



ECOWAS COMMISSION
COMMISSION DE LA CEDEAO
COMISSÃO DA CEDEAO

Labour-trafficking risks in Sahara-Sahel ASGM

Alice Fereday



OCWAR-T Policy Brief 3 | June 2023

Summary

This policy brief is based on a research report which assesses risks of exploitation and labour trafficking in gold-mining areas in northern Niger and northern Mali. It examines the modalities of recruitment and employment, the risks they pose to workers and the structural factors that contribute to the vulnerability of gold miners. The report also identifies key opportunities for policy makers to address these risks while recognising the crucial role of gold mining for local livelihoods and stability.

Recommendations

Support efforts to formalise gold mining in a way that allows ASGM to be sustained alongside industrial mining while providing guarantees for workers:

- Include safe labour standards in mining regulations;
- Adjust formalisation procedures to support independent gold miners and reduce corruption and clientelist risks;
- Promote dialogue around challenges and opportunities for ASGM in the Sahara–Sahel;
- Invest resources in the deployment of state services and security at goldfields.

Support roles for civil society to reduce risks in ASGM alongside national formalisation drives:

- Raise awareness of labour-trafficking risks in ASGM;
- Encourage and provide frameworks for the creation of gold-mining unions and cooperatives.



OCWAR-T

Organised Crime: West African Response to Trafficking

Introduction

Since 2013, the discovery of gold deposits across the northern Sahel and central Sahara and the subsequent boom in artisanal and small-scale gold mining (ASGM) have given rise to new challenges and opportunities for local communities and local, national and regional authorities. ASGM now plays a central role in political economies and stability dynamics in the region.

The geographic and political isolation of certain Saharan and central Sahelian sites which remain largely beyond the reach of national authorities, or where state presence is limited, and the sheer concentration of workers in otherwise lightly populated areas, have led some to emerge as nexus points for a plethora of criminal routes and activities.¹ Many gold-mining areas are also located along historic regional trafficking routes and have evolved alongside – and with linkages to – various illicit economies, such as drug trafficking, human smuggling, arms trafficking and banditry, some of which largely pre-date the gold rush.²

However, goldfields are also key to local economies and provide crucial employment opportunities in a context where alternative livelihood options are scarce. Amid rising insecurity and contracting economies, the boom in artisanal gold mining in the Sahel has helped to revive local informal economies, driving formal ancillary business opportunities around gold-mining areas and redefining socio-political dynamics. In so doing, the goldfields offer a degree of stabilisation in the broader areas in which they are located.

Yet gold mining also poses substantial risks and challenges to those involved. Existing research has identified the links between gold mining, illicit economies and conflict dynamics in the Sahel and West Africa³ and underlined potential risks of human trafficking in gold-mining areas in West Africa. However, specific research into labour-trafficking dynamics in goldfields in the more inaccessible zones of the northern Sahel and central Sahara is far more limited. Because of the remoteness of many of these sites, and the difficulty of conducting applied field research, evidence on the linkages between goldfields and labour trafficking in northern Niger and Mali is scarce.

This policy brief assesses risks of exploitation and labour trafficking in gold-mining areas in northern Niger and northern Mali. It examines the modalities of recruitment and employment, the risks they pose to workers and the structural factors that contribute to the vulnerability of gold miners. The research focuses on artisanal gold mining, which represents the bulk of gold mining in the focus area. Rather than implying that artisanal gold miners are inherently criminal, this focus is motivated by the recognition that the mostly informal nature of their activities – and indeed the challenges they face in accessing formalisation – makes them particularly vulnerable to exploitation.

The research therefore aims to provide a relevant and timely analysis of labour-trafficking dynamics at gold sites in northern Mali and Niger and the challenges and opportunities they pose for stabilisation strategies in a context affected by deteriorating security and political uncertainty across the region.

The report also identifies key opportunities for policy makers to engage with local communities, national authorities and regional actors to address human-trafficking risks in Sahara–Sahel goldfields while recognising the crucial role of gold mining for local livelihoods and stability.

Goldfields are key to local economies and provide crucial employment opportunities in a context where alternative livelihood options are scarce

Key findings: A nuanced approach to assessing labour trafficking dynamics in Sahara–Sahel goldfields

Defining labour trafficking in ASGM in the Sahara–Sahel

There is a degree of confusion in the definition of human trafficking, including labour trafficking, and the forms of exploitation or abuse that constitute it.⁴ The definition commonly accepted internationally is based on the Protocol to the United Nations Convention against Transnational Organized Crime to Prevent, Suppress and Punish Human Trafficking, in particular Trafficking Involving Women and Children – also known as the Palermo Protocol – which defines human trafficking as

the recruitment, transportation, transfer, harbouring or receipt of persons, by means of threat or use of force, or other forms of coercion, abduction, fraud, deception, abuse of power or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.⁵

By this definition, gold miners could be considered victims of human trafficking in various situations, to varying degrees of gravity.

However, applying this definition of human trafficking poses significant challenges for certain practices in Sahara–Sahel ASGM, where there are varied perceptions of these practices, the degree to which they are intentional and whether they are accepted locally.

In many cases, interviewed gold miners had experienced exploitative and abusive situations but would not consider themselves victims of human trafficking. Likewise, gold-site owners or local community leaders at the goldfields recognise that such situations exist without equating them to human trafficking; several interviews suggest that these situations are considered normal. Assessing human-trafficking dynamics therefore requires a more nuanced and locally grounded approach to understand the complex realities and modalities of the transport, recruitment and employment of gold miners.

Further, there is some doubt surrounding the utility of determining a person's status as a victim of human trafficking in such contexts. The goal of this determination is usually based on the rights granted to victims under international law. However, where governments lack the resources, capacity or willingness to uphold these rights, its importance seems limited.⁶ Therefore, it is likely that applying the Palermo Protocol definition to identify human trafficking in ASGM would be not only problematic with regard to the local context of this research but also largely futile.

Instead, the report focuses on evidence of exploitation or abuse that falls under a narrower definition of 'labour trafficking', using the International Labour Organization's definition of forced labour, which refers to

situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.⁷

This research thus highlights evidence in two broad categories: workers being forced to work for little or no pay by means of threat of or use of force (coercive control), and workers being forced to work for little or no pay by means of abuse of their positions of vulnerability. The following sections highlight evidence pertaining to both categories.

Risks of labour trafficking through coercive control

Examples of labour trafficking through coercive control are limited in the framework of this study. Little evidence of the use of force or violence to coerce workers was found in N'Tahaka. This does not mean that such practices do not exist; the lack of evidence could be linked to challenges in accessing victims and the reluctance of victims to report abuse. In the Nigerien goldfields, however, although these practices do not appear to be systematic, multiple interviewees reported instances where forms of violence have been used to coerce workers.

Interviewees provided both personal and eyewitness accounts of situations in which workers were deceived into working for little to no pay at gold-mining sites, and in some cases forced to work under the threat of violence.⁸ Several interviewees also reported witnessing workers in Nigerien goldfields being tied up at night by their employers, to stop them from escaping before they had paid their transport debt. Some interviewees claimed that this is a common practice when gold miners travel on credit.⁹

Multiple interviewees reported widespread use of force and violence against workers at the goldfields

Multiple interviewees also reported widespread use of force and violence against workers at the goldfields. Several gold miners reported they had been physically attacked by their employers, and many witnessed other workers being beaten in Djado.¹⁰ There were also reports of situations in which their employer refused to pay them at the end of the agreed time, which in some cases resulted in physical threats by the employer and physical altercations.

These are examples of the use of physical violence and constraint to coerce and exploit workers. However, interviews suggest that gold miners also face exploitation as a result of structural factors that create an environment of latent violence where workers are dependent on their employers and have little to no control over their working conditions or pay.

Risks of exploitation through abuse of positions of vulnerability

The geographic remoteness of the goldfields is the main structural factor contributing to exploitative working conditions and labour-trafficking dynamics. In Tchibarakaten and Djado, for example, most gold miners arrive from southern Niger or neighbouring countries and know no one other than the person who brought them to the site, usually an intermediary. Gold miners are dispatched to the different sites – which can be hundreds of kilometres away from the main market locality – without any means of communication or transport.¹¹

In these situations, although workers are free to leave when they want to and are not constrained in any physical way to continue working, they typically have no means of leaving and are therefore forced to remain until they have sufficient funds for their journey home or their employer agrees to take them back to the main site. Workers depend entirely on their employer, and where the only means of transport is the employer's vehicle, this dependence increases with the remoteness of the site. In these cases, even workers with enough funds to leave still depend on the employer's willingness. In Tchibarakaten and Djado, for instance, interviews with gold miners suggest that this form of dependence is abused by employers who take advantage of the vulnerability of workers.¹²

This geographic factor is more significant for remote goldfields like Tchibarakaten (400 kilometres from Arlit) and Djado (650 kilometres from Agadez) than those located closer to major towns and cities, such as N'Tahaka (50 kilometres from Gao).¹³ However, interviewed gold miners in N'Tahaka reported having travelled

on credit to the goldfield from further afield than Gao. Transport debts for gold miners in N'Tahaka can reportedly range between FCFA 200 000 and FCFA 500 000 (€305–€762).

Interviews in Djado suggest that travelling on credit, which is often necessary due to the cost of the journey from Agadez, is another key factor of vulnerability for prospective gold miners. Interviewees explained that they had in fact been recruited in Agadez, where smugglers gather prospective gold miners to transport them to Djado. On arrival in Djado, the smugglers 'sell' the gold miners' debt to employers.¹⁴

Interviews in Djado suggest that travelling on credit, which is often necessary due to the cost of the journey from Agadez, is another key factor of vulnerability for prospective gold miners

Another factor that can contribute to exploitative working conditions is the use – or misuse – of the traditional payment system known locally as *'les trois-tiers'* ('the three-thirds'). In this system, the extracted gold is divided into three equal parts. Two-thirds go to the employer and one-third goes to the team of gold miners. The employer deducts food and water provision fees from the gold-miners' share, which is then divided by the number of people in the team for each worker's share. In some cases, equipment (engine, compressor) fees are deducted from the total before it is divided by three; in others, the equipment fees are calculated as another equal share alongside the gold-miners' share.

This sharing system applies to all sites under study across northern Niger and Mali.¹⁵ Although it is accepted and understood by all gold miners in the region, it both relies on and contributes to the vulnerability of workers, who cannot negotiate better remuneration and often find themselves working for several months without pay: if they do not find gold, they receive only basic food and water. Yet this three-thirds payment system alone, although abused in some cases akin to exploitation, cannot be considered akin to labour trafficking.

In addition to this unequal distribution of revenues, however, gold miners can also be forced to share their earnings with the person who recruited them. As the pool of prospective miners is far greater than the demand for workers, many resort to recruiters to find employment at goldfields. In doing so, they often commit to sharing part of their earnings with the recruiter as a recruitment fee.¹⁶ Many interviewed gold miners believe they are being exploited by intermediaries, who exaggerate the cost of their services. They see intermediaries as abusing their power to exploit the precarious vulnerability of workers who have no viable economic opportunities other than gold mining.¹⁷

Some gold miners also suggest that they were misled by their recruiters and found the working conditions were not what they agreed upon before departure.¹⁸

In N'Tahaka, the vulnerability factors are somewhat different than in the remote goldfields of Djado and Tchibarakaten. Vulnerability seems more strongly linked here to insecurity at the goldfield and predation by Cadre Stratégique Permanent pour la Paix, la Sécurité et le Développement (Permanent Strategic Framework for Peace, Security and Development, CSP) armed groups.

Interviewees highlighted the role of armed groups in control of N'Tahaka in facilitating exploitation, due in part to the impunity they enjoy when conducting business and illicit activities. One gold miner explained that exploitation is common in N'Tahaka and accused members of the CSP who are involved in gold mining of abusing their position to impose unfair and exploitative conditions on workers.¹⁹ Interviews in N'Tahaka also suggest that high levels of dependence on employers or armed groups to provide equipment, food and water result in exploitation dynamics similar to those seen in Tchibarakaten and Djado.²⁰

Conclusion

This research found evidence of labour trafficking based on forced labour in Djado and Tchibarakaten, where some gold miners, particularly those originating from southern Niger, are subject to physical violence and constraint. However, these practices do not appear to be systematic across the goldfields under study. Instead, this research has highlighted key factors that exacerbate the vulnerability of gold miners to exploitative practices and abuse.

Several of these factors are linked to the remote geographic location of two goldfields under study, Djado and Tchibarakaten. The cost of travel from major towns such as Agadez or Arlit to the goldfields usually requires low-income prospective gold miners to travel on credit, and subsequently enter into indentured labour agreements with employers which make them vulnerable to exploitation. The remoteness of these goldfields, and even more so certain gold sites within them, further exacerbates their vulnerability, as gold miners are highly dependent on their employers.

The location of goldfields, combined with the high demand for employment in ASGM in the context of limited livelihood options, also creates a reliance on recruiters or intermediaries to find work there. Although not exclusively predatory, these actors can contribute to the exploitation of workers, either by deception (about working conditions, locations) or by demanding additional shares of their income.

Finally, security actors can also play a role in ASGM exploitation by abusing their positions of power to impose unfair or exploitative working conditions. This is especially the case in N'Tahaka, but it can be found across all the sites under study, including in community dynamics.

These practices also take place within a broader context of insecurity and ineffective law enforcement, which contributes to gold-miners' risks. Although not directly linked to labour trafficking and exploitation, organised crime dynamics such as drug and arms trafficking are also relevant insofar as they increase overall insecurity and violence in these remote areas, which can jeopardise the safety of workers.

Addressing these issues requires a multifaceted approach that takes into account the social, economic and political context in which ASGM takes place.

Although ASGM in goldfields such as Tchibarakaten is managed and increasingly regulated by local governance structures, efforts to address labour-trafficking risks and improve working conditions are lacking. More broadly, research shows that the Nigerien government's steps towards formalisation have, so far, only benefited local political and business elites while further exacerbating the vulnerability of individual miners.

In N'Tahaka, prospects for formalisation are bleak while the area remains beyond the control of Malian authorities, but this research suggests that improving security at the goldfield could help reduce the gold miners' vulnerability to exploitation. Further research is needed to assess the situation of goldfields in the Kidal region of Mali, where artisanal gold mining also plays an important role within local and regional political and security dynamics.

The current situation – marked by growing efforts and advocacy to formalise gold mining and harness its economic and development potential in a region otherwise marred by instability – represents a crucial opportunity for Sahel states. If properly managed, the gold-mining boom, rather than feeding into conflict and criminality and exposing workers to risks of exploitation and abuse, could secure safe and sustainable livelihoods.

Further, it provides opportunities to boost tax revenues and contribute to stabilising and bolstering state presence in otherwise marginalised and isolated regions. To do so, states must strike a balance between industrial and artisanal small-scale mining, and effectively address labour-trafficking risks and exploitative practices as part of formalisation efforts.

Recommendations

The following recommendations would contribute to reducing the risks of labour trafficking in ASGM in the Sahara–Sahel and improving working conditions for gold miners. While they are mainly directed at Djado and Tchibarakaten, they could also apply to other sites in the region. Although most cannot be applied to N’Tahaka in the current political and security context, they remain relevant to the broader ASGM context in Mali.

Achieving these recommendations could also be impeded by the lack of capacity and/or willingness of Sahelian states to effectively regulate and supervise remote Saharan goldfields. Therefore, international partners should play a role in pushing for and supporting their implementation.

Support the formalisation of ASGM

States should continue efforts to formalise gold mining in a way that allows ASGM to be sustained alongside industrial mining while providing guarantees for workers.

Include safe labour standards in mining regulations

The formalisation drive should ensure that gold-mining regulatory frameworks provide clear standards for working conditions in both ASGM and large-scale gold mining. These should also be disseminated by mining ministries and made accessible in the field through local representatives of the ministry. Ministries of labour and mines could elaborate a locally available grievance mechanism for complaints and standard procedures to assist miners whose rights have been violated. The mining ministry should create and allocate resources to mechanisms to monitor and supervise the implementation of these regulations.

Adjust formalisation procedures to support independent gold miners and reduce corruption and clientelist risks

To avoid further marginalisation and criminalisation of individual miners, formalisation should not be limited to granting permits to mining companies and should be more affordable and accessible to individual gold miners. Permit procedures should also be more transparent to reduce risks of corruption and clientelism. When providing the mining permit, the relevant authority should also provide information about safe mining, including labour standards.

Promote dialogue around challenges and opportunities for gold mining

Dialogue and sharing of experiences at national and local levels could help Sahel states to formulate and implement sustainable conflict-sensitive formalisation processes that mitigate labour-trafficking and exploitation risks. Experiences of formalisation in Mauritania, for instance, which focused on gold processing rather than extraction sites, and Sudan²¹ could provide useful comparative bases in areas that share similar characteristics.

Such dialogues should involve local actors and policy makers, such as gold miners themselves, community leaders and governmental actors, to ensure that formalisation processes are locally owned and that the institutionalisation of practices is accepted and considered fair at the local level.

Invest resources in the deployment of state services and security at goldfields

The formalisation of ASGM should be accompanied by efforts to provide security and basic services in return for taxation. The state deployment should also bring increased financial and human resources to local monitoring and supervision mechanisms and law enforcement.

Support roles for civil society in gold mining

National formalisation drives, even if successful, are lengthy and complex processes. While government efforts to support the formalisation of ASGM may provide safer conditions for workers at goldfields, addressing labour-trafficking risks should also involve civil society.

Raise awareness of labour-trafficking risks in ASGM

In prospective miners' places of origin, civil society should play a role in sharing relevant information on the ASGM situation. While these efforts should not aim to discourage prospective miners, they should provide information on working conditions in ASGM in key destination goldfields and advice on ways to reduce vulnerability (e.g. avoiding travel on credit, avoiding certain intermediaries, seeking written contracts from local management committees when possible). Information could be shared through civil society organisations, traditional community leadership structures or social media.

Encourage and provide frameworks for the creation of gold-mining unions

Gold-miners' unions could contribute to better representation of workers' interests, accompany formalisation processes, raise awareness around labour trafficking and exploitation risks and represent a credible and legitimate interlocutor for local and national authorities. A Syndicat National des Travailleurs des Mines de Niger (National Mineworkers Union of Niger) exists in western Niger, although its role and capacities are reportedly limited.

Encourage and provide frameworks for the creation of gold-mining cooperatives

Gold-miner cooperatives could support the sustainability of individual gold mining and reduce the vulnerability of workers by allowing the pooling of resources for gold-mining equipment, taxes and permits, and by reducing gold miners' dependence on mining companies. Mining permits should also be accessible to gold-mining cooperatives. Cooperatives could also be key interlocutors for local and national authorities in formalisation drives.

Notes

- 1 Lucia Bird and Lyes Tagziria, Organized crime and instability dynamics: Mapping illicit hubs in West Africa, GI-TOC, September 2022, <https://globalinitiative.net/analysis/west-africa-illicit-hub-mapping/>.
- 2 Mark Micallef, Raouf Farrah, Alex Bish and Victor Tanner, After the storm: Organized crime across the Sahel–Sahara following upheaval in Libya and Mali, GI-TOC, 21 November 2019, <https://globalinitiative.net/analysis/after-the-storm>.
- 3 Marcena Hunter, Beyond blood: Gold, conflict and criminality in West Africa, GI-TOC, November 2022, <https://globalinitiative.net/analysis/gold-conflict-criminality-west-africa/>; Marcena Hunter, Pulling at golden webs: Combating criminal consortia in the African artisanal and small-scale gold mining and trade sector, ENACT: Enhancing Africa's Response to Transnational Organised Crime, 24 April 2019, <https://enactafrica.org/research/research-papers/pulling-at-golden-webs-combating-criminal-consortia-in-the-african-artisanal-and-small-scale-gold-mining-and-trade-sector>; International Crisis Group, Getting a grip on central Sahel's gold rush, Report 282, 13 November 2019, www.crisisgroup.org/africa/sahel/burkina-faso-mali-niger/repandre-en-main-la-ruce-vers-lor-au-sahel-central; Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development, Illicit financial flows and conflict in artisanal and small-scale gold mining: Burkina Faso, Mali, and Niger, 14 September 2022, www.igfmining.org/announcement/illicit-financial-flows-conflict-artisanal-small-scale-gold-burkina-faso-mali-niger/.
- 4 Lucia Bird and Tuesday Reitano, Trafficking in persons in conflict contexts: What is a realistic response from Africa?, ENACT, June 2019, <https://globalinitiative.net/analysis/trafficking-in-persons-in-conflict-contexts/>.
- 5 Protocol to prevent, suppress and punish trafficking in persons especially women and children, supplementing the United Nations Convention against Transnational Organized Crime, United Nations, New York, 15 November 2000, Treaty Series, vol. 2237, p. 319; Doc. A/55/383, Article 3, https://treaties.un.org/Pages/ViewDetails.aspx?src=ind&mtdsg_no=XVIII-12-a&chapter=18&clang=_en.
- 6 For further discussion of this matter, see Lucia Bird and Tuesday Reitano, Trafficking in persons in conflict contexts: What is a realistic response from Africa?, ENACT, June 2019, <https://globalinitiative.net/analysis/trafficking-in-persons-in-conflict-contexts/>.
- 7 International Labour Organization, The meanings of forced labour, 10 March 2014, www.ilo.org/global/topics/forced-labour/news/WCMS_237569/lang--en/index.htm.
- 8 Interview with former gold miner in Agadez, November 2020.
- 9 Interview with gold miner in Tchibarakaten, July 2022.
- 10 Interviews with gold miners in Djado, July 2022.
- 11 Interviews with gold miners in Djado and Tchibarakaten, July 2022.
- 12 Interview with gold miner in Djado, July 2022.
- 13 Other gold sites in the Agadez region of Niger are located relatively close to large towns, such as those around Tabelot, 120 kilometres from Agadez.
- 14 Interview with gold miner in Djado, July 2022.
- 15 Interviews with gold miners in Djado and Tchibarakaten, Niger, and N'Tahaka and N'Abaw (remote), Mali, July and August 2022.
- 16 Interviews with gold miners in Djado and Tchibarakaten, July 2022.
- 17 Interview with Rhoumour Ahmet Tchilouta, July 2022; interviews with gold miners in Tchibarakaten, July 2022.
- 18 Interview with gold miner in Djado, July 2022.
- 19 Interview with gold miner in N'Tahaka, August 2022.
- 20 Ibid.
- 21 Perspectives shared by participants during validation workshop in Lagos, Nigeria, December 2022; see also Laurent Gagnol, Géraud Magrin and Raphaëlle Chevrillon-Guibert, Chami, ville nouvelle et ville de l'or. Une trajectoire urbaine insolite en Mauritanie, *L'Espace Politique*, 38:2, 2019, <https://doi.org/10.4000/espacepolitique.6562>.



Image credit	Page
Rhoumour Ahmet Tchilouta.....	Cover

This publication is co-funded by



EUROPEAN UNION



cooperation
germany – ecowas
ZUSAMMENARBEIT DEUTSCHLAND – ECOWAS

This publication was produced with the financial support of the European Union and the German Federal Foreign Office. Its contents are the sole responsibility of the author and do not necessarily reflect the views of the European Union or the German Federal Foreign Office.

About the author

Alice Fereday is a Senior Analyst at the Global Initiative against Transnational Organized Crime. She researches illicit economies and organised crime dynamics in the Sahel, with a focus on trafficking and smuggling dynamics in Niger and Chad. Alice holds degrees from City University London, Université Panthéon Sorbonne and Université Paris Dauphine.

Acknowledgements

The author would like to thank all those who contributed to this research. In particular, sincere thanks to those who conducted data collection and fieldwork in Niger and Mali for their excellent work in providing up-to-date, nuanced and granular data, without which this report would not have been possible. These include Rhoumour Ahmet Tchilouta, the BSECA and several other valued researchers who cannot be named here for security and confidentiality reasons. The author also extends thanks to the experts and researchers who took the time to share their knowledge of ASGM and those who kindly accepted to review the report, including Flore Berger, Laurent Gagnol, Livia Wagner and Marcena Hunter, among others. Finally, a special thank you to Tasnim Abderrahim for her help with the preliminary research, and to Lucia Bird, Matt Herbert and Mark Micallef for their support and guidance on the project.



OCWAR-T

Organised Crime: West African Response to Trafficking

Coordinated by

giz Deutsche Gesellschaft
für Internationale
Zusammenarbeit (GIZ) GmbH

Implemented by

ISS INSTITUTE FOR
SECURITY STUDIES

**GLOBAL
INITIATIVE**
AGAINST TRANSNATIONAL
ORGANIZED CRIME