



**GLOBAL
INITIATIVE**
AGAINST TRANSNATIONAL
ORGANIZED CRIME



PORT OF CALL

REGIONAL ILLICIT FLOWS
THROUGH DOUALA, CAMEROON

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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.

ACRONYMS AND ABBREVIATIONS

BGFT	Bureau de Gestion du Fret Terrestre (road freight management bureau, Cameroon)
BRI	Belt and Road Initiative
CAR	Central African Republic
EIA	Environmental Investigation Agency
IEIM	Illicit Economies and Instability Monitor
ISPS	International Ship and Port Facility Security
MINFOF	Ministry of Forests and Wildlife (Cameroon)
PAD	Port Autonome de Douala
PMC	Private military company



EXECUTIVE SUMMARY

Seaports are critical infrastructure hubs that facilitate the vast majority of global trade – both licit and illicit. Over 80% of international goods trade is carried by sea, according to 2021 data from the UN Conference on Trade and Development, and this percentage is even higher for most developing countries.¹ Whether it is fuel, grain or consumer goods, any major international supply chain relies on maritime trade. Yet port facilities are highly susceptible to infiltration by criminal networks looking to gain access to international markets.² As such, port authorities face a challenging task. They must ensure the smooth flow of international trade – an essential precondition for commerce and economic growth – while, at the same time, monitoring goods and safety standards and maintaining security. This latter role includes protecting ports and maritime trade against criminal exploitation.

The importance of transport infrastructure to global trade and connectivity has also made ports into a contested political arena. Many maritime infrastructure projects around the world have focused on enhancing throughput as a way of driving economic development.³ The vast programme of infrastructure projects under China's Belt and Road Initiative (BRI), for example, has been a central element of its foreign policy over the last decade. The BRI's maritime component has seen Chinese investment in ports all over the world, including in Africa.⁴ Indeed, ports are places where international standards and the interests of powerful countries are influential, and can compete with domestic political interests. Ports tend to be managed by a combination of public authorities and the private sector, and the oversight of port security is at the heart of many of these contested political questions.

Yet streamlined connections to global trade networks have also helped to facilitate illicit trade, from drugs to wildlife and timber.⁵ Previous research by the Global Initiative Against Transnational Organized Crime (GI-TOC) has underscored the pivotal role of transport infrastructure in underpinning global and regional illicit economies.⁶ Institutions, companies and individuals working in seaports regularly come under pressure to participate in corruption and criminal activity.

This includes illicit trade to and from conflict zones and regions of insecure governance. This was illustrated in the GI-TOC's 2022 mapping of illicit economic hubs in West Africa, Cameroon and the Central African Republic, and analysis of the relationship between illicit economies, conflict and political instability across the region.⁷ This highlighted the region's seaports as major nodes in regional and interregional illicit flows (including illicitly traded wildlife, or intercontinental drugs and arms flows), and as transit points for flows into and out of conflict zones.

Douala in Cameroon offers revealing insights into the relationship between transport hubs, illicit economies and instability. Douala is the main seaport and economic capital of Cameroon. It is a key strategic hub for international trade from Cameroon and its neighbours, including the landlocked Central African Republic (CAR) and Chad.⁸ Douala has also been undergoing a major process of reform aimed at improving port security. This reform process offers an opportune moment to investigate what the impact has been in curbing criminal activity.

This report uses two case studies to explore the role of Douala in regional illicit economies and instability dynamics.

First, the role of Russian mercenary organization the Wagner Group. The group has used Douala as a transport link for its operations in CAR, where it has since 2018 been hired by President Faustin-Archange Touadéra's administration to fight rebel groups in return for access to natural resources. It has extracted these resources and waged its military campaign with brutal consequences for Central African civilians.⁹

Second, the regional illicit timber trade. The Douala port, and Cameroon more broadly, acts as a conduit for West African timber to be sent on to the destination markets of Asia and Europe. This includes vast amounts of illegally logged timber, which has a severe impact on biodiversity, climate change and the local economies around the forests where these trees are felled.

Security reforms made at Douala port have improved official control over the movements of goods within the port and brought the port management in line with international standards. However, vulnerabilities endure and these improvements to physical security may be undermined by corruption. Poor working conditions – both within the port itself and in its associated transport infrastructure – are not only major safety concerns in themselves but make workers vulnerable to recruitment and exploitation by criminal networks. This highlights the importance of strengthening the human side of port management, alongside technical and physical improvements to port security.

Vulnerabilities of seaports to organized crime

As critical nodes in the global transportation system, seaports are pivotal to international trafficking. According to a UN Office on Drugs and Crime report, 'freight containers are constantly targeted for the shipment of drugs, counterfeit goods and weapons, which are smuggled alongside legal commodities'.¹⁰ Indeed, data gathered for the OECD in 2017 found that of all counterfeit goods seized worldwide, 56% of the total (in terms of value) was found on container ships.¹¹ And in 2021 the World Wildlife Fund estimated that between 72 and 90% of wildlife products, from timber to ivory, are trafficked by sea, of which container shipping is a major part.¹²

Container ships are also the primary means by which huge volumes of drugs are trafficked internationally. Most of the cocaine smuggled into the EU enters through the bloc's largest container ports – particularly Antwerp and Rotterdam – at a scale of multiple tonnes per shipment.¹³ A significant proportion of this cocaine passes through West African ports en route from Latin America to Europe.¹⁴

This is not surprising when one considers what seaports offer to criminal networks. Just as maritime connectivity boosts licit international trade, seaports connect the sources of illicit commodities with their destination markets.¹⁵ The road and rail networks, in which seaports are embedded, link the producers of any illicit good – from cocaine to cobalt, counterfeit medicines to critically endangered species – to these international gateways. The relationship between transport infrastructure and

the development of illicit trafficking routes has been widely documented in academic and research literature.¹⁶

The methods used by maritime traffickers to move illicit goods range from the simplistic to the highly sophisticated. Common methods include simply hiding illicit cargo amid legitimate goods or creating hidden compartments within a container or a shipping vessel. In the case of the black market trade in licit goods – timber, minerals, stolen vehicles, etc. – smuggling networks rely on falsified paperwork to disguise the origins of the merchandise or exploit gaps in regulatory systems (such as a lack of monitoring in timber markets) to fool port authorities into thinking the goods are legitimate.

In the container trade, several different methods have been described by law enforcement agents around the world. In what is typically known as the ‘rip-on/rip-off’ method, a container of legitimate merchandise is broken open, filled with illicit goods and then re-sealed to hide the fact that the container has been tampered with, and extracted by members of the criminal network upon arrival. Other methods include creating ‘clones’ of containers (with the same registration number as a shipment containing illicit goods) to avoid scans and customs controls, or the ‘trojan horse’ method, where members of criminal networks smuggle themselves into the secure port area inside containers so that they can extract the illicit goods hidden in other containers.¹⁷

New methods are emerging all the time: since 2018, a new method used by criminal networks was identified in Antwerp and Rotterdam whereby they would obtain the unique reference codes of containers from informants in logistics companies, allowing them to pose as the real customer and extract the drugs from the shipment.¹⁸ Europol estimated in 2023 that at least 200 tonnes of cocaine have so far been trafficked through these two ports using this method. As more sophisticated security technology has been introduced, trafficking networks have adapted to focus on corrupting the human element of these systems instead.

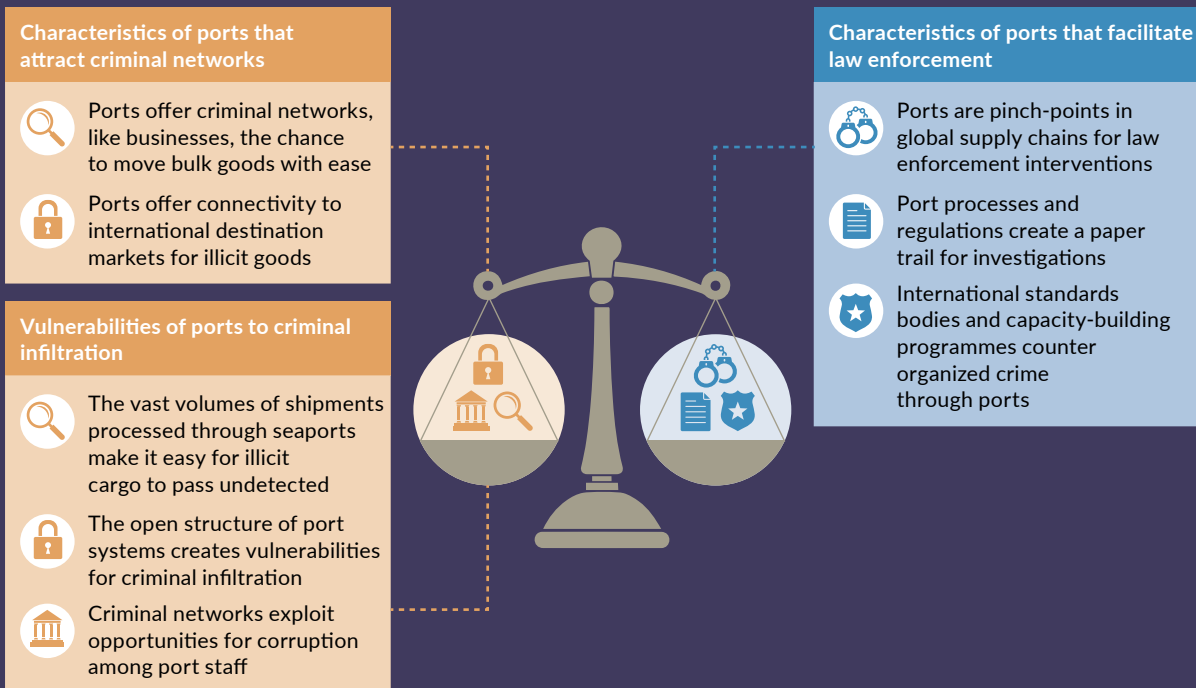
Maritime infrastructure in Africa is no exception to this global phenomenon. Analysis from INTERPOL found that criminal flows via seaports and airports are a ‘significant challenge’ for law enforcement in Africa. This was attributed to corruption among institutional and private sector actors at transport hubs and to the pressure on authorities in many African countries to maintain smooth international trade flows (to keep up with international competitors) while working with limited resources.¹⁹

There are several characteristics of seaports – geographic and institutional – which make them simultaneously attractive to criminal networks and vulnerable to criminal exploitation.²⁰

In terms of attractions for criminal networks:

- **Ease of moving goods in bulk** – Much like legitimate businesses, criminal networks look to trade in as high a volume as possible at the lowest cost.²¹ Seaports, whether by container ship or by other kinds of vessels, offer the best means of moving illicit goods in bulk – whether it is drugs, timber, ivory, or weapons and ammunition.
- **Connection to international markets** – Global illicit flows emerge to meet transnational demand. The shipment of timber from endangered species of tree, such as rosewood from African forests to markets in Asia, or Latin American cocaine to markets in Europe (often transited via West Africa) is made possible by the low-cost connections that international maritime trade offers.

CONCEPTUALIZING THE VULNERABILITIES OF SEAPORTS TO ORGANIZED CRIME



Regarding vulnerabilities to criminal infiltration:

- **Vast shipment volumes** – Around 90% of all global trade is conducted via maritime containers, amounting to more than 500 million containers annually. This sheer volume means that only a small percentage (less than 2% according to UN estimates) can be physically inspected for illicit goods. This makes detecting criminality incredibly challenging for law enforcement without using huge resources and impeding legitimate trade. Larger ports that have a higher throughput of vessels face a particular challenge.²²
- **Open nature of port systems** – To facilitate legitimate trade, a seaport must be accessible to personnel, vessels and goods from around the world, including jurisdictions from which illicit goods originate, or jurisdictions with which port authorities may not have effective cooperation or intelligence-sharing mechanisms. This creates an inherent risk of unknown, corrupt or criminal actors entering the port area.
- **Corruption of port staff and private sector workers** – Individuals with port access can help criminal networks to sidestep law enforcement barriers. As Europol showed in its 2023 analysis of cocaine trafficking via Antwerp, Hamburg and Rotterdam, the huge number of workers and companies with access to these ports (in addition to port authorities and law enforcement officers) offered myriad opportunities for circumventing customs controls through infiltration and corruption.²³ The growing sophistication of port governance, with complex hierarchies of private and public sector entities, increases this risk. Corruption can also extend to the tender processes for port management and construction, as they are high-value, capital-intensive infrastructure projects.

These characteristics manifest differently in each port. A GI-TOC analysis of ports in the Western Balkans, for example, assigned ports to three categories. 'Crime magnets', which were ports that attract criminality due to their geographical position along illicit transit routes; 'safe havens', where corruption among those in charge of the port facilitates criminality; and 'high-volume ports', which attract criminality because the vast amount of goods moving through them makes it harder to detect contraband.²⁴

At the same time, the port system can act as a nexus where regulation and law enforcement can monitor global trade and intervene where illicit activity is identified:

- **Seaports are a pinch-point in global supply chains, and a juncture at which law-enforcement interventions can be made.** Illicit goods flows can be highly dispersed and difficult to trace. Given the characteristics outlined above, maritime ports are key transit points where these flows are concentrated and interventions can have greater impact. Further, ports tend to be under close state control – even in countries with little control of their land borders – which facilitates intervention. For example, acting on intelligence, law enforcement officials may decide to conduct a controlled delivery (tracking a container of illicit goods to its destination to identify members of the criminal network involved), intercept goods or conduct a coordinated exercise with law enforcement at other ports to target a particular commodity flow.²⁵ The port is therefore a controlled environment where law enforcement capabilities can be used.
- **The regulatory and administrative processes at ports can create a paper trail for investigations.** While criminal actors will often take steps to conceal their connections to illicit shipments – for example by operating through proxies or shell companies – in many cases the paperwork and data created to track global trade can shed light on corporate structures linked to known criminal or conflict actors, enabling investigations by law enforcement, sanctions bodies, journalists and civil society groups.
- **International agreements, standards bodies and capacity-building programmes focused on seaports can bolster institutional capability to counter organized crime.** As INTERPOL noted in its 2020 study of African airports and seaports: 'global regulatory and security standards for both the marine and aviation transportation sectors have increased substantially since the turn of the millennium'. While significant areas of vulnerability still exist, common regulations on port security and safety have raised standards internationally.²⁶

Many of these characteristics – both risks and opportunities – can be seen at the port of Douala.

Mapping illicit hubs in West Africa

In 2022, the GI-TOC's Observatory of Illicit Economies in West Africa developed the Illicit Economies and Instability Monitor (IEIM), which mapped hotspots of illicit economies and violent conflict, and analyzed the relationship between them. This analysis was in response to the deteriorating security situation across parts of West Africa and the Sahel. In many of these complex and protracted conflicts, illicit economies play a significant role in creating the environments in which conflicts develop and in prolonging them, yet this role is complex and often little understood.

The IEIM is a tool designed to assess the relative importance of illicit markets in fuelling conflict and instability in the region, in 280 hubs identified across 18 countries in West Africa. It assesses the degree to which specific illicit hubs drive instability in the region by analyzing illicit economies

as vectors of instability. The tool is designed to enable policymakers to prioritize and target specific areas of illicit economies, in conjunction with other development and law-enforcement responses to instability.

One of the key findings was that transport infrastructure, including seaports and airports, act as key nodes in regional illicit economies in West Africa. Although coastal hubs are often far from the flashpoints of conflict in the region, they are important transit points for the commodities that flow to and from conflict areas. This includes vehicles (especially motorbikes), which are trafficked internationally to reach armed and violent extremist groups in West and Central Africa.²⁷

State-embedded actors (i.e., corrupt officials) were found to play a pivotal role in illicit economies in the region's seaports. Meanwhile, certain types of illicit economy were found to be more pervasive in West African seaports than inland hubs, including the cocaine trade, counterfeit goods, the illicit oil trade, and flora and fauna crimes. This attests to the key role played by ports as entry points for illicit commodities in the region.

The IEIM analysis ranked Douala in Cameroon as a 'high risk' hub for illicit and criminal activity. The mapping noted the importance of Douala as a transit hub for illicit commodities imported to, and exported from, the neighbouring Central African Republic (CAR). Timber was highlighted as a significant illicit economic flow through Douala's seaport. Other flows such as drugs, smuggled gold and human trafficking were highlighted as risk factors for Douala airport. Other coastal hubs in Cameroon were also classed as high risk, including Tiko, Limbe, Idenau, Idabato and Bakassi.²⁸

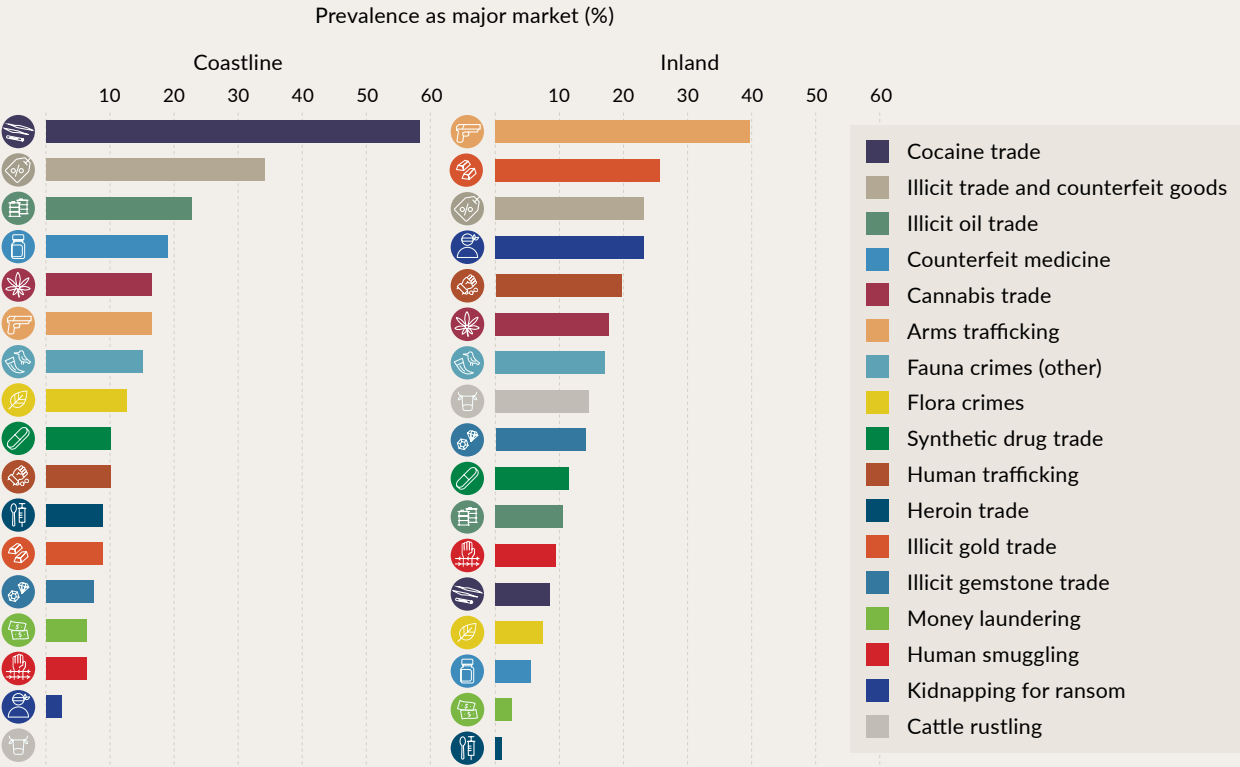


FIGURE 1 Illicit economy prevalence in coastline hubs versus inland hubs.

SOURCE: GI-TOC, Illicit Economies and Instability Monitor, <https://wea.globalinitiative.net/illicit-hub-mapping/map>

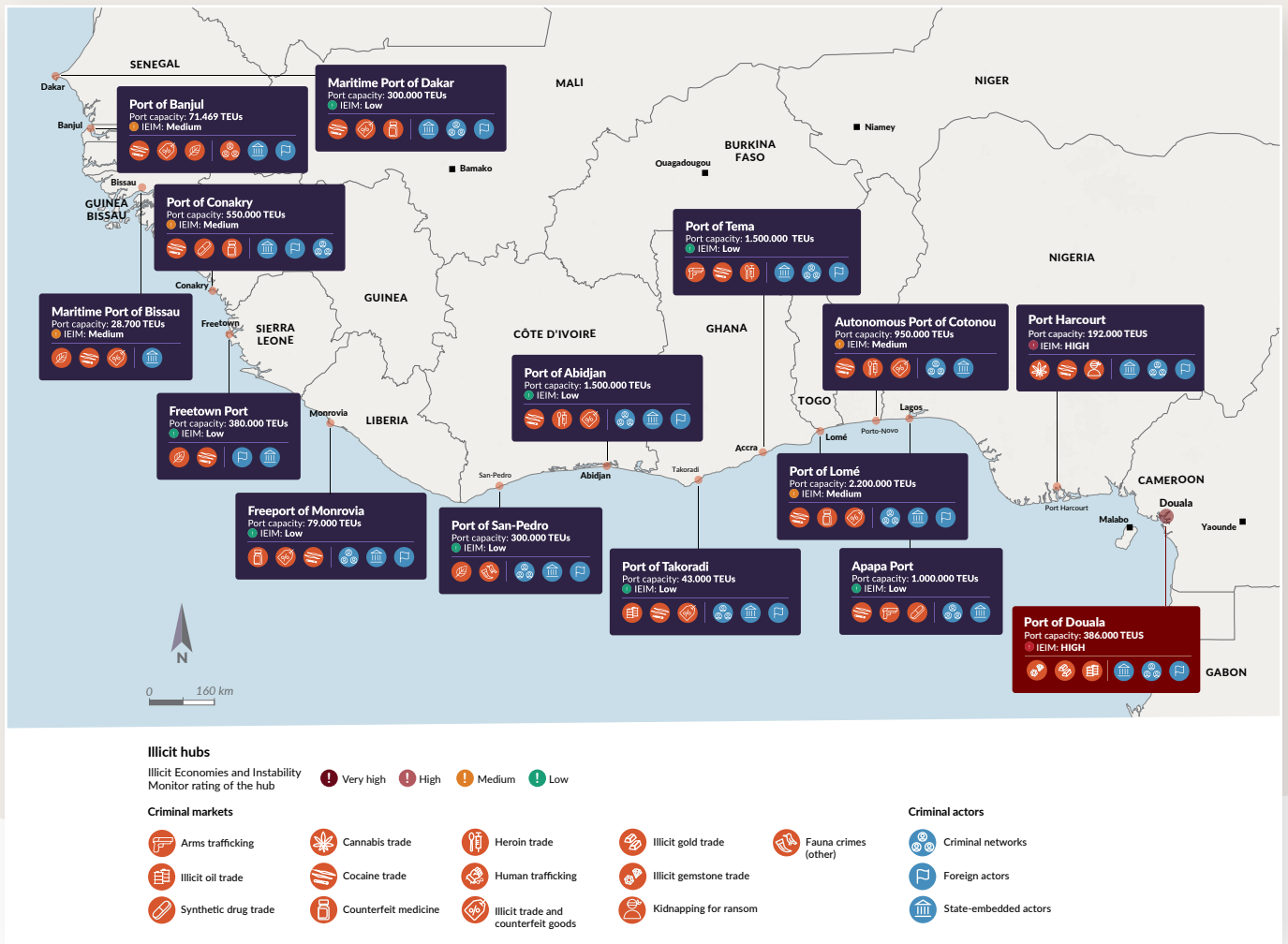


FIGURE 2 Regional seaport hubs, showing IEIM ratings.

SOURCE: GI-TOC, Illicit Economies and Instability Monitor, <https://wea.globalinitiative.net/illlicit-hub-mapping/map>

Methodology

This report draws on a series of interviews conducted in Douala in June 2023, including representatives of the port authority, security bodies and customs officials; members of the private sector at the port, including dock workers, freight forwarders and truckers; representatives of several trade unions representing port workers; and civil society groups. Official requests for access to data and interviews were made to the relevant authorities managing the Douala port, with a range of interviews subsequently granted. This was accompanied by a review of secondary sources, including government documents, media reports and academic literature. Open-source investigations, including company records databases and import–export data, were also used to gather information on suspected illicit flows through the Douala port. This built on methodologies developed for other GI-TOC research studies, including analysis of trafficking via container ports in the Western Balkans.²⁹



OVERVIEW: PROFILE AND MANAGEMENT OF THE DOUALA PORT

Douala is the main seaport and economic capital of Cameroon.³⁰ The port authority, the Port Autonome de Douala (PAD), estimates that it manages just under 85% of Cameroon's international trade.³¹ It is one of the only ports in Cameroon equipped with a container terminal alongside Kribi (located to the south of Douala and also a major exporter of goods, including timber from Cameroon).³²

This is a high volume of trade to manage: the port security body estimates that 11 million kilograms of cargo passes through Douala each year,³³ receiving around 100 vessels per month and managing around 700 containers for import and export each day.³⁴ The port comprises a container terminal, as well as a dedicated timber yard, and is also a busy fishing port.³⁵



View of the container terminal at Douala port. *Photo: Supplied*

The port is a key strategic hub for international trade for Cameroon and for neighbouring countries, including the landlocked CAR and Chad, and northern areas of the Republic of the Congo.³⁶ It is, for example, a hub for humanitarian aid flows into West and Central Africa.³⁷ Due to ongoing instability in Libya and Niger, and the civil conflict in Sudan, both CAR and Chad are now almost entirely dependent on trade routes from Cameroon.³⁸ While the latest data released by the Douala authorities shows the total volume of trade conducted via the port has declined in recent years (due to the completion of the nearby port in Kribi),³⁹ the proportion of imports and exports from CAR and Chad is reportedly on the rise, making Douala increasingly into a regional trade hub – including for a number of regional conflicts – as much as a national centre.⁴⁰



FIGURE 3 Major transport links to Douala.

This inter-regional trade is conducted according to bilateral agreements between Cameroon and CAR, and Cameroon and Chad, which manage the trade corridors between Douala–Bangui and Douala–N'Djamena. Trade destined for CAR, for example, goes through the Guichet Centrafricain de Transit de Douala (Central African transit office in Douala), where CAR customs duties and import procedures are applied at Douala with the aim of ensuring a smooth flow of goods to Bangui. Costs and security measures for these trade corridors are negotiated between the CAR and Cameroonian governments.⁴¹

A hinge for transcontinental illicit markets

The geographic position of Douala, and the trade corridors and transport routes leading to the port are a risk factor for illicit trafficking and criminal activity. The GI-TOC's analysis of illicit hubs in West Africa has highlighted several high-risk hotspots along the transport routes leading to Douala.⁴²

Garoua-Boulai, for example, is a major northern border town between Cameroon and CAR, located along one of the main highways linking Bangui to Douala. The town has been highlighted as playing a significant part in the smuggling of natural resources (wildlife, timber, gold and diamonds) from CAR into Cameroon. More broadly, south-western CAR is a major source for alluvial diamonds and gold production, meaning that surrounding infrastructure points become an essential transit route for networks seeking to illegally exploit these commodities.⁴³

Yaoundé (the capital of Cameroon and its second largest city after Douala) is also located along the Bangui–Douala corridor and is a significant transit point for illicit commodities such as gold, diamonds and various wildlife products. Yaoundé links the rural parts of Cameroon, Chad and CAR where these goods are sourced to Douala and the international markets beyond.

At one end of the N'Djamena–Douala corridor sits the tri-border area of the Lake Chad region. This area – between Maiduguri (Nigeria), Maroua (Cameroon), Diffa (Niger) and N'Djamena (Chad) – is a major crime zone and is at the heart of regional and national criminal dynamics. High levels of insecurity and a weak state presence allow illicit economies to thrive here, ranging from low-level smuggling to armed criminality. Activities include arms and drug trafficking, fuel and other commodity smuggling, and human smuggling and trafficking. Actors involved in these illicit activities include violent extremist groups such as Boko Haram.

The findings of the Global Organized Crime Index, likewise, highlight the regional pressures on a port such as Douala.⁴⁴ Neighbouring countries rank among the highest in the world for flora and fauna crimes (particularly timber and wildlife trafficking) as well as non-renewable resources crimes (which include illicit mining). Regional ports such as Douala are under strain from both directions, as transit points not only for the illicit commodities flowing out to international destination markets but also for the inward flow of the equipment and tools needed to extract them (such as mining and logging equipment). This is explored further in the case studies below.

Renationalization and security reform in Douala port

As noted at the outset of this report, ports can be a hotly contested political arena, where government priorities and private sector interests meet (and sometimes conflict). The port of Douala has, since 2018, been through a major overhaul of its management and security arrangements. Many areas of the port have traditionally been run by multinational companies, including French or Chinese companies.

However, the PAD has gradually renationalized many of these functions, including management of the container terminal, which have shifted to state-controlled companies.⁴⁵ Some areas, such as the timber terminal, remain under the control of private multinationals.

The security reforms have been aimed at making Douala internationally competitive and in line with global standards, after it faced criticism over declining standards and increased competition from ports in the region. In 2011, the Cameroonian government decided that a modernization process was needed, to make the port less porous and restrict unauthorized access.⁴⁶ The aim was to improve efficiency and security to make Douala the port of choice for international traders wishing to access Central African markets. In 2018, a company called PortSec SA was contracted to reform the physical security procedures in Douala, as discussed in more detail below.⁴⁷

Major stakeholders at the Douala port

Like any large port, a number of public and private sector actors are involved in the day-to-day running of Douala. As previous studies on corruption and criminality in ports have found, the varied roles of these actors and a lack of oversight of their activities can provide opportunities for corruption and criminal activity. In some instances, the presence of multiple agencies with overlapping security mandates can lead to conflict or confusion over port oversight. In other cases, the role of private security in controlling port activities can minimize oversight from law enforcement authorities. Balancing these competing interests, territories and information sharing can be a major challenge for the smooth and secure management of a port system. This section sets out the major actors involved in Douala.

Private and public actors involved in general port management, security and regulation:

- **Port Autonome de Douala:** the public body tasked with managing the port. It is one of four autonomous port management bodies in Cameroon, with the other three managing the ports of Kribi, Limbé and Garoua.⁴⁸ The PAD is responsible for port management and policy.
 - **Douala Port Security:** a subsidiary body of the PAD responsible for managing port security.
- **Customs and law enforcement:** the customs authorities present at the port of Douala include both the Cameroonian customs authorities and the Guichet Centrafricain de Transit de Douala.⁴⁹ The *guichet* manages customs procedures for cargo travelling along the Douala–Bangui corridor. All trucks travelling along this trade corridor are issued with a *bordereau électronique de suivi des cargaisons*, an electronic tracking slip that identifies their cargo and documents their onward route. Some customs checks have also been contracted out to private companies by the CAR authorities. Police are also stationed at the port to monitor for illicit activity and maintain security.
- **Private security:** security at the Douala port is also contracted to private-sector actors. As mentioned above, PortSec SA has played an instrumental role in reforming security at the port. Other private-sector actors include a Swiss-based company that is contracted to provide scanning services to monitor container traffic.
- **Le Bureau de Gestion du Fret Terrestre (BGFT):** the road freight management bureau is the public regulatory body that monitors road freight moving across Cameroon, and therefore any cargo transiting to and from the port of Douala.⁵⁰

There are various other private-sector workers operating at the port:

- **Stevedoring companies:** these groups, which are responsible for loading and unloading vessels, are licensed to operate within the central securitized port area, the area before goods go through customs checks. These companies operate warehouses within this area for the temporary storage of merchandise before or immediately after unloading from a vessel.⁵¹
 - **Dock workers:** generally recruited for the stevedoring companies by trade unions.⁵²
- **Freight forwarding agents:** the *transitaires ou commissionnaires en douane* are responsible for managing the customs arrangements of a shipment and forwarding it to its ultimate destination.⁵³
- **Shipping agents:** they represent the shipping companies and deal with the administration of the vessels coming into dock.⁵⁴
- **Truckers and freight drivers:** they are responsible for transporting the merchandise to and from the port. Trucking and road freight is managed by the BGFT.
- **Warehouse workers:** various companies (including a large number of timber companies) occupy the area surrounding the main secure port facility.⁵⁵

The risk of corruption and criminality varies among the different management authorities and private stakeholders outlined here. Underpaid and under-protected port workers, in particular, can be weak points in port systems that criminal networks look to exploit.

Kribi port – an emerging transit hub in the vicinity

Douala is one of only two ports in Cameroon equipped with a container port as well as the facilities for dealing with non-containerized goods. The other is Kribi, which was built more recently with the aim of boosting Cameroon's economic growth to the south-east. The port was built with significant Chinese financial backing, which is now supporting a second phase of port development.

Chinese state media has publicized the construction of Kribi as a major coup in Chinese regional diplomacy and engagement in Africa. 'Kribi Deep Seaport is the first large scale deepwater port in Cameroon. It was built by Chinese enterprises and also a result of mutually beneficial cooperation between China and Cameroon,' reported Chinese state-backed media CGTN. 'The once remote and backward small fishing village has transformed into a bustling modern port.'

Much like Douala, Kribi also houses a major timber terminal and so is a transit point for a significant amount of Cameroon's wood trade. Kribi serves many of the same domestic and international routes as Douala port, thereby



Workers load timber onto a vessel at the Port of Kribi.

© Adrienne Surprenant/Bloomberg via Getty Images

increasing the capacity of goods – both licit and illicit – that can transit from Cameroon's coastline. It is possible, given its strategic position, that Kribi will emerge as an increasingly important transit point for illicit commodities, particularly the illicit wildlife trade. ■



STRUCTURAL RISKS AND VULNERABILITIES TO ORGANIZED CRIME

Drawing on our interviews with stakeholders at Douala port, both in the port authorities and private sector, the risks and vulnerabilities to organized crime generally divided themselves into two major themes. First was the 'technical' side: the physical protection of the port area against infiltration by criminal networks and the management systems in place to monitor activity within the port. The second was the 'human' side: the risk of corruption of port authority agents and private-sector workers, driven in part by working conditions and pressures on personnel. This section explores both themes separately, before moving to detailed examples of illicit trade conducted via Douala in the following section.

Physical security, and technical and procedural issues

As discussed, the port of Douala has undergone a significant security reform programme since 2018.⁵⁶ These reforms have sought to tackle the risk of illicit trade passing through Douala by enhancing transparency and monitoring of people and goods entering and exiting the port; physically securing the port boundaries; and formalizing and automating mechanisms for customs and goods declarations.

Several key vulnerabilities were identified in port security prior to the reform programme, according to interviewees in management. These included the absence of a barrier delineating the port zone, insecure barriers at entry points and a lack of coordination between security services.⁵⁷ These weaknesses could be exploited by organized criminals to gain access to the port area to retrieve contraband unloaded from ships or steal other cargoes.⁵⁸

In the first reform phase, barriers to delineate the port zone and divide areas of activity were introduced, along with identity cards, security checks at key entrances and manned checkpoints for goods vehicles.⁵⁹ CCTV and vehicle tracking and monitoring systems were installed across the port area. A server room was created to monitor these systems, archive security data and utilize a database of known criminals, fraudsters or those suspected of trying to use the port for criminal activity (according to intelligence derived by port security and shared by local authorities).⁶⁰ Four hundred security personnel have reportedly been recruited and trained on these systems, including scenarios that cover criminal threats to port security. The reform process has also aimed to formalize the recruitment of dock workers. However, in practice – according to interviews with dockers – the concessionary

companies contracted at the port continue to use informal hiring practices on occasion, with potential risks for port oversight.

Scanners for containers were introduced at the entrance to the port for both import and export – six in total, including a mobile scanner that can be deployed throughout the port. Port authorities and other sources at the port say that 100% of container cargo imported or exported via Douala now goes through a scanning process.⁶¹ The scanning imagery is processed by a Swiss-based company, and transmitted back to the port authorities who then decide whether to proceed with a physical inspection.⁶² Further checkpoints were also created to allow for inspection of cargo entering the port by train (previously a weak point for unauthorized entry).⁶³ Bulk goods brought to warehouses within the port (i.e., not in containerized form), by contrast, are not scanned but monitored via document checks.⁶⁴

The general consensus among interviewees in the private sector, customs authorities and port workers' unions is that these security reforms – and the new electronic systems to manage customs declarations⁶⁵ – have improved security overall and closed up some of the more obvious opportunities for criminality and fraud, although some gaps remain. The BGFT reported that, in their view, the higher levels of security and automation of customs procedures (including payment mechanisms for customs) would make it harder for customs officials and transporters to collude in smuggling goods.⁶⁶ Similarly, dockworkers and dockworkers' unions reported that, despite some ongoing issues with informal hiring practices, access to the port has been formalized and there is more oversight over the recruitment of manual labourers. In the view of one trucking representative, however, these changes have been limited: 'I would say that if we compare things between 2018 and now, five years later, things are slightly better. Maybe 15 or 20% better' they said, 'but it's not a huge difference – maybe I'm a harsh critic but things have not changed a lot'.⁶⁷

On 29 December 2022, the Port Autonome de Douala was certified by the National Port Authority as being in compliance with the International Ship and Port Facility Security (ISPS) code, following an assessment of its security arrangements.⁶⁸ The ISPS code is a provision of the International Maritime Organization's International Convention for the Safety of Life at Sea, which sets out minimum security standards for ships, ports and government agencies. Adherence to the ISPS code means that a port has shown that it operates to a certain security level and has reaction protocols able to neutralize threats without interfering with the daily flow of goods or port activities. The ISPS provisions are chiefly concerned with minimizing the risk of terrorist activity and improving safety for workers but also, to some extent, with securing against criminal activity.

The certification of Douala indicates that it has taken steps to adhere to international norms. However, vulnerabilities in the port's physical security and procedures remain. Some of these are universal problems that all port authorities grapple with. One customs official, for example, raised that the pressure to keep goods moving efficiently with limited resources makes it impossible to identify all cases of misdeclared imports or smuggled goods – a challenge that faces even the world's largest and best-equipped port facilities.⁶⁹

Other vulnerabilities are specific to Douala. Recurrent power cuts and outages in internet connectivity, for example, impedes the use of technology-based security systems for port management,⁷⁰ as do frequent technical issues with the container scanners. While sources reported that all containers go through a scanning process, authorities at the port face various challenges including technical issues, difficulties interpreting the findings of scans and a limited capacity to search containers on the basis of a scan. Globally, only 3–4% of containers are subject to a physical search.

Other issues relate to the differing priorities and policies among port authorities. In customs, for example, the strategic priority is to target misdeclared commercial goods as this brings in additional customs revenues. However, illicit goods such as from the illegal wildlife trade (a major issue across West Africa, including in Cameroon) do not

constitute a commercial target, and so are not prioritized. These issues create further vulnerabilities for exploitation by criminal groups.

Corruption risks

Aside from the physical security questions, Douala has been dogged by corruption scandals for many years – some involving the highest levels of port management. This led local media house Actu Cameroun to refer to the ‘curse of the directors-general’ plaguing the PAD, as since its creation in 1999 no director-general of the body has escaped legal entanglements.⁷¹

The current director of the PAD, Cyrus Ngo'o, was given a six-month suspended prison sentence and several billion CFA francs in fines and damages after being convicted in August 2021 of abuse of office.⁷² The case related to a timber company – Cana Bois – which had leased warehouse space in the Douala port. Cana Bois disputed sharp rent increases claimed by the PAD (under the leadership of Ngo'o), which tenants had perceived as excessive.⁷³ Ngo'o was almost arrested in relation to the same case in August 2022 at Douala airport, but following a tense stand-off the warrant was lifted.⁷⁴ According to reporting from *Jeune Afrique*, the arrest attempt related to non-payment of the fines, as an attempt to pay this fine under the account of the PAD authority, rather than Ngo'o's personal funds, was rejected. Legal action relating to the Cana Bois affair continues today: in September 2023 it was reported that Cameroon's Supreme Court would hear the ongoing case relating to Cana Bois' warehouse in Douala.⁷⁵

The contract for security reform at Douala port, which was allocated in 2018 to a company called PortSec SA, has also proved controversial. Reports have been made in Cameroonian media from 2021 to 2023 regarding an ongoing Special Criminal Tribunal investigation into the contract with PortSec, regarding suspected mismanagement of funds.⁷⁶ Cyrus Ngo'o was questioned by the Tribunal in 2021, in response to which the PAD and Ngo'o rejected any allegations of wrongdoing.⁷⁷ In October 2023, a memorandum drafted by employees at the PAD was circulated by Cameroonian media groups claiming that the costs of the project were being grossly inflated compared to others in the region to achieve the same results and highlighting a lack of transparency around the project costs.⁷⁸

Part of the public scrutiny over the PortSec SA deal has been due to speculation about the company's ownership. It was a hitherto unknown company before it received the tender contract in 2018, which, according to documents leaked to a prominent Cameroonian activist at the time, appeared to have been allocated the lucrative security contract via a ‘special tender’ from the president's office. The company is registered in Panama (a tax haven) and its owners are not public. Yet investigative reporting from *African Arguments* in 2019 claimed that Eran Moas, an Israeli citizen who has long been a military adviser to the Rapid Intervention Battalion – an elite unit of the Cameroonian army directly commanded by the president – could be linked to the deal.⁷⁹ The publication contacted Moas, the PAD and the law firm listed on the leaked tender record for comment, none of which responded.

The current legal challenges facing Ngo'o are the latest in a series of legal scandals facing PAD management. In 2007, the former director, Alphonse Siyam Siwe, was sentenced to 30 years in prison along with three other co-defendants on charges related to the misappropriation of public funds in the management of the port, in what was described in the press as ‘very organized looting’.⁸⁰ Cameroon's asset recovery body auctioned properties that had been seized from Siwe. Siwe himself opposed this move, questioning the legitimacy of the recovery body.⁸¹ The case illustrates the long-lasting impact that financial mismanagement can have and the legal complexity of recovering misappropriated assets.

In 2015, another former director, assistant director and financial manager at the PAD were sentenced to 15 years each for embezzlement of public funds.⁸² As noted, the creation of complex hierarchies within port management, and sub-contracting of key functions such as management of customs paperwork to private entities, creates an

opportunity and risk for a variety of financial crimes, including corruption and illicit 'capture' of port facilities. The evidence outlined above suggests that this has been the case at Douala.

Overall, this long history of embezzlement and corruption among the top brass of Douala port has taken a toll on the management of the port. Without the siphoning off of funds by various officials over the years and with more effective financial oversight the port could be far more resilient to criminal activity, labourers within the port could enjoy better working conditions, and companies using the port facilities could have more efficient and secure services. This has been a major opportunity cost for the economic growth of Cameroon and the surrounding region.

Interviews conducted for this research further identified two categories of corruption risk at the port of Douala that may facilitate flows of illicit goods and subvert the physical security procedures in place. The first is that, despite automation and transparency reforms, everyday petty corruption – particularly at customs – is the norm.

The freight forwarders (or *transiteurs*) play a role in negotiating bribes with customs agents on behalf of their clients. Employees of one freight-forwarding company described how:

It's very hard to work without negotiation [i.e., bribery of customs officials]. More or less impossible. We can only try to minimize the bribes we pay. But sometimes even if you've done nothing wrong, they will make you negotiate, they will find an excuse to try and fine you, so you have to negotiate.⁸³

In their view, it is impossible to operate as a freight transit business at the port without engaging in these negotiations, even though it eats into profit margins.

The second-hand car market, which is a significant trade in Douala, was highlighted as a particular sector that functions through bribery. *Transiteurs* will use their contacts among the customs officials to under-value vehicles, thereby saving on import tax, in return for kickbacks.⁸⁴ Despite online and automated systems for customs being in place, some officials reportedly insist on processing paperwork manually to allow for face-to-face negotiations of bribes.⁸⁵

These issues are not isolated to customs and were also reported among port security.⁸⁶ There are law enforcement measures in place at Douala to counter day-to-day petty corruption, including operations by the national anti-corruption authorities and internal processes by which officials can report suspicious activity.⁸⁷ However, *transiteurs*, importers and journalists made clear that bribery remains a standard part of doing business at the port.⁸⁸ This presents a vulnerability, as a casual willingness to engage in low level bribery could extend to customs agents and port officials turning a blind eye to smuggling or helping criminals avoid scrutiny.

The second issue identified by truckers and their union representatives related to poor working conditions and pay. Drivers moving cargo to and from Douala across Cameroon and neighbouring countries deal with harsh working conditions and challenges along their routes, ranging from insecurity and threats of violence to exhaustion and accidents from poor road conditions.⁸⁹ This can act as an incentive for them to engage in criminal activity (such as transporting illicit cargo) to supplement their income. Truck drivers interviewed for this research



Truck accidents are rife along the road to Douala.

Photo: Supplied

reported that the impact of corruption along the road corridors increases risk of accidents by taking away drivers' funds for safe travel.

In particular, the large number of gendarmerie-manned checkpoints and weighbridges that must be passed along the main cargo routes were described as a problem,⁹⁰ as these formalities are an opportunity for petty corruption. In the view of the BGFT, the corruption that has become embedded in road and transport governance is a major vulnerability that can be exploited by criminal networks.⁹¹

The payment of bribes along the route is a cost that drivers must sometimes personally shoulder out of the expenses provided for long journeys.⁹² To cover costs, drivers can opt to sell goods along the route, one focus group of truckers said, including the cargo they are supposed to be transporting. They also described being given a lump sum to cover all expenses for their journeys – the costs of any bribes, and also their own food, lodgings and so on. The net result is that the more truckers have to pay out in bribes, the less money they have to pay for food or a place to sleep. Bribes therefore directly increase the risks of road accidents due to driver exhaustion.⁹³ Smuggling is one option to make additional money, including of fuel or ivory between the Republic of Congo and Cameroon. While the truckers' union warns members against engaging in this kind of side-line work because of the risk of arrest, drivers say that the risk of not engaging is greater:

There are too many companies that mistreat the truck drivers very badly. The Lebanese, the Chinese companies, and also Cameroonian companies. If you have an accident, you get nothing, they will abandon you. They won't give you anything.⁹⁴

While legislation is in place to set out minimum working conditions for these drivers, unions argued that this is so seldom adhered to that it is effectively 'obsolete', leaving drivers underpaid and under-protected.⁹⁵ Similarly, representatives of dockworkers' unions argued that some stevedoring companies refuse to pay minimum wage and apply safety regulations.⁹⁶ This causes risks, as some dock workers take additional jobs and are therefore exhausted.⁹⁷ The increased risk that drivers will be incentivized to smuggle goods or share information with criminal networks is likewise a consequence of these poor working conditions.⁹⁸

These problems show how security and resilience to criminal exploitation at the Douala seaport do not exist in isolation. Port security is dependent on security and governance in its hinterland and the routes leading to it. The conditions facing port workers and freight drivers bringing goods in and out, the human element of port security systems, make them vulnerable to recruitment by criminal networks.



EXPLOITATION OF DOUALA PORT BY CRIMINAL NETWORKS AND CONFLICT ACTORS

As outlined in the sections above, Douala port has a high-risk profile for exploitation by criminal groups: it is a crucial gateway to West and Central Africa, particularly unstable and insecure regions; it is one of the region's largest ports; and it has ongoing physical security vulnerabilities and corruption risks. In interviews, stakeholders highlighted the smuggling of fuel,⁹⁹ counterfeit medicines,¹⁰⁰ drugs,¹⁰¹ wildlife products¹⁰² and timber (detailed in the case study below) as some of the major criminal trades passing through Douala.

And yet interdictions of illicit cargo in Douala are, in fact, rare. Based on public statements from the PAD, there were no seizures of key strategic commodities such as arms, gold and other minerals, timber or drugs between 2018 and 2023. The only exceptions to this were the seizures in November and December 2020 of chemicals alleged to be ingredients for improvised explosive devices.¹⁰³ The most prominent goods seizures reported by law enforcement in Douala port relate to illicit or counterfeit medicines, or contraband fuel, of which there have been several multi-tonne seizures in the past two years.

Seizure data is a notoriously problematic metric to analyze as an indicator of illicit flows. An absence of large volumes of illicit goods being seized may indicate a low volume of goods being trafficked through a port, or instead may be an indicator of corruption (allowing illicit flows to pass undetected), a lack of capacity on behalf of law enforcement agents or that these agents' priorities are directed at combating other security issues. As one customs official told our research team in an interview, excisable products (which would include smuggled medical products) are made a priority at the port.¹⁰⁴

The prominence of illicit medical products in the seizures reported at Douala may be an indication of the strategic priorities among law enforcement and customs at the port, and regional law enforcement cooperation. Customs authorities at Douala port have recently completed the eighth iteration of Operation CRIPHARM, a regional law enforcement cooperation programme conducted with the World Customs Organization and coordinated with other central African states.¹⁰⁵ The operation aims to seize falsified, expired or illicit medical products through simultaneous law enforcement operations

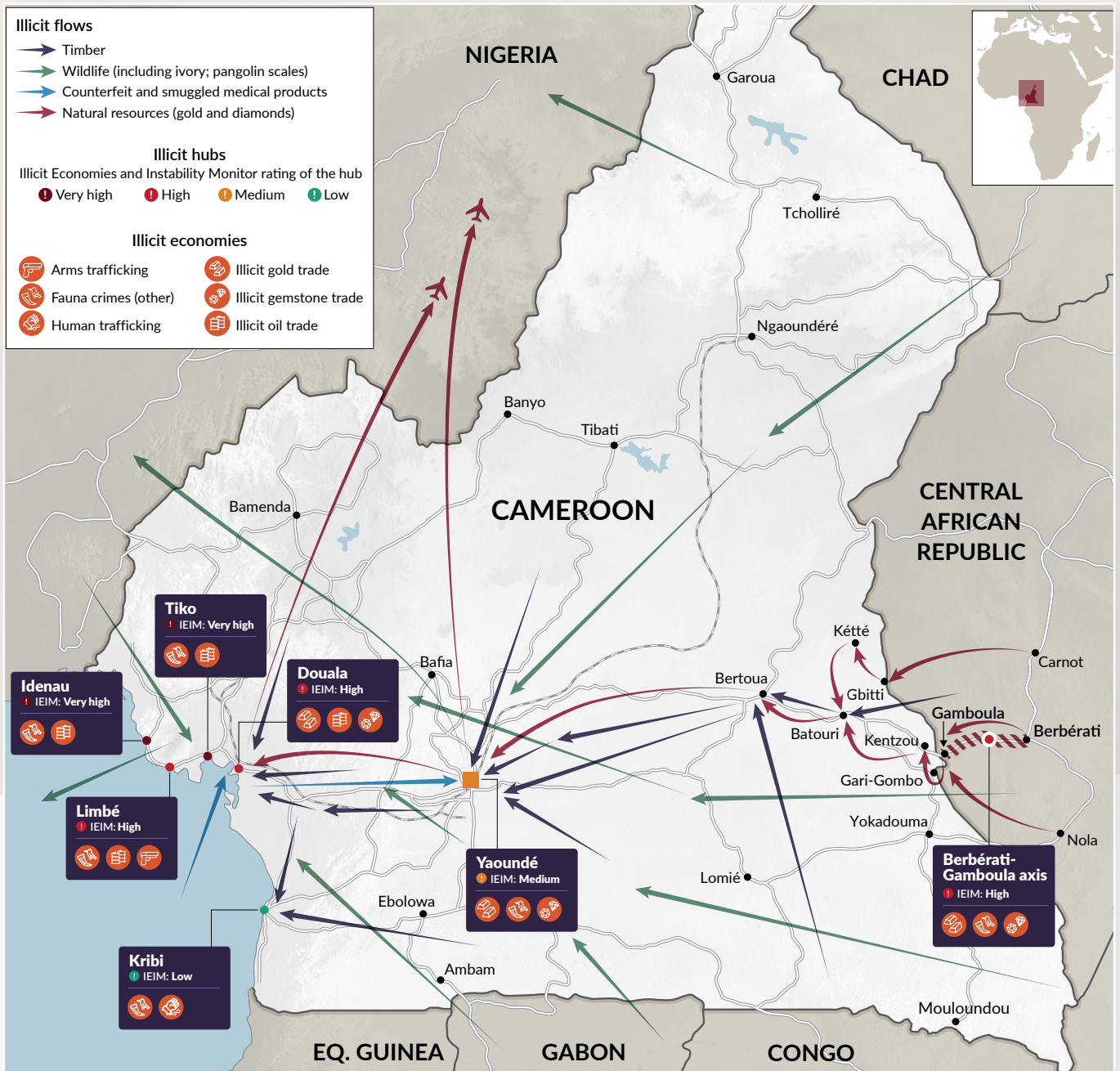


FIGURE 4 Illicit flows through Douala and illicit hubs.

in ports across the region, in order to counter transnational criminal networks. A customs officer at Douala reported that these pharmaceutical-focused operations are conducted twice per year.¹⁰⁶ These multilateral operations are likely to be a contributing factor to the prominence of medical products in reported seizures at Douala. Moreover, the strategic focus of customs authorities in Douala is, according to this officer, focused on increasing tax revenues (into which undeclared medical products would fall) as opposed to interdicting trafficking of illicit, non-taxable goods.¹⁰⁷

The other major category of seizures made at Douala is wildlife products, particularly ivory and pangolin scales. Several large-scale pangolin seizures were made between 2017 and 2020, containing from hundreds of kilograms to tonnes of scales.¹⁰⁸ At this time, pangolin seizures at Douala were among the largest in Central Africa. A 2019 study from wildlife trade monitoring group TRAFFIC on the illegal pangolin trade in Cameroon – both for meat and trade in the scales – found that scales were primarily destined for Yaoundé or Douala for international export.¹⁰⁹ However, since 2020 no more major seizures of wildlife products have been reported. According to the Last Great Ape Organization – a conservation NGO that cooperates with Cameroonian authorities on wildlife trafficking operations – major wildlife trafficking flows for goods such as pangolins and ivory have, in recent years, begun to shift towards Nigeria,¹¹⁰ and instead use overland routes through Cameroon to connect Nigeria with the major origin countries for wildlife commodities in Central Africa. Consequently, the reduction in seizures in Douala may reflect a decrease in illicit wildlife trade flows via the port.



Pangolin scales seized in Douala between 2018 and 2019.
Photo: Last Great Ape Organization

Case study 1: Wagner Group, CAR and Douala

As outlined, the findings of the GI-TOC's Illicit Economies and Instability Monitor analysis in 2022 found that ports are major gateways for illicit goods to and from conflict zones in West Africa.¹¹¹ There are many examples of such flows: cocaine trafficking routes, for example, enter West Africa through seaports and then pass through West and Central Africa, including countries, such as Mali, which are in the midst of conflict and where governance is fractured among various armed groups.¹¹² Armed groups can benefit from these trafficking routes by taxing traffickers, offering protection in return for money or, in the case of firearms and vehicles, being the direct recipients of trafficked goods.¹¹³

The case of Russian mercenary organization the Wagner Group – or the newly formed Africa Corps, which has been created by the Russian military to take over Wagner's activities in Africa – is a key example of conflict dynamics at play in Douala.

The port appears to have been critical to the group's extensive economic operations in neighbouring CAR. The Wagner

Group is a notorious private military company (PMC), which has been active in Africa for a number of years. The group made international headlines in 2022 for its role in Russia's invasion of Ukraine, the failed mutiny launched by its former leader, Yevgeny Prigozhin, in June 2023, and Prigozhin's death in an aeroplane crash several weeks later.

Since its first documented military engagement in Africa, in late 2017, Wagner deployed troops to (at least) five African countries: CAR, Libya, Sudan, Mali and briefly to Mozambique. Groups linked to the Wagner network, including companies and political strategists, have also been present in some capacity in over a dozen African countries.¹¹⁴ They have also – as has been widely documented by international observers, the UN and other governments – been accused of committing serious human rights abuses during their military operations.

The Wagner Group has been shown to operate in the grey zone spanning both legal and illegal economies. Wagner's business model has been to deploy mercenaries to African countries

typically in exchange for access to valuable natural resources such as gold and diamonds. Companies with links to Wagner have then been documented as acquiring access to resources, including through illegal, corrupt, questionable and irregular means. In January 2023, the US designated Wagner as a ‘transnational criminal organization’.

After the death of Prigozhin in August 2023, negotiations began to determine the future of the organization: whether it will continue in its current form, be taken more directly under Russian military leadership or be absorbed into other, Russia-based PMCs.¹¹⁵ During these negotiations, Wagner troops continued to operate in African countries and some of its commanders and political liaisons in countries such as CAR appear to have remained in place. In late 2023, a new body emerged under the aegis of Russia’s military: the so-called Africa Corps. The Africa Corps appears to have been created to take over the military operations of Wagner in Africa.¹¹⁶ It has also expanded to new theatres of operation, as its troops have been operating in Burkina Faso. The future of the corporate structures such as mining companies linked to Wagner in Africa remains somewhat unclear. Nonetheless, the way that Wagner structured and developed its presence in Africa – including via the port of Douala – remains an illustrative case study of the importance of transport infrastructure to conflict actors.

CAR is the African country where Wagner has the most established presence, militarily, politically and economically. Russian mercenaries have provided President Faustin-Archange Touadéra with military and political support since at least early 2018, which proved instrumental in sustaining his embattled presidency against an onslaught of rebel groups. Wagner’s contribution was pivotal in early 2021, when it helped to repel a rebel attack on the capital, Bangui, and in so doing provided a lifeline to the Touadéra regime.¹¹⁷ Wagner mercenaries continued to provide military support, notably to the presidential guard. Individuals linked to the group – such as Dmitri Sytyii (the former head of the Russian cultural house in Bangui¹¹⁸) and Alexandr Ivanov (the head of the Officers Union for International Security, a PMC that acts as a front company for Wagner)¹¹⁹ – took prominent public-facing roles in CAR, which was unusual compared to Wagner’s operations in other countries.

A network of companies with apparent links to the Wagner Group have been identified over the past three years in CAR, trading in a range of goods that include gold, timber, diamonds and even agricultural and food products.

These companies include:

1. Lobaye Invest – a mining company registered in CAR since late 2017 that has received licences to mine gold and diamonds across swathes of CAR territory.¹²⁰
2. Midas Ressources – another mining company, which has received licences to extract gold including at the large-scale Ndassima gold mine in Ouaka prefecture.¹²¹
3. Diamville – diamond and gold trading company registered in CAR since March 2019.¹²²
4. Logistique Economique Etrangere – a Wagner-linked logistics company based in CAR that deals with import-export operations.¹²³
5. First Industrial Company – a company directed by Dimitri Sytyii that imports branded spirits to CAR.¹²⁴
6. Bois Rouge/Wood International Group Sarlu – a timber company operating logging concessions in Lobaye province.¹²⁵

Some of these companies have been accused of engaging in illegal activity. A report from the investigative group All Eyes on Wagner, for example, accused Diamville of having sourced diamonds forcibly from artisanal miners in collaboration with Wagner troops, and from areas not covered by the Kimberley Process (an international certification scheme designed to prevent conflict diamonds from entering the market).¹²⁶ In its June 2023 announcement of sanctions against Diamville, the US Treasury reported that: ‘In 2022, Diamville participated in a gold selling scheme that entailed converting CAR-origin gold into U.S. dollars. Following the imposition of U.S. sanctions on several Russian financial institutions, participants in the scheme planned to move the proceeds by transferring cash by hand. Additionally, Diamville shipped diamonds mined in the CAR to buyers in the UAE and in Europe.’¹²⁷

Other companies in the network have been allocated access to resources in a way that, according to some, is irregular. The mining rights of the Ndassima gold mine, for example, granted to Midas Ressources, were previously held by a Canadian company, which accused the CAR government of ‘unlawful expropriation’ of its mining rights.¹²⁸

All of the above-listed Wagner-linked companies are now subject, to some extent, to international sanctions by the US, the EU and other Western countries. The Wagner Group, like many sanctioned groups, is known to make use of front and shell companies and complex corporate structures to disguise their operations from international observers. Although the companies

identified as operating in CAR may not be the entirety of the Wagner corporate network, they nonetheless provide a set of data to investigate the group and its operations through the port of Douala.

The Wagner-linked companies in Douala have made use of international supply chains in order to operate. The port is used for both the export of goods including timber, but also to import the equipment needed to carry out this work. Given that CAR

is landlocked, Douala is the most accessible international port for these supply chains and so appears to have become a major part of Wagner's logistics operations. Wagner troops have also played a role in providing security along the roads leading from Bangui to Cameroon.

In the course of this research, export records were sourced for over 100 shipments linked to the above-listed companies passing via Douala between 2021 and early 2022.

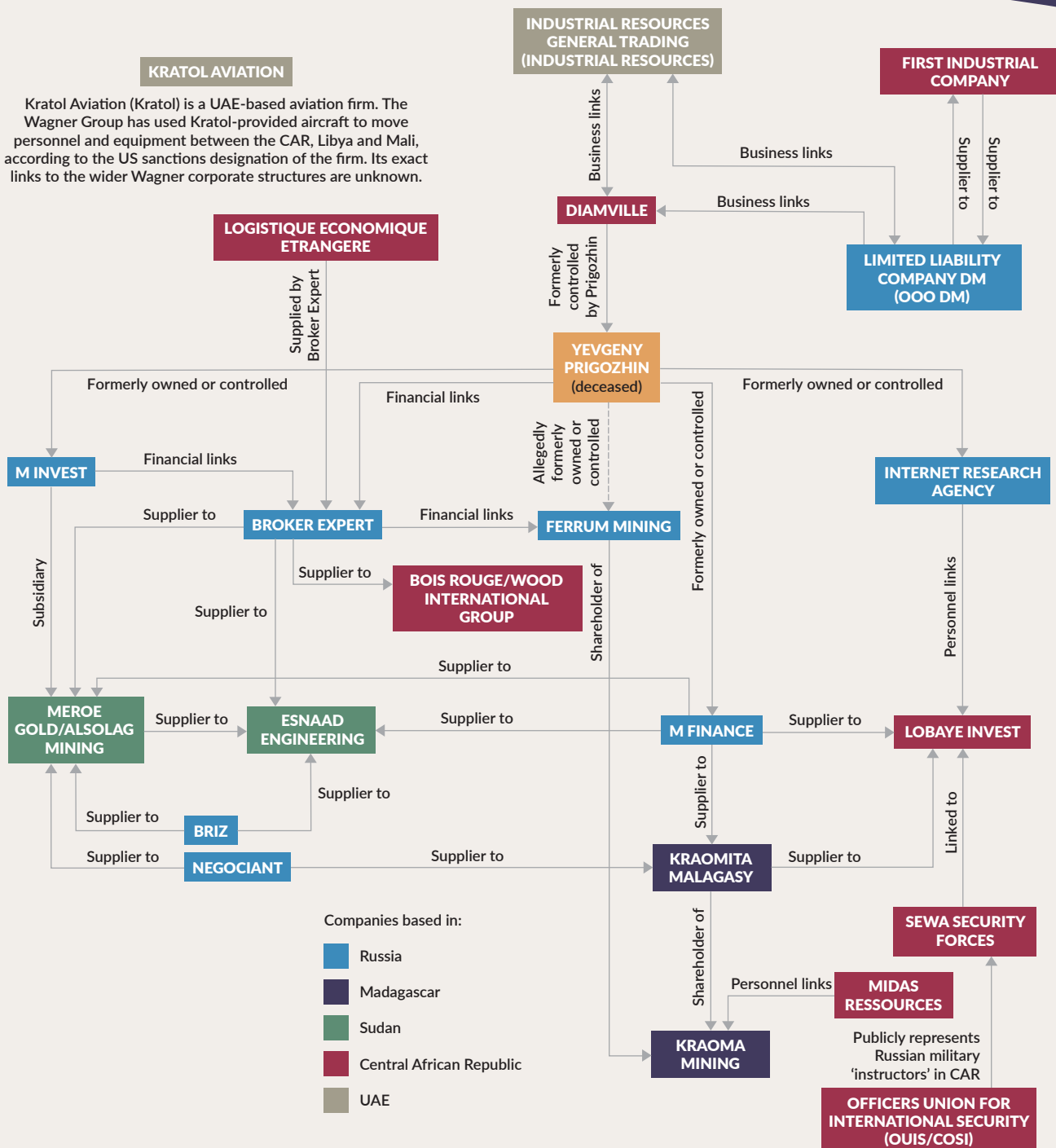


FIGURE 5 The Wagner-linked network of companies in Africa.



Wagner Group mercenaries train troops in the Central African Republic, October–November 2023. Part of Wagner’s role in CAR has been to provide security along the road from Bangui to Cameroon. Photo: COSI – Officers Union for International Security, via Telegram

Between November 2021 and August 2022, Bois Rouge (now Wood International Group) imported goods from Russia to CAR via Douala, including generators, timber-carrying tractors and welding equipment. Midas Ressources sourced goods from Cameroon in early 2022 including explosives and detonating equipment (which could be used in their mining operations), also shipped via Douala. First Industrial Company imported various industrial goods, from bulk containers to chest freezers. For many of the shipments listed, a transit point for the cargo is unspecified. Given that many exports recorded for the CAR-based Wagner companies on these databases do not specify which port a shipment has passed through,¹²⁹ although none report any other port being used than Douala, it is likely that a number of these unspecified shipments have also passed through Douala.

This is consistent with the findings of other investigative groups and reporters tracking Wagner’s economic operations out of CAR. An investigation by the *Jeune Afrique* newspaper in August 2022 described Douala as a turntable for Wagner, with exports via the port facilitated by Logistique Economique Etrangere (also known by its English name International Global Logistics).¹³⁰ Investigations into Wagner’s timber trade by All Eyes on Wagner, one of the leading investigative groups, found that the Douala and Kribi ports are key for the Wagner Group to export goods but also to import equipment for their activities in CAR, as shown by numerous bills of lading for importing machinery to CAR.¹³¹

Bois Rouge (later Wood International Group or WIG) appears to have the largest ongoing presence in Douala, based at the port’s timber yard. The role of this company in Central African

Republic was first reported on by European Investigative Collaborations and All Eyes on Wagner in August 2022, who highlighted that timber was principally being exported via Douala.¹³² In the following months, the company changed its name from Bois Rouge and appeared as Wood International Group Sarlu in export data and online sources. In a subsequent May 2023 report, the same investigative consortium showed how WIG had exported hundreds of cubic metres of timber to clients in China, Pakistan, Turkey and EU countries.¹³³ A similar investigation by news network CBS reviewed export documents at Douala port showing WIG exports from Cameroon and found trucks transporting timber on behalf of WIG from Douala and Kribi.¹³⁴

Our research suggests that WIG continued to operate via Douala to export timber in the months since. This included a review of online trade databases, for which the latest available data shows WIG timber exports dating to June 2023.¹³⁵ A source at the Douala timber yard confirmed that the arrival of WIG there coincided with the departure of Bois Rouge (supporting previous investigations finding that WIG is just a reincarnation of the same company), and that WIG has continued to transport wood from CAR via Douala and stockpile wood in the timber yard.¹³⁶ According to statistics showing the total timber stocks held in Douala by WIG each month between May and September 2023, it appears that trade continued apace during this period, with stock rising and falling monthly by an average of almost 200 000 cubic metres of timber.¹³⁷ As the available data shows only the total amount of timber held in Douala in any given month, it is difficult to tell exactly the volume transiting via the port.

On 14 September 2023, WIG was placed under sanctions by the US on account of its links to the Wagner Group.¹³⁸ A source working in the Douala timber yard reported that the company halted its operations, with no imports or exports made from Douala, since October 2023, a month later.¹³⁹ A union of transport businesses – the Union de Consignataires et Armateurs du Cameroun – published a letter on 1 December 2023 advising its member businesses to be ‘vigilant to avoid any potential problem’ when dealing with Wood International Group thanks to the US sanctions designation.¹⁴⁰

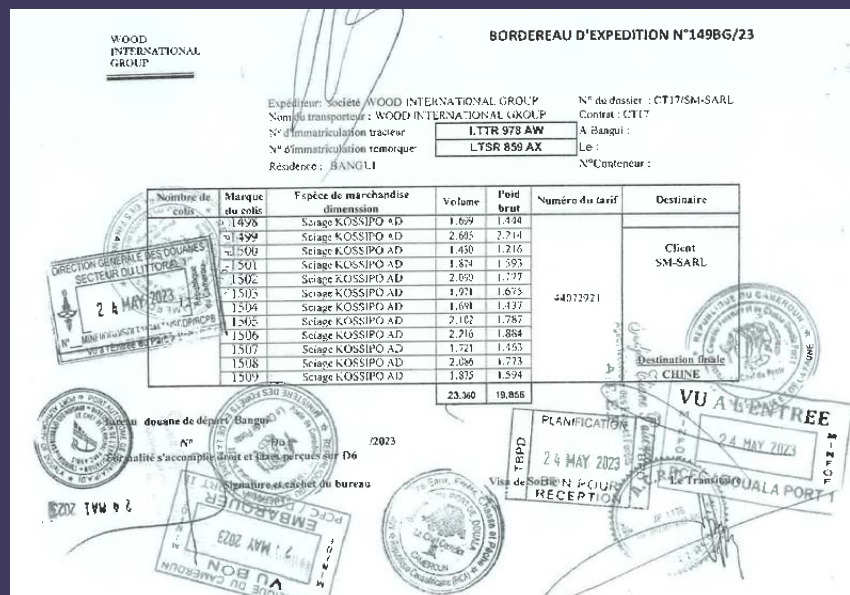
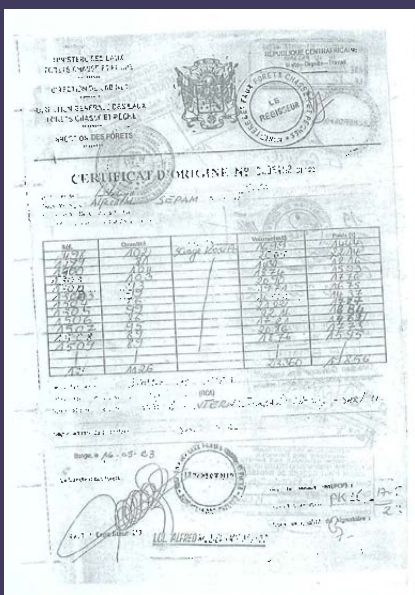
It is not clear, at this stage, whether the halt of WIG’s activities in Douala is temporary or permanent, and what may be the cause. While this may be linked to the US sanctions designation several weeks earlier, it could also be a consequence of the death of Prigozhin and the Africa Corps takeover of Wagner’s operations in Africa. It is also not the first time that WIG’s timber stocks have been blocked at the port of Douala. According to sources at the port, in early 2023 a WIG cargo was blocked at the port for several weeks. After some time, the management of the timber yard lifted the measure, for reasons unknown, and exports were allowed to continue.

Overall, this case study shows how supply chain access is crucial to organized crime and may contribute to regional instability. The Wagner Group is a fairly unique organization, as it comprises both an armed group and economic network,

operating in both legal and illegal spheres. However, the same logic applies to other conflict actors who are importing goods, from weapons to vehicles and other equipment. International supply chains – like WIG’s timber trade – are essential for all those seeking to profit from conflict, instability and the exploitation of natural resources.

It also shows how supply chain access through international shipping and transport hubs is used and abused by criminal networks and conflict actors, including those that are subject to economic sanctions. The Wagner Group is a sanctioned entity in Switzerland, the EU, the US and a number of other Western nations.¹⁴¹ Many of its subsidiaries, individual officers/employees and affiliates have also been individually sanctioned. WIG/Bois Rouge, for example, is directly sanctioned by the US and the Ukrainian anti-corruption agency.

Infrastructure hubs, global shipping and logistics are widely operated through multinational companies. This brings an increased challenge for these multinationals to conduct adequate due diligence, to avoid trading with sanctioned entities, or entities that may be sanctioned in future. In this case, Bois Rouge was well known to be linked to Wagner even before the US designation of that specific company. Companies operating in this sector – which may be based or headquartered in Europe, have US subsidiaries or conduct transactions in dollars – would lessen their legal and ethical risks of trading with sanctioned entities through proactive and transparent due diligence processes. ■



Export documents for timber traded by Wood International Group, shared with the GI-TOC. Photo: Supplied

Case study 2: Timber trafficking via Douala

The illicit timber trade is one of the largest illicit flows out of Douala, with a large proportion ultimately destined for consumers in Asia, and China in particular. Intense international demand for timber – including rare and protected species such as rosewood – is a major challenge for forestry authorities across Africa and a threat to biodiverse ecosystems and endangered species.¹⁴²

The scale of illegal timber exports from Cameroon is illustrated by the huge disparity in trade data between the amount claimed to have been legally exported and what is ultimately declared as imports by destination countries. COMTRADE, the UN database on world imports and exports, shows a significant gap between the declared imports by China and Vietnam, and what is declared to have been exported to these countries by Cameroon. An investigation by the Pulitzer Center that consulted the COMTRADE data for Vietnam and China found that, between January 2013 and December 2018, there was a discrepancy of

US\$1 099 million between import declarations and the export declarations by Cameroon.¹⁴³ Similar discrepancies are also reported by Italy, the US and France (though on a smaller scale since they are not as common a destination for Cameroonian timber).¹⁴⁴ No data is reported from Cameroon after 2018, which would allow for a more up-to-date comparison, yet the available data for destination countries suggests that the levels of imports have remained consistent.

Trade economists have highlighted discrepancies in COMTRADE data as a red flag for illicit activity, as it suggests that exports are being mis- or under-declared at the point of export. Similar analyses have highlighted discrepancies in exports of gold from African countries and imports into the UAE, a known hub for the illicit gold trade.¹⁴⁵ Thus, the apparent trade discrepancies are a red flag for undeclared timber exports from Cameroon, and by extension from Douala as by far its largest export hub, followed by neighbouring Kribi.

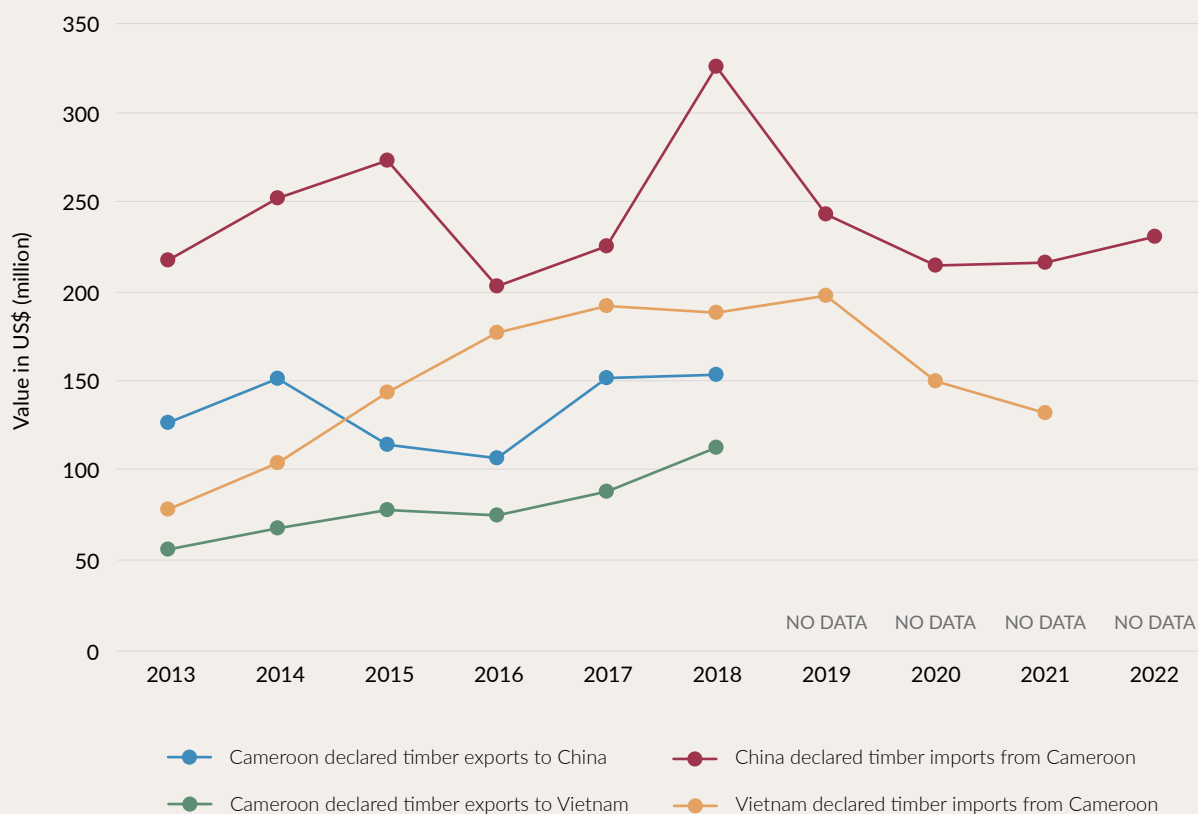


FIGURE 6 Discrepancies in declared timber exports by Cameroon and declared timber imports from Cameroon by China and Vietnam.

SOURCES: Pulitzer Center, COMTRADE



Douala port timber yard. Photo: Supplied

Investigations into Cameroon's illicit timber trade have, for years, highlighted Douala and Kribi as key transit points for exports. The Pulitzer Center's investigation concluded there was a 'troubling increase' in illegal logging, with the main culprits alleged to be legal logging companies who launder illegally harvested wood into the legal trade.¹⁴⁶ Drawing on interviews with truckers, loggers and communities near the logging sites, the investigation found that corruption was key to illegal logging in Cameroon¹⁴⁷ - with trucks carrying illicit timber allowed to pass through several checkpoints manned by the forests' ministry, customs, police and gendarmerie on their way to Douala or Kribi.¹⁴⁸

Similar findings have been made before. In 2020, an investigation by the Environmental Investigation Agency (EIA) concluded that Vietnamese companies operating in Cameroon have been crucial in driving illegal timber trading between the two: 'the majority [of these companies] are located around the port of Douala for logistical reasons', operating sawmills and warehouses. In the course of the investigation, company employees told undercover investigators that exporting more wood than the legal limit was 'at the heart of their business model'.¹⁴⁹

To ascertain whether this has continued, we conducted a review of data available from the Ministry of Forests and Wildlife (MINFOF) since 2020.¹⁵⁰ The ministry releases

public decisions on companies suspended from trading in timber due to their involvement in illegal activity. Five companies that were named in the 2020 EIA report have been suspended by MINFOF during the past three years. In total, 26 timber companies logging or operating sawmills in the littoral region (where Douala is located) have been subject to a suspension since 2020. Some companies have been sanctioned twice or three times for repeated illegal timber trading. The evidence from these decisions suggests that some of the companies initially named by the EIA have continued to engage in illegal activity over a period of some years, and that illegal wood processing is centred in Douala.

By reviewing import-export databases against the MINFOF sanctions, it appears that at least one company has flouted the suspension. Export data reviewed by the GI-TOC suggests that DR Bois, a Douala-based company sanctioned by MINFOF on 8 February 2022,¹⁵¹ continued to export timber in February and March.¹⁵²

The collective evidence gathered by environmental organizations, journalists and the forestry authorities suggests that Douala is a magnet for companies wishing to flout legal restrictions on timber trading. And yet the fact that there have not been any timber seizures reported from Douala since 2018 suggests that this flow is departing from the port entirely unimpeded. ■



CONCLUSIONS

Douala is a critical economic gateway for Cameroon and its neighbours. Port authorities face the challenging task of maintaining and expanding the port, while at the same time bringing it in line with international standards for safety and security, including measures to counter organized crime and trafficking. While Douala's security reforms may have made some steps in this direction, vulnerabilities to criminal activity remain and significant illicit flows (particularly of timber) continue.

Studies of organized crime in seaports around the world have outlined a number of characteristics that render these transport hubs vulnerable to exploitation by criminal and conflict actors (detailed above). As our analysis has found, Douala exemplifies many of these characteristics:

- **A connection to international markets.** Douala provides a link to the international markets for illegal timber, acts as a nexus of supply chains for organizations such as the Wagner Group, and is the source for other illicit goods such as counterfeit medicines.
- **Vast shipment volumes.** In the interests of facilitating trade, there is limited time available for customs and law enforcement to investigate potential fraudulent activity in Douala and many ports globally. This means illicit trade can blend in with the large volume of licit trade, avoiding checks on whether goods passing through the port are legally sourced (such as timber, or chemical fertilizers or medicines).
- **An opportunity to move illicit goods in bulk.** Through Douala, these products include timber, wildlife products, fuel and counterfeit medicines. These products are traded via the port, in part, because of the efficiencies and economies of scale offered by containerized transport. Transit via the port (rather than smaller informal ports or clandestine routes) is the most economic option for criminal networks.
- **The open nature of port systems.** In the case of Douala, the Wagner Group's involvement in timber trafficking illustrates how the openness of the port to goods coming in from elsewhere creates a challenge for port security. Goods flow overland to Douala from regions of West and Central Africa where the monitoring of illicit markets and the resources to do so are limited, or non-existent in some cases, due to conflict. Governance issues in feeder regions therefore has a direct impact on the resilience of the port system to organized crime.

- **The corruption of port staff and private sector workers.** Within Douala itself, corruption ranges from high-level embezzlement to petty customs bribery. Yet, the risks of corruption also go beyond the port, as financial pressures on truck drivers and corruption at overland timber checkpoints open up additional avenues for illicit goods to enter the port area.

As noted, a GI-TOC analysis of ports in the Western Balkans broke seaports down into three main categories: 'Crime magnets', places that, because of their geographical position along illicit transit routes, attract criminality; 'safe havens', where corruption among business and political elites in charge of the port facilitate criminality; and 'high-volume ports', which attract criminality simply as the vast quantity of goods moving through the port make it harder to detect contraband.¹⁵³

Douala exhibits characteristics from all three categories. As a geographic hinge between source regions for illicitly sourced timber or illicit wildlife commodities, and international markets, it becomes a magnet for this particular illicit trade. Corruption issues make the port more vulnerable to criminal exploitation. And it is a high-volume hub compared to other ports in the region with large volumes of containers and other goods passing through each day.

However, at the same time, Douala demonstrates how ports can be critical intervention points for law enforcement.

For example, the case study of the Wagner Group demonstrates how the regulatory and administrative processes at ports can create a paper trail for investigations. Sanctions monitors and investigative reporters have dug through the documentation to trace seemingly innocuous timber and equipment shipments to one of the most brutal mercenary organizations in the world today. This can form the basis for action against the entities and shell companies comprising criminal networks (as with the direct sanctions on Wood International Group) or provide leverage through cooperation between Cameroon and international partners to stifle trade flows to conflict actors.

The COMTRADE data showing the discrepancy between timber imports to destination countries and exports from Cameroon is another example of this paper trail. The data can provide a red flag that signals to authorities in Cameroon that there is an issue with timber exports, which should be addressed through changes in management both of the timber market and at the ports.

The port security reform in Douala, which has brought it in line with the ISPS port security code, is an example of how international standards can influence local policy to improve security across different jurisdictions. Despite major concerns surrounding the management of port security contracts and ongoing high-level corruption at Douala, many interviewees were of the view that the reform process has made a difference to port security and levels of criminality.

Similarly, international cooperation – such as the CRIPHARM operations conducted with the World Customs Organization – to intercept counterfeit medicines shows how regional capacity-building operations can counter organized crime effectively. The same approach of simultaneous international operations could also be used in Douala to target other illicit commodities, such as timber or wildlife products.

The following recommendations are aimed at harnessing these opportunities and reducing the vulnerabilities that have been identified at Douala port. Ultimately, shifts in policy at Douala and other ports across the region could reduce the risk of transport hubs being exploited by criminal and conflict actors.

Recommendations

Douala port is explored in this paper as a case study of broader trends. The recommendations are therefore divided into those that are specific to Douala and other, more general recommendations which can be applied in similar contexts.

Overall recommendations to reduce criminal exploitation of seaports:

- Ensure adequate working conditions for all employees with access to the port system. This will reduce the push factors for employees to engage in corruption and criminal activity.
- Profile criminal networks in neighbouring regions, and global illicit market trends, to strategically forecast emerging criminal threats to the port. (For example, as the gateway between Central Africa's forests and Asian destination markets, Douala should prioritize timber crime).
- International and regional bodies should work with port management to cut off supply chains to conflict actors. This can include sanctions bodies, intelligence organizations, international monitoring groups, the United Nations and law enforcement.
- Ensure full transparency in tender processes to prevent embezzlement of critical port funds.
- Set goals and performance indicators for customs authorities to target illicit flows with an environmental and security impact – such as illegal wildlife or timber trade. This will ensure that these trafficked goods are targeted just as much as those that offer an opportunity to increase tax revenue.
- Multinational companies based in the US and EU should take proactive due diligence to prevent exploitation of their services by criminal and conflict actors, including those subject to sanctions.

Specific recommendations for Douala port:

- Prioritize cooperation with MINFOF to reduce illicit timber flows via Douala, particularly ensuring that companies suspended by MINFOF do not continue to export timber illegally.
- Suspend exports via Douala seaport for companies linked to the Wagner Group, cooperate with international investigations to shed light on Wagner's operations in Africa and cooperate with countries that have placed sanctions on these companies.
- Ensure minimum standards are enforced for working conditions for all port workers and truck drivers accessing Douala port.
- Investigate allegations of corruption relating to port management and the everyday running of the port and reduce opportunities for criminality.



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