

SANCTIONS AND ORGANIZED  
CRIME INITIATIVE: 2023 SERIES



**GLOBAL  
INITIATIVE**  
AGAINST TRANSNATIONAL  
ORGANIZED CRIME

# CRIME AND SANCTIONS

THE CASE OF GUINEA-BISSAU

Lucia Bird Ruiz-Benitez de Lugo | Matt Herbert

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## FROM VISION TO ACTION: A DECADE OF ANALYSIS, DISRUPTION AND RESILIENCE

The Global Initiative Against Transnational Organized Crime was founded in 2013. Its vision was to mobilize a global strategic approach to tackling organized crime by strengthening political commitment to address the challenge, building the analytical evidence base on organized crime, disrupting criminal economies and developing networks of resilience in affected communities. Ten years on, the threat of organized crime is greater than ever before and it is critical that we continue to take action by building a coordinated global response to meet the challenge.

# GLOSSARY

**Coerce:** A designation objective to influence a designated actor to shift their conduct, either in full or in part

**Constrain:** A designation objective to impede the ability of the designated actor to pursue a specific course of action, such as a particular harm or criminal activity

**Designation:** The listing of an individual or entity for sanction

**Designation objective(s):** The specific objective(s) sought for a sanction on an individual or entity

**Disrupt:** A strategic goal to impact the ability of an illicit network (including non-designated actors) to continue to operate in ways which, or engage in activities that, pose defined harms of concern to the sanctioning jurisdiction

**Reveal:** A strategic goal to present otherwise hidden information regarding the function of criminal markets or activities of corrupt individuals in order to reinforce norms and shape narratives

**Shape:** A strategic goal to alter the functioning of a criminal ecosystem, generally by influencing the cost-benefit assessments made by non-designated actors, in order to deter or minimize certain harms or to promote adherence to norms of behaviour

**Signal:** A designation objective to use an individual designation to convey a message to a broader audience (or different messages to multiple audiences)

**Strategic goal:** The broader aims a sanctions regime or linked set of designations seek that extend beyond impacts on the individuals or entities designated

# ABBREVIATIONS

<b>DEA</b>	Drug Enforcement Administration
<b>ECOMIB</b>	Economic Community Mission in Bissau
<b>ECOWAS</b>	Economic Community of West African States
<b>EO</b>	Executive Order
<b>GI-TOC</b>	Global Initiative Against Transnational Organized Crime
<b>UNIOGBIS</b>	United Nations Integrated Peacebuilding Office in Guinea-Bissau
<b>UNSC</b>	United Nations Security Council
<b>UNSG</b>	United Nations Secretary-General



## EXECUTIVE SUMMARY

In the early 2000s, as the flow of cocaine transiting West Africa from Latin America towards Europe drew international attention, Guinea-Bissau gained notoriety as ‘Africa’s first narco-state’.<sup>1</sup> While this is a polemical and rightly contested term, the country remains an important hub in international cocaine trafficking. Ongoing monitoring indicates that significant volumes of the drug continue to be unloaded in Bissau-Guinean waters and either trans-shipped for onward maritime trafficking or taken onshore for land transit.

The cocaine trade – alongside others, including timber and arms trafficking – has played a significant role both in driving the entrenchment of organized crime networks within the country, and in fuelling political instability. This combination is no coincidence. The intertwining of highly lucrative criminal markets with state institutions that offer both financing and competing interests has repeatedly pushed the country into political turmoil. These characteristics make Guinea-Bissau an important case study of the use of international sanctions in response to illicit economies and their links to political instability.

The United Nations Security Council (UNSC) sanctions regime for Guinea-Bissau was established in May 2012, shortly after sanctions imposed by the Economic Community of West African States (ECOWAS), following a *coup d’état* by the then military leadership, and establishment of military rule. Led by then army chief of staff General Antonio Indjai, the military seizure of power was widely dubbed in media and by domestic commentators alike the ‘cocaine coup’, as it was driven in large part by the military’s desire to achieve control of the lucrative and rapidly expanding cocaine trade.

The UNSC demanded that the military command take immediate steps to restore and respect the constitutional order, instituted a travel ban against five, and then an additional six, individuals, including General Indjai, and established a sanctions committee.<sup>2</sup> The sanctions designation criteria targeted persons who directly undermined the rule of law and civilian leadership, promoted impunity and instability, or provided financial support, including through proceeds from organized crime and the illicit drug trade. The European Union issued restrictive measures immediately after the UNSC sanctions regime, ‘gold-plating’ it with asset freezes on listed individuals.<sup>3</sup>

The UNSC sanctions regime, although triggered by the unconstitutional seizure of power, also responded to growing concern about the scale of cocaine being trafficked through Guinea-Bissau, largely to burgeoning consumption markets in Europe, as a broader threat to international interests.

The domestic impacts of Guinea-Bissau's cocaine market are vast. Overspill from the transit trade cultivates local consumption of the drug while rents from the trade have penetrated upper levels of the state and contributed significantly to political crises that have destabilized the country and pose further obstacles to development. Only a very small group of people in Guinea-Bissau benefit from the cocaine trade, but its second-order impacts of deteriorated governance and warped policy drivers are felt by the greater population, 64 per cent of whom live below the poverty line.<sup>4</sup>



**A soldier patrols the government palace area in Bissau, 1 February 2022, the day the building was attacked.**  
© AFPTV teams / AFP via Getty Images

Since the mid-2000s, states have been exploring how to use international sanctions as part of a toolkit to respond to the growing influence of organized crime globally. In part, this came from an expanded perception of organized crime not only as a criminal justice concern but also as a threat to national security and international stability.<sup>5</sup> There has been limited assessment of how this exploration has unfolded in practice, the impacts of particular regimes and how this tool could be used most effectively.

The 2012 Guinea-Bissau sanctions regime was established at a crucial point in the development of international approaches that recognized the relationship between organized crime and stability and utilized sanctions as an element (in some cases, the central element) of the response. These innovations generally focused on non-state criminal actors. It is important, however, to look at the effect of sanctions on state-embedded criminal actors, such as those designated by the Guinea-Bissau regime. According to the 2019, 2021 and 2023 iterations of the Global Organized Crime Index – an expert-led assessment of organized crime at the national level – state-embedded actors are the most 'dominant vectors of organized crime' globally and across Africa, and their influence is growing.<sup>6</sup>

This report details the context in which the UNSC sanctions regime was established, exploring both domestic dynamics and broader trends in international thinking about crime, conflict and instability. It then considers how the regime was implemented before assessing its perceived impacts on the designated individuals and on wider illicit-economy dynamics. It concludes with targeted recommendations for maximizing the impacts of sanctions, specifically drawing from the example of Guinea-Bissau.

The report is part of a series of publications based on Global Initiative Against Transnational Organized Crime (GI-TOC) research on the use of targeted sanctions against criminal actors. The series encompasses global, country-specific and thematic studies.<sup>7</sup> The first global thematic report in the series, 'Convergence zone: The evolution of targeted sanctions usage against organized crime', explores the emergence and development of sanctions as part of the toolkit for responding to organized crime and outlines similarities and divergences in the sanctioning approaches of the US, the UN, the EU and, more recently, the UK.<sup>8</sup>

## Methodology

As part of a wider GI-TOC workstream on sanctions, this report draws on 60 interviews with current and former government officials, UN investigators, lawyers, NGO personnel and local actors from a number of countries on the overall use of sanctions against transnational organized crime. With regard to Guinea-Bissau, the research included the GI-TOC's ongoing monitoring of illicit markets in Guinea-Bissau, 15 stakeholder engagements in Bissau and Dakar with former Bissau-Guinean government officials and public servants, journalists, lawyers and representatives of civil society, and further engagements with international diplomats and representatives of international organizations working in the field of sanctions.

The work also draws on broader background research and analysis conducted by the GI-TOC on transnational organized crime and the related use of sanctions over the last decade. Finally, the research draws on reports and articles published by governments, think tanks and academics on targeted sanctions.

This paper, and the GI-TOC series on sanctions against criminal actors as a whole, focuses on criminals whose activities are not outlawed solely because of a sanctions regime, but are involved in more broadly proscribed criminality, such as drug trafficking, human smuggling and trafficking and illicit exploitation of natural resources.

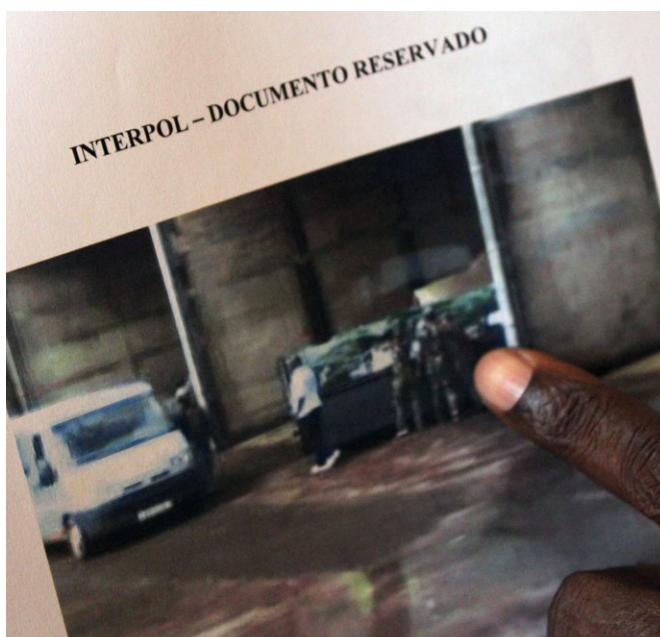




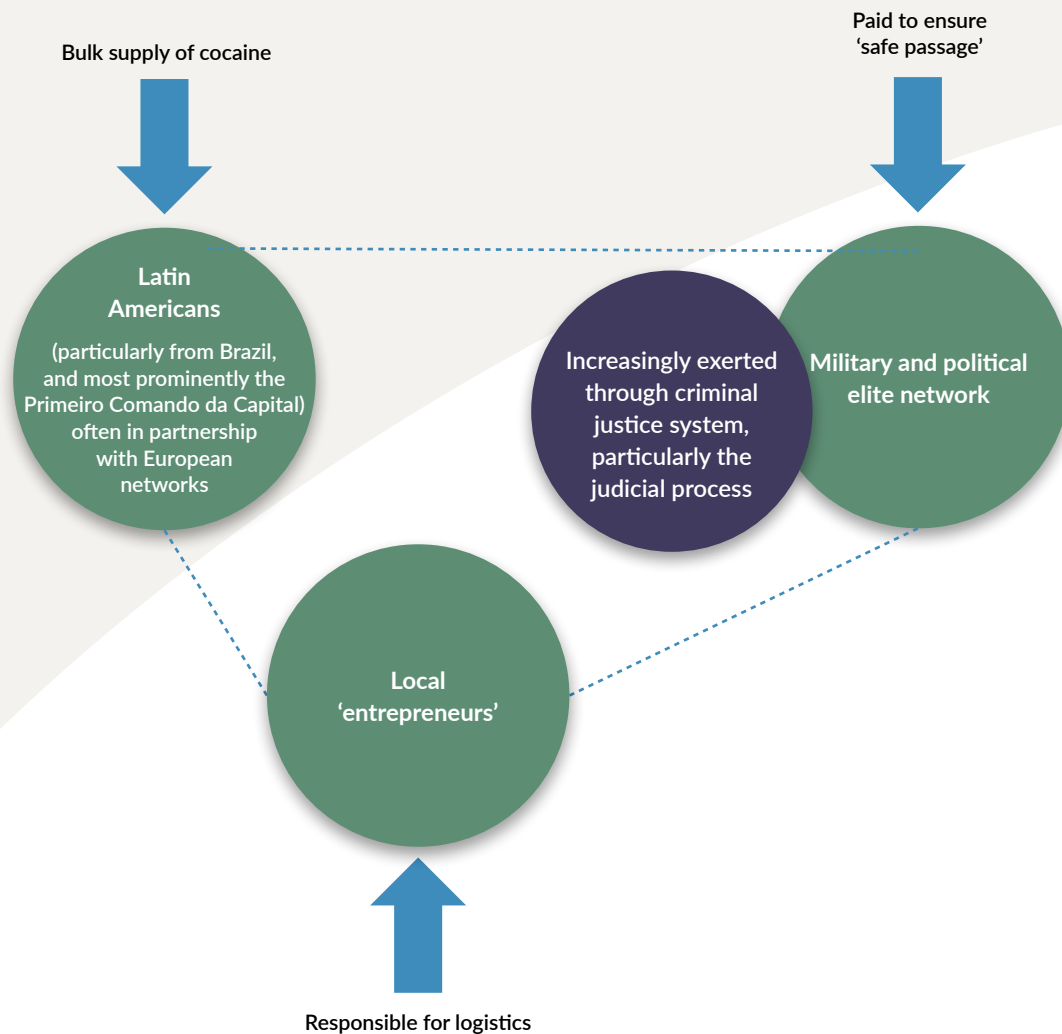
## GUINEA-BISSAU'S CRIMINAL MARKET ECOSYSTEM

**G**uinea-Bissau's two most significant illicit economies – cocaine trafficking and the illicit timber trade – are encased in state protection, intimately linking the dynamics of these criminal markets to national politics. Protection nodes stretch across the military and political elites, and (more recently) elements of the criminal justice system. In contrast to the numerous abrupt and often unscheduled power transitions which have characterized Guinea-Bissau's politics, this structure of protection has remained remarkably consistent. While flashes of volatility can dislodge specific protagonists, the overall structure stays largely intact.

With criminal rents financing patronage networks and entrenching the status quo, and all parties holding tight, illicit economies, most centrally the cocaine trade, present a significant obstacle for existing political structures to evolve into a governance system of broad-based resource sharing and social protection.



An INTERPOL document showing where Guinea-Bissauan soldiers reportedly unloaded a shipment of cocaine in 2012. © Chris Collins/Tribune News Service via Getty Images



**FIGURE 1** Guinea-Bissau's criminal market protection network.

The intertwining of criminal, political and military interests has been a critical factor in Guinea-Bissau's repeated cycles of political turmoil, with illicit economies providing an important revenue source for those in power since the 1990s. It began when cash-strapped Bissauan officials, wanting to fund clientelist networks and political mobilization, turned to trafficking arms to separatist fighters in the Casamance region of southern Senegal. Revelations of this activity sparked the Guinea-Bissau Civil War in 1998.

Cocaine trafficking, which began in the 1990s, became a prominent source of rents for the Bissau-Guinean elite in the early 2000s, particularly in the wake of the 2003 military coup that ended a brief post-war period of civilian rule. By the 2005 elections, significant volumes of cocaine transited the country with military and political protection right from the top; sketches discovered in a Judicial Police warehouse raid in 2007 named the heads of each of the security forces, suggesting they played a key role in protecting the trade.<sup>9</sup> Within a year of the elections, three distinct Latin American cells were

allegedly operating, each protected by, and paying off, the military.<sup>10</sup> Regional criminal entrepreneurs operated as intermediaries and helped to coordinate the trafficking.<sup>11</sup> These three – the politico-military elite, regional criminal entrepreneurs and Latin American traffickers – formed the highly visible points of Guinea-Bissau's triangular cocaine ecosystem.<sup>12</sup> Cocaine trafficking through Guinea-Bissau reached a peak in 2007, when everything changed.

It seems that the military started to steal from the Latin American traffickers, leading them to move operations to neighbouring states.<sup>13</sup> The ensuing mistrust brought the bulk transit trade in Guinea-Bissau to an abrupt halt, with a significant proportion displaced to neighbouring states, which weakened the military's hold on the market and slashed their profits. Following the displacement of a proportion of the bulk transit trade, fewer rents were available to the military and political protectors of the trade, and competition escalated.

Tensions arising from attempts to control the cocaine trade led to a series of high-profile assassinations in 2009 – including the murder of the military chief of staff, Tagme Na Waie, and the revenge killing of President João Bernardo Vieira<sup>14</sup> – and the military's 2012 'cocaine coup', which triggered the imposition of sanctions.<sup>15</sup>

As explored in further detail below, the illicit logging market only surged in 2012, after the sanctions regime was enacted. It became a central source of rents for the military regime, whose revenues had been squeezed by the suspension of foreign aid and the displacement of cocaine-trafficking flows. Profits from the illicit logging market were effectively used to pay military salaries between 2012 and 2014. While the illicit logging trade diminished significantly after this point, elite involvement continued as its profits provided financing for electoral campaigns, among others.<sup>16</sup>



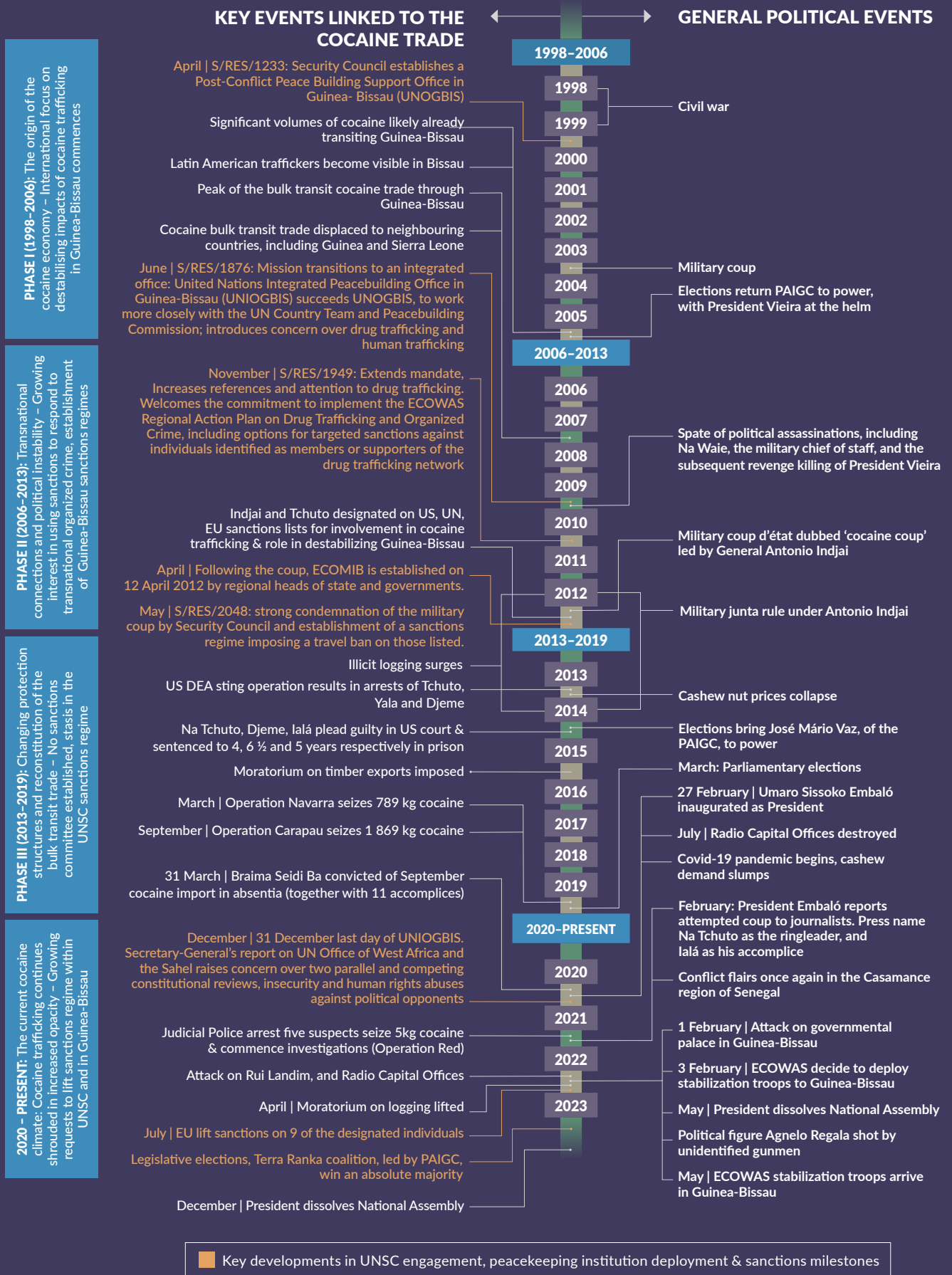
## PRELUDE TO SANCTIONS

**M**ore than a decade before the 2012 sanctions regime, international and regional concerns about conflict in Guinea-Bissau had emerged in the wake of the bloody civil war. In 1998 and 1999 respectively, the ECOWAS Monitoring Group and the United Nations Integrated Peacebuilding Office in Guinea-Bissau (UNIOGBIS) set up operations in Guinea-Bissau, with the primary mandate of consolidating the peace.<sup>17</sup>

From the early 2000s, UN sanctions regimes in West Africa explicitly targeted the role of illicit economies, particularly illicitly exported natural resources, in financing the conflicts in Liberia, Sierra Leone and Côte d'Ivoire. While this remained primary, the role of trafficking more broadly was increasingly recognized. There were also concerns of a 'narco-jihadi nexus' emerging globally.<sup>18</sup>

By the mid-2000s, at the same time that the international community was addressing perceived drivers of conflict in Guinea-Bissau, the amount of cocaine transiting West Africa towards Europe became an issue.<sup>19</sup> In 2007, Guinea-Bissau was added to the agenda of the UN's Peacebuilding Commission, an intergovernmental advisory body created in 2005 to provide greater coherence and coordination to the efforts of the various actors involved in peacebuilding processes. After adopting a strategic framework for peacebuilding with the government, Guinea-Bissau began receiving support in 2008.<sup>20</sup> That same year, the UN Office on Drugs and Crime warned that drug traffickers were 'infiltrating state structures and operating with impunity' in Guinea-Bissau.<sup>21</sup> By 2009, the mandate of UNIOGBIS had been amended to include responding to drugs trafficking, with its emphasis further increased in subsequent UNSC resolutions.<sup>22</sup>

# TIMELINE OF KEY EVENTS RELATING TO THE POLITICAL ECONOMY OF BISSAU AND SANCTIONS DEPLOYMENT



By 2010, the UNSC was repeatedly expressing its concern regarding the 'threats to national and subregional security and stability posed by the growth in drug trafficking and organized crime in Guinea-Bissau'. By this point, targeted sanctions against individuals identified as members or supporters of 'the drug trafficking network' in the country were on the table, as part of ECOWAS's Regional Action Plan on Drug Trafficking and Organized Crime, and 'welcomed' by the UNSC.<sup>23</sup>

The Malian insurgency in January 2012 – a mere four months before Guinea-Bissau's sanctions – was a key event for strengthening international and regional focus on the destabilizing impacts of organized crime, specifically cocaine trafficking.<sup>24</sup> News of the insurgency at that time, although it has since been questioned and tempered, fuelled already growing narratives of a narco-jihadist nexus across the Sahel and West Africa more broadly, heightening concerns around the destabilizing impacts of drug trafficking across the region.<sup>25</sup> This led to widespread calls – including from the UN secretary-general (UNSG) – for the imposition of 'targeted travel and financial sanctions against individuals or groups in Mali engaged in terrorist, religious extremist or criminal activities' relating to the uprising.<sup>26</sup> Although this did not come to pass, the explicit inclusion of 'criminal activities' in the UNSG's statements conveys the widespread recognition of the role played by cocaine trafficking in financing elements of the separatist movements behind the uprising. This was an important moment in international conceptions of the destabilizing impacts of drug trafficking in West Africa.

Moreover, political figures and analysts at the time repeatedly supported the narrative that the influence of cocaine traffickers had begun in Guinea-Bissau and then spread, destabilizing the region. In the words of Kofi Annan, reported in 2013, 'We didn't act early enough when the problem started in Guinea-Bissau. That was the entry point and it's now spread along the coast – and through the Sahel to Europe and by ship and by plane.'<sup>27</sup>

The scene was set for the Guinea-Bissau sanctions regime, which would be established in the midst of ongoing discussions about regional and international responses to the Malian uprising, in which Guinea-Bissau had been positioned as the source of the cocaine that was driving instability across the region. The Guinea-Bissau regime, while retaining the model of targeting crime as an underwriter of 'spoilers', incorporated a far more central focus on the destabilizing impacts of trafficking than its predecessors, and explicitly recognized cocaine trafficking as a standalone driver of instability in the region.

## International approaches to criminal sanctions

**T**he 2012 sanctions regime for Guinea-Bissau took place in the context of increasing international recognition of organized crime as a national security threat (most prominently by the United States) and a destabilizing force (most prominently by the UN).

The US had been leveraging sanctions against criminal actors since 1995, when President Bill Clinton's Executive Order (EO) 12978, 'Blocking assets and prohibiting transactions with significant narcotics traffickers', targeted Colombian drug traffickers.

In 2010, President Barack Obama's EO 13536, 'Blocking property of certain persons contributing to the conflict in Somalia', linked piracy to terrorism. Detailing the risks of such foreign criminal actors to the US, it noted that growing criminal infiltration of governments and the broader financial system had effects on democracy, the rule of law, peace and conflict and the functioning of global markets.

Up until 2011, in the words of one former US official, 'it was drugs and terrorism; we weren't even talking about transnational organized crime until Obama'.<sup>28</sup> But then, just one year before the Guinea-Bissau sanctions regime, EO 13581, 'Blocking property of transnational criminal organizations', empowered the designation of any foreign actor who 'engages in an ongoing pattern of serious criminal activity involving the jurisdictions of at least two foreign states; and that threatens the national security, foreign policy, or economy of the United States'.<sup>29</sup>

The UN had also substantially increased sanctions designations of criminal actors since the early 2000s. However, in contrast to US-style thematic programmes premised on national security goals, the UN regimes were country-based and addressed conflict and political instability, including unconstitutional transitions of power. Criminal actors were designated for the destabilizing impacts of illicit economies, often through their financing of conflict actors or spoilers.

Drug trafficking was also among the first criminal markets that the UNSC identified as contributing to instability. Between 2000 and 2019, it was mentioned in around 10 per cent of UNSC resolutions, second only to arms trafficking in terms of crime types referenced.<sup>30</sup> ■

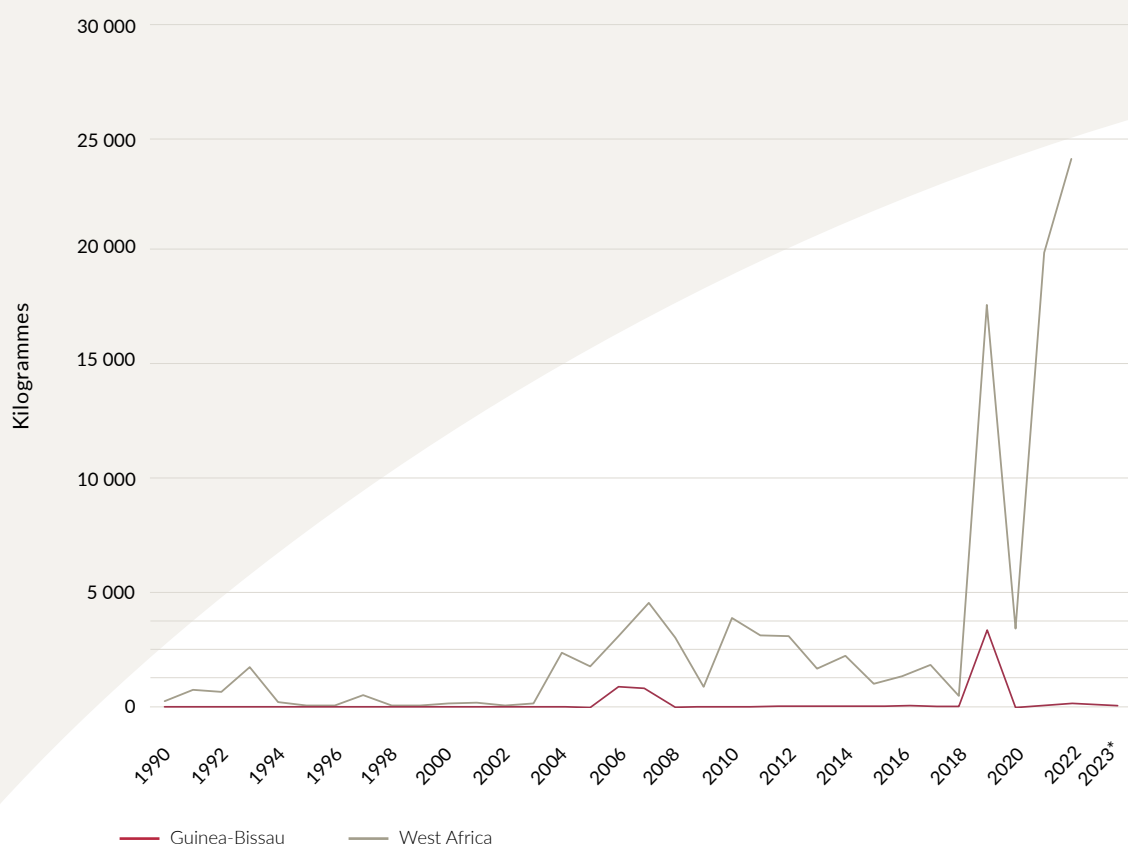
## Sanctions established: The 2012 'cocaine coup'

Growing concerns for stability in Guinea-Bissau proved well founded: in April 2012, General Antonio Indjai, army chief of staff at the time, led a successful military coup d'état, widely dubbed the 'cocaine coup' because it was so clearly connected to the military's desire to control the lucrative and rapidly growing cocaine trade.

In response to the coup, and after talks failed, regional and international sanctioning bodies – most prominently ECOWAS, the UNSC and the EU – together with development funders, took a range of steps.

ECOWAS imposed diplomatic, economic and financial sanctions on Guinea-Bissau, in line with the body's typical approach of leveraging sanctions against unconstitutional changes of power.<sup>31</sup> From March 2012, ECOWAS had already deployed a peacekeeping mission, the Economic Community Mission in Bissau (ECOMIB), to Bissau, tasked with a new wave of security sector reform.<sup>32</sup> While ECOWAS had been closely involved in Guinea-Bissau prior to this, the deployment marked a new stage in regional engagement in the country. Both regional (ECOMIB) and international (UNIOGBIS) peacekeeping missions would be deployed in Guinea-Bissau until their withdrawal in 2020.

The UN Security Council, demanding that the military command take immediate steps to restore and respect constitutional order, instituted a travel ban against 11 individuals (including General Indjai) and established a sanctions committee in May 2012.<sup>33</sup> In line with its traditional focus on peace and stability and unconstitutional transitions of power, the sanctions regime targets those 'undermining the stability' of Guinea-Bissau, in particular the coup leaders. The designation criteria include the provision of 'means of support or financing' through 'proceeds from organized crime, including the illicit cultivation, production and trafficking of narcotic drugs and their precursors originating in and transiting through Guinea-Bissau'.<sup>34</sup> The resolution emphasises the calls from the deposed civilian Bissau-Guinean government for a 'response from the Security Council to the crisis' and the coordinated efforts of the African Union and ECOWAS, embedding the UN action in the wider framework of national and regional condemnation.<sup>35</sup>



**FIGURE 2** Cocaine seizures in Guinea-Bissau compared with regional seizures.

NOTE: \*Up to October 2023 for data on Guinea-Bissau. Up to December 2022 for regional seizures.

The EU, shortly after the UNSC sanctions, implemented asset freezes on the six UNSC designees (quickly expanded by the UNSC to 11 in July), and then shortly after on an additional 15, bringing the total to 21. The EU thereby gold-plated the UN sanctions regime and strengthening the UN-imposed travel bans.<sup>36</sup> The asset freezes froze all accounts belonging to the listed persons in EU banks. Given that the Bissau-Guinean elite were believed to hold significant assets in EU financial institutions (also by way of property investments, although these are harder to target through sanctions) in Europe, particularly Lisbon, this additional measure was designed to increase pressure on the designated individuals.

Finally, in the wake of the sanctions, regional and international development partners, including the African Union, the Community of Portuguese Language Countries and the Organisation Internationale de la Francophonie suspended Guinea-Bissau from their activities. The African Development Bank and the World Bank also suspended their operations in the country.<sup>37</sup>





© Anton Ivanov/Shutterstock

## 2012–2020: Ongoing crisis, international apathy

Since 2012, no names have been added to either the EU or UNSC lists despite subsequent political crises.<sup>38</sup> In part, this is due to the UNSC's failure to establish a panel of experts, despite the secretary-general's continued recommendations to do so. A number of names have gradually been taken off the EU sanctions list,

In 2018, ECOWAS imposed sanctions (travel bans and asset freezes) on 19 individuals for 'impeding the process for ending the crisis in Guinea Bissau' and called for supporting international regimes, including specifically from the UN.<sup>39</sup> The ECOWAS sanctions explicitly targeted the lack of progress in stabilization agreements,<sup>40</sup> and its designations included at least three persons who had previously not been on international sanctions lists: two high-level political officials believed to be lynchpins in Guinea-Bissau's cocaine trafficking economy and one senior element of the criminal justice system widely perceived to be a crucial node in the cocaine economy's protection infrastructure.<sup>41</sup> Even then, no parallel UN or EU sanctions were issued.



Nuno Gomes Nabiam served as prime minister under President Embaló from February 2020 until the legislative elections in June 2023, at which point Nabiam was appointed as special adviser to the president. Picture taken 15 May 2014. © Seyllou/AFP via Getty Images

UNSC and EU sanctions lists also remained static when officers occupied state buildings in March 2020, following a disputed presidential election in late 2019, in support of Umaro Sissoco Embaló.<sup>42</sup> Notably, ECOWAS did not intervene either, damaging its credibility within Guinea-Bissau. The limited long-term impact of UNSC and EU sanctions on the designees could be inferred from press photographs of listed individuals – Mamadu N’Krumah, Ibraima Papa Camara, and Antonio Indjai – standing with President Embaló at his unconstitutional inauguration of Prime Minister Nuno Gomes Nabiam on 29 February 2020.



From left to right: Sousa Cordeiro, Ministry of Interior; António Abel, Military House Chief; General Esteve Lassana Massali, Brigadier Army Chief of Staff; Ibraim Papa Camará, Chief of Staff of Air Force; Estevão na Mena, Chief of Staff of CEMGFA; Carlos Mandrugal, Navy Chief of Staff; Biagê Na N'tam, Chief of the General Staff of the Armed Forces; President Umaro Sissoco Embaló; Mamadu N’Krumah, Deputy Chief of Staff of the Armed Forces; Prime Minister Nuno Nabiam; Antonio Indjai (former Chief of Staff of the Armed Forces). © Photo taken at the Presidential Palace, Bissau, 29 February 2020.

In September 2020, mere months after the military’s breach of a six-year period of not interfering in politics, ECOWAS withdrew its peacekeeping mission. The UN’s UNIOGBIS followed suit at the end of the year. These occurred primarily in response to requests from President Embaló of Guinea-Bissau, and donor fatigue. At the time, there was a consensus within the country that the conditions that prompted the UN peacekeeping mission in Guinea-Bissau had not subsided and, in some ways, the situation was worsening.<sup>43</sup>



# WHAT IMPACT HAVE SANCTIONS HAD?

In 2015, having spoken to a number of the designated individuals, the UNSG reported, ‘Three years later, the sanctions regime continues to have an impact on the 11 designated individuals and a deterrent effect on other potential political spoilers.’<sup>44</sup> The reality – with the benefit of an additional decade of hindsight – is more chequered.

As part of this GI-TOC series of studies on sanctions, we have explored how analytical frameworks for assessing the impacts of sanctions on organized crime need to be reworked from traditional approaches, to tailor analysis for illicit economies, particularly in contexts where designations target non-state actors, and where the nation state is not the unit of analysis (e.g. in thematic regimes).<sup>45</sup>

In the case of the Guinea-Bissau regime, the focus remained squarely on state actors – namely the military regime in power at the time. However, to explore the impact of the regime as a whole on the destabilizing consequences of illicit economies, analytical frameworks tailored for assessing impact from this perspective are more helpful.

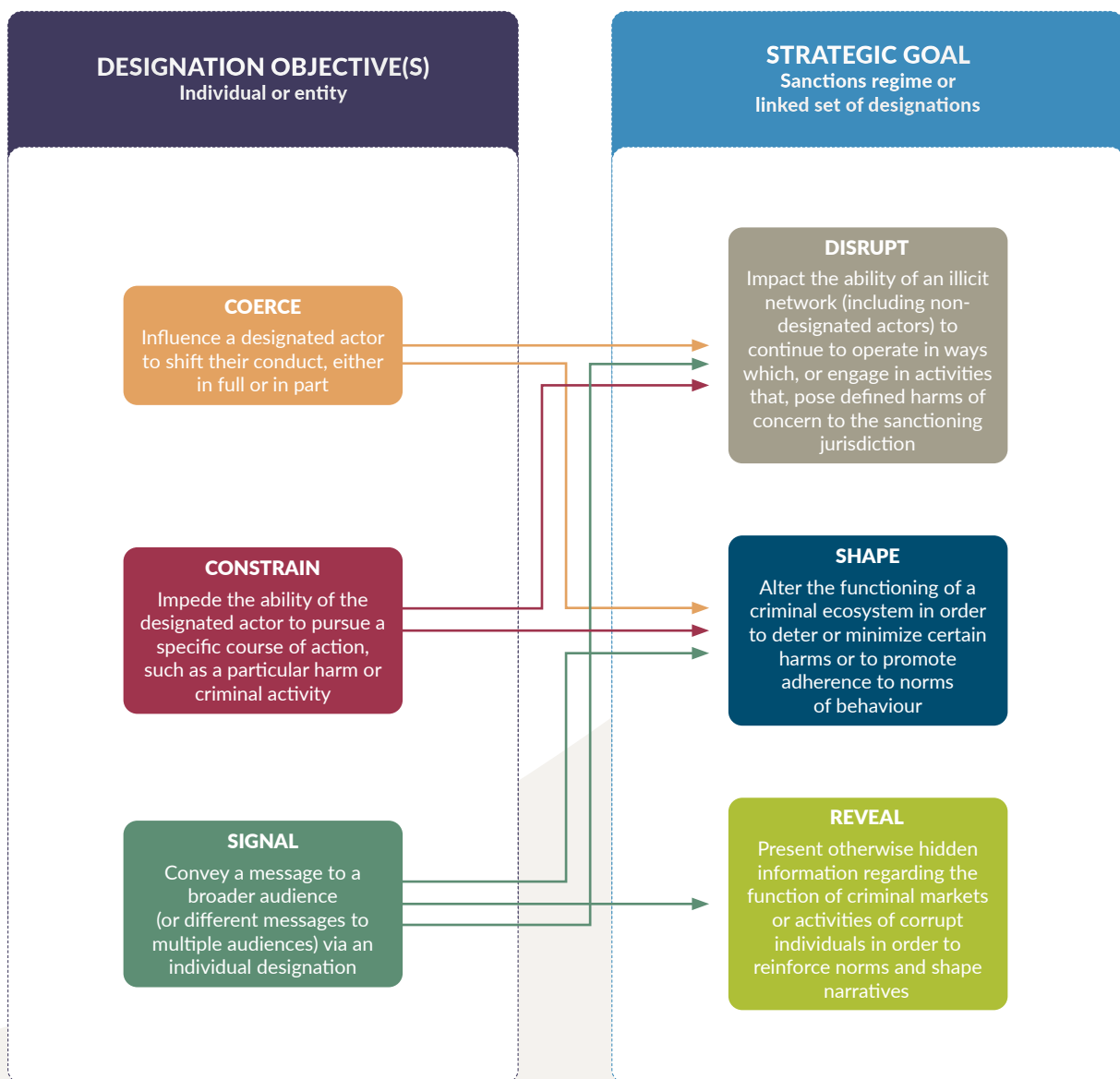


Aristides Gomes, former prime minister of Guinea-Bissau (centre right), during a Security Council meeting on the situation in Guinea-Bissau, 30 August 2018.

© EuropaNewswire/Gado via Getty Images

Consequently, the following analysis uses the GI-TOC's framework for targeted sanctions on illicit economies.<sup>46</sup> The framework looks at the objectives and impact of sanctions regime at two distinct, but interrelated, levels: strategic goals and designation objectives.

Strategic goals involve the broader aims and impact of a sanctions regime or linked set of designations, extending beyond impacts on the individuals or entities designated. Designation objectives, in turn, involve the specific objective(s) sought for a sanction on an individual or entity and the impact which they have had. Crucially, while impacts should be assessed at distinct levels, the impacts of designation objectives should drive towards achieving specific the strategic goals, as highlighted in Figure 3.



**FIGURE 3** Strategic goals and designation objectives for sanctions focused on crime and corruption.

The GI-TOC framework offers three broad typologies of impact at the level of strategic goals: disrupting criminal networks, shaping the functioning of a criminal ecosystem, and revealing otherwise hidden information regarding the function of criminal markets or activities of corrupt individuals in order to reinforce norms and shape narratives.

There are also three broad typologies of impact around designation objectives: coerce, constrain, and signal. Behavioural change (coercion) is more tightly focused around the designated individual or entity, driving towards a shift away from problematic behaviour for that actor alone. Constraint aims to impede the ability of the designated actor to pursue a specific course of action, such as a particular harm or criminal activity. Finally, via signalling an individual designation can be used to convey a message to a broader audience (or different messages to multiple audiences), both within and outside the criminal ecosystem, and plays an important role in setting or enforcing international regulatory or behavioural norms. While some sanctions regimes are limited to one or two of these aims, many pursue all three in tandem – this tripartite approach can overall drive towards more sustainable disruption, shaping, or revelation strategic goals.

We consider the impact of the Guinea-Bissau sanctions regime – first at the level of strategic goals of the regime, and then the designation objectives of the individual listings – below.

## Assessing impact in line with strategic goals

Identifying the strategic goals of sanctions regimes is not always a simple process, as these may be numerous, and of unclear priority.<sup>47</sup> Illustratively, while the UNSC resolution establishing the Guinea-Bissau sanctions regime is explicit in its 'demand' that constitutional order was restored, concerns about cocaine trafficking are woven throughout the resolution.

### Extract from UNSC Resolution 2048 (2012) establishing the Guinea-Bissau sanctions regime

**D**eploring the recurrent illegal interference of the military leadership in the political process in Guinea-Bissau and expressing concern that interference of the military in politics and the impact of illicit drug trafficking and organized crime in Guinea-Bissau have significantly hampered efforts to establish rule of law and good governance and tackle impunity and corruption,

Expressing grave concern over the negative impacts of illicit drug trafficking and organized crime on Guinea-Bissau and the subregion,

Expressing deep concern about the possible increase in illicit drug trafficking as a result of the military coup,

Underlining that any lasting solution to instability in Guinea-Bissau should include concrete actions to fight impunity and ensure that those responsible for politically-motivated assassinations and other serious crimes such as illicit drug trafficking-related activities and breaches of constitutional order are brought to justice,

Requests the Secretary-General to be actively engaged in this process, in order to harmonize the respective positions of international bilateral and multilateral partners, particularly the AU, ECOWAS, CPLP and the EU, and ensure maximum coordination and complementarity of international efforts, with a view to developing a comprehensive integrated strategy with concrete measures aimed at implementing security sector reform, political and economic reforms, combating drug-trafficking and fighting impunity. ■

## Disruption: delinking the cocaine trade from political instability

The UNSC sanctions regime primarily sought to address the seizure of power by the military junta and the threat posed to democracy. However, the UNSC recognized that cocaine trafficking was a key destabilizing factor fuelling the junta's actions and thus threatening political stability. Therefore, a second goal of the UNSC sanctions regime was aimed at disrupting the role of cocaine trafficking in financing political instability in the country.

The UNSC regime for Guinea-Bissau is in line with the UN's typical sanctioning approach, targeting criminal actors (in this case, elements of the military regime widely recognized to be involved in cocaine trafficking) who were operating as conflict enablers. Illustratively, in an oblique reference to the spate of political assassinations which preceded the coup in 2009, including the brutal murder of President Vieira, the resolution speaks of the need to break current impunity for those behind 'politically-motivated assassinations and other serious crimes such as illicit drug-trafficking-related activities'.<sup>48</sup> The assassinations were widely believed – including by Bissau-Guinean law enforcement – to have been driven by power struggles over control of the cocaine trade. This reference underscores the goal of delinking the cocaine trade from political volatility in the country.

The EU's gold-plating of the UN approach appears likely underpinned by a similar logic, which tackles the destabilizing impact of illicit economies, here cocaine trafficking. As one European official noted, 'Countering [organized crime] is not a goal in and of itself for our sanctions approach but [it] is intimately linked to stability and fragility, and so there is a link to our core goals.'<sup>49</sup>

The US, an important player within the Council, followed the UNSC sanctions regime and its framing in terms of governance and stability. In their view, Guinea-Bissau's role in international cocaine trafficking was part of the broader context but, as the cocaine was not destined for US markets, their concern was more with the expansion of violent extremism across the region and whether Guinea-Bissau could become a platform for such destabilizing actors.<sup>50</sup> Again, the central focus was on the instability linked to cocaine trafficking, and indirectly the threat violent extremism could pose within the region and more broadly.

Consequently, had the cocaine trade continued to operate at a similar scale but its connection to state – and particularly, military – infrastructure weakened under the sanctions, that would count as a success for the regime's stated (and implicit) aims.

The regime can be assessed to have achieved a degree – but by no means total – success in this regard.

In considering protection for cocaine trafficking, although this has increasingly featured political and criminal justice stakeholders, it appears that military elements remain closely linked with the trade.<sup>51</sup> For example, a Bissau-Guinean national believed to be a central figure in Bissau's currently booming cocaine market and a key member of a group that reportedly flew to Bolivia in 2022, allegedly to negotiate directly with Latin American networks, is part of the military infrastructure.<sup>52</sup> However, the growing importance of regional criminal entrepreneurs in coordinating cocaine trafficking through Guinea-Bissau and the sustained spread of protection nodes beyond the military seem more attributable to the military's attempts to steal profits in the early 2000s than to the sanctions imposed.<sup>53</sup>

However, the sanctions arguably achieved a greater degree of success in disrupting the functioning of the military regime in power at the time, who were heavily implicated in cocaine trafficking, and their ability to destabilize the country. Tracking military involvement in politics in the wake of sanctions offers some insights into this avenue of impact.

The 2014 return to civilian rule that followed negotiations between Vaz and the military leaders ushered in an unprecedented six-year spell of military non-intervention in politics. One element of this negotiated handover is believed to have been a promise by Vaz not to implement security-sector reform – despite Vaz having publicly committed to this in 2014.<sup>54</sup>

Some stakeholders indicated that the sanctions, in their role of signalling international and regional condemnation of military political intervention, may also have contributed to this period of non-interference. In 2016, the UNSG reported 'a broad consensus that sanctions have acted as a deterrent to the direct involvement of the security and defence forces in the deteriorating political situation the country has faced since August 2015'.<sup>55</sup> The UNSC's 2020 assessment is even more confident: 'For almost six years, the sanctions regime, including the designation of individuals to be subject to a travel ban, had been successful in deterring the military from interfering in politics'.<sup>56</sup> In 2022, a political analyst and civil society figure noted: 'From the political point of view, since the sanctions were applied, we have not had any more coup d'état situations, which is characteristic of our armed forces'.<sup>57</sup>

Experts are hesitant to attribute this behavioural change in the military to the sanctions. This may be partly due to the challenges of determining causality, but the perceived apathy of the international community in the wake of the sanctions regime is also widely believed to have undermined its impact.

The sustainability of the trend of military non-interference was called into question by the February 2020 military occupation of state buildings in support of Embaló's declared electoral victory. This action reinforced the view that the military would not refrain from intervention when its interests were truly threatened by political developments. In this case, the threat was a potential victory by the PAIGC, led by Domingos Pereira, which had long supported security-sector reforms.

Many Bissau-Guineans believe that the international community's failure to condemn the military actions and its rapid recognition of Embaló's presidency weakened its influence in the country. The events of February 2020 contributed to the UNSG's ongoing recommendation to keep the sanctions regime in force.<sup>58</sup>

## On shaping illicit economies

The UNSC resolution expressed 'deep concern about the possible increase in illicit drug trafficking as a result of the military coup',<sup>59</sup> indicating that cocaine trafficking was a concern in its own right and not only as a driver of the political instability.



In September 2019, the government of Guinea-Bissau seized a record-breaking consignment of cocaine as part of Operation Navarra. *Photo: Supplied*

This underscores the strategic goal of the regime to 'shape the situation', that is, to mitigate the growth of cocaine trafficking through the country, in part by signalling the international community's censure of it.<sup>60</sup> This goal would be intricately intertwined with the growing conception of cocaine trafficking as a threat to international stability. The fact that Europe is the primary destination for cocaine flowing through Guinea-Bissau may also have contributed.

Did the sanctions regimes 'shape' the cocaine economy ecosystem, in Guinea-Bissau? Guinea-Bissau's overarching criminal ecosystem did fundamentally change. However, sanctions were only one element of the international response to the coup, which complicates causality, a common challenge in assessing impacts of sanction regimes.

Upon seizing power, the military junta was in dire financial straits. Sanctions were accompanied by the stoppage of international aid flows to Guinea-Bissau – an important source of unearned revenue for military and political elites. Multilateral financial institutions also imposed lengthy pauses in their in-country operations. In 2016, the UNSG estimated that 80 per cent of Guinea-Bissau's budget depended on 'external financial support'.<sup>61</sup> The cumulative effects of these steps were therefore vast. Other external factors, such as a dip in the price of cashew nuts, the country's main export product, also squeezed the junta's budget.

This was compounded by the decline of the bulk cocaine trade through Guinea-Bissau. It had already been tailing off since 2007, when the military elite apparently tried to steal greater profits from the Latin American cartels, triggering displacement to neighbouring states, including Guinea. Indeed, decreasing cocaine-trafficking profits are believed to have driven the growing competition that ultimately led to the military takeover.<sup>62</sup>



In 2013, following the coup, Indjai, desperate for revenue, was lured into a US Drug Enforcement Administration (DEA) sting operation – a bold overseas law enforcement operation staged less than a year after the UNSC sanctions were established. Although it failed to capture Indjai, the operation successfully arrested another designated individual, former Navy Chief of Staff Bubo Na Tchuto, and then convicted him in a US court on charges of drugs trafficking. This should be seen as a parallel criminal justice approach to address the cocaine trade's role in financing military-regime spoilers in Guinea-Bissau. The trade through Guinea-Bissau then waned further, with traffickers spooked by the US intervention.

Guinea-Bissau's reliance on external aid, together with the diminished profits available from the largely displaced bulk cocaine trade, rendered it particularly vulnerable to external measures limiting financial inflows. Illicit economies were thus a central element of the military's resilience to sanctions and accompanying measures, allowing the regime to withstand pressure for two years and the military as a whole to survive largely unscathed. In 2012, the military turned elsewhere: to the illicit logging trade, unofficially awarding logging concessions to officers in lieu of pay.<sup>63</sup> Illicit logging surged. According to a report by the US Environmental Investigation Agency, timber exports from Guinea-Bissau to China reached 98 000 tonnes in 2014, the equivalent of about 255 000 trees.<sup>64</sup>

Had the junta been unable to find a source of funding, its patronage networks – based on rent-sharing and crucial to the institution's resilience – may have broken down, weakening it over the long term and potentially breaking its grip on the cocaine trade. Instead, the financial consequences of the sanctions regimes, along with the pause in international aid, were pivotal in the wholesale expansion of illicit logging, with devastating environmental impacts.

Analysis of UN targeted sanctions found that there were 'unintended consequences' in 94 per cent of cases; in 58 per cent, these included increased criminality and corruption.<sup>65</sup> In Guinea-Bissau, the wholesale growth of the illicit logging trade, and the long-lasting consequences this had for forest cover and biodiversity in the country, can be counted among them. This was tacitly recognized in the UNSG's 2015 report which recommended not only the establishment of a panel of experts, but also a 'focus on corruption and natural resources'.<sup>66</sup> The recommendations were never acted upon.

Sanctions have thus apparently contributed to rerouting the military elite from one illicit economy – cocaine trafficking – to another, illicit logging. While the latter is now recognised to have had devastating environmental impacts, it was arguably a lower-priority criminal market at the time than the former. This 'reshaping' of the illicit economy ecosystem away from a criminal market signalled as being particularly toxic by sanctions, towards one which is perceived as lower risk, has been tracked across a range of jurisdictions.<sup>67</sup> However, the sanctions appeared to make no material difference to how the military regime engaged with illicit economies as a whole. Indeed, they became even more important as revenue streams for the junta between 2012 and 2014.

Now, in 2023, both of Guinea-Bissau's most lucrative economies – the cocaine trade and illicit logging – are in a period of sharp expansion. The country remains an important trans-shipment and redistribution hub for international cocaine trafficking, and elements of the military continue to play an important role in protecting the trade. While the volume of cocaine flows through the country has fluctuated over time, numerous well-positioned sources indicate increased cocaine trafficking through Guinea-Bissau, and West Africa more broadly, since around 2019.<sup>68</sup> Intelligence from national and international law enforcement authorities shows the continued and escalating discharge of cocaine from mother ships in Bissau-Guinea's territorial waters to smaller vessels heading across the coastline.<sup>69</sup>

In February 2022, there was an attack on the Presidential Palace. While its exact nature remains in question, President Embaló immediately blamed the incident on interests within the cocaine trade, demonstrating the widespread recognition of its influence in the economy of Guinea-Bissau's politics.<sup>70</sup>

Criminal interests have also penetrated the criminal justice system. In a highly controversial judgment in 2022, the Supreme Court acquitted Seidi Bá and Ricardo Monje, alleged ringleaders in the importation of tonnes of cocaine, following their ground-breaking conviction by Bissauan courts in 2020. Close observers, from retired political officials to members of the judiciary, have heavily criticized the judgment acquitting the individuals, pointing to a number of procedural breaches, and opining that influence from criminal networks was likely at play.<sup>71</sup>

As regards the illicit logging market, the trade diminished following the return to civilian rule in 2014 and the imposition of a moratorium on timber exports in 2015. However, it is again escalating since the moratorium was lifted in 2022. The trade also remains intricately linked to a number of elite elements linked to state institutions and political parties.

## Revelation

When an international actor decides to sanction an individual or entity, the public statement announcing the designation typically lays out a brief narrative of why the actor was sanctioned. When the reasons for sanctioning include involvement in criminal markets, this narrative often lays out allegations of specific crimes committed. The issuance of multiple designations then can begin to detail an increasingly clear picture of how organized crime or corruption operates and impacts a given jurisdiction. However, in the context of Guinea-Bissau, the listings narratives centred around the role of the designated individuals in planning the coup, and did not engage with their involvement in cocaine trafficking, providing no specific information in relation to their criminal interests.

In the UN sanctions process, the Panel of Experts reports can play an important role in revelation. Panels of Experts provide crucial support to sanctions committees, typically conducting in-depth data collection and monitoring of sanctions implementation, and recommending any changes needed to the regime, including regarding additional designations, or delistings. Such extensive data-gathering and analysis are beyond the capacity of sanctions committees.<sup>72</sup>

The highly detailed nature of reports by such panels, their perceived political neutrality, and regular issuance, means that they become important narratives around peace and security challenges and the intersection of criminal dynamics with them, and making it impossible for powerful actors to claim ignorance of the issues.<sup>73</sup>

In the context of Guinea-Bissau, the UN Secretary General repeatedly called for the establishment of such a panel in order to identify those 'who meet the designation criteria for targeted measures' (namely, identify new designations required) and assess 'the capacity of the local authorities to monitor illicit trafficking and transnational criminal activities'.<sup>74</sup>

Without the support of a Panel of Experts, the impact of the sanctions on peace and stability in the country was not monitored as closely as it could have been, and the regime was allowed to stagnate in the face of significant domestic developments. This lack of establishment also undermined the

potential value of closely tracking the engagement of the military in cocaine trafficking, and how sanctions were impacting this. International officials in Guinea-Bissau view this failure to establish a Panel as a crucial weakness in the application of the regime.<sup>75</sup>

In the absence of a Panel, the regular reports by the Secretary General showed that the international community remained a close observer of dynamics in Guinea-Bissau, despite the static nature of the designations themselves. They also continued to drive forwards the message that involvement in cocaine trafficking by the military and political elite was against international norms, ensuring reputational costs of any publicized engagement remained high, and preventing engagement in cocaine trafficking from becoming fully normalized within the political establishment.

Furthermore, any degree of revelation provided by sanctions regimes can also be seen as an attempt at ensuring a degree of accountability against transgressors. A US lawyer noted that, while an imperfect tool, sanctions have emerged to fill an ‘accountability vacuum,’ as other international instruments, including international human rights courts, are increasingly perceived to be ‘running on fumes’.<sup>76</sup>

In line with this, the UNSC reported that, for the people of Guinea-Bissau, the UN sanctions regime represented the UNSC’s support for the rule of law and its efforts to combat impunity and was an important accountability measure in the broader reconciliation process. Except for its designation of the coup leaders, citizens had ‘not yet seen the perpetrators of the coup or the perpetrators of human rights violations face serious consequences’ in Guinea-Bissau.<sup>77</sup>

## **Considering designation objectives: Impacts on listed individuals**

### **Coercing behavioural change**

Coercing behaviour change is the objective most flagged in public by US, UN and EU systems, with targeted sanctions focused on criminal actors frequently discussed by policy makers as coercive, behaviour change tools.<sup>78</sup> This approach is in line with traditional sanctions approaches, which have long been construed as efforts to alter nation-state and government behaviour.

The drive to change behaviour by a designee, nominally, is driven by the desire to unlock frozen funds, be able to reengage with banks and other financial actors, to regain access to travel visas, or to clear one’s reputation.

In the context of Guinea-Bissau, the sanction regime’s restrictions on travel, largely to Europe and to a lesser extent to the United States, are perceived to have had the most significant practical impacts on the designated individuals, and had the most power to coerce behaviour change (although, as assessed later, this was ultimately limited).

The travel bans frustrated the military elite’s pattern of travelling for leisure but also, and more importantly, to receive healthcare, given the low standard available in Bissau.<sup>79</sup> Travel for medical reasons could warrant an exemption under the UNSC regime, but the refusal of a European Schengen visa to one such applicant shows that it is not always granted.<sup>80</sup>

## ANTONIO INDJAI



Picture taken 8 May 2015.

© Emma Farge via Reuters

General Antonio Indjai, head of the armed forces and a leader of the 2012 coup, presents an important case study for analyzing the impact of the sanctions. Not only was he arguably the most prominent designated individual, but his connections to the cocaine trade have been repeatedly highlighted. Indjai has, at various points, denied being involved in trafficking.

Indjai did not typically travel abroad or hold significant financial assets overseas, which weakened the impact of the restrictions imposed on him. He exemplifies the ‘purely internal players – who don’t travel outside the country’ that UN Panel of Expert representatives identify as particularly difficult to reach through sanctions programmes.<sup>81</sup> Indjai now appears to split his time between his Bissau residence and his farm and is believed to be suffering from ill health in his advanced years. Ongoing travel bans may therefore pose an ongoing obstacle to seeking medical treatment in Europe (while exemptions for medical treatment exist, these are not always granted).

The key target of the DEA’s 2013 sting operation against Bissau’s high-level drug traffickers, Indjai was indicted by a US court for agreeing to provide weapons to representatives of the Revolutionary Armed Forces of Colombia (FARC) – actually, undercover DEA agents – in exchange for a consignment of cocaine. Transcripts of his engagement with the DEA agents in the months following the coup and imposition of sanctions show him pressing for the completion of the deal and demonstrating little compunction about drug trafficking.<sup>82</sup> Details of the operation were also set out in the US indictment.

He remained in his post until 2014, when – due, at least in part, to significant international pressure – he accepted the democratic elections and subsequent civilian rule. He was replaced by General Biaguê Na N’tam, who remains there today. The sanctions were an important – but by no means the deciding – element of Indjai’s resignation. Na N’tam’s appointment was the result of protracted negotiations between domestic power structures, led by former President José Mário Vaz, and regional and international bodies, including the EU and the UN.

Indjai then disappeared from public life, retreating to his cashew farm outside Bissau. Whether his influence in the military and his involvement in cocaine trafficking diminished is contestable. He was reportedly pivotal in gaining support for Embaló’s 2019 presidential campaign among the influential Balanta military hierarchy. That Indjai was among the coterie of men flanking Embaló at the Presidential Palace in February 2020, as mentioned above, supports the suggestion that he retained significant influence.

There are also indications that Indjai remained active in Bissau's cocaine economy. For example, Indjai was allegedly connected to the October 2021 seizure of five kilograms of cocaine by the Judicial Police in Operation Red. This operation was triggered by the kidnapping of two individuals, Ivan Sampaio and Lucas Rocha. Amado Lamine Conte (alias Du), a military officer, Ernesto Augusto Ndengle and Domingos Vasco Nbatcha were arrested in connection with the kidnapping.<sup>83</sup> Testimonies from suspects interviewed by the Judicial Police as part of Operation Red claimed that Du was acting under orders from Indjai.<sup>84</sup>

In April, the Regional Court of Bissau handed down suspended sentences of three years to Lucas Rocha and ten months to Domingos Nbatcha for drug charges and charges against public order. The remaining eight accused, including Du, were acquitted of all crimes.

In August 2021, the US issued a US\$5 million reward for information leading to Indjai's arrest, calling him 'one of the most powerful destabilizing figures in Guinea-Bissau'. Indjai is the only African target on the State Department's narco-offenders list, which is largely preoccupied with Latin America and, to a lesser extent, central Europe. The press statement contained no recent information, instead linking back to 2012 and 2013 evidence.<sup>85</sup>

The announcement surprised authorities in Bissau, with Embaló quickly rejecting any possibility of extradition.<sup>86</sup> Domestic responses to this reveal Indjai's perceived continued influence: 'The soldiers will revolt,' said one armed forces official in 2021, speaking to a US journalist. 'Indjai has men all over the units. The president risks paying with his life – just like the rest of his government.'<sup>87</sup> ■

The UNSC travel bans also limited the regional travel of designated individuals, which would have been disruptive as Senegal is generally used as a secondary health provider. This is broadly perceived to have been ineffective due to corruption, limited scrutiny of cross-border movement and the use of fraudulent documents.<sup>88</sup> Some international officials reported that Senegalese authorities improved their compliance with the travel bans shortly after the sanctions were established, which coincided with Senegal's rotating membership on the UN Security Council. This uptick in Senegalese enforcement reportedly created 'a lot of anxiety' that designated persons could lose their ability to travel.<sup>89</sup>

However, Senegal's enforcement of the travel ban is broadly perceived to have weakened over time, diluting its impact. The UNSG's 2015 report mentioned that the regional implementation of the travel ban 'was not completely enforced', but that it 'did make it more difficult for listed individuals to travel in the region for the purposes of garnering support for another coup'.<sup>90</sup> Luis Vaz Martins, a lawyer and human rights advocate in Guinea-Bissau, offered a more damning assessment in 2022:

The ban on travelling to Europe had a strong impact because [the designated individuals] no longer had access to goods purchased in the old continent, but above all, they no longer had access to health services and specialized professionals in Europe. For the African continent, it had practically no impact, as they continued to travel without restrictions despite the sanctions.<sup>91</sup>

That travel bans seem to have greater impacts than asset freezes is in line with findings from other contexts. As one former member of UN panels of experts in the Democratic Republic of Congo and Côte d'Ivoire explained, 'It is counterintuitive. One would have thought that asset freezes are more painful, but limiting travel is a matter of prestige [...]. Speaking to high-profile sanctioned people, the first thing they complained about was the limitations on travel.'<sup>92</sup>

Because the loss of travel rights is closely tied to an individual's status, reputational implications are a central element of sanctions' ability to coerce behaviour change. The 2015 UNSG's report shed further light on these goals:

The sanctions have had a psychological and stigmatizing effect on the designated individuals, having conveyed the opprobrium of the international community for their unconstitutional actions in connection with the coup d'état. The maintenance of the sanctions regime signals a continuing commitment on the part of the Security Council to encouraging the rule of law and efforts to combat impunity.<sup>93</sup>

The report goes on, accurately, to comment that 'United Nations sanctions are widely regarded as the only serious measure holding the coup leaders accountable for their actions'.

For some of the designated coup leaders, such reputational implications had clear and significant impacts. For example, the Transitional Government (a civilian government appointed in 2013 to support with the transition process in the run-up to elections in 2014, but which were subservient to the military regime) nominated Colonel Idrissa Djaló as ambassador to the Gambia, but his credentials were refused.<sup>94</sup> General Daba Nualna, spokesperson of the military junta at the time, was forced to suspend the doctorate he was working on in Portugal and was removed from the Bissau Law School (in turn coordinated by the University of Lisbon Law School), where he had long been a respected professor.

However, Nualna's reputation does not seem to have been unduly harmed nationally, as he was appointed president of the High Military Court, a position he held until late 2022.<sup>95</sup> This perfectly illustrates the dichotomy between international reputational harm and much more limited national impacts that holds true for all the designated individuals. With the exception of General Indjai, who was replaced under significant international pressure, the military officers retained their roles when the country returned to constitutional rule in 2014. Although there are reports that some elements of Bissau-Guinean communities shunned the designated individuals, this does not appear to have been widespread.<sup>96</sup> By contrast, designated officials found themselves excluded from ceremonies, training opportunities and other meetings coordinated by embassies in the country.<sup>97</sup>

Targeted sanctions are widely recognized to be most effective when the host country cooperates with the sanctions regime.<sup>98</sup> This has not been the case in Guinea-Bissau, where the national government has predominantly either been silent on, or openly critical of, the sanctions. The disjunction between international and domestic reputational impacts of the sanctions tracks across all designations.

## **Constraint**

Targeted sanctions impose a cost on designated individuals that either constrains their ability to behave in the threatening way the sanctions seek to dissuade (here military involvement in the cocaine trade, or in politics), or makes operating in such a way undesirable by making it less beneficial.

Notably, for both financial and travel sanctions, the degree of constraint is dependent both on the degree of a criminal actor's exposure to international reach and the degree of cooperation in the country in which the actor is based. While a growing number of criminal actors operate transnationally, many operate purely within a single state, with limited international travel or foreign bank accounts. In such circumstances, the ability of the international community to constrain via sanctions is heavily dependent on the cooperation of the state where the designee lives.

In the context of Guinea-Bissau, the EU established asset freezes for all designated individuals. The rationale of doing so – from the perspective of targeting criminal actors – is that impeding the ability of criminal actors to access key aspects of the licit economy increases the cost and hassle of doing business, impacting the profitability and power of the criminal actor.<sup>99</sup> Cocaine-trafficking funds from Guinea-Bissau are often laundered through financial channels and property markets in Dakar and Europe, with Paris and Lisbon the favourite laundering hubs in the latter. The investments of some of the political and military elite in European real estate markets may have been rendered vulnerable to asset freezes, but the impacts of such measures are unclear. This is particularly because many members of the military regime were predominantly domestic actors, retaining much of their illicit profits within the country, with a significant proportion disbursed through patronage networks.

Similarly, travel bans can be key elements of the sanctions toolkit for constraining the ability of criminal actors to meet and speak with key associates and business partners. However – the designated individuals in Guinea-Bissau fall more within the internal, predominantly domestic typology of criminal actor largely shielded from such impacts: the role played by elements of the military regime at the time was that of protectors within Bissau-Guinean territory, negating any need to travel. (Notably, the reported travel of some military figures to Bolivia in 2022, allegedly to negotiate directly with Latin American cartels would mark a significant break with the past.) Consequently, while the travel bans were extremely onerous on many of the listed individuals – as explored above – such impacts were predominantly from a personal perspective, rather than affecting the illicit engagement of the designated individuals.

These types of ‘internal actors’ can nonetheless be constrained in their activities if the host state takes steps to enforce international sanctions domestically. For example, Colombia and Mexico both enabled domestic banks to terminate accounts of individuals and entities sanctioned under the US Kingpin act.<sup>100</sup> However, the Bissau-Guinean state has at no point taken action to enhance the power of international sanctions within the country, further undermining impact.

## Signalling

Signalling can be a goal in and of itself, though typically thought of as working in tandem with efforts to coerce the behavioural change of designees or to constrain their activity. Notably, as a means of messaging, signalling can achieve impact regardless of whether a designated actor is exposed internationally to the effects of designation or whether their country of residence has the capacity and will to enforce sanctions against them.

The Guinea-Bissau regime is an important case study for analysing impact from the perspective of signalling: traditional analyses of impact (which apply the coerce/constrain/signal framework to regimes as a whole), have marked the UNSC sanctions regime for Guinea-Bissau as the only one ever established with the primary aim of ‘signalling’.<sup>101</sup> This is in contrast to the majority of regimes, where the coercion of behavioural change has been assessed as the main goal.<sup>102</sup>

This may have been in recognition of the limited complementary tools and resources available to the sanctioning bodies in the Bissau-Guinean context. Given the hostile military-led government, which had been quickly cut off from international financial aid, and limited diplomatic presence, the regime was meant to ‘signal’ the international community’s continuing focus on developments in Guinea-Bissau, and opprobrium regarding state involvement in cocaine trafficking.

Signalling can be particularly impactful as a deterrent for individuals sitting at the nexus of criminality and government power, including military officers, such as those designated in Guinea-Bissau, who play a key role in protecting the cocaine trade. Such individuals are usually insulated by their connections from domestic accountability for their actions, and can have a lot to use reputationally from sanctioning.

However, in the context of Guinea-Bissau, as tracked above regarding the reputational impacts of the sanctions, such impacts were more limited. Ruth Monteiro, former minister of justice and human rights, opined that the 'signalling' effect of the sanctions was limited, echoing sentiments shared by a number of domestic stakeholders. In her view, 'the sanctions had little or no impact on impunity and the involvement of those targeted, and therefore were not able to dissuade others from entering and continuing illicit trafficking'.<sup>103</sup> It is certainly clear that, since the regime was established, additional military officials have become embroiled in Guinea-Bissau's cocaine trade.

Other Bissau-Guinean political observers however cited the potentially deterrent power of sanctions,<sup>104</sup> and the ongoing importance of the sanctions in signalling international condemnation of elite involvement in cocaine trafficking (this is explored further below in 'Delistings: Further insights'). Arguably, the sanctions regime has sent a consistent message around the international norms prohibiting state engagement in cocaine trafficking. While within Guinea-Bissau the involvement of many state figures is an open secret, when specific allegations regarding the involvement of a particular official surface, this can continue to shape political decision-making. Illustratively, in September 2022 a proportion of a cocaine consignment seized was alleged to have been appropriated by senior political figures, including Botche Candé (then Minister of Interior) and Bacari Biai (then Attorney General). Such allegations were made in audio files leaked to the public, which were picked up widely in domestic and international media.<sup>105</sup> Both Candé and Biai denied their any involvement in the seizure. The ensuing scandal appeared to force President Embaló to move Candé out of his role, to the less prestigious post of Minister of Agriculture, and to dismiss Biai (albeit with no clear reference to the cocaine case as part of the rationale). Although Biai was reappointed months later, and Candé was appointed to another lucrative state position, this speaks to the ongoing reputational harms of public involvement in cocaine trafficking – a norm that could have been further eroded in the absence of international condemnation signalled through sanctions regimes.

## Delistings: Further insights

Because the possibility of delisting underpins how sanctions are meant to drive behavioural change in designated individuals, it is crucial to look at delisting when assessing the impact of sanctions. In numerous cases, designated individuals clearly consider the pathways towards delisting as central to their decision-making. For example, one Libyan government official sanctioned in 2018 reportedly sought advice about what he needed to do to be removed from the list soon after the sanctions were announced.<sup>106</sup>

Delisting can occur for a variety of purposes, including factual errors in designation, the death of the designee, being held sufficiently accountable by a designee's own country, or the cessation of a sanctions programme. But it is generally held out as a positive inducement for designees to change the activity or behaviour which led to their listing in the first place.

As noted in the UNSG's 2015 report, 'Sanctions are not an end in themselves; the Security Council could consider establishing clear benchmarks for the lifting of sanctions in Guinea-Bissau'.<sup>107</sup> Such benchmarks were never established. This is in line with broader findings that the effective use of delisting as an incentive is hampered by opaque delisting processes.<sup>108</sup>



Although the UNSG repeatedly recommended that the sanctions be reviewed, both to allow certain individuals to be considered for delisting given their 'commendable behaviour' and to issue additional sanctions on new 'political spoilers',<sup>109</sup> the UNSC and EU sanctions lists were unchanged until 2022 (with the exception of deceased individuals being delisted).

In recent years, the UNSC has clearly been fractured on the future of the Guinea-Bissau regime, with a number of member states discussing the possibility of lifting sanctions. Since early 2020, actors both outside the Council, including President Embaló,<sup>110</sup> and within it, including China and Russia,<sup>111</sup> have called for sanctions on military officials to be lifted. Some EU members, allegedly including Portugal, have reportedly made similar calls for at least some of the sanctions to be lifted.<sup>112</sup>

Notably, the US publication of a reward for information on Indjai occurred in the midst of these ongoing negotiations, catching most international and national observers by surprise. On the face of it, this indicated ongoing US support for the sanctions regime but it remains unclear whether it was fully tied into a concerted strategy for sanctions.

Despite the widely held view that the sanctions have had limited impact, international officials and political analysts in Guinea-Bissau unanimously expressed deep concern over the possibility of lifting the sanctions. Doing so was perceived to ignore the alleged continued role of certain sanctioned individuals – including Antonio Indjai – in illicit markets and as spoilers to long-term stability. It would also be perceived as solidifying impunity for the elite and a retraction of international focus on Guinea-Bissau that could drive even greater brazenness in criminal activities and disregard for the law.<sup>113</sup>

Most of the concern centred on the signalling power of lifting the sanctions, rather than any sustained practical impact on the individuals themselves. This ties into the assessed (and unusual) primary aim of the original UNSC Guinea-Bissau regime: 'to signal and/or stigmatize a target or others about the violation of an international norm'.<sup>114</sup>

Some stakeholders do attribute a degree of signalling power to the sanctions, and the consequent degree of constraining military involvement in politics and elite involvement in illicit markets. Particularly against the backdrop of the 2020 military interference in politics, lifting the sanctions seemed to risk signalling international indifference to military seizures of power in Guinea-Bissau, and thus in West Africa more broadly, at a time when unconstitutional power transitions are a crucial concern across the region.

In consultations in 2021, numerous stakeholders in Guinea-Bissau argued not only against the termination of the current regime, but also for the expansion of the regime to include non-military actors heavily involved in illicit markets. The narrow application of sanctions to the military was widely seen to have fomented a culture of impunity among political players, which would be cemented were the regime to be terminated.

It is likely that the lack of consensus within the Security Council and the EU, with Portugal reportedly among the dissenting group, made such expansion politically untenable. Further, in the current geopolitical context, there were justifiable concerns that further sanctions could drive Guinea-Bissau closer to powers with little concern for domestic human rights and illicit markets: including China, Turkey, Saudi Arabia and, most concerningly of all, Russia. Given that sanctions are ultimately a foreign policy tool, these concerns may well continue to trump the desire to disrupt the political and military protection of cocaine trafficking and the role of cocaine rents in destabilizing Guinea-Bissau. At the time of writing, the UNSC had made no changes to its sanctions regime.<sup>115</sup>

## Were sanctions a factor in the February 2022 attack of the Presidential Palace?

The nature, drivers, and actors involved in the February 2022 occupation of Bissau's Presidential Palace remain largely opaque, with several competing narratives in circulation. According to these, the incident may have been linked to President Embaló's concession to Senegal which allowed its army to pursue Casamance rebels into Bissau-Guinean territory. Or it may have been staged to trigger the deployment of ECOMIB troops against a potential military coup.

A third prominent narrative suggests that military elements themselves were behind the incident. In this view, the incident was triggered by ongoing discontent with the president's failure to fulfil his promise to have the international sanctions designations lifted.<sup>116</sup> It is currently impossible to verify which – if any – of these interpretations is correct. However, the prominence of the third certainly suggests the continuing importance of the sanctions for the designated individuals, in contrast to the prevailing judgement that the sanctions had limited overall impact. ■

In July 2022, a little more than two years into Embaló's presidency, the EU quietly lifted restrictive measures on nine of the designated officials. Antonio Indjai, Ibraima Papa Camara and General Mamadu Ture (known to be close to Indjai) were among the nine individuals subject to ongoing measures.<sup>117</sup> A number of the delisted individuals had held senior military posts. The delisting of some individuals, particularly those who seemingly kept operating in the cocaine trade with limited discretion, was met with surprise and condemnation by Bissau-Guinean observers.<sup>118</sup>

Curiously, a few months earlier, the UK's March 2022 update of its sanctions list also chose to delist a number of individuals. It retained sanctions on a slightly different set of individuals than the EU, including Indjai and Mamadu Ture, but not Papa Camara, and maintained asset freezes on Augusto Mario Co, Daba Nualna and Celestino de Carvalho.<sup>119</sup>

One EU official reported that the EU sanctions regime had been subject to legal challenge, which had resulted in the lifting of sanctions on nine individuals.<sup>120</sup> While there is precedent for this, the EU often re-imposes slightly adapted sanctions on individuals whose listing is challenged. That this did not occur here may indicate that the sanctions were felt to have served their purpose. While the reasoning behind the UK and EU decisions remains unclear, the processes were remarkably discreet. The lifting of sanctions was not widely publicized in international, regional or national news, and neither was it widely shared by EU stakeholders in the ECOWAS region with EU member-state representatives or international counterparts.<sup>121</sup>

Many Bissau-Guinean stakeholders perceive the United Nations and Western powers to have been reticent in criticizing the president's clear steps towards consolidating power and shrinking any space for opposition or dissent. The lifting of sanctions could be perceived as part of a broader 'whitewashing' of the worrying developments in the country, in the interest of retaining geopolitically advantageous relationships with authorities in Guinea-Bissau.

In the run-up to the EU's decision, President Embaló repeatedly called for the lifting of its sanctions on members of the military, which were far more onerous than the UN's. These calls appear to have waned.

## Undermining factors

The establishment of international sanctions on Guinea-Bissau held significant promise. The initial impacts were amplified by the country's dependence on foreign aid. The military elite's reliance on European hospitals and schools meant that visa bans were powerful restrictions for listed individuals. The possibility of visa bans being imposed on further individuals acting to undermine stability in the country, including through engagement in cocaine trafficking, thus held potential to operate as a deterrent for elite engagement in cocaine trafficking.

However, their effectiveness was undermined by two key factors. The first was a failure to appropriately resource and revise the sanctions regime. Its application only to military officers, the failure to establish a panel of experts or other monitoring structure and the failure to add new designations since 2012 all weakened the regime's signalling and deterrence powers. Characterized by apathy, its implementation – both for new listings and delistings – was mired in stasis, weakening impact and diminishing incentives for behavioural change. Patchy regional alignment with the travel bans also weakened their impact, as designated individuals had some ability to move across many ECOWAS borders, including for healthcare.

Secondly, the illicit logging market, by providing an alternative source of rents, crucially bolstered the resilience of designated actors to the imposed sanctions and their initial financial consequences. It also allowed the military's patronage system to survive the financial stresses of the sanctions regime and the freezing of foreign aid. This is only one example of how illicit economies in Guinea-Bissau are the glue that holds together an extremely resilient state protection structure that has significantly undermined governance, to the ongoing detriment of the Bissauan people.<sup>122</sup>



## CONCLUSION

**T**he case of Guinea-Bissau provides insight into the use of sanctions where criminal markets are encased in a high degree of state protection and are a central driver of political instability. The transit of high-value illicit commodities through a country – as is the case with cocaine markets across West Africa – is particularly likely to engender structured elite protection markets. Such scenarios can range from a limited but highly damaging co-option of powerful state players to the full criminal capture of the state. These illicit economies are particularly complex to disrupt: where influential figures appropriate the extensive rents, the political will to do so is typically non-existent.

For external actors who want to erode the political protection of the illicit economy and shape its ecosystem, sanctions may be one of the few tools available. Several lessons can be drawn from the Bissau-Guinean experience to maximize the likely impact of their deployment. These lessons are likely to be materially different from 'best practice', where different criminal markets feed into armed conflict, bringing a distinct set of considerations into play.



A soldier of Guinea-Bissau lowers the flag to half mast at the Forte d'Amura Military camp in Bissau, April 2012, the time of the military coup. © Seyllou/AFP via Getty Images

## Recommendations

**Ensure sanctions regimes are appropriately resourced, including follow-up, implementation and monitoring mechanisms. All UNSC regimes should have a panel of experts to keep them dynamic and responsive to shifting contexts.** Investing appropriate resources to implement established regimes is central to the effectiveness of sanctions. The Guinea-Bissau case study illustrates how the absence of a panel and adequate resources drives long-term erosion of the efficacy of the regime.

**Ensure designations are not artificially limited to certain state institutions, as this weakens the broader signalling power of sanctions.** In Guinea-Bissau, the military actors were the most visible individuals, but there were also high-level political figures who supported the coup and were heavily involved in cocaine trafficking, and whose impunity was remarked upon by many Bissau-Guineans. Sanctions could have reached into the political and civilian protection infrastructure that became more and more important with time. A number of high-ranking officials are widely believed to merit designation due to their ongoing involvement in protecting cocaine trafficking and illicit logging and indirectly contributing to Bissau's chronic political instability.

Moreover, sanctions could – and should – have been applied against high-level criminal entrepreneurs, in line with the growing emphasis on using sanctions designations to target non-state actors involved in transnational organized crime. The case of Seidi Bá presented a striking opportunity.<sup>123</sup> His acquittal under questionable circumstances in July 2022, which was widely decried by members of the judiciary, civil society and law enforcement alike, has closed this window where national and international interests would have been perfectly aligned.<sup>124</sup>

**The lifting of sanctions should be leveraged in engagement with designated individuals, and host governments where relevant, as an incentive for behavioural change around the main goals of the regimes,** and more broadly for curtailing the links between states and crime. Lifting sanctions in a piecemeal and poorly communicated manner squanders such potential political capital and wastes the powerful inducement of delisting.

**Anticipation of shaping.** There should be strategic assessments by sanctioning jurisdictions on how the issuance of multiple designations will impact illicit markets and the ecosystems. This should be factored into broader strategic planning, in order to ensure that sanctioning jurisdictions can be responsive to the shifts and prevent the harmful or problematic activity that motivated a set of designations from re-emerging in a slightly altered, or even worsened, form.



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