-TOC.[91]

Ransoms are negotiated according to the kidnappers' estimate of what the victim's family is able to pay, with the kidnappers sometimes gleaning inside knowledge through connections with the victim's bank. Adriano Nuvunga, a professor and head of the Mozambican think tank Centre for Democracy and Development, says that 'there are signs that bank workers give information about the victims' balances and movements to kidnapping planners'.[92]

The ransoms demanded can be substantial, as shown by the case of businessman Rizwan Adatia, who was rescued by police on 20 May 2020. Benjamina Chaves, the director of National Criminal Investigation Service (SERNIC) in Maputo province, told the press that the kidnappers had initially demanded US$5 million.[93] The kidnappers dropped their demands to US$2.8 million the following week after formal police investigations had begun, then lowered the ransom again to US$1 million when they realized that the authorities were close to tracking them down. They then lowered it again to US$300 000 the day before Adatia's rescue. Three kidnappers were arrested during the operation.[94]

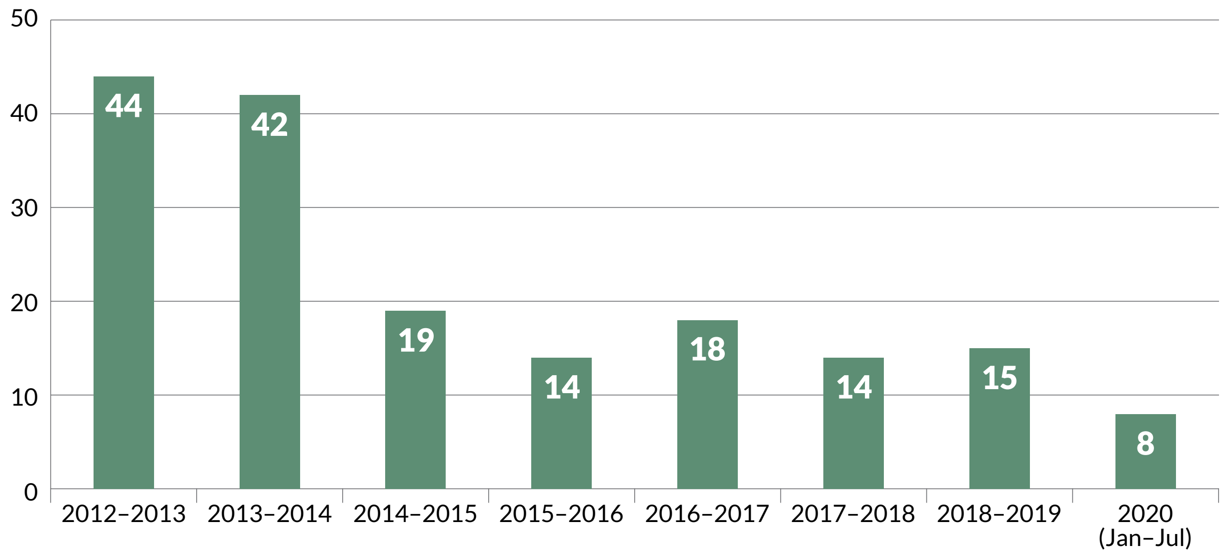


FIGURE 5 Year-on-year in kidnappings in Mozambique (April to April, with the exception of 2020).

SOURCE: Annual reports from the Procuradoria-Geral da República de Moçambique to parliament (2014–2019); media reports.

However, such detail about a kidnapping is rare. While at least five of the eight individuals kidnapped in Mozambique in 2020 have been subsequently released or rescued, the fate of the detainees is not always publicly known. In addition, police and victims alike are often unwilling to publicly discuss ransom payments, and the authorities do not release much information regarding the arrests and prosecutions of kidnappers.

However, recent kidnappings suggest that similar groups of actors may be involved in multiple operations. Information obtained by police following the arrest of Adatia's kidnappers led to the rescue of Manish Cantilal later the same day, indicating possible operational linkages between the two gangs. Furthermore, the group behind the November 2019 abduction of Shelton Lalgy (nephew of the owner of the Lalgy logistics company) is also reported to have kidnapped an Asian citizen named Balesh Moulal – a trader based in the city of Maxixe, in late 2019. One of the members of the group was arrested in Beira City while in the process of orchestrating another kidnapping.[95]

SIGNS OF STATE AND SECURITY INVOLVEMENT

There is evidence to suggest that state officials – including police and military officers – may be implicated in some kidnappings. According to Chaves, a senior official of the Municipal Council of Maputo City was implicated in the kidnapping of Adatia,[96] while SERNIC stated that a member of the Mozambique Armed Defence Forces was one of three people arrested on suspicion of having kidnapped Shelton Lalgy in the city of Matola.[97] (Lalgy was released in February after a ransom was paid.) SERNIC named the officer as the main suspect in the supply of arms and ammunition used by the group in its raids.

But according to Antonio Frangoulis, the lawyer and former director of the police-investigations branch which preceded SERNIC, those arrested by police are usually just 'small fish,' such as guards or domestic workers. 'The real planners and principals of these crimes are in the offices commanding the actions and are untouchable,' he said.

There are clear signs – such as repeated failures to investigate kidnappings and prosecute the perpetrators – that the Mozambican police and associated institutions are influenced by criminal networks, including groups that carry out kidnappings. 'What we see is the criminalization of the state in which groups of bandits have the ability to manage decisions that should be taken against them, which is why you see this passivity and impunity towards them and their actions,' Nuvunga said.[98]

This pattern of impunity was broken in the case of Rizwan Adatia. In the view of a Maputo-based businessman interviewed for the Risk Bulletin, intense pressure from the Indian government on the Mozambican authorities to find and release Adatia (an Indian citizen) brought about the rescue. 'This time they had kidnapped the wrong person,' he said.[99]

The same climate of impunity also surrounds other crimes in Mozambique, such as assassination. Mozambican police officers have reportedly formed so-called 'death squads' to carry out state-sponsored assassinations. As reported in a previous Risk Bulletin issue, the assassination of election observer Anastácio Matavel in October 2019 was carried out by agents of the Rapid Intervention Unit, which is linked to the Mozambican police.[100] The weapons used in the crime had been sourced from state warehouses.[101]

While the trial of Matavel's killers was a significant step in revealing the existence of the police death squads – six officers were sentenced to between three and 24 years in prison – the masterminds of the crime were not identified. The legal counsel for the general command of the Mozambican police argued that the officers had acted in their individual capacities, and not on behalf of the state.[102]

The July 2020 shooting of Vuma, the business leader, was also reportedly linked to the police. A security guard who witnessed the attack told the press that Vuma had identified the shooter as 'Salimo'. Ongoing press investigations have identified 'Salimo' as a police officer who has been hired as a hitman by wealthy individuals.[103]

It remains unknown whether other groups could be involved in the kidnapping in Mozambique, such as other organized-crime groups or business rivals contracting kidnappings to be carried out on their competitors. Manish Cantilal, one of the kidnapping victims in 2020, had previously been arrested in 2014 on suspicion of involvement in several kidnappings, but was later cleared.[104] This came after a judge, Dinis

Silica, was gunned down the day he was due to make a ruling on Cantilal's case.[105] Investigations of comparable kidnappings of businessmen in the Pakistani and Indian communities in South Africa have raised suspicions of the involvement of Pakistan-linked mafia groups.[106]

STATE ACTION AND INACTION

At the end of 2015 – President Filipe Nyusi's first year in office and a year in which 19 people were kidnapped – the then-interior minister Jaime Basilio Monteiro assured the public that the police would get the situation under control.[107] Since then, the authorities have attempted to encourage information-sharing to help trace the movements of kidnappers. Since the locations used by the kidnappers are generally rented houses, the Mozambican police and local authorities have called on the owners of short-term rented properties to register them with licensed real-estate agents. Landlords must also inform the local authorities of the identities of new tenants.

In addition, the Interior Minister Amade Miquidade told parliament in May that the financial sector should play more of a role in helping identify kidnappers, as the transfer of large sums of money to pay ransoms could be used to trace criminals.[108] Banks do not currently have any specific measures in place to deal with this type of crime, according to the Mozambique Financial Information Office, a government financial watchdog.

But cooperation with private partners is likely to yield scant results if the state itself does not act. Sources have told the GI-TOC that, despite repeated pledges, the Mozambican authorities have not passed any reforms or visible measures to prevent kidnappings.[109] This situation, combined with an apparent lack of will to investigate and prosecute kidnappers, may further empower the kidnappers to expand their operations. In the words of Alberto Ferreira, an academic and opposition parliamentarian: 'as in southern Italy where the *mafiosi* control political power, here too the kidnappers are in control'. Looking to the future, Ferreira warns that impunity for kidnapping groups may invite other criminal groups to move into this business.

Notes

1 Confidential report seen by the GI-TOC, July 2020.
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4 Alias has been changed.
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