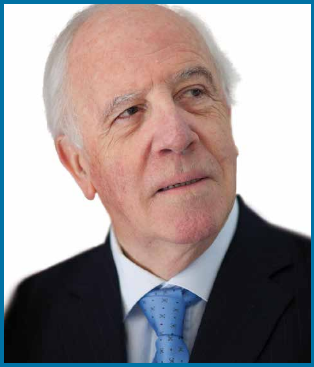
COUNTER EXTREMISM PROJECT

AN UNHOLY ALLIANCE

LINKS BETWEEN EXTREMISM AND ILLICIT TRADE IN EAST AFRICA



ABOUT THE AUTHOR

A British diplomat from 1968-2006, Sir Ivor Roberts served in Lebanon, Paris, Luxembourg, Canberra and Vanuatu (formerly New Hebrides), and was Minister in the British Embassy in Madrid and Ambassador in Belgrade, Dublin and Rome. He was head of counter-terrorism in the Foreign Office in the 1980s.

Sir Ivor retired from the Diplomatic Service in September 2006 on his election as the President of Trinity College, Oxford, a post he held until 2017. He is a Visiting Professor at St Mary's College, London. In 2009, he published, as editor and major contributor, the first new edition for 30 years of the classic reference book on diplomacy, *Satow's Diplomatic Practice* (Oxford University Press). A further revised, centenary edition was published at the beginning of 2017. His book on his experiences in Yugoslavia during the Bosnian war and the Kosovo crisis, *Conversations with Milošević*, was published in 2016.

Sir Ivor is an Honorary Fellow of Keble College, Oxford, and of Trinity College, Oxford. He is a Fellow of the Chartered Institute of Linguists (FCIL), and speaks fluent Italian, French and Spanish and limited Serbo-Croatian. Sir Ivor was made a Knight Commander of the Order of St Michael and St George (KCMG) in 2000.

COUNTER EXTREMISM PROJECT

INDEX

METHODOLOGY

This report is based on a desk review of existing literature and open source material, monitoring of digital and print media as well as research in the digitised archives of national and regional newspapers, descriptive statistics of secondary data, and key informant interviews.

ABBREVIATIONS & ACRONYMS

ACA: Anti-Counterfeit Authority

AfCFTA: African Continental Free Trade Area

AMISOM: African Union Mission to Somalia

ASWJ: Ahlu Sunnah Wal Jamaah

BBI: Building Bridges Initiative

C.A.R.: Central African Republic

CID: Anti-Narcotics Criminal Investigations Directorate (Uganda)

CITES: Convention on International Trade in Endangered Species of Wild Fauna and Flora

COMESA: Common Market for Eastern and Southern Africa

DCEA: Drug Control and Enforcement Agency (Tanzania)

DCI: Directorate of Criminal Investigations

D.R.C: Democratic Republic of Congo

EAC: East African Community

EACC: Ethics and Anti-Corruption Commission (Kenya)

IGAD: Intergovernmental Authority on Development

INTERPOL: International Criminal Police Organization

ISIS: Islamic State of Iraq and Syria

ISCAP: Islamic State Central Africa Province

ITP: Illicit Tobacco Trade Protocol

IWT: Illegal wildlife trade

KAM: Kenya Association of Manufacturers

KES: Kenyan shilling

KNFP: Kenya National Focal Point on Small Arms and Light Weapons

KRA: Kenya Revenue Authority

LRA: Lord's Resistance Army

OECD: Organisation for Economic Co-operation and Development

OSBP: One-stop border post

PPB: Pharmacy and Poisons Board (Kenya)

RENAMO: Mozambican National Resistance

SADC: Southern African Development Community

SDGs: Sustainable Development Goals

SALW: Small Arms and Light Weapons

UGX: Ugandan shilling

URA: Uganda Revenue Authority

UN: United Nations

UNECA: UN Economic Commission for Africa

UNODC: UN Office on Drugs and Crime

UN PoA: UN Program of Action to Prevent, Combat and Eradicate the Illicit Proliferation of Small Arms and Light Weapons

USD: United States dollar

1: EXECUTIVE SUMMARY

East Africa, which has experienced relative stability on the African continent and is considered a key security partner in the war on terror, is at a critical juncture. As it struggles to recover from the ravages of the COVID-19 pandemic, the region finds itself engaged in a struggle against extremism, crime and corruption.

Surrounded on all sides by potent terror groups, deeply penetrated by domestic and international crime groups and undermined from within by corrupt members of its business, civic and political classes, East Africa's fragile institutions face a dire threat.

At the heart of this struggle is the persistent menace of illicit trade. Illicit trade exacts a terrible cost from East African society, corroding its economic and social structures, threatening precious wildlife populations and leeching vital resources that should rightly be directed to sustainable development goals.

Illicit trade networks in East Africa are intimately connected to zones of political instability in neighbouring countries, such as Somalia, the Central African Republic and the Democratic Republic of Congo, as well as northern Mozambique. The conflicts in these regions are sustained by a two-way traffic of illicit goods with East Africa.

This report demonstrably reveals that illicit trade has also become the principal financier of extremism, funder of criminal enterprises and breeder of corruption in both East Africa and its surrounding regions.

This report shows how:

- In recent years, East Africa's developed transport infrastructure and increasingly affluent consumer markets have seen the region become a prime target for illicit trade networks.
- Weak border controls, security infrastructure and market surveillance tools have facilitated the emergence of a mass market for illegally imported and exported goods, including counterfeit pharmaceuticals, alcohol and tobacco.
- Militant groups such as Al Shabaab and Ahlu Sunnah Wal Jamaah exploit the illegal wildlife trade to pay their soldiers and fund their campaigns of violence, while causing huge damage to precarious populations of elephant, rhino and pangolin.
- Illegal wildlife trafficking has continued during the pandemic despite increasing international awareness of the threat posed by zoonotic diseases which may originate in the illicit transfer of animal products.
- Ongoing conflicts in central African nations such as the Democratic Republic of Congo and Central African Republic are fuelled by the illegal expropriation and smuggling of environmental resources, including diamonds and wildlife. These illicit goods are commonly routed through East Africa on their way to international markets.
- Asian crime syndicates target East Africa to import illicit animal products and export narcotics and counterfeit goods. Their penetration

of the region has been greatly enabled by the rise of digital technologies and the absence of any meaningful digital security infrastructure.

- Organised crime groups from South America, West Africa and Europe also use the region as an important staging post for international drug trafficking. Rising addiction rates suggest the region is fast becoming a destination market for illegal narcotics.
- International and regional crime groups, as well as corrupt officials, have moved quickly to exploit the COVID-19 pandemic, selling counterfeit sanitising gels and coronavirus testing kits. The same groups are poised to intercept legitimate COVID-19 vaccine supply chains with counterfeit and potentially dangerous substitutes.

Illicit trade is the lifeblood which sustains extremist groups operating in East Africa and its surrounding regions, including Al Shabaab, ISIS and the Janjaweed to the north, the Lord's Resistance Army and dozens more rebel militias in Central Africa, and the ISIS-linked Ahlu Sunnah Wal Jamaah in northern Mozambique. Similarly, urban gangs and international crime syndicates operating throughout the region, as well as corrupt state officials and businessmen, all thrive off the shadow economy.

Illicit trade is not only a key enabler of extremism, crime and corruption in East Africa, it is also the common denominator which connects them.

Globalisation has enabled a rapid convergence of illicit trade networks, opening up markets to international crime groups while facilitating coordination between illegal organisations. In recent years, this trend has become increasingly apparent in East Africa, with illicit trade providing a basis for cooperation between myriad malefactors, such as between Al Shabaab and the street gangs of Nairobi, as well as South American narco-traffickers and corrupt elements of Mozambique's political classes.

The scale of the problem is staggering. A recent market survey conducted by the Kenya Association of Manufacturers determined determined that 40% of consumer products, including cigarettes, alcohol and water, are illicit. As much as 70% of the alcohol available in Uganda is thought to be illegal.

At every link in the illicit chain, economic, social and political harm is done to East African society.

Illicit trade causes environmental despoliation and labour exploitation, while exposing consumers to unregulated and potentially unsafe products and reducing civic trust. It also diverts critical tax revenues. Every year, Kenya loses USD 900 million to counterfeit products, according to the country's Anti-Counterfeit Authority. Illegal tobacco alone costs the region USD 100 million annually.

Combatting illicit trade is therefore a regional and international imperative, but also an unenviable task. East Africa's vast land and sea borders make the detection of smuggling particularly difficult. Weak security and market controls further ease the penetration of illicit goods.

Despite all this, there are signs of hope.

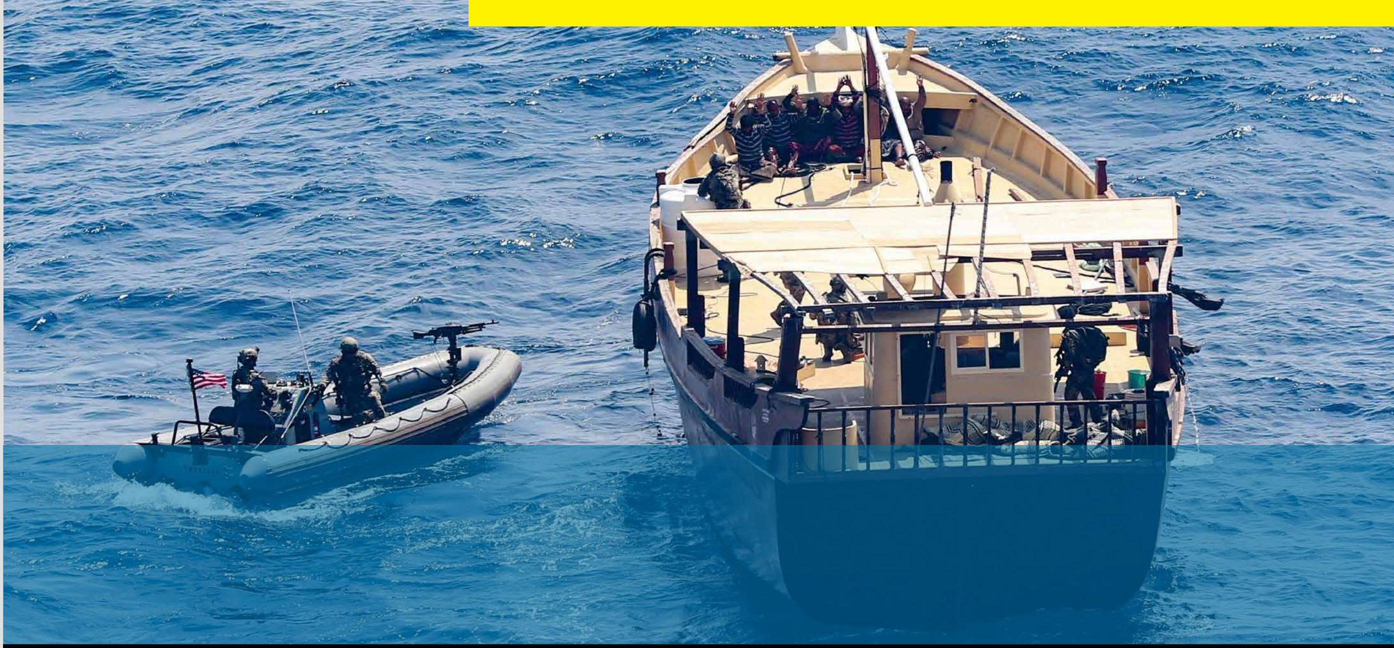
There is increasing awareness of the deep connections between illicit trade, extremism, crime and corruption, leading national governments and, to a lesser extent, regional bodies, to take more concerted action to clamp down on illegal trafficking in all its forms. International assistance targeting specific categories of illicit trade, such as anti-narcotics training programmes overseen by the United States' Drug Enforcement Administration (DEA), have also been helpful.

As this report makes clear, however, there is a great need for coordinated action against illicit trade across the whole East African region. It is not enough for individual countries to take isolated measures targeting only specific categories of illicit trade.

The region is only as strong as its weakest link. As Kenya has improved its maritime security, heroin traffickers have begun redirecting their shipping routes to the coasts of Tanzania and Mozambique, where enforcement agencies are weaker. Similarly, Uganda's lack of factory inspections has created a gaping hole in the East African Community's customs union, allowing illicit goods to enter the market unchecked, while sowing distrust amongst regional trading partners.

In order for East African countries to rebuild following the COVID-19 pandemic, return to positive economic growth and secure the future for its young, bustling populations, illicit trade must be tackled as a matter of highest priority. Clawing back a portion of the tax revenue lost to illicit trade every year would greatly aid the region's post- COVID-19 economic recovery, while negating the need to raid an already over-stressed and narrow tax base. To do this, East Africa desperately requires updated and enhanced tools to fight back against illicit trade, and these must be adopted uniformly across the region.

In the Recommendations section, a five-point plan illustrates how national governments and their international allies can effectively combat illicit trade and, in so doing, turn off the taps for extremism,



2. ILLICIT TRADE & EXTREMISM

2.1 CONCEPT DEFINITION

Illicit trade consists of the exchange of a good or service between individuals or organisations where either the commodity or the unregulated manner of the exchange is deemed illegal in a given jurisdiction.

Within this broad definition, the Organisation for Economic Co-operation and Development (OECD) has identified four categories of illicit trade, including the exchange of prohibited goods or services (eg, illegal narcotics), the irregular sale of regulated commodities (eg, intellectual property rights), the sale of excise goods outside of their legally designated destination market for the purpose of avoiding local duties (eg, illicit tobacco) and the sale of stolen goods (eg, electronics).

2.2 WHO PROFITS FROM ILLICIT TRADE?

According to the World Economic Forum, illicit trade presently deprives the global economy of USD 2.2 trillion annually, accounting for nearly 3% of global GDP. Every year, Kenya alone loses USD 900 million to counterfeit products, according to the country's Anti-Counterfeit Authority (ACA). An increasing share of the value created by illicit transactions, both in East Africa and around the world, is captured not by small traders engaged in ad hoc practices, but by sophisticated extremist groups and transnational crime syndicates.

Around the globe, terror groups such as Hezbollah, the Taliban and Islamic State of Iraq and Syria (ISIS) rely on illicit trade to fund their ideological projects. Transnational crime syndicates such as the Italian mafia and Latin American drug cartels similarly derive a significant proportion of their revenues from the profits generated by such activities.

Illicit trade is attractive to extremist and criminal groups not only because it is lucrative, but also because it is predictable (eg, as compared to ransom) and low-risk (eg, as compared to theft). Despite the efforts of national governments and international enforcement agencies, illicit trade inherently favours the perpetrator. Illicit trade supply chains are incredibly difficult to dismantle once established and, unlike once-off operations such kidnapping, they can supply a constant and predictable revenue stream to illegal organisations.

With the exception of certain highly politicised illicit goods or services, such as illegal narcotics, perpetrators charged with illicit trafficking offences often face comparatively light judicial sentencing when compared to other illegal activities, such as armed robbery. As such, illicit trade allows illegal groups to consolidate and grow their position without exposing their organisations to existential risk.

2.3 CONVERGING NETWORKS

For as long as governments have sought to regulate economic activity, there have been individuals and organisations who have sought to skirt the law in the pursuit of profit. In recent decades, however, the scale and sophistication of illicit trade has been fundamentally transformed by the march of globalisation. By exponentially increasing the mobility of legal goods and services, globalisation has also dramatically expanded the parameters of illicit trade. As the value of illicit trade networks have grown, an increasing proportion of the profits is being captured not by small-scale and localised illicit actors, but by transnational criminal and extremist organisations.

In recent decades, terror groups and organised crime syndicates have become increasingly networked, collaborating with each other at national, regional and international levels for their mutual benefit. To take but one example, Afghani opium grown in Taliban-controlled regions is distributed in bulk to European markets through a chain of illegal organisations that may include ethnic Afghani traffickers, Iranian and Kurdish crime groups, as well as the Albanian or Turkish mafia. Digital communications and tools, such as 'dark web' software, have also greatly expanded the possibilities for collaborative illicit activity.

The convergence of illicit trade networks on a global scale has expanded the reach of criminal and extremist organisations, enabling them to penetrate new markets and reap increased profits while causing significantly greater harms.

2.4 DRIVERS OF ILLICIT TRADE

That illicit trade varies from region to region, in terms of both volume and character, is accounted for by three factors: capacity, opportunity and resilience.

Capacity refers to the relative sophistication of criminal or extremist organisations operating in a given region and their ability to capitalise on local illicit trade opportunities.

Weak illegal groups which are unable to evolve or adapt to their circumstances will not be able to maximise the potential profits that may be derived from illicit trade, no matter the abundance of opportunity. By contrast, strong and adaptive organisations may continue to increase their market share, enter new markets and broaden their portfolio of illicitly traded goods to the point that they become internationally relevant actors.

Opportunity is defined as the relative abundance of valuable products or market demand and can be usefully subdivided into two categories: source- and end-market opportunities.

Source-market opportunities consist of natural resources or locally manufactured goods which may be profitably diverted to the illicit economy, either for domestic or international consumption. End-market opportunities exist wherever there is demand for a good or service which cannot be legally satisfied (eg, banned narcotics, commercial sex) or where an illegal product can be provided at a lower market price than its legal alternative (eg, smuggled fuel).

The final determinant of illicit trade consists of the resilience of civic institutions to the incursions of illicit actors and the ability of relevant authorities to attach risk to illegal activity. State measures which may increase risk for illicit traders include border controls, transparency measures, anti-corruption programmes, inter-state agency cooperation and criminal sentencing.

Thinking about illicit trade in terms of capacity, opportunity and resilience helps us to understand the unique characteristics of the East African market.

EXTREMIST PROFILE

Al-Shabaab

Founded: 1996-7

Typology: Jihadist terror group

Following: 7,000-9,000

Area of Operation: Somalia, Kenya, Ethiopia, Djibouti

Illicit Portfolio: Sugar, charcoal, ivory, heroin, cocaine

3. ILLICIT TRADE & EAST AFRICA

3.1 CAPACITY OF ILLICIT TRADE ACTORS

East Africa presents a dense network of illegal groups, from the myriad extremist organisations which populate its periphery, to the urban gangs, transnational crime groups and corrupt officials that operate within the region. While the capacity and sophistication of these groups vary considerably, each of them rely, to a greater or lesser extent, on illicit trade to generate a substantial proportion of their revenue. The increasing convergence of these groups and the cooperation they exhibit in terms of managing sophisticated multi-lateral illicit trade operations is a rising cause for concern.

3.1.1 EXTREMISM

East Africa is surrounded, on almost all sides, by zones of pronounced political instability, providing a rich breeding ground for extremist and militia groups.

By devastating the regions they inhabit and oppressing the communities over which they hold dominion, extremist groups create the conditions by which they must necessarily seek external markets in order to finance their existence. Illicit trade is in many cases the only means by these groups can generate predictable revenue streams. For the extremist groups occupying East Africa's fringe, the region's relative affluence and superior transport infrastructure makes it an attractive target market for illicit goods as well as a useful conduit for contraband destined for international markets.

To the north, from the wreckage of Somalia's civic institutions has risen Al Shabaab, a potent terrorist organisation which has persisted even in the teeth of a coalition of international forces led by the United States. The group's 2010 bomb attack in Kampala and 2013 storming of the Westgate Mall in Nairobi, which killed 67, demonstrated Al Shabaab's reach outside Somalia. On 5 January 2020, the terror group carried out an assault on a Kenyan military base ('Camp Simba') inside Kenya used by U.S. forces. Three U.S. personnel were killed in the attack. The group continued to carry out numerous suicide bombings, car bomb attacks and ambushes throughout 2020 and into the early weeks of 2021.

Al Shabaab sustains its deadly campaign through extortion of businesses, taxation,

zakat (religious donations), remittances and illicit trade rackets. A highly adaptive organisation, Al Shabaab has responded with agility to any international attempts to staunch the illicit flows which it oversees. The Somali terror group likely receives training and munitions from al-Qaeda, to which Al Shabaab pledged allegiance in 2012.

ISIS has also gained a toehold in Somalia, although its capacity at present is limited compared to Al Shabaab. Both groups benefit from access to the Yemini illicit arms market, which has flourished since the onset of civil war in the Middle Eastern state in 2014 (see Spotlight: Arms & Munitions section).

Ongoing instability in South Sudan, where more than 1,000 civilians were killed in 2020 despite an official end to hostilities in February, and the threat of a long-lasting civil war in Ethiopia present further challenges to stability in the wider region, especially in terms of the illicit trade in arms and munitions.

To the west, Central Africa remains mired in brutal conflicts left largely unchecked by ailing or failed political systems. Although the Lord's Resistance Army (LRA) is not the force it once was, it retains a vicious capacity to cause harm and is but one of many such militia groups currently active in Central Africa. In the Central African Republic (C.A.R.), the peace accord agreed by 14 armed groups and the government in February 2019 collapsed in late 2020. Although President Faustin-Archange Toudera was re-elected in January 2021, government forces have barely retained control of the country's capital, Bangui. At present, one in four Central Africans are internally displaced or have sought refuge abroad. The country's many militia groups are sustained by a two-way trade in valuable illicit resources, especially diamonds, and illegal arms traded in the north-eastern Vakaga prefecture (on the Sudanese border) as well as the southern Basse-Kotto prefecture (on the D.R.C. border).

In northern Mozambique, a three-year insurgency in the gas-rich Cabo Delgado region is an increasing cause for concern.

Ahlu Sunnah Wal Jamaah (ASWJ), sometimes referred to as Al Shabaab by locals (although there is no known connection to the Somalian terror outfit), is believed to have a franchise agreement with ISIS. ASWJ allegedly pledged allegiance to ISIS in May 2018 and was incorporated into Islamic State Central Africa Province (ISCAP) in 2019.

More than 2,400 have been killed in the conflict, with more than half a million displaced in the past 12 months alone. In November 2020, Tanzanian and Mozambican authorities announced a joint operation against the Islamic militants, following a number of attacks on villages on both sides of the border throughout October. In August 2020, the Islamic fundamentalist group seized the port town of Mocímboa da Praia, while the town of Palma is presently besieged by insurgents, who have been accused of major human rights abuses.

Although still a young organisation, ASWJ has the advantage of drawing its followers from communities with a long history of exploiting Mozambique's traditional smuggling routes. The group benefits from a diverse illicit trade portfolio, which includes the export of timber, gemstones and wildlife products and the large-scale import of narcotics, especially heroin. Besides ASWJ, splinter groups of the Mozambican National Resistance (RENAMO) continue to stage attacks in central Mozambique despite a formal peace agreement reached in 2019.

COUNTER EXTREMISM PROJECT

3.1.2 ORGANISED CRIME

Extremist groups conducting illicit trade in East Africa are aided and abetted by a network of domestic actors, most notably urban gangs.

The emergence of multiparty democracy in Kenya marked a historic moment for the country, which also brought challenges. Both the inaugural 1992 election and most of the country's subsequent electoral cycles have been marred by violence encouraged by rival political factions, who routinely employed militias and gangs to provide protection, disrupt opponents and intimidate civilians.

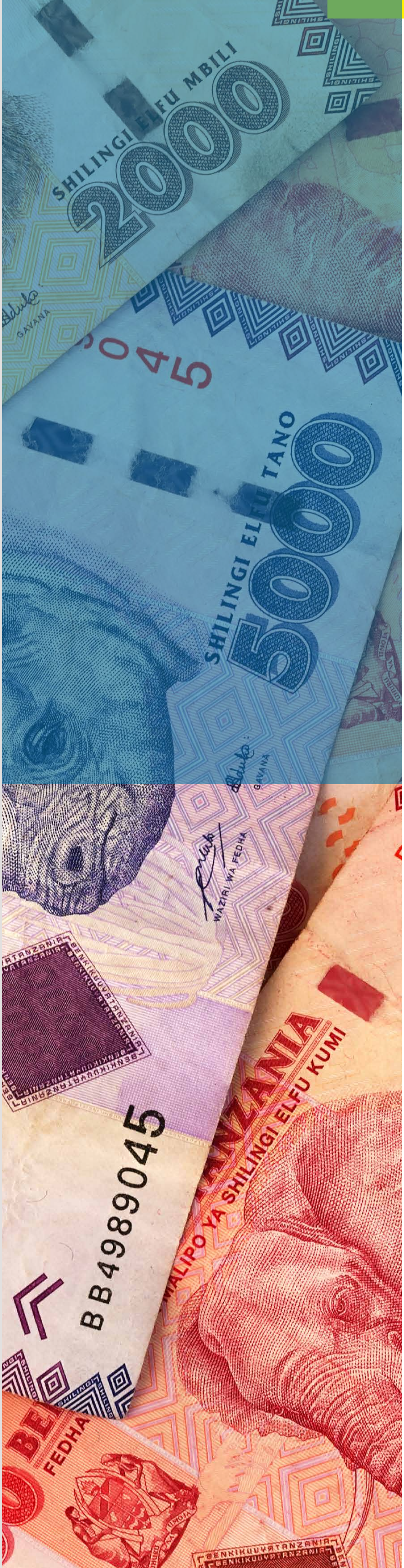
At first, many of the gangs hired by aspiring political leaders were almost or entirely financially dependent on their benefactors and tended to fade in strength and influence between election cycles. In the course of the 2000s, however, through increased access to illicit weapons (see Spotlight: Arms & Munitions section p.37), Kenya's gangs became increasingly independent. Even so, deep links between the country's political classes and urban gangs persist. In 2020, several of the gangs operating in Nakuru, including Gaza, Confirmed and Wazito wa Tanzania, caused sufficient unrest for the county governor to call upon the central government to intervene. The plea provoked a rebuke from Cabinet Secretary Dr Fred Matiang'i, who blamed local political leaders for funding the criminal groups.

By controlling territory in major transport hubs such as Nairobi and Dar es Salaam, urban gangs have become serious players in the region's illicit trade networks, providing critical access points to regional and international markets for the extremist groups populating East Africa's borders.

Transnational organised crime groups also operate in the region.

Asian crime syndicates target East Africa both for in terms of importing illicit wildlife products and exporting illegal narcotics and counterfeit products. Organised crime groups from South America, West Africa and Europe also use the region as a staging post for narcotics trafficking. On 13 April 2020, a high-profile member of a major Brazilian organised crime group, Primeiro Comando da Capital (PCC), was arrested in Mozambique, highlighting the increasingly important connection between South American narco-traffickers and their counterparts on the Swahili coast.

Nigerian gangs, harried by domestic anti-narcotics authorities in their own country, are increasingly using East Africa as a base for methamphetamine manufacture. In 2017, Ugandan authorities arrested a Nigerian national in possession of large amounts of methamphetamine-precursor chemicals. Nigerian-run laboratories have also been detected as far away as Mozambique. Methamphetamine use remains low in East Africa, suggesting that much of this product is subsequently shipped to other markets.



3.1.3 CORRUPTION

Criminal and extremist groups operating illicit trade rackets in East Africa rely on the complicity of corrupt officials to facilitate illegal trafficking and evade detection. Meanwhile, the largesse generated by illicit activity increases the power of illegal organisations to infiltrate civic institutions and breed further corruption.

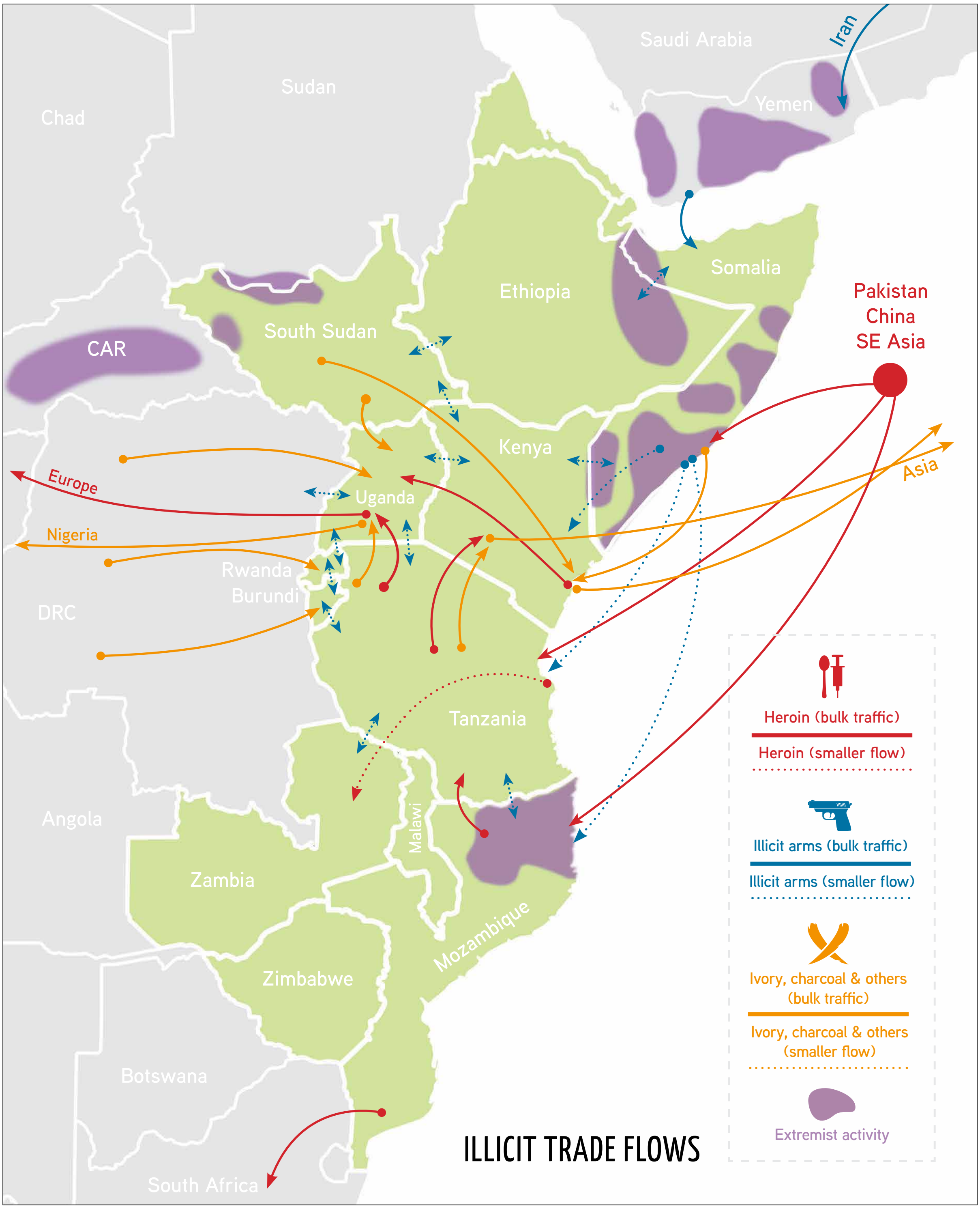
This pattern is notable in Tanzania and Mozambique, where efforts to stamp out narcotics trafficking have been severely hampered by corrupt elements of the countries' political and civic institutions.

Although Kenya has made some progress in this department (see section 3.2.4 p.18), problems persist. Corrupt elements of the Kenya Police Service are believed to work closely with urban gangs, such as the Gaza group operating in Nairobi's slums, to corner important parts of the illicit trade market, as well as other illegal activities such as extortion.

These practices have not gone unnoticed by the Kenyan public. According to the Corruption Barometer Index for 2019, Kenyans perceive the police to be the most corrupt institution in the country. Another perception poll, published by Afrobarometer in January 2020, also found the Kenya Police Service to have the worst reputation of Kenya's civic institutions. The same poll also found that Ugandans take a similar view of their own police service.

Other components of Kenya's civic body have also been implicated in illicit trade activities.

Three KRA officials and one member of the Pharmacy and Poisons Board (PPB) were arrested in 2018 following the discovery of KES 200 million (c. USD 1.8 million) worth of Mandrax tablets disguised as vitamin supplements at Eldoret airport, an incident which highlighted both the importance of Kenya's secondary airports to the regional narcotics market as well as the complicity of corrupt officials. In May 2019, the KRA indicted 75 members of staff for offences including the illegal clearance of cargo. Among these were 61 officials from the Domestic Taxes Department and 14 from the Customs and Border Control Department. The move followed the termination of employment of 85 KRA officers for similar offences in 2018, including three for the trafficking of illicit ethanol that had been marked for destruction.



3.2 OPPORTUNITIES FOR ILLICIT TRADE

East Africa is unusually rich in terms of both source- and end-market opportunities for illicit trade.

Numerous source-market opportunities are provided by the region's natural environment, including the presence of valuable mineral resources and wildlife species. Some of these 'opportunities' are entirely or almost exclusive to East Africa, as with much of its mega-fauna.

The region's weak state capacity and sizable informal economies also create a permissive environment for the illicit trade of manufactured products, including those for agricultural and consumer use.

3.2.1 THE ILLEGAL WILDLIFE TRADE

As the world witnesses alarming rates of extinction, experts agree we are fast approaching a point of no return in terms of biodiversity loss. Along with climate change and habitat degradation, the illegal wildlife trade (IWT) is a key driver of species decline. Nor are the dangers posed by IWT limited to biodiversity. The World Health Organization (WHO) estimates that some 60% of emerging infectious diseases are zoonotic. Such diseases have the potential to cause enormous damage to human society, as attested by Ebola, MERs, SARS and, most recently, COVID-19.

Estimated to be worth up to USD 23 billion annually, IWT also represents a major source of funding for extremist and organised criminal groups.

Extremist groups involved in IWT in East Africa and its surrounding regions include Al Shabaab, ASWJ, RENAMO and the Sudanese Janjaweed. Asian crime syndicates and domestic poaching syndicates also operate throughout the region.

As well as poaching conducted within East Africa, the region also plays an important role as a transit hub for wildlife products poached in the surrounding regions. IWT is a major revenue stream for rebel groups operating in the D.R.C. and C.A.R., helping to sustain deadly civil wars as well as to deplete precarious wildlife populations. On Sunday 10 January 2021, six rangers were killed by local militia in Virunga National Park, home to highly endangered mountain gorillas and one of the few remaining elephant populations in the D.R.C. More than 200 rangers have been killed in Virunga in the past decade. Landlocked and lacking access to sophisticated transport infrastructure, rebel groups in Central Africa rely on smuggling networks leading west, to the likes of Nigeria, and east, through South Sudan, Uganda and Kenya, in order to access international markets.

As well as ivory poached from African elephant populations (see Spotlight: Ivory section), dwindling black rhinoceros populations also continue to be killed for their horns, despite the concerted efforts of national and international bodies to curb the trade. Rhino horn, which is made of keratin, is highly prized in Asian markets, where the price per kilogram can rise to over USD 60,000, making it more valuable than gold or cocaine. Although the number of Afri-

can rhinos killed through poaching has steadily declined over the past five years, down from a peak of 1,349 animals in 2015, reports that rhino horn is being advertised as a cure for COVID-19 have raised concerns of increased poaching of the critically endangered species. Rhino populations are targeted by poachers in both Kenya and Tanzania, as well as the D.R.C. and Ethiopia. Rhino horn originating from Mozambique accounts for nearly 10% of all seizures globally, second only to South Africa. The trade is believed to finance RENAMO splinter groups, amongst other extremist and criminal groups.

The pangolin, a small anteater-like animal with eight subspecies spread throughout Africa and Asia, has in recent years also emerged as one of the most trafficked animals worldwide. Between 400,000 and 2.7 million are hunted in Central Africa every year. Until recently, most pangolin hunted in Africa were consumed locally as bushmeat. However, due to increased market convergence, an increasing number are now trafficked to Asia, where the animal's scales are used in traditional Chinese medicine. Pangolin meat is also prized as a delicacy in some Asian countries and has been cited as a possible source of the COVID-19 virus.

In 2016, the international commercial trade of all eight sub-species of pangolin was banned by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), citing fears of the creature's imminent extinction. Despite this, the illicit trade in pangolin has continued unabated. UN Office on Drugs and Crime (UNODC) data shows year-on-year growth in pangolin seizures from 2014, when pangolin parts equivalent to 13,900 animals were seized, to 2018, the most recent year for which such data is available, when the equivalent of 141,900 animals were seized.

Although not a major centre for pangolin hunting in its own right, East Africa is an important transit hub for animals poached in Central Africa. In January 2019, Ugandan officials charged two Vietnamese nationals with possession of several thousand pangolin scales as well as 750 pieces of ivory. The consignment was believed to have been packaged in the D.R.C. before being smuggled into Uganda via South Sudan.

Growing demand for ejiao, a gelatin obtained from donkey skin which is also used in traditional Chinese medicine, has caused ripple effects throughout East Africa and the wider region for much of the past decade. Recognising the donkey as an important beast of burden for agricultural communities, many countries in East Africa and its surrounding regions have by now banned the export of donkey products in order to prevent further depletion of domestic stocks.

However, a lag between bans imposed in Uganda and Ethiopia in 2017 and Kenya, which outlawed donkey exports in February 2020, created a window of three years for heavily-armed Kenyan donkey rustlers to stage cross-border raids in search of livestock. Following a challenge in the High Court, Kenya's donkey slaughter ban was lifted in June 2020. The country's only licensed abattoir based in Turkana continues to export legally to the Chinese market, despite ongoing concerns about how donkeys supplied to the factory are procured.

EXTREMIST PROFILE

Lord's Resistance Army (LRA)

Founded: 1987

Typology: Heterodox Christian - Acholi nationalist militia

Following: 100 – 3,000

Area of Operation: Uganda, South Sudan, D.R.C, C.A.R.

Illicit Portfolio: Ivory

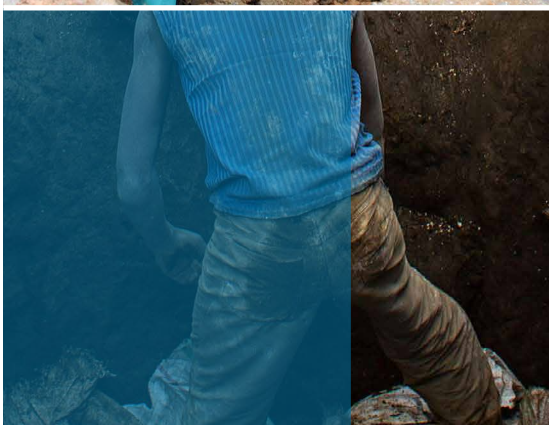
3.2.2 NATURAL RESOURCES

As well as products derived from IWT, other naturally occurring resources, such as timber and mineral deposits, also present opportunities for illicit trade.

Between 30-40% of Ugandan timber is reported to originate from illegal logging, with timber smuggling often combined with other categories of illicit trade, including gold and ivory. Charcoal manufactured from illegally felled forestry has contributed to habitat degradation in northern Uganda, although pressure exerted by local civil society groups has seen some recent progress in terms of breaking up larger operations.

Timber illegally logged in Central Africa is frequently transported through East Africa. In December 2020, Kenyan courts indicted a truck driver charged with smuggling mahogany worth KES 1.4 million (c. USD 13,000), which was believed to have been illegally sourced in the D.R.C.

Charcoal derived from illegally logged acacia has been a mainstay of Al Shabaab finance for many years. Following the terror group's capture of the port of Kismayo in 2008, proceeds from the export of charcoal, mostly to Middle Eastern markets, rose to USD 35-50 million annually. The recapture of Kismayo by African Union Mission to Somalia (AMISOM) forces in 2012 and a United Nations (UN) Security Council ban on Somali charcoal exports in the same year reduced the terror group's



revenue derived from the trade, but even to this day profits remain in the millions.

Mineral and ore deposits in Central Africa contribute to a booming trade in illegally expropriated resources, a proportion of which is trafficked through East Africa. Profits derived from illicit mining, much of which is pocketed by militias, contribute greatly to the ongoing conflict in the eastern D.R.C., while the UN Security Council has cited the importance of diamond and gold smuggling to the prolonging of civil war in the C.A.R.

The export of illegal gold from Uganda has increased significantly over the course of the past five years. The Ugandan gold refining industry has become an important component of the country's economy, even outstripping traditional agricultural exports. However, with much of the gold refined in Uganda sourced from other countries, there remains serious concerns that the industry is not as effective as it might be in preventing illegal gold from entering the system.

> Illegally appropriated mineral and ore deposits in Central Africa are trafficked through East Africa. Much of the profit is pocketed by militias and fuels ongoing conflicts in the eastern D.R.C. and C.A.R.

In Tanzania's gold belt, unregulated mining has created significant demand for child labour. The problem has been considerably aggravated by COVID-19-related economic disruption, with many families forced to pursue sources of income outside the legal economy.

In 2009, enormous ruby deposits were discovered in Mozambique's Cabo Delgado province. The country has since become the world's most productive source of gem-quality rubies. ASWJ, the ISIS-linked insurgency which controls significant territory in the same northern province, combines its trade in precious gemstones with illegal timber and wildlife products to run a highly-profitable illicit export business.

3.2.3 AGRICULTURAL & CONSUMER PRODUCTS

East Africa's economic landscape provides a further array of source- and end-market opportunities. A considerable part of the East African economy is agriculture-based and the illicit trade in related products is correspondingly significant. Kenya's first ever major scandal involving counterfeit products came about in 1979-80, when fake insecticides wiped out central Kenya's entire coffee crop. Since then, the problem of counterfeit products infiltrating the economy has only grown. The Kenya Association of Manufacturers (KAM) estimates that 40% of their market share is lost annually to counterfeits, at enormous cost to government tax receipts.

In recent years, imports of sugar to Kenya have been capped in order to protect an unproductive domestic industry, creating a significant market opportunity for illicit actors. Ugandan-origin sugar, which is produced at a markedly lower cost to the Kenyan product, is illegally trafficked in substantial quantities. The scale of the problem was highlighted in 2018 when the Speaker of the Kenyan National Assembly, Justin Muturi, invited the Ethics and Anti-Corruption Commission (EACC) and the Directorate of Criminal Investigations (DCI) to investigate claims that certain MPs had accepted substantial bribes for their assistance in burying a committee report into illicit sugar smuggling.

According to a report of the UN Security Council, as part of the same illicit trade channels which enable the group's export of charcoal, Al Shabaab also imports large quantities of cheap sugar which it in turn smuggles into Kenya, where prices are artificially high. Thousands of bags of sugar are believed to be smuggled into Kenya from Somalia every day, enriching Somali warlords.

A recent market survey conducted by the Kenya Revenue Authority (KRA) determined that 40% of consumer products, including cigarettes, alcohol and water are illicit. The WHO has independently estimated that nearly half (44%) of the alcohol consumed in Kenya is illicit, costing the exchequer an estimated KES 78 billion (c. USD 706 million). A significant proportion of this is smuggled into the country from Uganda, where as much as 70% of alcohol consumed is believed to be counterfeit, with border towns such as Busia and Malaba representing major entry points.

In December 2019, a multi-agency Kenyan operation seized KES 36 million (c. USD 326,000) worth of ethanol in Malaba. In 2018, local activists lobbied the Kenyan government to investigate an ethanol smuggling ring which they believed was bringing product into the country from Tanzania, while using fake KRA stamps to evade tax.

Tobacco, a major cash crop in East Africa and one of the most important categories of illicit trade in the region, receives in-depth treatment in a dedicated section.

3.2.4 NARCOTICS

In recent years, East Africa has become a major access point for illegal narcotics arriving from Asia and South America. Although an increasing share of the illicit narcotics volume smuggled into the region has East Africa as its ultimate destination, weak security controls have also made it an important staging post for transnational criminal groups using complex global itineraries to evade authorities. In recent years, Nigerian, Pakistani and European criminal syndicates have increasingly used East Africa as a transport node for heroin which is first shipped in volume to coastal states, such as

Kenya, Tanzania and Mozambique, from where it is smuggled overland to be flown out of Entebbe airport to high-security destination markets such as Europe.

In 2019, Uganda's Anti-Narcotics Criminal Investigations Directorate (CID) reported seizures of heroin at Entebbe airport of 123 kilograms, compared to 31 kilograms in 2018. In December 2020, Ugandan authorities destroyed almost 70 kilograms of narcotics seized in Entebbe airport over a six-month period. Although heroin made up the bulk of the incinerated product, varying amounts of cocaine, methamphetamine, morphine and cannabis were also destroyed.

The Somali coast represents another important access point for illegal narcotics, with Al Shabaab using its networks in the port towns of Kismayo and Bosaso to process cocaine arriving from South America as well as heroin from Asia's Golden Crescent and Golden Triangle, which the terror group subsequently smuggles into Kenya.

Using the same transport routes which facilitate its outgoing trade in illicit wildlife products, timber and gemstones, ASWJ imports large quantities of heroin, some of which is trafficked north into Tanzania as well as southwards towards the South Africa market.

3.2.5 ILLICIT PHARMACEUTICALS & HUMAN TRAFFICKING

East Africa has become a major target for the global trade in illicit pharmaceuticals, estimated to be worth USD 200 billion per year. According to a 2016 International Criminal Police Organization (INTERPOL) report, the largest interceptions of counterfeit pharmaceuticals at a global level were made in Kenya. Unlicensed pharmacies continue to proliferate throughout the region, creating an environment where counterfeit medicines can easily reach a mass market. The sale of illicit opioid medications, such as codeine-based cough syrup, has led to rising numbers of overdose deaths.

The MEDICRIME Convention, the only extant international criminal law convention providing the means to criminalise the falsification of medicines and medical devices (first adopted by the Council of Europe in 2010), is yet to be signed or ratified by any East African country.

The COVID-19 pandemic has provided ample opportunity for illicit actors to capitalise on an already entrenched trade in counterfeit pharmaceutical products, including fake testing kits and hand-sanitising gels which do not meet the minimum 60% alcohol standard recommended by the WHO. These substandard products have had a deleterious effect on public confidence in national authorities at a time when trust in civic institutions is seen as critical to preventing the spread of the virus.

Throughout the pandemic, authorities have warned that criminal enterprises, particularly those which have penetrated Mombasa port's freight handling facilities, will continue to intercept legitimate COVID-19 medicine supply chains and introduce counterfeit substitute medicines, especially from Asia.

Although human trafficking is largely beyond the scope of the present report, it is worth noting that the same smuggling routes used to traffic illicit consumer products throughout East Africa are also used in the illegal transport of people. On 24 March 2020, Mozambican authorities discovered the bodies of 64 Ethiopian immigrants in an airtight lorry container in transit towards South Africa.

3.3 RESILIENCE TO ILLICIT TRADE

According to the Organised Crime Index 2019, East Africa has the second least resilience to illicit trade of any African region, beating only Central Africa. The region presents a daunting set of challenges for authorities seeking to heighten the risk attached to illicit trade. Porous borders, vulnerable communities and weak state capacity are the norm throughout East Africa. In certain areas, however, the region has shown some improvement, not least in increasing awareness amongst policymakers of the threat posed by illicit trade and the creation of instruments designed specifically to tackle the problem.

3.3.1 BORDERS, TRANSPORT INFRASTRUCTURE & ONLINE SECURITY

The region's vast land and coastal borders add greatly to the complications of detecting cross-border illicit trade activity. The length of Kenya's borders with Uganda (772 km) and South Sudan (232 km), both of which are considered major sources of illicit products, aptly illustrates the challenges facing authorities.

Slow progress in terms of establishing legal frameworks for the management of trans-boundary protected areas has further weakened the region's capacity to combat poaching.

Beyond the region's large port cities, East Africa's long coastline provides ample opportunities for smuggling activities conducted by smaller vessels. The widespread use of dhows, traditional small wooden vessels, facilitates trafficking activities throughout the Swahili coast and creates enormous difficulties for authorities.

The Kenya Coast Guard Service, established in 2018, has considerably improved the country's capacity to intercept illicit narcotics traffic within its waters. However, this has largely resulted in heroin-laden dhows simply redirecting to Tanzanian and Mozambican coastlines, which are less ably guarded, with this product subsequently smuggled overland into either Kenya or Uganda. East Africa's developed transport infrastructure (relative to surrounding regions) has helped turn it into a major conduit for illicit goods both arriving and departing from the continent. Illicit actors are aided by poor surveillance infrastructure across much of the region's main transport nodes. Mombasa port, until recently the global hub for ivory trafficking, has in recent years made some strides in terms of enhancing detection of illicit traffic (see Spotlight: Ivory section), but the sheer volume of goods passing through the harbour means that much still goes undetected.

As well as major seaports, secondary airports in the region with poor surveillance capacity are used prolifically in the import and export of illicit cargo. These products are subsequently distributed throughout the region and beyond. Entebbe airport in Uganda, which is notorious for its weak security measures, has become a major gateway for illicit product.

The rise of the digital domain has created a vast new border for authorities to police, one that East Africa's anti-illicit trade agencies are ill-equipped to monitor. Poor-to-negligible online security has also seen illegal imports ordered on the internet arriving in significant quantities from Dubai, China, Turkey, India and Singapore, flooding East African markets with counterfeit products.

3.3.2 ECONOMY

In the decade before the pandemic, many East African countries consistently posted strong economic growth. During this period Kenya's real GDP averaged at 5%, leading to the country being upgraded from a low- to a lower-middle-income country by the World Bank in 2013. In June 2020, the World Bank announced that Tanzania had also been upgraded to lower-middle-income status.

Although the COVID-19 pandemic has not affected the East African region as much as others in terms of health outcomes, it is expected to see some of the worst outcomes in terms of GDP and the labour market. Economic stagnation will have serious consequences for continued investment in institutional resilience.

According to the UN Economic Commission for Africa (UNECA), as of December 2020 only four East African countries were on course to post positive economic growth: South Sudan (4.1%), Ethiopia and Tanzania (1.9% each), and Kenya (1%). A separate report published by the Common Market for Eastern and Southern Africa (COMESA) suggested that Uganda, Rwanda and Ethiopia may also see positive growth, albeit marginal. As a whole, the region is expected to show a steep decline in growth, from 6.6% in 2019 to 0.6% in 2020.

Governments such as Kenya's, which have relied on heavy borrowing in recent years (56.5% of GDP in 2018), will be tempted to hike taxes in order to avoid defaulting on debt. However, if added pressure is placed on the existing tax base, which is already narrow, this will drive more business into the irregular economy. The same is also true of Uganda where only 1.5 million pay taxes out of a workforce of 10 million, with the remainder employed in the informal sector.

Governments such as Kenya's, which have relied on heavy borrowing in recent years will be tempted to hike taxes in order to avoid defaulting on debt

3.3.3 TRADE

Improving the ease of conducting legitimate cross-border trade between East African countries is central to the war on illicit trade. However, at present, the East African region remains caught between the twin impulses of economic integration and national protectionism.

Intra-Africa trade stands at 15%, compared to Europe (68%), North America (37%) and Latin America (20%). The average tariff on intra-Africa trade stands at 6.1%, which is higher than the average rate imposed on goods exported from the continent. The African Continental Free Trade Area (AfCFTA), which was launched on 1 January 2021, brings together 1.2 billion people and 55 countries with a combined gross domestic product of USD 3 trillion. UNECA has said that East Africa will generate USD 1.8 billion and over two million jobs from the successful implementation of AfCFTA, but the fledgling project is likely to face multiple challenges if the history of its regional precursor, the East African Community (EAC), is anything to go by.

In theory, the EAC, which was founded in 1967 and revived in 2000 after collapsing in 1977, envisages a customs union and a common system of external tariffs. In 2008, a free trade area was also agreed with the Southern African Development Community (SADC) and COMESA. In practice, however, non-tariff barriers are used pervasively in covert trade wars between EAC members. As well as protecting domestic industries, concerns about sub-standard and counterfeit products are another commonly cited motivation for imposing unilateral trade restrictions.

In December 2020, the Kenyan Federation of Poultry Farmers called for a suspension of imports from Uganda on the basis that cheap cuts from third-party countries were being imported into Uganda and exported to Kenya in contravention of regulations stipulating that only fully dressed chicken can be imported. Similar trade spats also exist between the two countries over beef and milk imports, often turning on Uganda's lack of systematic factory inspections.

The COVID-19 pandemic and the unilateral border closures which followed within the EAC highlighted the perils of thwarting legitimate cross-border trade. Many legitimate traders, such as those in the Kenyan-Tanzanian border town of Isebania, were driven into illegal smuggling following the closure of the border. Meanwhile, although illicit trade volume decreased overall during 2020 due to movement restrictions, as evidenced by the rise in heroin prices, 'ant' trafficking (numerous smugglers with small loads) outside of major border posts increased.

Recently, Kenya has taken a number of measures to improve the ease of doing legal cross-border trade.

In November 2020, the Kenyan government signed a KES 1.31 billion (USD 13.1 million) deal with Trade Mark East Africa to develop an integrated cross-border market in the town of Busia on the Ugandan border. Similar integrated markets, intended to improve the ease of conducting cross-border business for small traders, are planned in Namanga, Taita-Taveta and Isebania on the Tanzanian border.

One-stop border posts (OSBPs) represent a similar concept. Rather than pass through two identical security controls on either side of the border, OSBPs can reduce cross-border transit times by merging these into one. Managed correctly, OSBPs can encourage legal trading compliance by removing barriers while also discouraging smuggling through effective surveillance and cooperation. In November 2020, the KRA seized KES 10 million (c. USD 90,000) in counterfeit goods, including ethanol and cosmetics, which were mis-declared as Tanzanian-manufactured sandals, at the Taveta-Holili OSBP in Taita-Taveta county.

While measures such as integrated markets and OSBPs can improve legal cross-border trade compliance where ease of doing business is the underlying issue, wide discrepancies in East African tax regimes create market opportunities for criminal operatives who have no intention of complying with legal trade. Kenya's excise rate, which in recent years has streaked ahead of that imposed by neighbouring countries, is a cause for particular concern and has led to a sharp increase in tobacco smuggling (see Spotlight: Tobacco section p.32).

3.3.4 SOCIETY

East African society's resilience to illicit trade has not been assisted by the ravages of the pandemic, with an estimated 38 million jobs believed to have been lost over the course of 2020.

At the same time as the pandemic took hold, fragile rural economies in East Africa were also affected by the worst locust infestation in more than 25 years, leaving many communities in precarious circumstances. The economic impact of 2020-21 is already having huge implications for the region's illicit markets as families seek jobs in the irregular economy and cheaper counterfeit products, such as cigarettes, become more attractive.

East Africa has one of the youngest average populations in the world. Uganda, which has the youngest population of any East African country, has an average age of 15.9, with as much as 70% of the population under 30. While this represents an enormous economic opportunity for the region, it will also present challenges.

If the generations coming through cannot find a place in the legitimate economy, they will perforce seek employment in the informal sector. Worse still, large numbers of disenfranchised youths will foster an environment where criminalisation, radicalisation and extremism can take hold.

According to the African Youth Survey 2020, 10% of African youths had been approached by recruiters for militias and extremist groups. The problem is particularly acute in Kenya's northern Wajir, Lamu, and Mandera districts, where Al Shabaab is known to court disenfranchised youths, as well as in southern Tanzania, where ASWJ likewise conducts efforts to co-opt and radicalise local youths. In April 2020, ASWJ shot dead more than 50 youths who refused to join their ranks. In October 2020, a number of Tanzanian youths were arrested attempting to cross the border to join the militant group. Youth unemployment in Mombasa (50%) has also fed into the city's gang culture.

3.3.5 POLITICAL & CIVIC INSTITUTIONS

Good governance is the best bulwark against illicit trade. In this respect, the East African community is only partly well served.

The Ibrahim Index, which tracks and measures standards of governance on the African continent, ranked no East African country in its top ten for 2019, with the closest being Rwanda (11th) and Kenya (14th). The lowest ranking East African country, Burundi, sits at 44th. Many of the countries in East Africa's neighbourhood are ranked amongst the lowest out of 54 countries, including Sudan (48th), the D.R.C. (49th), the C.A.R. (50th), South Sudan (53rd) and Somalia (54th).

Fair and transparent democratic institutions, which increase accountability, prevent overmighty concentrations of power and improve civic trust, are a critical component in the war against illicit trade. The Economist Democracy Index for 2019 found that East Africa fares only middling in this respect also, with Kenya the highest ranked from the region (12th) followed by Tanzania (13th) out of 44 Sub-Saharan countries, or 94th and 95th out of 167 countries worldwide.

Recent national elections in the region, such as in Tanzania (October 2020) and Uganda (January 2021), have placed a severe strain on social compacts in those countries. Kenya, which has seen serious electoral violence since its first multi-party elections in 1992 and most recently in 2017, is due to hold a referendum in 2021 on the Building Bridges Initiative (BBI). An attempt to address the root causes of the country's cycle of electoral violence at a constitutional level by spreading political power more evenly, the BBI referendum will itself prove a test of Kenya's resolve to put ethnically driven political conflict behind it. Even if the BBI constitutional amendments are ratified, they will not succeed in their objective – reducing political violence – unless concerted measures are also taken to break the links between politics, gang culture and illicit trade.

Political strife in neighbouring countries also threatens to undermine stability in East Africa.

Ethiopia, until recently hailed as an economic and political success story, has at the time of writing embarked on a dangerous phase of internal conflict. The full consequences of Prime

Minister Abiy Ahmed's decision to deploy the military to quash dissent in the country's restive Tigray region are not yet known. Should Africa's second most populous country slide into a long-lasting civil war, the ramifications for the wider region will be serious indeed. The country, with its federalist settlement already in tatters, is due to hold national parliamentary elections on 5 June 2021.

The Ethiopian conflict has also reportedly inspired Somalia's President, Mohamed Abdullahi Mohamed, to launch similar military operations in the southern autonomous region Jubaland. Somali presidential and parliamentary elections, originally due to be held in 2020, have been postponed indefinitely. While the pandemic has been offered as an official explanation for this delay, growing rifts between the federal government and the country's regional administrations are the more important factor. Following the expiry of his term of office on 8 February 2021, the federal state presidents of Puntland, Jubaland and the Council of Presidential Candidates have ceased to recognise the authority of President Mohamed, creating a further serious stress test of the country's already decrepit federalist constitution.

3.3.6 SECURITY COOPERATION

Regional cooperation and international assistance are essential guards against the terror threats which menace East Africa and its surrounding regions. Despite this, recent months have witnessed a number of diplomatic fracas which threaten to destabilise some of the most vital frameworks for multilateral cooperation.

The African Union's peacekeeping mission in Somalia, AMISOM, is a vital component of the war against Al Shabaab and until recently a shining example of regional security cooperation. Events in recent months, however, have seen AMISOM thrown into disarray, creating the possibility of a perilous security vacuum.

In late 2020, the African Union security chief, Gebreegziabher Mebratu Melese, who is of Tigrayan ethnicity, was dismissed at the behest of the Ethiopian government, which also disarmed the Tigrayan elements of its contribution to AMISOM.

An ongoing diplomatic spat between Kenya and Somalia has seen the latter threaten to expel Kenyan troops from AMISOM. Somalia's federal government has accused Kenya of training Jubaland state forces, although a commission appointed by Intergovernmental Authority on Development (IGAD), which brings together the governments of Kenya, Somalia, Ethiopia, Uganda, Djibouti, Sudan and South Sudan, has found no evidence to substantiate Mogadishu's accusations. As in the past, any deterioration of relations between Kenya and Somalia will only serve to empower Al Shabaab and increase the terror group's ability to operate its illicit trade rackets without impediment.

International support on security matters is a vital component of East Africa's war against extremism. Uganda, which receives a total assistance budget exceeding USD 970 million per year from the United States, is especially dependent on international assistance for its security infrastructure. However, recent fluctuations in policy emanating from Washington have created considerable uncertainty.

In December 2020, US President Donald Trump ordered the withdrawal of nearly all American troops from Somalia by 15 January 2021. In the same month, then President-elect Joe Biden promised to aid Kenya's fight against terrorism in a phone call with President Uhuru Kenyatta, although he did not specify if this would entail a revocation of Trump's earlier order.

3.3.7 ANTI-ILLICIT INFRASTRUCTURE: LAW ENFORCEMENT

Anti-illicit infrastructure can take two forms: policies which tackle illicit trafficking and traffickers directly and measures designed to prevent goods from being diverted onto the illicit market in the first place.

In terms of investigating and dismantling organised criminal networks, regional authorities face many of the same challenges as their counterparts around the world. In particular, higher-level members of criminal groups remain insulated from investigation due to horizontal operational practices. As elsewhere, actual smuggling is typically carried out by those at the very bottom of the criminal food chain, meaning that arrests related to once-off seizures generally have little overall impact on illicit trade activity.

Despite this, the region's legal infrastructure for combatting organised crime is seen as improving.

The Kenyan government has enacted a number of reforms, including programmes to allow plea bargaining and enhanced investigative tools, to better enable vertical investigations of criminal organisations. As well as its newly minted coast guard, the country's Anti-Narcotics Unit is seen as the leading narcotics enforcement agency in the region.

Mentoring programmes conducted by the United States' Drug Enforcement Administration (DEA) have already proved a success in terms of training officials working for Kenya's anti-narcotic agencies and Tanzania's Drug Control and Enforcement Agency (DCEA), as well as improving regional coordination between East African anti-narcotics trafficking agencies. Mozambique has also recently agreed to receive similar training from the DEA. Uganda's Anti-Narcotics CID remains chronically under-resourced and although the country has signed a number of relevant treaties on organised crime, Kampala is notable for failing to implement protocols and agreements.

In terms of their approach to illegal narcotics, East African countries have swerved between stringent prohibition-style measures and more holistic campaigns targeting demand side issues. While Tanzania, Uganda and Kenya have all undertaken public awareness campaigns in recent years, they have also introduced strict

penalties for drugs possession. Although not necessarily through design, in practice Uganda's Narcotic Drugs and Psychotropic Substances (Control) Act (2016) has seen courts impose draconian penalties for drug users while drug traffickers largely escape attention. Meanwhile, the same Act also contained elements hinting at a more permissive attitude, including the legalisation of marijuana cultivation for export.

If passed in its current form, Kenya's Narcotics, Drugs and Psychotropic Substances Control (Amendment) Bill 2020 will introduce jail terms of five years for those convicted of possessing drug amounts less than one gram, rising to 50-year sentences for those caught with amounts greater than 100 grams. The bill also introduces legal penalties for the possession of chemical precursors (currently not covered by Kenyan law).

Recent years have seen increasing awareness at government level of the link between extremism and illicit trade. Speaking at the 2020 National Security Review and Planning Conference in Mombasa, President Kenyatta directed the country's enforcement agencies to suppress the means by which Al Shabaab militants generate funds through Kenya, including both remittances and illicit trade.

Over the past decade, Kenya has made progress in terms of combatting corruption.

Since the adoption of the 2010 Constitution, a number of steps have been taken in terms of reforming the Kenya Police Service, including the passing of the National Police Service Act (2011). While improvements have been made in terms of accountability and transparency, many difficulties persist.

3.3.8 ANTI-ILLICIT INFRASTRUCTURE: MARKET SURVEILLANCE

In terms of preventing goods from being diverted onto the illicit marketplace, there have been some notable achievements in recent years. Kenya's tobacco monitoring systems are the benchmark standard in the region, while the development of this infrastructure has had beneficial spill-over effects for the monitoring of other industries, such as alcohol (see Spotlight: Tobacco section p.32).

While progress in tackling certain specific categories of illicit trade has been notable - a countrywide crackdown on illicit alcohol in 2015 led to the closure of 115 breweries - perhaps the most important development in recent years has been the Kenyan government's identification of illicit trade as a pervasive threat requiring collective action across all government departments and across all categories of illicit. The ACA, established under the Anti-Counterfeit Act (2008) and coming into force in 2010, provided an early indication of the more comprehensive approach to follow. In May 2018, an inter-agency anti-illicit working group was launched to strengthen coordination among different agencies in curbing all forms of illicit trade. In 2020, the Kenyan government launched the National Illicit Trade Observatory, a tool which will enable monitoring of illicit trade in Kenya.


Photo by Rachel Mabala

In 2019, the Uganda Revenue Authority (URA) introduced Digital Tax Stamps, paper stamps carrying a quick response (QR) code enabling distributors, retailers and consumers to verify the authenticity of products using only their smartphones.

The new system, which is being steadily rolled out on an industry-by-industry basis, has already greatly improved compliance, with government revenue from certain categories, including alcohol and mineral water, tripling in the course of 2020. However, Kenya's experiment with paper tax stamps for the tobacco market (first introduced in the early 2000s), makes clear that such devices are insufficient as a standalone measure designed to improve licit market share (see Spotlight: Tobacco section).

Ultimately, other weaknesses in Uganda's anti-illicit infrastructure, including the absence of systematic factory inspections and market surveillance measures, mean that the country's problems with illicit manufacture are likely to persist, with dire consequences for bi-lateral trade. Kenyan officials frequently impound Ugandan-origin goods on the suspicion that the 'Q' mark issued by the Ugandan National Bureau of Standards is counterfeit. While Ugandan trade associations make counterclaims that economic protectionism is the real motivation for such seizures, Kampala's weak market and factory surveillance regime lends credence to the accusations.

4. SPOTLIGHT: IVORY

4.1 A HISTORY OF SLAUGHTER

The world's most trafficked animals make up a diverse portfolio, ranging from the small and obscure, including pangolin and juvenile European eels, to the iconic and immense, such as tiger and rhino. Perhaps the most totemic, however, is the African elephant.

The largest land mammal on the planet, the African elephant (Loxodonta africana) has been listed as a vulnerable species on the International Union for Conservation of Nature (IUCN) Red List since 2004. From a population of more than 10 million in the 1930s, fewer than 500,000 remain today. Beyond the mass slaughter of animals, patterns of poaching behaviour can have further implications for elephant populations. The tendency of poachers to initially target high-value bull elephants can skew sex ratios and make the recovery of herds more difficult. Once large males have been eradicated, poachers may begin to target greater numbers of animals in order to continue harvesting equivalent amounts of ivory, further depleting populations.

After one half of all remaining African elephants were lost in the decade before 1989, international outcry forced a reckoning. CITES - the primary international body responsible for control of the trade in protected wildlife species and which accords varying degrees of protection to more than 35,000 species of animals and plants - banned the international trade in elephant tusks in 1989, while the Kenyan government burned its ivory stockpiles (numbering 2,000 tusks) in a powerful symbolic gesture. In the decade that followed, with demand dampened and poaching reduced, elephant populations enjoyed a modest recovery.

These gains were short lived, however, with the turn of the millennium witnessing a resurgence of poaching, driven primarily by renewed demand for ivory, especially on the Chinese market (where the wholesale price of raw ivory tripled to USD 2,100 per kilo in course of 2001-2014), as well as a deteriorating political situation in Central Africa. Almost two-thirds of Africa's forest elephant population were lost between 2002 and 2011. In time, poachers also turned their attention eastward, towards the savannah elephants of East Africa, where a third of the population was lost between 2007-14. Between 2010 and 2012 alone, 100,000 African elephants were killed to satiate the world's appetite for ivory. Although the slaughter has abated slightly in recent years, approximately 20,000 elephants are still being poached for ivory every year.

Almost two-thirds of Africa's forest elephant population was lost between 2002 and 2011

4.2 IVORY, EXTREMISM & ORGANISED CRIME

Around the world, extremist groups have deep connections in the IWT. In Afghanistan, the Taliban facilitates the hunting of snow leopards and other rare or endangered species for wealthy customers.

In East Africa and its surrounding regions, global demand for ivory has encouraged a host of extremist groups to engage in the poaching and illicit trafficking of elephant tusks.

While the price per kilo of ivory in destination markets can now reach USD 1,000 and above, African poachers often receive USD 200 or less from middlemen. A 2015 National Geographic investigation found that the value of smuggled ivory can rise tenfold as it moves through the illicit market supply chain. Despite the comparatively low profit yield for those that incur the greatest risk, ivory poaching and smuggling (as well as other forms of IWT) remain a lucrative option for extremist groups and organised criminal networks due to the sheer volume of product that can be trafficked.

In the same way that 'blood diamonds' fuelled West African conflicts during the 1990s, profits derived from poached ivory have helped to finance the war economies of present day Central Africa, supplementing the incomes of the region's many militia groups. For the Lord's Resistance Army (LRA), Joseph Kony's brutal outfit, poaching may now be the group's primary source of revenue. Prior to the secession of South Sudan in 2011, the LRA relied on a network of trusted brokers to ferry much of its illicit ivory north to Khartoum, where a lively trade with the Sudanese army allowed it to be exchanged for cash and munitions. Since the interruption of this trade route, the LRA has largely diverted its ivory stockpiles eastward, where it travels, via a network of intermediaries, to developed port cities on the Swahili coast, such as Mombasa, whence it departs the continent.

Central Africa's pronounced instability also makes it an attractive prospect for the horseback militias of Chad, Niger and Sudan, such as the Janjaweed, whose raids into the region's national parks have had a devastating effect on local elephant populations. While some of the ivory harvested on these expeditions is trafficked north, a proportion is also believed to travel east through Kenya.

Al Shabaab benefits from the illegal ivory trade, using the money it generates to fund the payroll of its soldiers. Unlike the LRA, the more sophisticated Somalian terror group rarely engages in poaching directly, but rather operates as a middleman or trafficker, reselling to foreign traders at greatly inflated prices.

Such is Al Shabaab's purchasing power that it can both stockpile and solicit ivory on demand from poachers and regional brokers. Although Somalia's porous ports provide one point of departure for the group's illicit product, Kenyan and Tanzanian entrepots are generally preferred, due to their closer proximity to poaching sites, superior infrastructure for bulk shipping and access to major shipping routes.

Further south, splinter groups of the Mozambican National Resistance (RENAMO) have been accused of poaching elephants and rhinos to fund their insurgency. Similarly, the Sunni Islamic terror group Ahlu Sunnah Wal Jamaah (ASWJ) also relies on IWT to finance its operations. The group is known to use camps and routes long operated by organised crime syndicates in Cabo Delgado to evade authorities. Even before ASWJ attacked and took control of Mocímboa da Praia in August 2020, the port town played a key role in the ISIS-linked group's export of ivory and other illegal wildlife products, as well as its importation of heroin destined for the South African market.

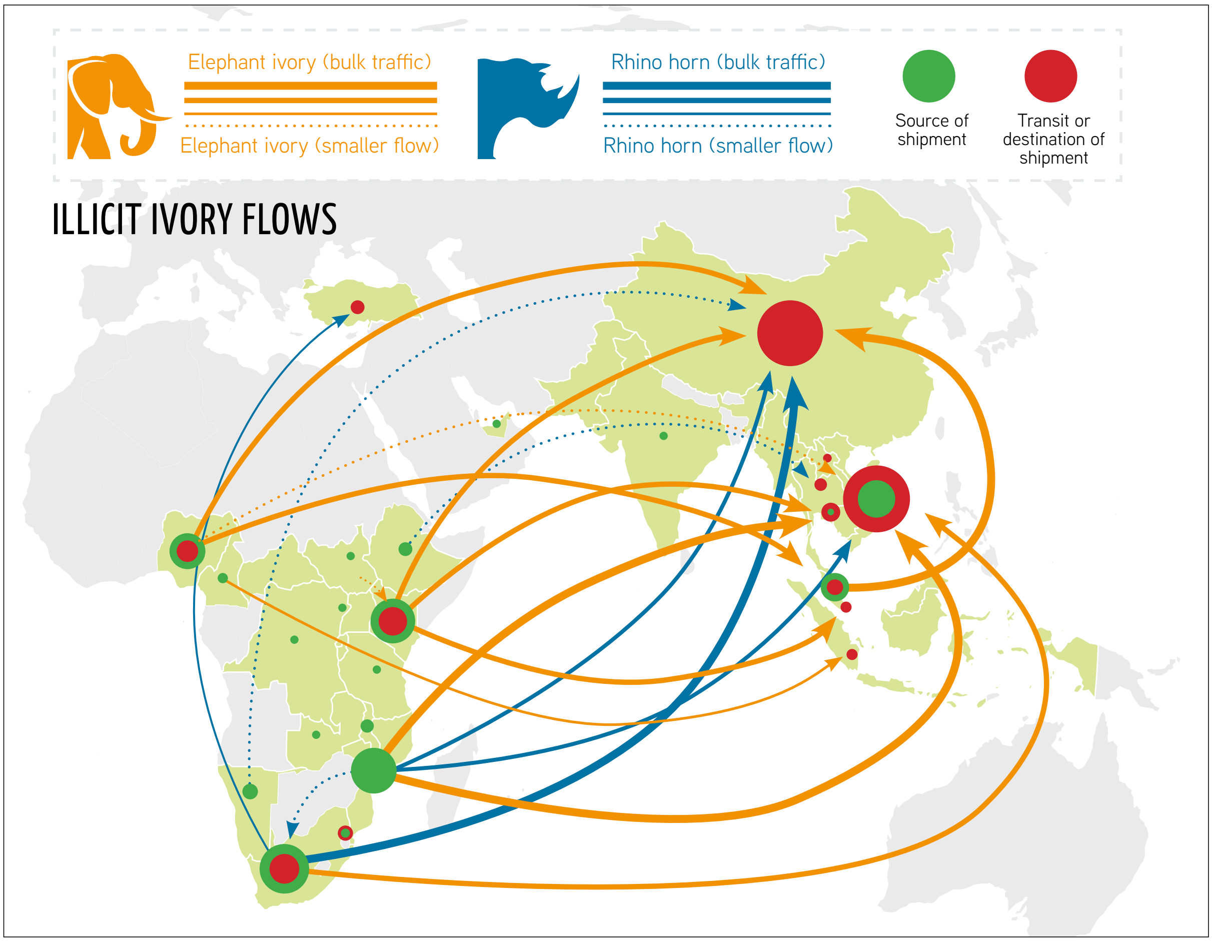
Asian criminal groups take advantage of weak online security infrastructure in both East Africa and Asia to procure illegal wildlife products through remote orders. While some of these transactions take place on the 'dark web' using cryptocurrencies, most occur on the 'surface web', including open listings on mainstream social media platforms. Asian crime syndicates also operate directly in the East African region.

In March 2020, 14 Chinese nationals were arrested in a township on the outskirts of Kampala on charges of illicit wildlife trafficking and illegal presence in Uganda. The suspects were charged with possessing dried elephant penis parts valued at UGX 17.1 billion (c. USD 460,000), six tortoises valued at UGX 22.8 million (c. USD 7,500) and half a kilogram of pangolin scales valued at UGX 5.7 million (c. USD 1,500).

4.3 CORRUPTION AND THE IVORY TRADE

Besides fuelling extremism, ivory poaching and smuggling also breeds corruption. Traffickers routinely bribe officials, including park rangers, border guards and police, while money laundering associated with IWT undermines the integrity of financial systems in East Africa.

In 2015, the Kenya Revenue Authority (KRA) suspended an official believed to have facilitated the illegal shipment of ivory, rhino horn and other illegal wildlife products worth an estimated KES 570 million (c. USD 5.1 million), which was subsequently seized in Singapore. The smuggled goods were discovered in a consignment of tea leaves destined for Vietnam.



Corrupt officials with deep connections to criminal syndicates and extremist groups alike, ensured that Mombasa port acted as the global hub of ivory trafficking for much of the 2000s and early 2010s, with tusks poached in Tanzania, Mozambique, the D.R.C., Uganda, Zambia and South Sudan all funnelled through the facilities in Kilindini harbour. An estimated 170 tonnes of ivory were seized by authorities in Mombasa between June 2009 and June 2014 (representing 230,000 elephants). A marked slowdown in seizures since 2016 may represent a displacement of smuggling routes to elsewhere, although an absence of detection does not always indicate the absence of crime. Nairobi's Jomo Kenyatta International Airport is similarly viewed as a major transit node for illegal ivory departing the African continent.

Underpaid and poorly trained border guards represent another major vulnerability in the region's anti-IWT infrastructure. The illegal ivory which gravitates towards Kenya's ports and airports first enters the country at busy land border crossing points, such as the Busia and Malaba posts on the Uganda border, where strategic ant trafficking makes detection difficult for unskilled officials.

There is a long history of military personnel involving themselves with IWT. During the late 1970s and 1980s, South African special forces engaged in systematic ivory poaching and smuggling in collaboration with RENAMO. In 2012, the *New York Times* reported on the apparent poaching of 22 elephants in Garamba National Park in the D.R.C. by a helicopter-equipped unit of the Ugandan military.

COUNTER EXTREMISM PROJECT

4.4 FIGHTING BACK AGAINST POACHING

Considering the emotional resonance of the plight of the elephant, governments and international bodies have, until recently, been surprisingly slow to act to abolish the legal markets which drive demand.

CITES has had its own part to play in this.

Although the convention's 1989 ban on the sale of ivory was categorical, in 1997 three African countries, Botswana, Namibia and Zimbabwe, were permitted to make a once-off sale of 50 tonnes of raw ivory to Japanese traders. Despite protests from many other African countries that the derogation would reignite international demand for ivory, a similar dispensation was granted to the same countries, as well as South Africa, in 2008. The release of 102 tonnes of government stockpiled ivory on the Japanese and Chinese market has been widely credited with reviving Asia's ivory carving industry.

The past 10 years have seen growing recognition of the demand-side problem of ivory trafficking, leading to a number of national authorities introducing bans on the commercial sale of ivory. In 2016, the United States, then the world's second biggest market for ivory, introduced a near-total ban on the commercial sale of African elephant ivory.

The Chinese government's decision to ban the elephant ivory trade, first announced by President Xi Jinping in September 2015, led to the closure of the world's largest ivory market. Even before its implementation on 31 December 2017, the announced ban had the effect of depressing global demand, with the price of raw ivory plummeting from more than USD 1,300 per kilogram in 2015 to less than USD 700 per kilogram by the start of 2017. In 2019, the United Kingdom also followed suit introducing its own ivory sales ban. If maintained, China's February 2020 ban on wildlife consumption, which was driven by concerns about the origin of the COVID-19 virus, may help to further depress demand.

As well as addressing the demand-side issue of ivory trafficking, the international community has also begun, albeit fitfully, to add elements to its demand-side toolkit. Enhanced bi-lateral cooperation between governments and the introduction of more stringent legal penalties for IWT offences are a noted example of this trend. Already, improved cooperation between East African governments and Beijing has had a positive effect in terms of deterring transnational organised crime groups, not least due to the threat of extradition to China where criminal sentencing is notoriously harsh.

By contrast, law enforcement agencies remain relatively toothless in terms of tackling the illicit financial flows which emanate from and support ivory trafficking, as well as IWT more generally. There are welcome signs that this loophole may be addressed in the coming years.

The past decade has seen the rise of so-called 'Magnitsky legislation'. Named after Sergei Magnitsky, who was imprisoned by Russian authorities for investigating massive tax fraud, denied critical healthcare and subsequently died under suspicious circumstances, 'Magnitsky legislation' empowers governments to impose sanctions on foreign individuals who have committed human rights abuses or are involved in significant corruption. Following the example set by the United States, which enacted the Magnitsky Act in 2012 and expanded its remit in 2016, Canada, the European Union, United Kingdom and many other countries have since adopted similar sanctions regimes.

Similar legal instruments should be mobilised against wildlife traffickers and their abettors. If an IWT-specific Magnitsky-style framework were to be adopted by a sufficient quotient of the international community, it could represent the most significant paradigm shift in the war on ivory poaching since the CITES ban of 1989, as well as for IWT more generally.

In recent years, national governments in East Africa have begun to improve their anti-IWT infrastructure. The Kenyan government acknowledged early on that creating a market for legal ivory through the sale of tusks confiscated from poachers would ultimately fuel demand for illegal ivory. The country's 1989 burning of ivory stockpiles emphasised the point, which was reiterated by the burning of a further 105 tonnes of confiscated ivory in 2016. This followed the passing of the Wildlife Conservation and Management Act (2013), which introduced more stringent sentencing for wildlife traffickers.

Despite the progress made over the course of the past decade, huge seizures of ivory in recent years make it clear that the illicit trade in elephant tusks has not been consigned to the past.

In January 2014, a Chinese national was ordered to pay a fine of KES 20 million (c. USD 230,000) or serve a seven-year jail term for the possession of illegal ivory, becoming the first individual to be convicted under the law.

The Uganda Wildlife Act (2019) similarly introduced considerably stiffer penalties for IWT, including a maximum fine of UGX 20 billion (c. USD 540,000) or life imprisonment, or both, for an offence relating to critically endangered species, such as Rothschild's giraffe, mountain gorilla and elephant.

By contrast, attempts to manage IWT at a regional level have been stymied. The East Africa Transboundary Ecosystem Bill, which was passed by the East African Legislative Assembly in January 2012, has at the time of writing, not yet been ratified by member states. However, the EU-funded Cross-Regional Wildlife Conservation in Eastern & Southern Africa and the Indian Ocean (CRWC) Programme, launched in 2017, has shown how a more integrative approach to IWT can have notable success.

Despite the progress made over the course of the past decade, huge seizures of ivory in recent years (including three record-breaking seizures in 2019 alone) make it clear that the illicit trade in elephant tusks has not been consigned to the past.

5. SPOTLIGHT: TOBACCO

5.1 ILLICIT MARKET SHARE

Tobacco is one of the most commonly trafficked illicit goods at a global level in terms of both geographical breadth and sheer volume.

According to the WHO, as many as one in every 10 cigarettes consumed worldwide is traded illegally. In developing economies, this proportion can rise considerably higher. In 2007, the illicit market share on the African continent was estimated at 15%, with Africans smoking 60 billion illegal cigarettes. In the years since, Africa, along with the Middle East, has continued to see some of the steepest growth in terms of illicit volume.

Although reliable data is not available for all East African countries, research conducted in 2011 suggested that Uganda's illicit market share for tobacco products stood as high as 20%, or 300-400 million illegal cigarettes. For reasons elaborated below, Kenya's illicit tobacco market share has shown pronounced volatility in the course of the past two decades but has, at various stages and by numerous authorities, been estimated at between 10% and 30%.

> As well as funding criminal and extremist groups, illegal tobacco costs East African governments c. USD 100 million in lost taxes every year

The harm emanating from the illicit trade in tobacco is considerable. As well as funding criminal and extremist groups, illegal tobacco also deprives government services of excise tax revenues. In East Africa, illicit tobacco is believed to cost governments USD 100 million in taxes every year. Unregulated tobacco sold at below legal market prices also affects government smoking cessation policies, particularly in terms of reducing uptake by youth and lower-income communities. Finally, counterfeit products, which are not subject to market-standard regulatory checks, may include dangerous chemicals and expose consumers to increased risk.

5.2 DRIVERS OF THE TRADE

There are numerous reasons why tobacco products have become a target for illicit actors around the globe. As well as being in constant demand as one of the world's most popular and fast-moving consumer goods, tobacco typically invites high levels of taxation, which domestic and transnational criminal organisations may easily undercut. Substantial price differentials between countries driven by varying degrees of taxation create additional opportunities for smuggling between low- and high-cost jurisdictions.

Proceeds derived from illicit tobacco can be immense. In the present market, a shipping container carrying 10 million cigarettes, which cost as little as USD 100,000 to produce in China, may bring as much as USD 2 million sold illicitly in the United States.

Despite the enormous profits it brings to illegal organisations, illicit tobacco has not traditionally attracted the same degree of moral censure as many other categories of illicit trade, such as illegal narcotics, arms dealing and human trafficking. As a consequence, criminal sentencing is often comparatively lenient. This, according to the OECD, creates a further form of enticement for criminal organisations:

Entering or expanding an illicit tobacco market has strategic value for criminal enterprises, since it strengthens the financial base for extending illegal activity into additional markets at relatively low risk.

5.3 MECHANISMS OF THE TRADE

Illicitly traded tobacco comes in several forms, including counterfeit (illegally produced, bearing false labels or trademarks), contraband (genuine legal product diverted after manufacture to illegal markets), and 'cheap/illicit whites' (produced under legal auspices for the sole purpose of being exported and illegally sold in another jurisdiction).

The illicit tobacco market in East Africa is defined by the fact that the region is not only an important destination market, but also a source market for illicit tobacco.

While tobacco consumption is widespread in almost all parts of the world, production is limited to specific regions, not least due to climatic factors. Africa, along with parts of South and North America, India and China, is a major centre of tobacco production, with cultivation prevalent throughout East Africa and its surrounding regions.

An abundance of locally cultivated tobacco leaf means that illicit actors operating in East Africa are able to target legal tobacco supply chains pre-production, post-production and at the point of production, creating a highly complex environment for enforcement authorities.

EXTREMIST PROFILE

Ahlu Sunnah Wal Jamaah (ASWJ)

Founded: c. 2012

Typology: Salafi jihadists

Following: c. 5,000

Area of Operation: Northern Mozambique

Illicit Portfolio: Narcotics, gem stones, timber, wildlife products

5.4 ILLICIT TOBACCO, EAST AFRICA AND THE WAR ECONOMIES

Worldwide, a host of extremist groups have and continue to profit from illegal tobacco, ranging from the Irish Republican Army (IRA) and its successor splinter groups and the Lebanese terror group Hezbollah, as well as the merged al-Qaeda groups Hay'at Tahrir al-Sham (HTS) in Syria and Jama'at Nasr al-Islam wal Muslimin (JNIM) in the Sahel.

Organised crime groups in Albania, Kosovo and North Macedonia, as well as the Italian mafia and numerous South East Asian and Chinese syndicates are also well known to profit from the trade.

The same picture also emerges in East Africa and its surrounding regions, where illicit tobacco has been found to fund extremist groups in the D.R.C., while also financing corrupt practices throughout the region.

According to a UN Security Council Group of Experts report published in 2005, the Forces Armées du Peuple Congolais (FAPC), a rebel group operating in the north-eastern Ituri region of the D.R.C. between 2003-2005, was part funded by an extensive illicit trade network based around cigarettes as well as sugar, petrol and gold.

At the heart of this enterprise was a pipeline of 'Supermatch' cigarettes, produced by Mastermind Tobacco Kenya and brought into the D.R.C. by a network of Ugandan and Congolese businessmen who enjoyed privileged arrangements with the FAPC, including avoidance of customs protocols and a monopoly of sales in the region controlled by the rebel group. The same illicit network also facilitated the smuggling of cigarettes back into Uganda, a process known as 'roundtripping', with tax evasion facilitated by corrupt customs officials on both sides of the Uganda-Congo border.

The same UN Group of Experts concluded that illicit tobacco not only financed the FAPC insurgency, funding the regular payment of 4,000-5,000 troops, but also created a "permissive environment" which in turn enabled the group to procure weaponry through cross-border smuggling.

Although the FAPC was forced to disband in 2005, political instability has continued to plague the north-eastern reaches of the D.R.C. ever since, fuelled in part by an illicit tobacco

network stretching into Uganda and beyond.

A further UN Security Council Group of Experts report published in December 2008 identified Tribert Rujugiro Ayabatwa, founder of the PanAfrican Tobacco Group (PTG), as a major financier of the National Congress for the Defence of the People (CNDP). A militia group waging a brutal insurgency against government forces between 2006-2009, the CNDP has been implicated in human rights violations including mass rape and the recruitment of child soldiers.

As controlling shareholder of PTG, Africa's largest indigenous manufacturer of tobacco products, Rujugiro's tobacco portfolio involves interests throughout East Africa, including in Uganda, Tanzania, Burundi, as well as the D.R.C., South Sudan and elsewhere. In the years since the 2008 report, Rujugiro's subsidiaries and associates have continued to be linked to illicit activity throughout the region.

In 2012, Mastermind Tobacco Kenya launched a lawsuit against Leaf Tobacco and Commodities (LTC), a subsidiary of PTG, accusing the Rujugiro-owned company of counterfeiting its flagship brand, Supermatch, and selling it cheaply on the Kenyan market.

A further midterm report of another UN Group of Experts published in December 2018 accused the Rwanda National Congress (RNC), which Rujugiro has been accused of financing, of fomenting instability in the D.R.C. Rujugiro, who pleaded guilty to tax evasion before a South African court in 2009, has also been accused of funding rebel groups in Rwanda.

5.5 KENYA'S TWO-DECADE BATTLE AGAINST THE ILLICIT TRADE IN TOBACCO PRODUCTS

Kenya is not only the most studied market in East Africa in terms of illicit tobacco, it is also the country which has taken the most proactive measures to combat the trade. Kenya's experience is relevant to the wider region both as a success story and a cautionary tale.

In 2003, prompted by reports that the country had become a major transit point for illicit tobacco, with Tanzania the main source market and Sudan, Uganda and the D.R.C. the principal destination markets, the Kenyan government undertook a major audit of the domestic tobacco industry.

A litany of abuses was discovered, including undeclared production, product falsely declared for export, undeclared imports, underreported values and counterfeit production. A series of reforms followed, including the introduction of paper tax stamps, leading to a 52% rise in legal cigarette and cigar sales from 2003 to 2004 and an increase in monthly excise tax revenue from KES 230 million (c. USD 2.1 million) to KES 350 million (c. USD 3.2 million).

By 2005, however, criminals had begun to find workarounds and in the years that followed the legal market share once again began to shrink. Further reforms enacted in 2009-2010, including the establishment of dedicated tax enforcement units, a new licensing regime for manufacturers and the introduction of an electronic cargo tracking system (ECTS), led to the closure of three tobacco factories and the recuperation of at least USD 50 million in unpaid taxes. Mastermind, the aforementioned maker of 'Supermatch', was charged USD 20 million in outstanding taxes after authorities discovered it had engaged in systematic brand misclassification. Legal sales of cigarettes and cigars rose by 67% in the immediate wake of the 2009-10 reforms.

Kenya's anti-illicit infrastructure was bolstered in March 2014 by the introduction of an excisable goods management system (EGMS) for tobacco and alcohol products. The system allowed for much more comprehensive monitoring of the tobacco supply chain, although it does not yet provide the same level of functionality as some of the 'tracking and tracing' digital tax stamp systems being adopted in Europe, particularly where traceability is concerned. The Excise Duty Act and the Tax Procedures Act adopted in November 2015 further tightened the licensing requirements for tobacco manufacturers, such that by May 2018 only British American Tobacco and Mastermind Tobacco, and 10 importers, were licensed in Kenya.

The implementation of the EGMS led to an astonishing 4,728% rise in tax revenue between July and December 2014. For the year as a whole, tax compliance was improved by 45%, while the KRA reported seizures amounting to 20 million cigarettes.

The adoption of the Kenyan Excise Duty Regulations 2020 provided the KRA with the ability to require domestic manufacturers to pay the unpaid excise on products manufactured for export that are subsequently found for sale in the Kenyan market.

5.6 PERSISTENT PROBLEMS, DURABLE SOLUTIONS

Despite these notable successes, Kenya's anti-illicit tobacco infrastructure continues to show vulnerabilities. While the introduction of the EGMS and other components added since 2003 have greatly improved compliance amongst domestic producers, the present system is less robust when it comes to tackling imported illicit tobacco.

In the past five years, the KRA has raised the excise duty on cigarettes by more than 150%, inadvertently creating a significant market opportunity for uncustomed tobacco smuggled across the border from neighbouring countries. Arrests in recent months suggest that Uganda, where excise rates are much lower and factory inspections are rarely conducted, has now become the primary source of illicit tobacco found on the Kenyan market.

In August 2020, detectives in Turkana arrested smugglers transporting illicit cigarettes, as well as beer, bhang (ie, cannabis) and sugar. In December 2020, Kenyan police arrested an individual in Githunguri, an agricultural town north of Nairobi, on charges of possessing 1.4 million uncustomed cigarettes, representing a lost tax value of KES 11.6 million. The seizure included Supermatch cigarettes with a tax value of KES 8.3 million. The same individual was also charged with the illegal possession of 50,000 falsified tax stamps.

As a consequence, illicit tobacco continues to have a major presence on the Kenyan market, while reports that illegal cigarettes are sometimes used by corrupt politicians to pay gangs for their support highlight the nefarious ancillary consequences of the trade.

In May 2020, Kenya ratified the 2012 WHO Protocol to Eliminate Illicit Trade in Tobacco Products, also known as the Illicit Tobacco Trade Protocol (ITP), a vital step towards cracking down on illicit tobacco. In order to be fully compliant with the ITP, Kenya will be required to introduce stricter penalties for illicit tobacco convictions, including increased fines for ant-trafficking offences.

To date, Kenya is the only East African country to ratify the ITP. Although Uganda domesticated the WHO Framework Convention on Tobacco Control (WHO-FCTC) through its Tobacco Control Act (2015), Kampala has neither signed nor ratified the ITP, despite growing evidence that the country has become the primary source of illicit tobacco in the region.

At present, the scope of national revenue authorities is limited to manufacturers domiciled, or that possess a local subsidiary, in that country. As a consequence, EAC member states which have worked to improve their anti-illicit infrastructure remain exposed to weaker enforcement standards in other countries.

While regional cooperation on illicit tobacco control has been slow, the KRA has engaged with the EAC to discuss possible regional solutions, including the harmonisation of tax regimes. Kenya's ECTS cargo monitoring system also introduced the principle of inter-state cooperation, including verification by authorities at either end and information sharing.

EXTREMIST PROFILE

Janjaweed

Founded: c. 1987

Typology: Arab ethnic nationalists

Following: Unrecorded

Area of Operation: Sudan, Chad

Illicit Portfolio: Ivory, arms

6. SPOTLIGHT: ARMS & MUNITIONS

6.1 DEFINITIONS

No other category of illicit trade does such direct and measurable harm to human society as that of the illegal trade in arms and munitions.

Around the world, illicit arms fuel conflicts, facilitate crime, displace communities and enable human rights violations. Their presence in communities disrupts livelihoods, hinders sustainable development goals, breeds distrust between citizens and undermines the credibility of legitimate state authority.

For the purposes of this report, illicit arms are understood in the broadest sense to refer to any weapons and ammunition, or the constituent parts thereof, which are manufactured, used, held or trafficked in violation of international or national law. Of particular interest to this report is the subcategory of munitions commonly referred to as small arms and light weapons (SALW).

While the importance of preventing illicit trafficking in heavy weaponry has long been acknowledged, the past two decades have seen an increasing awareness of the dangers posed by illegal SALW flows. The UN defines 'small arms' as any hand-held firearm that can be carried by one person, such as revolvers, rifles, submachine-guns, assault rifles, and light machine-guns, while 'light weapons' are those which are transportable by several persons, animals or light vehicles, including portable anti-tank guns or missiles, portable anti-aircraft guns or missiles and mortars of less than 100mm calibre.

6.2 MECHANISMS OF ILLICIT ARMS TRAFFICKING

Although linked to the legal arms trade in important ways, illicit arms flows do not necessarily mirror legitimate arms circuits. Weapons that are legally manufactured in one region may be diverted onto the illicit market following their shipment to another jurisdiction. A further layer of complexity derives from the durability of firearms. Unlike perishable and single-use consumer goods, illegal munitions can remain in circulation long after their diversion onto the illicit market and may be transferred between many owners covering multiple geographies.

Sources of illicit arms flows vary considerably. In some cases, legally produced arms are procured directly from manufacturers in contravention of national or international prohibitions, thereby becoming illicit at the factory gate. Another important source of illicit arms arises when otherwise sanctioned imports are 're-transferred' illegally to third parties. Existing national stockpiles of munitions may enter the illicit market following the collapse of regimes, or be siphoned to illegal parties by corrupt officials. Cross-border and domestic trafficking of already illegal arms represents an extremely important category of arms trafficking, while the marketing of readily convertible imitation firearms and artisanal production represent peripheral if not unimportant threats.

While large consignments of illegal weapons are most often transported by air or seaborne vessels, two thirds of all cross-border illicit arms flows in 2020 were conducted over land, according to the UN Office on Drugs and Crime (UNODC). This corresponds to a widely acknowledged fact that the majority of illicit arms trafficking is accounted for by small-scale transfers either between individuals or conducted by individuals on the behalf of larger organisations, also known as "strategic ant trafficking".

6.3 MEASURING ILLEGAL ARMS FLOWS

As with other categories of illicit trade, much of the illegal arms market remains beyond our field of view. Our understanding of illicit arms flows is limited by the capacity of authorities to intercept trafficked firearms as well as by their willingness to report such statistics. What data is available is distorted by the fact that the majority of illicit firearms detected by law enforcement authorities are not discovered at their point of diversion onto the illicit market or in relation to illicit trafficking offences but are instead uncovered in the course of other forms of criminal investigation, such as narcotics trafficking. Although revealing, such data provides only limited insight into wider illicit arms trafficking networks.

6.4 RIVALRIES: CIVIL WARS & ETHNIC TENSIONS ON EAST AFRICA'S BORDERS

Throughout the second half of the twentieth century, Cold War rivalries and postcolonial conflicts helped to create a mass market for illicit arms throughout East Africa and its surrounding regions.

While Soviet Russia and the United States, as well as their assorted secondary power allies, flooded the region with free or subsidised weaponry, the collapse of regimes in Uganda, Ethiopia, Rwanda and Somalia in the late 1980s and early 1990s also led to huge numbers of state-owned arms being dumped on the private arms market. A significant proportion of these munitions remain in private possession throughout the wider region. Even those countries which remained comparatively stable during the post-independence period, such as Kenya and Tanzania, were ultimately affected by the same sweeping historical trends.

As illicit arms spilled over from neighbouring countries, especially following the fall of Idi Amin in 1979 as well as Mengistu Haile Mariam and Siad Barre in 1991, they were readily acquired by the pastoralist communities living on or near Kenya's north and north-western borders, with towns such as Mandera, Moyale, El Wak, Lokichoggio, and Isiolo becoming well-known SALW bazaars.

A similar pattern unfolded in Tanzania's north-western regions, including Kagera, Kigoma, Rukwa and Katavi, in this case driven largely by the arrival of militia groups associated with conflicts in Burundi, the D.R.C. and Rwanda. While using Tanzania as a base, members of these groups frequently sold their munitions to the local population for sustenance.

The emergence of illicit arms trafficking as a widespread phenomenon in parts of rural Kenya and Tanzania created a community-level example of 'security dilemma', where a pervasive sense of insecurity locks groups into deadly arms races from which there is no easy escape. As a direct result, customary practices such as cattle rustling and inter-tribal disputes, which traditionally involved stealth and minimum force, became increasingly more confrontational and deadly. One of the many unwanted collateral effects of northern Kenya's high levels of gun ownership is the increasingly deadly donkey rustling highlighted in an earlier section of this report.

6.5 ILLICIT ARMS & THE RISE OF ORGANISED CRIME

If political patronage gave rise to Kenya's urban gang culture, access to illicit arms allowed it to become an independent phenomenon. Here the link to Kenya's militarised northern tribes was vital, with increasingly efficient illicit arms supply routes established between Nairobi, Mombasa and the north by the mid-2000s. In turn, gangs based in Nairobi and Mombasa, as well as Eldoret, Thika and Kisumu, became important conduits for illicit arms trafficking between northern conflict zones and the Great Lakes and Central African regions, helping to fuel the First and Second Congolese Wars, the Burundian Civil War and the insurgencies which wracked northern Uganda.

Increased access to illicit arms enabled gangs to consolidate their control over Kenya's rapidly expanding urban spaces and to broaden their revenue streams by developing a diverse portfolio of illicit categories, not least narcotics. Similar patterns have played out across the region. In Tanzania, illicit arms fed the rise of violent crime rates in Dar es Salaam, Arusha, Mwanza and Mbeya throughout the 2000s, while urban violence is now also endemic in Uganda's cities.

6.6 CIVIL WARS IN SOUTH SUDAN & THE C.A.R.

Major conflicts on East Africa's doorstep in the past decade have helped to reheat the regional illicit arms market by attracting vast quantities of heavy weaponry and SALW. In several cases, regional powers have been complicit in furnishing these conflicts with munitions, with inevitable knock-on consequences for their own domestic security.

The civil war which began in South Sudan in 2013 and lasted until February 2020, at the cost of up to 400,000 lives and causing the displacement of several million, helped to trigger a new wave of illicit arms trafficking in the wider East Africa region.

The conflict was greatly exacerbated by the delay in imposing a UN arms embargo - belatedly implemented in July 2018 - allowing international and regional actors to continue providing uninterrupted consignments of legal arms for almost five full years. Unsurprisingly, a significant proportion of these munitions has subsequently been diverted onto the illicit market.

In the early phase of the conflict, legally procured arms consignments tended to reach South Sudan by one of two mechanisms. Either they were delivered directly by international manufacturers, especially from China, or they were provided indirectly by regional backers.

In May 2014, Chinese arms manufacturer China North Industries Corporation (Norinco) shipped an enormous consignment of arms to the Sudan People's Liberation Army (SPLA), including 20,000 grenades, 40,000 rockets, 1,200 anti-tank guided missiles and a host of smaller munitions, as well as 27 million rounds of ammunition. Although these transfers were entirely lawful, the numbers involved ensured a lively trade in subsequent illicit transfers, including to the rival Sudan People's Liberation Movement-in-Opposition (SPLM-IO).

During the early phase of the conflict, the Ugandan government provided considerable direct support to the SPLA, including in the form of Uganda People's Defence Forces (UPDF) troops deployed to Sudan. Uganda also served as an important transit point for heavy weaponry, including three Ukrainian-manufactured Mi-24 attack helicopters which were assembled in Entebbe before delivery to Juba.

Not all the support provided by Kampala during this phase was strictly legal. Arms belonging to the UPDF of Bulgarian, Slovak and Israeli manufacture, appeared to have been re-transferred to the SPLA in contravention of a long-standing EU embargo on arms supplies to Sudan and South Sudan and without authorisation from the Israeli government.

As the conflict ground on, the SPLM-IO found it increasingly difficult to source arms, as attested by a number of thwarted illicit deals, including one involving a militia group based in the C.A.R.

Around the same time, legal supplies of Russian arms to the government in the C.A.R. (Moscow was given an exemption from a 2013 UN arms embargo in December 2017) precipitated an arms race amongst the 14 militia groups involved in the ongoing civil war there, most of which turned to traffickers in Sudan and South Sudan in their search for illicit munitions.

The huge numbers of illicit arms in circulation in Sudan and South Sudan also threaten to fuel the emerging conflict in Ethiopia with authorities in Khartoum and Juba having little power to cut supply lines to the Tigray People's Liberation Front (TPLF). The Ethiopian government, which has been a major supplier of arms to the SPLA since the 1980s, including ammunition from its own munitions plant, Homicho Ammunition Engineering Industry (HAEI), now faces the prospect of Ethiopian-origin weaponry ending up in the hands of Tigrayan insurgents.

6.7 AL SHABAAB & THE YEMEN CONNECTION

Although Somalia has been under a UN arms embargo since 1992, arms trafficking remains pervasive, facilitated by its proximity to countries with a history of instability. Al Shabaab presents a potent security threat to a number of East African countries and preventing the terror group from acquiring lethal capacity remains one of the most vital priorities for the region.

The terror group's adaptiveness in terms of procuring munitions is well illustrated by the increasing lengths the international community has to go to in its efforts to frustrate Al Shabaab's access to explosive materials.

Since 2018, as its access to military-grade explosives diminished, Al Shabaab progressively turned to the use of Improvised Explosive Devices (IEDs). The group's ongoing access to the commercial and homemade materials which it uses in the manufacture of IEDs prompted the UN Security Council to expand its existing embargo to include such components in November 2019. Despite the expanded scope of the embargo, in 2020 the UN felt it necessary to issue a warning that Al Shabaab would most likely turn to the illicit market in order to procure these materials.

In recent years, Yemen has emerged as an important source of illicit arms trafficking to Somalia's semi-autonomous Puntland region, currently home to ISIS-affiliated insurgents as well as Al Shabaab, which has a stronghold in the Golis mountains.

Even before the outbreak of civil war in 2015, Yemen already had some of the highest levels of civilian gun ownership globally. Although domestic demand in Yemen remains high, weapons trafficked to Somalia can command a significant mark-up in price. A further draw for traffickers lies in the proximity of the Somali market, with speedboats taking only a matter of hours to traverse the Gulf of Aden.

An indirect source of illicit arms trafficking to Somalia comes from the Islamic Republic of Iran's supply of arms to the rebel Houthi faction in Yemen. Since 2015 and most recently in 2020, international naval forces have intercepted at least 10 vessels destined for Somalia carrying a wide array of Iranian-sourced munitions, including AK-pattern assault rifles, RPG launchers, anti-tank guided missiles, heavy and light machine guns as well as ammonium nitrate fertiliser (used in the making of explosives).

As well as providing Al Shabaab and ISIS with critical supplies of lethal munitions, illicit weapons originating in Yemen are also increasingly being detected in the domestic markets of East African countries, a concrete illustration of the collateral and unexpected damage caused by unchecked illicit arms flows.

6.8 IMPROVING RESILIENCE

The past two decades have seen East African and international bodies make considerable strides in terms of SALW trafficking.

The Nairobi Declaration on the illicit Proliferation of Small Arms and Light Weapons in the Great Lakes Region and Horn of Africa (2000), saw 10 regional governments commit to a coordinated regional plan of action to tackle SALW trafficking, including harmonising national laws, building institutional capacity and information sharing. In turn, the Nairobi Declaration indirectly influenced the formulation of the UN Program of Action (UN PoA) to Prevent, Combat and Eradicate the Illicit Proliferation of Small Arms and Light Weapons in All Its Aspects (2001), which established a politically binding legal framework specifically designed to tackle the illicit SALW trade, the first of its kind.

Although significant developments in terms of acknowledging the dangers posed by illegal SALW flows, both the Nairobi Declaration and UN PoA fell into the trap of focusing on the international sources of illicit arms, while ignoring the problem of domestic demand and trafficking within borders. This institutionalised blind spot was particularly damaging in the case of Kenya, where illicit arms flows increasingly occurred inside the country's borders.

EXTREMIST PROFILE

Islamic State in Somalia

Founded: 1987

Typology: Islamist militia, affiliate of ISIS

Following: 300

Area of Operation: Somalia

Illicit Portfolio: Arms

Fierce violence surrounding the election in 2007 spurred the Kenyan government into action. In the course of 2008, two disarmament drives recovered a combined tally of 151 firearms and more than 2,000 rounds of ammunition, while drawing stinging criticism for the heavy-handed behaviour of state security forces. A further operation conducted in 2010 led to the recovery of 1,201 firearms and 1,665 rounds of ammunition. However, a national survey of SALW ownership conducted by the Kenya National Focal Point (KNFP) in 2012 revealed that up to 680,000 weapons remained in civilian hands.

Further impetus for action came in the form of the Sustainable Development Goals (SDGs) adopted by United Nations members in 2015, which identified illicit arms flows as a major impediment to development. SDG Target 16.4 committed member states to significantly reducing illicit arms flows by 2030, as part of which member states are required to feed data pertaining to illicit arms seizures to the UN Office for Disarmament Affairs (UNODA) and the UNODC.

Although compliance from member states has overall been poor, Kenya has stood out in its efforts to provide information on SALW confiscations. The resulting data reveals a detailed portrait of Kenya's illicit arms landscape in the second half of the 2010s.

In 2017, the most recent year for which such data is available, the Kenyan government seized 51 machine guns, 5,720 rifles, 738 pistols, 840 revolvers, 2,136 shotguns, 202 submachine guns and 41 other SALWs (including rocket launchers), for a total haul of 9,728 units compared to 5,264 the year before. 33,608 rounds of ammunition and parts and components of weapons were seized in 2017 (compared to 21,141 in 2016). For both 2016 and 2017, all arms seizures made by Kenyan authorities were made within the country's national territory and not at its land borders, nor in its airports or water harbours.

7. RECOMMENDATIONS

A five-point plan for a safer, wealthier and more stable East Africa:

1. Treat crime, corruption, extremism and illicit trade as equal evils threatening national security
2. Adopt comprehensive multi-category anti-illicit trade strategies
3. Foster regional cooperation and enlist international support to fight illicit trade
4. Target law enforcement interventions to deter illicit trade and catch the perpetrators
5. Introduce surveillance tools to enforce manufacturing and market regulations to prevent the production and free circulation of illegal products

1: Treat crime, corruption, extremism and illicit trade as equal evils threatening national security

It is evident that crime, corruption, extremism and illicit trade are inextricably linked in East Africa.

Therefore, to combat the extremist, criminal and corrupt dangers facing the region it is imperative that national governments and appropriate regional bodies adopt an approach which treats illicit trade as an equivalent security threat. Illicit trade, extremism, crime and corruption must be seen as a composite whole. This can be achieved through, among other measures, closer harmonisation of legal penalties.

2: Adopt comprehensive multi-category anti-illicit trade strategies

Policies which focus only on individual categories of illicit trade, such as illegal timber smuggling or narcotics trafficking, ignore the fact that much of the illicit trade activity in the region is multi-category, such as when illicit rubies travel outwards on the same smuggling routes that carry inward flows of heroin.

In terms of erecting regional and state level anti-illicit infrastructure, Kenya is the current leader in the field. The country's Anti-Counterfeit Authority and inter-agency anti-illicit working group have provided a more comprehensive and concerted attempt to tackle the issue. Similar authorities should be instituted throughout the region. Where such bodies already exist, as in Kenya, they should be strengthened as a matter of urgency. Investments in anti-illicit infrastructure may be quickly repaid by the vast sums of money that can be recuperated in terms of lost tax revenue, as attested by Kenya's success in increasing legal tobacco share since the early 2000s.

Understanding illicit trade is the most important first step towards a comprehensive approach to the problem. In this regard, Kenya's National Illicit Trade Observatory represents a critical development. If the monitoring programme can fulfil its promise by throwing light on hidden corners of the illicit market it will have considerable ramifications for the efficacy of enforcement authority interventions, as well as public awareness of the issue. The Kenya National Focal Point (KNFP) on Small Arms and Light Weapons represents another valuable investment in monitoring systems by Nairobi. Similar monitoring systems should be implemented by other East African countries where they do not already exist.

Cooperation with international monitoring programmes for illicit trade, such as those run by the UNODC as a custodian of UN SDGs measurement tools, must improve. At present, Kenya is the only country in the wider region which consistently feeds data on illicit arms seizures to the UNODC, while Burundi has provided partial data. Internationally funded monitoring programmes such as these represent a cost-effective means for East African governments to boost their anti-illicit infrastructure, while also drawing international attention to the difficulties faced by the region.

Linked to the above, national governments should establish publicly available databases which record all illicit seizures. Such a move would greatly increase transparency and help prevent the re-sale of illicit product by corrupt officials, with further tangible rewards in the form of increased public trust.

3: Foster regional cooperation and enlist international support

Effective combatting of illicit trade requires a comprehensive regional approach, without which national-level interventions are doomed to fail.

The East African Community (EAC) has a significant role to play in this regard. As well as driving harmonisation of market standards (see below), the regional body must pressurise member states to adopt key measures designed to enhance enforcement cooperation. Member states should start by ratifying the EAC's East Africa Transboundary Ecosystem Bill.

As well as regional cooperation, international support will also be vital. United States DEA programmes have already proved to be a considerable success in terms of improving detection rates of narcotics trafficking. These and similar programmes should be enhanced and rolled out at a regional level, with particular focus on strengthening land-border and digital security capacity building.

The conflicts currently affecting the D.R.C. and the C.A.R. are fed by illicit trade. Assisting East African nations to cut off these illicit supply lines is therefore one of the most powerful interventions the international community can make in order to bring peace to Central Africa. Similarly, the international community must once again engage with East African governments to assist them in their battle against regional security threats such as ISIS, Ahlu Sunnah Wal Jamaah and Al Shabaab. As well as conventional military support, assisting the region to strengthen its anti-illicit infrastructure will be critical in the fight against extremism.

As part of the same measures, the international community must make its contributions to the region's security infrastructure contingent on anti-illicit reforms. The unconditional support given to certain East African administrations in the past in order to secure regional security goals has reduced the leverage of international donors to affect domestic reforms, including in terms of stamping out illicit trade networks.

Similarly, free trade deals struck between international parties and East African countries as well as the EAC, such as those currently being negotiated between Kenya and both the United States and the United Kingdom, represent a vital opportunity to ensure that anti-illicit measures are prioritised within the region.

Through the banning of commercial ivory markets, governments such as the United States, China and the United Kingdom have greatly assisted East Africa's war on the illegal wildlife trade. These countries, particularly China, must now go further. Beijing's February 2020 ban on wildlife consumption must be made permanent.

Global powers must enact strict and comprehensive 'Magnitsky'-style sanctions regimes that specifically target illegal wildlife trafficking so that poaching syndicates are no longer able to operate with impunity on the international stage. Given the threat posed by illegal wildlife trafficking, not only to animal populations but to human society also (through the spread of zoonotic diseases), such measures must be adopted with utmost urgency.

4: Law enforcement interventions to deter illicit trade & catch perpetrators

The value leeched from the region's legal economies by illicit trade causes innumerable harms, while reducing state resilience and increasing susceptibility to future illicit trafficking. Only by attaching greater risk to illicit activity can East Africa begin to turn the tide.

The region's legal and enforcement infrastructure requires both strengthening and fine-tuning.

The anti-narcotics law adopted by Uganda in 2016 has increased penalties for drug use without greatly enhancing the capacity of courts to prosecute senior members of narcotics trafficking networks. Similar measures may soon be introduced in Kenya if the Bill presently wending its way through the Kenyan legislature is enacted in its current form.

There is a difficult balance to be struck here. Criminalising drug use is proven to fail in terms of reducing addiction rates. On the other hand, the systematic use of 'strategic ant trafficking' by illegal organisations means harsher penalties for possession of small amounts of illicit products and substances are a necessary evil.

The region's lawmakers should ensure that the justice system imposes stringent sentencing on traffickers, even those carrying small amounts, while adopting a less punitive approach towards those possessing very small amounts that could only be intended for personal consumption.

With illicit opioid pharmaceuticals already in wide circulation, driving up addiction and overdose rates, and the prospect of counterfeit COVID-19 medicines adding a further layer of danger, the MEDICRIME Convention should be signed and ratified by all East African countries as a matter of urgency.

Border security controls in the region at present are far below what is required to prevent illicit trafficking. Increased rollout of One Stop Border Posts and integrated markets promise to improve the ease of doing cross-border trade and improve compliance of otherwise legitimate traders. However, preventing determined illicit trafficking will require training programmes for officials and better detection tools.

Online security measures are almost entirely absent within the region, allowing increasingly networked criminal organisations to procure and retail illicit product through remote orders. As well as strengthening domestic and regional frameworks, international and corporate expertise should be leaned on to address severe knowledge gaps within East African law enforcement agencies.

5: Introduce surveillance tools to enforce manufacturing and market regulations to prevent the production & free circulation of illegal products

In terms of market interventions, the region has a long way to go if it is to make progress in terms of bringing broad swathes of its economic activity into the formal economy.

Kenya's tobacco monitoring systems are the benchmark standard in the region, while the development of this infrastructure has had beneficial spill-over effects for the monitoring of other industries, such as alcohol. The country has and continues to reap a handsome reward for its investment in these systems.

Uganda's Digital Tax Stamps, although a welcome step in the right direction, will be easily outmanoeuvred if not complemented by comprehensive market surveillance and factory inspection regimes. Implementation of these measures will have immediate benefits in terms of the standing of Ugandan-origin products within the region and remove an important barrier to trade.

In line with this, Kampala should also, as a matter of utmost urgency, sign and ratify the Illicit Tobacco Trade Protocol (ITP) and erect the monitoring systems required for compliance under the protocol.

Market integration, a core objective of the EAC, is an exercise in trust. A customs union is only as strong as its weakest link. Once illicit product has successfully infiltrated the market, it can circulate within it with greater ease, due to the lack of internal checks. As well as strengthening important entry points such as Mombasa port and the region's secondary airports, the EAC must therefore make the harmonisation of market standards and the enforcement of those standards its main priority in terms of advancing its integrative agenda.

As an important bridge towards this, the EAC should establish a framework allowing for the investigation and prosecution of suspected illicit manufacturers by appropriate agencies from importing member states. At present, only national enforcement agencies have jurisdiction, making it difficult for member states which suspect that their markets are being infiltrated by counterfeit or substandard goods to have recourse to justice.

Bibliography

- Central African Republic traders in deadly battle over militia taxes in Bangui. (2019, December 27). BBC. Retrieved from https://www.bbc.co.uk/news/world-africa-50925562
- KRA suspends staff over Sh570m impounded ivory. (2015, May 20). Business Daily. Retrieved from https://www.businessdailyafrica.com/bd/economy/kra-suspends-staff-over-sh570m-impounded-ivory--2087690
- Truck driver charged with smuggling mahogany worth Ksh.1.4million. (2020, December 17). Citizentv.Co.Ke. Retrieved from https://citizentv.co.ke/news/truck-driver-charged-with-smuggling-mahogany-worth-ksh-1-4-m-2413269/?utm_source=relatedarticles&utm_medium=deeplinking&utm_campaign=AlsoRead
- Militant Islamists "behead more than 50" in Mozambique. (2020, November 9). BBC News. Retrieved from https://www.bbc.co.uk/news/world-africa-54877202
- Mozambique: Is Cabo Delgado the latest Islamic State outpost? (2020, May 5). BBC News. Retrieved from https://www.bbc.co.uk/news/world-africa-52532741
- How Mozambique's smuggling barons nurtured jihadists. (2018, June 2). BBC News. Retrieved from https://www.bbc.co.uk/news/world-africa-44320531
- President Uhuru Kenyatta petitioned over illicit liquor racket. (2018, January 17). Capital News. Retrieved from https://www.capitalfm.co.ke/news/2018/01/president-uhuru-kenyatta-petitioned-illicit-liquor-racket/
- Police Seize over 500 litres of Illicit Brew. (2020, March 19). Retrieved March 23, 2021, from https://www.kenyanews.go.ke/police-seize-over-500-litres-of-illicit-brew/
- Digital tax stamps will curb fake goods - URA. (2020, February 20). Daily Monitor. Retrieved from https://www.monitor.co.ug/uganda/business/technology/digital-tax-stamps-will-curb-fake-goods-ura--1876232
- Uganda seizes 750 pieces of ivory being smuggled from South Sudan. (2019, January 31). Al Jazeera. Retrieved from aljazeera.com/news/2019/1/31/uganda-seizes-750-pieces-of-ivory-being-smuggled-from-south-sudan
- African Peace Forum, & Project Ploughshares. (2006). Controlling Small Arms in the Horn of Africa and the Great Lakes Region: Supporting implementation of the Nairobi Declaration. Project Ploughshares. Retrieved from https://ploughshares.ca/wp-content/uploads/2012/08/controllingsmallarmsHorn.pdf
- African Union. (2017). African Union Master Roadmap Of Practical Steps To Silence The Guns In Africa By Year 2020. Retrieved from https://au.int/sites/default/files/documents/38304-doc-1_au_roadmap_silencing_guns_2020_pdf_en.pdf
- Agade Mkutu, K. (2005). Pastoralist Conflict, Governance and Small Arms in North Rift, North East Africa: The cases of Karamoja, Uganda; West Pokot; Dol Dot, Laikipia; and Baragoi, Samburu, Kenya. University of Bradford. Retrieved from https://halshs.archives-ouvertes.fr/tel-01266773
- Agutu, N. (2021, March 3). Two charged with smuggling sugar, milk worth Sh5m. The Star. Retrieved from https://www.the-star.co.ke/news/2021-02-10-two-charged-with-smuggling-sugar-milk-worth-sh5m/
- Alusala, N. (2015). Assessment Report on Cross-Border Small Arms and Light Weapons Trafficking Between the Democratic Republic of the Congo and the Republic of Burundi. Retrieved from https://aoav.org.uk/wp-content/uploads/2016/02/AOAV-DRC-Burundi-Border-Assessment-Report-FINAL_en.pdf
- Amadala, V. (2020, October 15). KRA warn officials aiding tax evasion at Namanga border. The Star. Retrieved from https://www.the-star.co.ke/business/kenya/2020-10-15-kra-warn-officials-aiding-tax-evesion-at-namanga-border/
- Anami, L. (2020, November 13). Cross-border traders in Busia to get market. The East African. Retrieved from https://www.theeastafrican.co.ke/tea/business/cross-border-traders-in-busia-to-get-market-3020220
- Anti-Counterfeit Authority. (2020). National Baseline Survey on Counterfeit and Other Forms of Illicit Trade in Kenya: Executive brief summary. Retrieved from https://www.aca.go.ke/images/2020/National_Baseline_Survey_Counterfeit_and_Illicit_Trade_In_Kenya.pdf
- Bahadur, J. (2020). Snapping Back Against Iran: The case of the Al Bari 2 and the UN arms embargo. Retrieved from https://globalinitiative.net/wp-content/uploads/2020/11/Snapping-back-against-Iran-The-case-of-the-Al-Bari-2-and-the-UN-arms-embargo_GITOC.pdf
- Bahadur, J. (2020). Following the Money: The use of the hawala remittance system in the Yemen-Somalia arms trade. Retrieved from https://globalinitiative.net/wp-content/uploads/2020/09/Following-the-money-The-use-of-the-hawala-remittance-system-in-the-Yemen–Somalia-arms-trade.pdf
- Barbigaba, J. (2020, December 15). Comesa counts pandemic linked economic losses. The East African. Retrieved from https://www.theeastafrican.co.ke/tea/business/comesa-counts-pandemic-linked-economic-losses-3229128
- Béraud-Sudreau, L., da Silva, D. L., Kuimova, A., & Wezeman, P. (2020). Emerging Suppliers in the Global Arms Trade. SIPRI Insights on Peace and Security, 13. Retrieved from https://www.sipri.org/sites/default/files/2020-12/sipriinsight2013_emerging_suppliers.pdf

COUNTER EXTREMISM PROJECT

- Bevan, J. (2009). Between a Rock and a Hard Place: Armed violence in African pastoral communities. Retrieved from http://www.genevadeclaration.org/fileadmin/docs/regional-publications/Armed-Violence-in-African-Pastoral-Communities.pdf
- Bevan, J. (2008). Blowback: Kenya's illicit ammunition problem in Turkana north district. Small Arms Survey. Retrieved from http://www.smallarmssurvey.org/fileadmin/docs/B-Occasional-papers/SAS-OP22-Kenya.pdf
- Bromley, M., Caparini, M., & Malaret, A. (2019). Measuring Illicit Arms And Financial Flows: Improving the assessment of Sustainable Development Goal 16. Retrieved from https://www.sipri.org/sites/default/files/2019-07/bp_1907_sdg_16.pdf
- Bromley, M., Maletta, G., & Brockmann, K. (2018). Arms transfer and SALW controls in the Middle East and North Africa: Mapping capacity-building efforts. SIPRI Background Paper. Retrieved from https://www.sipri.org/sites/default/files/2018-11/bp_1811_att_mena_1.pdf
- Carlson, K., Wright, J., and Dönges, H. (2015). In the Line of Fire: Elephant and rhino poaching in Africa. In E. G. B. and K. K. G. McDonald, E. LeBrun, A.A. del Frate (Ed.) (pp. 7–35). Geneva: Small Arms Survey. Retrieved from http://www.smallarmssurvey.org/fileadmin/docs/A-Yearbook/2015/eng/Small-Arms-Survey-2015-Chapter-01-EN.pdf
- Carlson, K. (2016). Measuring Illicit Arms Flows: Somalia. Small Arms Survey: Research Notes, 61. Retrieved from http://www.smallarmssurvey.org/fileadmin/docs/H-Research_Notes/SAS-Research-Note-61.pdf
- Cartwright, R., & Baric, A. (2018). The rise of counterfeit pharmaceuticals in Africa. ENACT, 2(6), 1–15. Retrieved from https://enact-africa.s3.amazonaws.com/site/uploads/2018-11-12-counterfeit-medicines-policy-brief.pdf
- Chutel, L. (2021, March 10). Mozambique's Forgotten Insurgency. Foreign Policy. Retrieved from https://foreignpolicy.com/2021/03/10/mozambiques-forgotten-insurgency/
- Conflict Armament Research. (2018). Weapon Supplies Into South Sudan's Civil War: Regional re-transfers and international intermediaries. Retrieved from https://www.conflictarm.com/reports/weapon-supplies-into-south-sudans-civil-war/
- Dutta, S. (Ed. . (2019). Confronting Illicit Tobacco Trade: A Global Review of Country Experiences. Retrieved from http://documents1.worldbank.org/curated/en/677451548260528135/pdf/133959-REPL-PUBLIC-6-2-2019-19-59-24-WBG-TobaccoIllicitTradeFINALvweb.pdf
- Economist Intelligence Unit (EIU). (2020). Democracy Index 2019: A year of democratic setbacks and popular protest. Retrieved from http://www.eiu.com/public/thankyou_download.aspx?activity=download&campaignid=democracyindex2019
- Eligh, J. (2020). A Shallow Flood: The diffusion of heroin in eastern and southern Africa. Retrieved from https://globalinitiative.net/wp-content/uploads/2020/05/A-Shallow-Flood-The-Diffusion-of-Heroin-in-Eastern-and-Southern-Africa-GITOC.pdf
- ENACT. (2019). Organised Crime Index Africa 2019. Retrieved from https://enact-africa.s3.amazonaws.com/site/uploads/2019-09-24-oc-index-2019.pdf
- Etyang, H. (2020, August 9). 400 crates of contraband beer from Uganda seized in Turkana. The Star. Retrieved from https://www.the-star.co.ke/counties/rift-valley/2020-08-09-400-crates-of-contraband-beer-from-uganda-seized-in-turkana/
- Faltas, S. (2018). Controlling Small Arms: practical lessons in civilian disarmament and anti-trafficking. BICC: Knowledge Notes, 3. Retrieved from https://www.bicc.de/uploads/tx_bicctools/bicc_Knowledge_Note_3_2018__Controlling_Small_Arms.pdf
- Financial Action Task Force (FATF). (2012). FATF Report: Illicit Tobacco Trade. Retrieved from https://www.fatf-gafi.org/media/fatf/documents/reports/Illicit Tobacco Trade.pdf
- Florquin, N., Hainard, E., & Jongleux, B. (2020). Trade Update 2020: An eye on ammunition transfers to Africa. Retrieved from http://www.smallarmssurvey.org/fileadmin/docs/S-Trade-Update/SAS-Trade-Update-2020.pdf
- Gastrow, P. (2011). Termites at Work: A report on transnational organized crime and state erosion in Kenya. Retrieved from https://globalinitiative.net/wp-content/uploads/2017/12/IPI-Termites-at-Work-A-Report-on-Transnational-Organized-Crime-and-State-Erosion-in-Kenya.pdf
- Global Initiative Against Transnational Organized Crime (GITOC). (2020). Annual Report 2020. Retrieved from https://globalinitiative.net/wp-content/uploads/2020/12/GI-TOC_Annual_Report_2020.pdf
- Haysom, S., & Opala, K. (2020). The Politics of Crime: Kenya's gang phenomenon. Retrieved from https://globalinitiative.net/wp-content/uploads/2020/11/The-politics-of-crime-Kenyas-Gang-Phenomenon_GITOCESAObs.pdf
- Heinrich, S., Wittman, T., Ross, J., Shepherd, C., Challender, D., & Cassey, P. (2017). The global trafficking of pangolins: A comprehensive summary of seizures and trafficking routes from 2010-2015.
- Hideg, G., & del Frate, A. A. (2021). Still Not There: Global violent deaths scenarios, 2019-30. Retrieved from http://www.smallarmssurvey.org/fileadmin/docs/T-Briefing-Papers/SAS-SANA-BP-GVD-scenarios.pdf
- Holtom, P., Bromley, M., & Simmel, V. (2012). Measuring International Arms Transfers. Retrieved from https://www.sipri.org/sites/default/files/files/FS/SIPRIFS1212.pdf
- Holtom, P., & Pavesi, I. (2018). Trade Update 2018: Sub-Saharan Africa in focus. Retrieved from http://www.smallarmssurvey.org/about-us/highlights/2018/highlight-trade-update-2018.html#:~:text=Trade Update 2018%3A Sub-Saharan Africa in Focus uses multiple,and importers of small arms.&text=Official data indicates that South,small arms during 2013–15.

COUNTER EXTREMISM PROJECT

- Human Rights Watch. (2002). Playing with Fire: Weapons proliferation, political violence, and human rights in Kenya. Human Rights Watch. Retrieved from https://www.hrw.org/reports/2002/kenya/Kenya0502
- International Alliance for Responsible Drinking (IARD). (2018). Alcohol in the Shadow Economy: Unregulated, untaxed, and potentially toxic. Retrieved from https://www.iard.org/getattachment/1b56787b-cc6d-4ebb-989f-6684cf1df624/alcohol-in-the-shadow-economy.pdf
- International Committee of the Red Cross. (1999). Arms Availability and the Situation of Civilians in Armed Conflict. Retrieved from http://www.icrc.org/eng/resources/documents/publication/p0734.htm
- INTERPOL. (2020). Assessment of COVID-19 Pandemic Impact on Illicit Medication in East Africa. Retrieved from https://enact-africa.s3.amazonaws.com/site/uploads/2020-12-03-Covid-19 illicit-medications-east-africa-pdf.pdf
- Jorgic, D. (2015, June 15). Kenya wages war on smugglers who fund Somali militants. Reuters. Retrieved from https://www.reuters.com/article/us-kenya-security-somalia-insight-idUSKBN0P105320150621
- Kenya Police Service. (2018). Annual Crime Report 2018. Retrieved from https://www.nationalpolice.go.ke/crime-statistics.html
- Kenya Revenue Authority. (2020, October 9). Press Release: KRA seize alcoholic products affixed with counterfeit excise stamps worth Ksh. 12 million. Retrieved from https://www.kra.go.ke/en/media-center/press-release/978-kra,-seize-alcoholic-products-affixed-with-counterfeit-excise-stamps-worth-ksh-12-million
- Kenya Revenue Authority. (2018, August 30). Press Release: Excisable goods worth Ksh 1.2 million seized, destroyed in Nairobi. Retrieved from https://www.kra.go.ke/en/media-center/press-release/371-excisable-goods-worth-ksh-1-2-million-seized,-destroyed-in-nairobi
- Kenya Revenue Authority. (2020, December 1). Press Release: KRA foils attempt to smuggle contraband goods at Taveta border. Retrieved from https://www.kra.go.ke/en/media-center/press-release/1017-kra-foils-attempt-to-smuggle-contraband-goods-at-taveta-border
- Kenya Revenue Authority. (2020, October 27). Press Release: Two suspects charged in court for smuggling sugar from Uganda. Retrieved from https://www.kra.go.ke/en/media-center/press-release/988- two-suspects-charged-in-court-for-smuggling-sugar-from-uganda
- Kenya Revenue Authority. (2018, August 30). Press Release: KRA suspends officers in irregular sale of ethanol. Retrieved from https://www.kra.go.ke/en/media-center/press-release/370-kra-suspends-officers-in-irregular-sale-of-ethanol
- Kingma, K., Muhereza, F., Murray, R., Nowak, M., & Thapa, L. (2012). Security provision and Small Arms in Karamoja: A survey of perceptions. Small Arms Survey. Retrieved from http://www.smallarmssurvey.org/fileadmin/docs/C-Special-reports/SAS-SR17-Karamoja.pdf
- Kisero, J. (2020, September 17). Step up war on cigarette smuggling. Business Daily. Retrieved from https://www.businessdailyafrica.com/bd/opinion-analysis/columnists/step-up-war-on-cigarette-smuggling-2301588
- Kivuva, E. (2018, August 7). Counterfeit pesticides cost farmers Sh120bn. The Star. Retrieved from https://www.the-star.co.ke/counties/2018-08-06-counterfeit-pesticides-cost-farmers-sh120bn/
- Ladu, I. (2021, February 17). Poor messaging failing bid to widen tax base - study. Daily Monitor. Retrieved from https://www.monitor.co.ug/uganda/business/finance/poor-messaging-failing-bid-to-widen-tax-base-study--3295082
- Lawson, K., & Vines, A. (2014). Global Impacts of the Illegal Wildlife Trade: The costs of crime, insecurity and institutional erosion. Retrieved from https://www.chathamhouse.org/sites/default/files/public/Research/Africa/0214Wildlife.pdf
- Lemieux, A. M., & Clarke, R. V. (2009). The international ban on ivory sales and its effects on elephant poaching in Africa. British Journal of Criminology, 49(4), 451–471. https://doi.org/10.1093/bjc/azp030
- Lezhnev, S. (2016). A Criminal State: Understanding and countering institutionalized corruption and violence in the Democratic Republic of Congo. Retrieved from https://enoughproject.org/files/A_Criminal_State_Enough_Oct2016_web.pdf
- Lumbe, R. (2020, December 1). Nakuru gangs leave a trail of blood and tears. People Daily. Retrieved from https://www.pd.co.ke/news/nakuru-gangs-leave-a-trail-of-blood-and-tears-60782/
- Lutta, S. (2020, August 7). Officials seize smuggled beer, marijuana in Turkana. Daily Nation. Retrieved from https://allafrica.com/stories/202008070669.html
- Mahr, K. (2017, April 4). Tanzania struggles to end child labor from the lure of gold. Reuters. Retrieved from https://www.reuters.com/article/us-tanzania-mining-children-feature/tanzania-struggles-to-end-child-labor-from-the-lure-of-gold-idUSKBN176007
- Maina, N. (2020, December 19). Transform the sugar sector once and for all. Retrieved from https://nation.africa/kenya/business/seeds-of-gold/transform-the-sugar-sector-once-and-for-all--3233134
- Mawejje, J. (2013). Tax Evasion, Informality and the Business Environment in Uganda. Economic Policy Research Centre: Research Series, (113).
- Maze, K., & Rhee, H. (2007). International Assistance for Implementing the UNPoA on the Illicit Trade in Small Arms and

Light Weapons in All Its Aspects: Case study of East Africa.

- Mellersh, N. (2015, November 17). Crossing borders: East African integration. African Law & Business. Retrieved from https://iclg.com/alb/5967-crossing-borders-east-african-integration
- Melvin, N. (2019). The Foreign Military Presence in the Horn of Africa Region. Stockholm International Peace Research Institute (SPRI), (April). Retrieved from https://sipri.org/sites/default/files/2019-04/sipribp1904.pdf
- Melvin, N. (2019). The New External Security Politics Of The Horn Of Africa Region. SIPRI Insights on Peace and Security, 2. Retrieved from https://www.sipri.org/sites/default/files/2019-05/hoa_pb_april_2019_1.pdf
- Melvin, N. (2019). Managing The New External Security Politics Of The Horn Of Africa Region. Retrieved from https://www.sipri.org/sites/default/files/2019-05/sipriinsight1904_1.pdf
- Mkutu, K. (2001). Pastoralism and Conflict in the Horn of Africa. Retrieved from https://www.saferworld.org.uk/resources/publications/75-pastoralism-and-conflict-in-the-horn-of-africa
- Muingi, S. (2020, December 2). KRA seizes goods worth Sh10 million at Taveta border post. The Star. Retrieved from https://www.the-star.co.ke/counties/coast/2020-12-02-kra-seizes-goods-worth-sh10-million-at-taveta-border-post/
- Mutinda Musau, B. (2016). Rethinking Disarmament in the Horn Of Africa: A comparison of initiatives in Kenya and Uganda. University of Nairobi. Retrieved from http://erepository.uonbi.ac.ke/handle/11295/98772
- Mwere, D. (2020, December 10). Bill proposes 50-year term for traffickers of banned drugs. Daily Nation. Retrieved from https://nation.africa/kenya/news/bill-proposes-50-year-term-traffickers-banned-drugs-3224096
- Ndawana, E., Hove, M., & Ghuliku, S. (2018). Tanzania: Small arms proliferation in East Africa and national security. Conflict Studies Quarterly, (23), 48–77. https://doi.org/10.24193/csq.23.3
- Nelson, A. (2020). A Triangle of Vulnerability: Changing patterns of illicit trafficking off the Swahili coast. Retrieved from https://globalinitiative.net/wp-content/uploads/2020/06/Triangle-of-Risk.-web.pdf
- Nwuneli, N. (2018, March 10). Fake processed food is becoming an epidemic in African urban life. Quartz Africa. Retrieved from https://qz.com/africa/1226112/fake-food-or-fraud-food-in-nigeria-kenya-and-other-african-countries/
- Nyasuguta, F. (2020, July 27). 10,000 litres smuggled milk seized in Turkana. The Star. Retrieved from https://www.the-star.co.ke/counties/rift-valley/2020-07-27-10000-litres-smuggled-milk-seized-in-turkana/
- Organisation for Economic Co-operation and Development (OECD). (2016). Illicit Trade: Converging Criminal Networks. OECD. https://doi.org/10.1787/9789264251847-en
- Protus, C. (2020, December 28). KDF Special Forces kill Al-Shabaab militants in Boni Forest. Kenyan News. Retrieved from https://kenyannews.co.ke/news/kdf-special-forces-kill-al-shabaab-militants-in-boni-forest/
- Rasmussen, J. (2017). Sweet Secrets: Sugar Smuggling and State formation in The Kenya-Somalia Borderlands. Danish Institute for International Studies, 1–34. Retrieved from https://www.jstor.org/stable/resrep13466?seq=1#metadata_info_tab_contents
- Richards, J. (2013). Demobilization in the DRC: Armed Groups and the Role of Organizational Control. Small Arms Survey: Armed Actors Issue Brief, 1. Retrieved from http://www.smallarmssurvey.org/about-us/highlights/highlight-drc-ddr-issue-brief.html
- Ross, H. (2017). Tracking and tracing tobacco products in Kenya. Preventive Medicine, 105, S15–S18. https://doi.org/10.1016/j.ypmed.2017.04.025
- Ross, H. (2015). Controlling Illicit Tobacco Trade: International experience. Retrieved from https://tobacconomics.org/uploads/misc/2015/05/Ross_International_experience_05.28.15.pdf
- Ross, H., Vellios, N., Smith, K. C., Ferguson, J., & Cohen, J. E. (2015). A closer look at 'Cheap white' cigarettes. Tobacco Control, 25(5), 527–531. https://doi.org/10.1136/tobaccocontrol-2015-052540
- Rugadya, N. (2021, February 12). Digital tax stamp faked, four arrested. Uganda Radio Network. Retrieved from https://ugandaradionetwork.net/story/digital-tax-stamp-faked-four-arrested
- Shaw, M., Nellemann, C., & Stock, J. (2018). World Atlas of Illicit Flows. INTERPOL and Global Initiative Against Transnational Organized Crime (GITOC). Retrieved from https://globalinitiative.net
- Shaw, M., Reitano, T., Haysom, S., & Tinti, P. (n.d.). States on the Cusp: Overcoming illicit trade's corrosive effects in developing economies. Retrieved from https://globalinitiative.net/wp-content/uploads/2020/10/States-on-the-Cusp-Overcoming-illicit-trades-corrosive-effects-in-Developing-Economies.pdf
- Small Arms Survey. (2019). Weapons Compass: Mapping illicit small arms flows in Africa. Retrieved from http://www.smallarmssurvey.org/fileadmin/docs/S-Trade-Update/SAS-Trade-Update-2020.pdf
- Stanyard, J. (2020). Gangs in Lockdown: Impact of Covid-19 restrictions on gangs in east and southern Africa. Retrieved from https://globalinitiative.net/wp-content/uploads/2020/10/Gangs-in-lockdown-Impact-of-Covid-19-restrictions-on-gangs-in-east-and-southern-Africa-GITOC.pdf
- Taylor, P. (2019, August 19). Kenya reports another illegal sugar seizure. Securing Industry. Retrieved from https://www.

securingindustry.com/food-and-beverage/kenya-reports-another-illegal-sugar-seizure/s104/a10571/#.YFpUekj7RhG

- Taylor, P. (2019, January 30). Africa needs more tools to fight falsified medicines. Securing Industry. Retrieved from https://www.securingindustry.com/pharmaceuticals/africa-needs-more-tools-to-fight-falsified-medicines/s40/a9155/#.YFvJjkj7RQL
- Titeca, K., Joossens, L., & Raw, M. (2011). Blood cigarettes: Cigarette smuggling and war economies in central and eastern Africa. Tobacco Control, 20(3), 226–232. https://doi.org/10.1136/tc.2010.041574
- Transnational Alliance to Combat Illicit Trade (TRACIT). (2019). Mapping the Impact of Illicit Trade on the Sustainable Development Goals. Retrieved from https://unctad.org/system/files/non-official-document/DITC2020_TRACIT_IllicitTradeandSDGs_summary_en.pdf
- Transparency International Kenya. (2017). Kenya's Task Force on Anti-Corruption for REDD+: Assessment report. Transparency International Kenya. Retrieved from https://images.transparencycdn.org/images/2017_report_TI_KenyasTaskForceOnAnti-corruptionForREDD_EN_v2.pdf
- Truth, Justice, and R. C. (2008). Commissions of Inquiry - CIPEV Report (Waki Report). Retrieved from https://digitalcommons.law.seattleu.edu/tjrc-gov/5
- United Nations Office on Drugs and Crime (UNODC). (n.d.). UNODC DATA. Retrieved from https://dataunodc.un.org/
- United Nations Office on Drugs and Crime (UNODC). (2020). Issue Paper: Supporting evidence-based action to counter illicit firearms trafficking and related forms of crime. Retrieved from https://www.unodc.org/documents/firearms-protocol/2020/IAFQ-issue-paper-2020-04-27-WEB.pdf
- United Nations Office on Drugs and Crime (UNODC). (2020). Global Study on Firearms Trafficking 2020. Vienna. Retrieved from https://www.unodc.org/documents/data-and-analysis/Firearms/2020_REPORT_Global_Study_on_Firearms_Trafficking_2020_web.pdf
- United Nations Office on Drugs and Crime (UNODC). (2016). Issue Paper: The firearms protocol and the arms trade treaty: divergence or complementarity? Retrieved from https://www.unodc.org/documents/firearms-protocol/SynergiesPaper.pdf
- United Nations Office on Drugs and Crime (UNODC). (2015). Summary Data From Country Responses on Firearms Seizures and Trafficking. Retrieved from https://www.unodc.org/documents/firearms-protocol/Country_Factsheet_WEB.pdf
- United Nations Office on Drugs and Crime (UNODC). (2020). Global Study on Firearms Trafficking 2020. Retrieved from https://www.unodc.org/documents/data-and-analysis/Firearms/2020_REPORT_Global_Study_on_Firearms_Trafficking_2020_web.pdf
- United Nations Office on Drugs and Crime (UNODC). (2015). UNODC Study on Firearms 2015: A study on the transnational nature of and routes and modus operandi used in trafficking in firearms (Vol. 53). Retrieved from https://www.unodc.org/documents/firearms-protocol/UNODC_Study_on_Firearms_WEB.pdf
- United Nations Regional Centre for Peace and Disarmament in Africa (UNREC). (2011). Regulating Small Arms Brokering in Eastern Africa. Retrieved from https://www.unrec.org/docs/Small Arms Brokering in Eastern Africa.pdf
- United Nations Security Council (UNSC). (2018). from the Group of Experts on the Democratic Republic of the Congo addressed to the President of the Security Council.
- United Nations Security Council (UNSC). (2008). S/2008/773 - Letter dated 10 December 2008 from the Chairman of the Security Council Committee established pursuant to resolution 1533 (2004) concerning the Democratic Republic of the Congo addressed to the President of the Security Council. Retrieved from https://www.undocs.org/S/2008/773
- United Nations Security Council (UNSC). (2005). S/2005/30 - Letter dated 4 January 2005 from the Group of Experts on the Democratic Republic of the Congo addressed to the Chairman of the Security Council Committee established pursuant to resolution 1533 (2004) concerning the Democratic Republic of the. Retrieved from https://www.undocs.org/S/2005/30
- United Nations Security Council (UNSC). (2020). S/2020/949 - Letter dated 28 September 2020 from the Panel of Experts on Somalia addressed to the Chair of the Security Council Committee pursuant to resolution 751 (1992) concerning Somalia. Retrieved from https://www.undocs.org/en/S/2020/949
- United Nations Security Council (UNSC). (2019). S/2019/930 - Letter dated 6 December 2019 from the Panel of Experts on the Central African Republic extended pursuant to resolution 2454 (2019) addressed to the President of the Security Council. Retrieved from https://undocs.org/S/2019/930
- United Nations Security Council (UNSC). (2019). S/RES/2498 - Resolution 2498 (2019). Retrieved from https://undocs.org/en/S/RES/2498(2019)
- United Nations Security Council (UNSC). (2019). S/RES/2488 - Resolution 2488 (2019). Retrieved from https://undocs.org/en/S/RES/2488(2019)
- United Nations Security Council (UNSC). (2020). S/RES/2528 - Resolution 2528 (2020). Retrieved from https://undocs.org/S/RES/2528(2020)
- United Nations Security Council (UNSC). (2019). S/2021/79 - Letter dated 22 January 2021 from the Panel of Experts on

Yemen addressed to the President of the Security Council. Retrieved from https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/S_2021_79.pdf

- United Nations Security Council (UNSC). (2013). S/2013/413 - Letter dated 12 July 2013 from the Chair of the Security Council Committee pursuant to resolutions 751 (1992) and 1907 (2009) concerning Somalia and Eritrea addressed to the President of the Security Council. Retrieved from https://www.securitycouncilreport.org/atf/cf/%7B65BFCF9B-6D27-4E9C-8CD3-CF6E4FF96FF9%7D/s_2013_413.pdf
- United Nations Security Council (UNSC). (2018). S/2018/1002 - Letter dated 7 November 2018 from the Chair of the Security Council Committee pursuant to resolutions 751 (1992) and 1907 (2009) concerning Somalia and Eritrea addressed to the President of the Security Council. Retrieved from https://undocs.org/S/2018/1002
- United Nations Security Council (UNSC). (2019). S/2019/858 - Letter dated 1 November 2019 from the Chair of the Security Council Committee pursuant to resolution 751 (1992) concerning Somalia addressed to the President of the Security Council. Retrieved from https://undocs.org/S/2019/858
- United States Department of State Bureau for International Narcotics and Law Enforcement Affairs. (2021). International Narcotics Control Strategy Report - Volume I: Drug and chemical control (as submitted to Congress). Retrieved from https://www.state.gov/2021-incsr-volume-i-drug-and-chemical-control-as-submitted-to-congress/
- United States Department of State Bureau for International Narcotics and Law Enforcement Affairs. (2021). International Narcotics Control Strategy Report - Volume II: Money laundering (as submitted to Congress) (Vol. II). Retrieved from https://www.state.gov/2021-incsr-volume-ii-money-laundering-as-submitted-to-congress/
- USAID Bureau for Africa. (2020). Illicit trade: Convergence of criminal networks. Retrieved from https://globalinitiative.net/wp-content/uploads/2020/03/ROL-and-OC-White-Paper-4-Criminal-Market-Convergence-March-2020.pdf
- Wafula, P. (2021, February 22). URA impounds wine, spirits with forged digital stamps. Daily Monitor. Retrieved from https://www.monitor.co.ug/uganda/business/commodities/ura-impounds-wine-spirits-with-forged-digital-stamps-3299946
- Walker, S. (2020, February 26). Illicit economies fuel CAR conflict - UN. Global Initiative Against Transnational Organized Crime (GITOC). Retrieved from https://globalinitiative.net/analysis/illicit-flows-car-conflict/
- Wanja, C. (2019, April 19). Fake phones worth over Ksh10m seized in Nairobi. KBC. Retrieved from https://www.kbc.co.ke/fake-phones-worth-over-ksh10m-seized-in-nairobi/
- Warigia Karingu, A., & Karanja Ngugi, P. (2013). Determinants of the Infiltration of Counterfeit Agro-Based Products in Kenya: A Case of Suppliers in Nairobi. International Journal of Social Sciences and Entrepreneurship, 1(5), 28–36. Retrieved from http://www.ijsse.orghttp//www.ijsse.org
- Weiss, T. (2004). Guns in the borderlands: Reducing the demand for small arms. Retrieved from https://media.africaportal.org/documents/Mono95.pdf
- Wepundi, M., Nthiga, E., Kabuu, E., Murray, R., & del Frate, A. A. (2012). Availability of Small Arms and Perceptions of Security in Kenya : An assessment. Retrieved from http://www.smallarmssurvey.org/fileadmin/docs/C-Special-reports/SAS-SR16-Kenya.pdf
- Weru, S. (2016). Wildlife Protection and Trafficking Assessment in Kenya: Drivers and trends of transnational wildlife crime in Kenya and its role as a transit point for trafficked species in East Africa.
- Williams, P., & Ali, H. Y. (2020). The European Union Training Mission in Somalia: An assessment. SIPRI Background Paper. Retrieved from https://www.sipri.org/sites/default/files/2021-02/bp_2011_eutm_somalia_3.pdf
- World Bank Group. (2020). Doing Business 2020: Comparing business regulation in 190 economies. Retrieved from http://documents1.worldbank.org/curated/en/688761571934946384/pdf/Doing-Business-2020-Comparing-Business-Regulation-in-190-Economies.pdf
- World Economic Forum. (2021). Connecting Countries and Cities for Regional Value Chain Integration: Operationalizing the AfCFTA. Retrieved from http://www3.weforum.org/docs/WEF_Regional_Value_Chain_Integration_Automotive_Case_Study_2021.pdf
- World Health Organisation. (2012). Joint National Capacity Assessment On The Implementation Of Effective Tobacco Control Policies In Kenya. Retrieved from https://apps.who.int/iris/bitstream/handle/10665/76700/9789241504393_eng.pdf?sequence=1&isAllowed=y

COUNTER
EXTREMISM
PROJECT