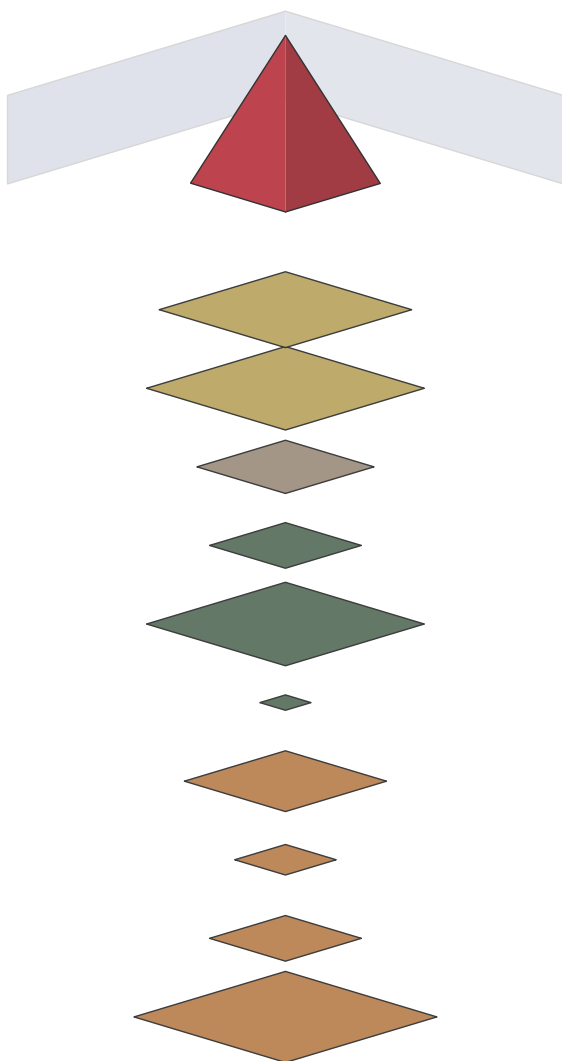




COMOROS



3.86 CRIMINALITY SCORE

47th of 54 African countries
9th of 13 Southern African countries



CRIMINAL MARKETS **3.85**

HUMAN TRAFFICKING	5.00
HUMAN SMUGGLING	5.50
ARMS TRAFFICKING	3.50
FLORA CRIMES	3.00
FAUNA CRIMES	5.50
NON-RENEWABLE RESOURCE CRIMES	1.00
HEROIN TRADE	4.00
COCAINE TRADE	2.00
CANNABIS TRADE	3.00
SYNTHETIC DRUG TRADE	6.00



CRIMINAL ACTORS **3.88**

MAFIA-STYLE GROUPS	1.00
CRIMINAL NETWORKS	4.50
STATE-EMBEDDED ACTORS	6.00
FOREIGN ACTORS	4.00



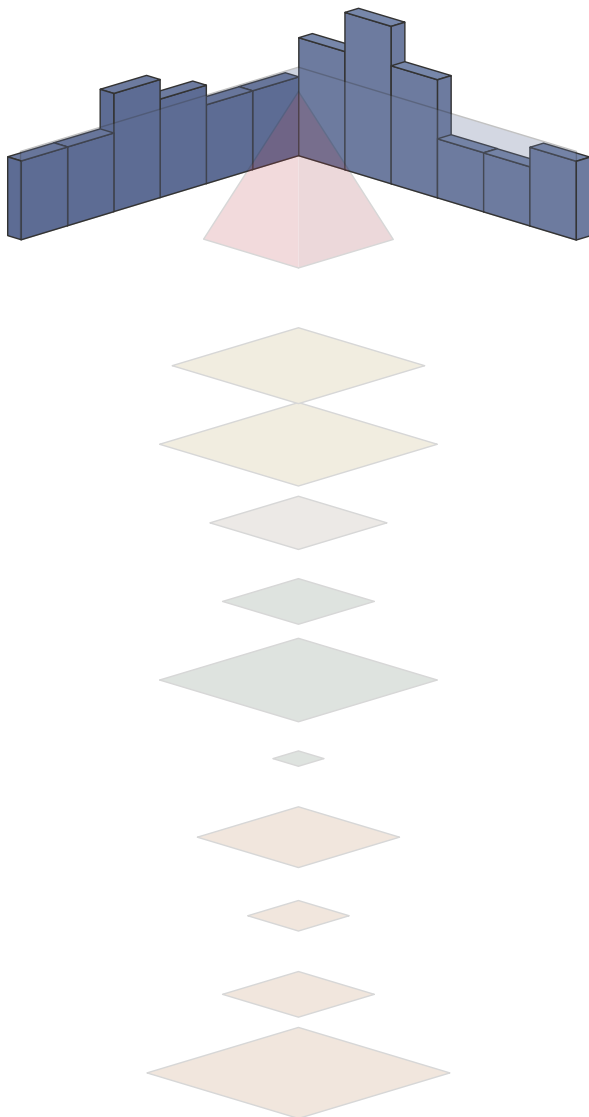
2.38 RESILIENCE SCORE

45th of 54 African countries
13th of 13 Southern African countries





COMOROS



2.38 RESILIENCE SCORE

45th of 54 African countries
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POLITICAL LEADERSHIP AND GOVERNANCE	2.00
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	2.00
INTERNATIONAL COOPERATION	3.00
NATIONAL POLICIES AND LAWS	2.50
JUDICIAL SYSTEM AND DETENTION	2.00
LAW ENFORCEMENT	2.00
TERRITORIAL INTEGRITY	3.00
ANTI-MONEY LAUNDERING	4.00
ECONOMIC REGULATORY CAPACITY	3.00
VICTIM AND WITNESS SUPPORT	1.50
PREVENTION	1.50
NON-STATE ACTORS	2.00



3.86 CRIMINALITY SCORE

47th of 54 African countries
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CRIMINAL MARKETS 3.85



CRIMINAL ACTORS 3.88



CRIMINALITY

Criminal Markets

PEOPLE

The Comoros is a country of origin and a waypoint for victims, mainly women, being trafficked from Africa into the Arabian Gulf for sex work and forced labour. It is also a destination country for forced labour and the exploitation of children.

Human smuggling into Mayotte, which has higher living standards than the Comoros islands, is common and profitable, and has a significant influence on the political economy of both Mayotte and the Comoros. Smuggling businesses are emerging and growing across the islands, especially in Anjouan, as greater numbers of people emigrate irregularly from the Comoros and neighbouring islands. The Comoros is too remote to play a major role in the human-smuggling industry, but the high number of deaths at sea as a result of the smuggling is a grave concern.

TRADE

The Comoros plays a negligible role in transnational arms trafficking and there are extremely low levels of armed violence on the islands. However, the country is affected by the rampant crimes occurring in the Indian Ocean, including trafficking, piracy and illegal fishing. Cases of piracy and armed robbery are growing, and the use of light weapons, usually acquired from brokers operating in the Indian Ocean, is common among drug traffickers and pirates.

ENVIRONMENT

The Comoros is a large producer of vanilla, where an illicit trade runs parallel to the legal trade. There are reports of the country acting as a transit point for illicit Madagascan logs. There has been rapid clearing of land due to population growth and urban development, and while it is not tied to organized crime, it may contribute to unregulated and illicit deforestation.

Illegal fishing is a large problem in the Mozambique Channel and significantly affects the Comoros. While vessels from China and other Asian countries have been identified as the main culprits, there have been vessels sailing under the Comoros flag that have also been implicated. Most of the Comorian fleet has no

connection to the country and operates in breach of national laws, mainly in the waters of West Africa. This has led to the EU issuing the Comoros a red card over its complicity in illegal, unreported and unregulated fishing. Moreover, tortoise trafficking is a major issue and there are also reports of shark fin moving between the Comoros and Madagascar. There are no recent reports of a non-renewable resource crimes market operating in the country.

DRUGS

Heroin is imported into the Comoros from Tanzania and Madagascar, primarily through maritime entry points. The Comoros is primarily a destination market for heroin, although there have been some instances of Comorian mules with heroin detained in Mauritius and France. Additionally, poor governance structures and proximity to growing heroin redistribution hubs (particularly Madagascar) could mean that the Comoros' transit role could grow in the future. Because of the extreme poverty that the majority of the population experiences and the high price of the drug, the cocaine market is very small in the Comoros and for the most part concentrated in the capital, Moroni. Nevertheless, due to its geographical location, the country may become an attractive transit location for cocaine trafficking in the future.

The domestic use of cannabis is widespread, and the drug is both cultivated on the island and imported from Madagascar and Tanzania. Some cannabis resin imported into the Comoros is exported onwards to Mayotte. Synthetic-drug use is a growing concern in the Comoros, especially among the youth, with the country operating predominantly as a destination market with little onward transit. Synthetic drugs are cheap and widely accessible. The use of synthetic cannabinoids is growing and has been blamed for an increase in local theft and domestic and social problems.

Criminal Actors

The Comorian state facilitates or is actively involved in most illicit markets on the islands, with corruption being particularly focused on human trafficking. Human smuggling to Mayotte is fully state-sanctioned, as the state does not recognize an international boundary. Loose criminal networks are also operational in the Comoros. As the local drug market grows, domestic criminal networks are developing and profiting, while Tanzanian



networks importing heroin are well established. Criminal networks are mainly centred on human trafficking and child labour, exploiting the desires of families to move their children to Grande Comore. A significant number of people in the Comoros, especially fishermen, are employed by human-smuggling networks from Mayotte.

In Comoros, the smuggling and trafficking of people is largely facilitated by state actors, but international

syndicates are primarily responsible for the transportation of people to and from the islands. Tanzanian actors are predominantly involved in drug trafficking, while vanilla smuggling is suspected to be facilitated by Madagascan nationals. They also play a significant role in importing drugs and tortoiseshells from Madagascar, but not in domestic distribution. There is no reported existence of mafia groups or equivalents in the Comoros.

RESILIENCE

LEADERSHIP AND GOVERNANCE

There have been minimal efforts on the part of the government to curb organized crime, and a lack of political coordination between the three main islands hampers effective governance. The Comoros remains a fragile state, and since 2009, the government and the opposition have been at odds over attempts to change the constitution, which has taken all focus from tackling organized crime. The 2018 referendum resulted in the presidential term being extended and power being concentrated, contrary to the constitution limiting presidential terms and stipulating that the presidency must rotate between each of the three main islands. The referendum was boycotted by a large portion of the electorate and there have been concerns around vote rigging. The Comoros thus has one of the highest corruption perceptions globally and is often described as an emerging dictatorship.

The Comoros is party to some international treaties pertaining to organized crime, but the country has been 'red-carded' by the EU and labelled as non-cooperative due to its insubstantial efforts to curb illegal fishing. Political relationships between the Comoros and France (relevant due to their proximity to Mayotte) fluctuate, but are generally difficult. There appear to be very few extradition agreements between the Comoros and other nations and international cooperation appears to be very limited. The legal system in the Comoros is hybrid in nature, using indigenous customary law, Islamic law and French civil law. The legal system is underdeveloped, and the legislative framework in place to combat organized crime is insufficient, falling below international standards.

CRIMINAL JUSTICE AND SECURITY

Courts are underresourced and overburdened in the Comoros. Courts in the country also suffer an undue degree of political interference from the executive, as demonstrated by the suspension of the constitutional court in 2018 by executive order from the president. The perception amongst stakeholders on the islands is that enforcement is weak and corruption is endemic throughout the judiciary and among members of the legal profession, leading to informal justice systems being preferred to the formal systems. Similarly, corruption is endemic in law enforcement and police officers are known to collude with criminal networks across a range of markets, actively facilitating criminal activities. The rule of law is weak in the Comoros and authorities show little interest in improving standards of training or in tackling issues of corruption and criminal facilitation. As the Comoros consists of three main islands, maintaining border security is difficult and the border police is underresourced. Maritime surveillance capacity is extremely limited, as is the security infrastructure at the two main ports of the islands. Informal ports and harbours across the islands enable smaller boats to disembark and dock undetected. It is also worth noting that the government refuses to recognize the national boundary between the Comoros and Mayotte.

ECONOMIC AND FINANCIAL ENVIRONMENT

The financial system in the Comoros is underdeveloped and the country lacks the means to estimate proceeds of illicit activity. However, due to its underdeveloped financial system, many forms of sophisticated financial e-commerce crime are made impossible. Although money laundering is criminalized, policies are poorly implemented and systems for identifying instances



of money laundering are weak. The Comoros does not have an environment suitable for businesses to thrive. Entrepreneurs are unsupported, most citizens are employed in the informal sector and regulatory capacity is extremely poor. The financial system is broadly mistrusted due to political interference and the justice system has provided more support to non-paying creditors than lending institutions.

CIVIL SOCIETY AND SOCIAL PROTECTION

Insufficient support is offered to victims of organized crime, and human-trafficking victims are often housed by government employees themselves due to insufficient resources. There is also no support available for drug users, and civil-society organizations have to be privately funded and lack adequate resources. There are minimal measures in place to prevent organized crime, with the government's efforts to provide training and prevent trafficking in human beings severely lacking. Drugs are openly available in many parts of the islands, and there are limited arrests and no apparent targeting of high-level operators. Along with lack of funding and dependence on foreign donors, repressive measures have recently been taken against civil-society organizations as well as media outlets. After the controversial referendum in 2018, the media landscape has worsened considerably, with journalists experiencing a number of freedom violations, including arrests, attacks and intimidation. As a result, some journalists have been forced to flee Comoros. Strict defamation laws also impede freedom of press and contribute to the deteriorating media environment in the country.

