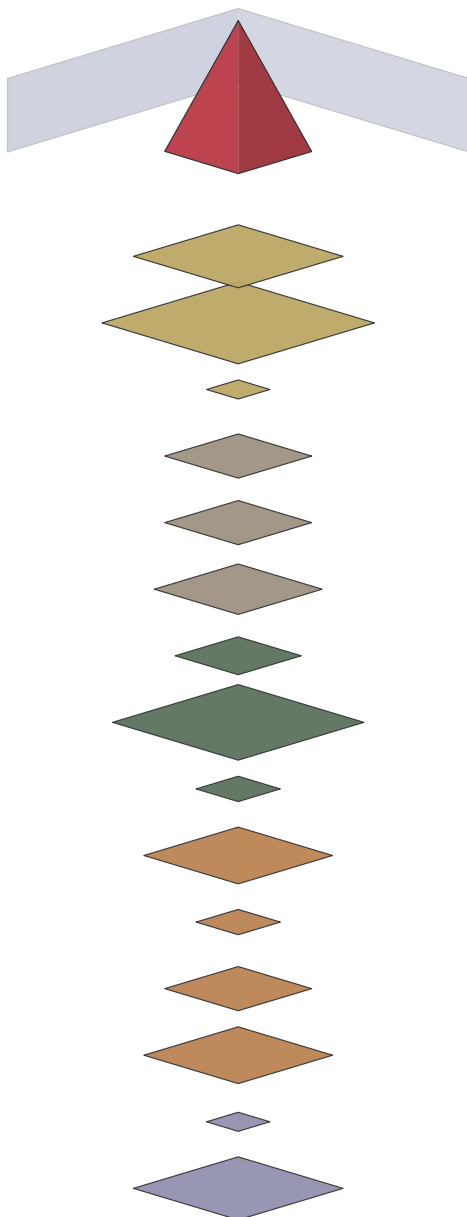




COMOROS



3.92 CRIMINALITY SCORE

51st of 54 African countries
12th of 13 Southern African countries



CRIMINAL MARKETS **3.73**

HUMAN TRAFFICKING	5
HUMAN SMUGGLING	6.5
EXTORTION & PROTECTION RACKETEERING	1.5
ARMS TRAFFICKING	3.5
TRADE IN COUNTERFEIT GOODS	3.5
ILLICIT TRADE IN EXCISABLE GOODS	4
FLORA CRIMES	3
FAUNA CRIMES	6
NON-RENEWABLE RESOURCE CRIMES	2
HEROIN TRADE	4.5
COCAINE TRADE	2
CANNABIS TRADE	3.5
SYNTHETIC DRUG TRADE	4.5
CYBER-DEPENDENT CRIMES	1.5
FINANCIAL CRIMES	5



CRIMINAL ACTORS **4.1**

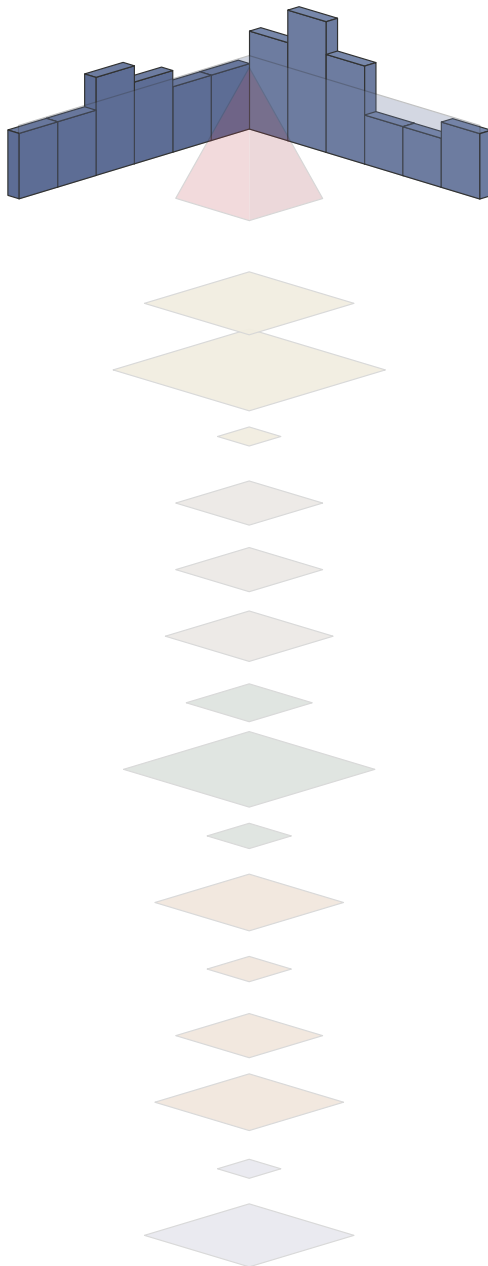
MAFIA-STYLE GROUPS	1
CRIMINAL NETWORKS	4.5
STATE-EMBEDDED ACTORS	7
FOREIGN ACTORS	5
PRIVATE SECTOR ACTORS	5



2.38 RESILIENCE SCORE



COMOROS



2.38

RESILIENCE SCORE

45th of 54 African countries

13th of 13 Southern African countries

POLITICAL LEADERSHIP AND GOVERNANCE	2
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	2
INTERNATIONAL COOPERATION	3
NATIONAL POLICIES AND LAWS	2.5
JUDICIAL SYSTEM AND DETENTION	2
LAW ENFORCEMENT	2
TERRITORIAL INTEGRITY	3
ANTI-MONEY LAUNDERING	4
ECONOMIC REGULATORY CAPACITY	3
VICTIM AND WITNESS SUPPORT	1.5
PREVENTION	1.5
NON-STATE ACTORS	2



3.92

CRIMINALITY SCORE



CRIMINAL MARKETS

3.73



CRIMINAL ACTORS

4.1



CRIMINALITY

Criminal Markets

PEOPLE

Human trafficking remains a challenge in the Comoros and this has not changed significantly, even after the COVID-19 pandemic. The Comoros is still a country of origin and a transit point for victims of sexual and labour exploitation. It is part of the human trafficking routes from East Africa to the Arabian Gulf. Comorian nationals, including children, may be subjected to forced labour on the island of Mayotte, which is an overseas department of France, in the agricultural, construction, and domestic servitude sectors. Rural children are particularly vulnerable to exploitation, abuse, sex trafficking, and forced labour as they migrate to urban areas for better opportunities.

Human smuggling networks in the Comoros continue to benefit from the high emigration rate, with Mayotte being a popular first step to reach France. Although the Comoros is not a major transnational hub for human smuggling because of its remoteness, the market represents a significant issue in the country considering the size of its territory and the disproportionate number of people involved. During the pandemic, human smuggling flows temporarily reversed, but maritime smuggling from the Comoros to Mayotte increased after restrictions were lifted. Most people being smuggled on boats from the Comoros to Mayotte are Comorian, but there is also a significant proportion of irregular migrants originating from other African countries. This illicit market has a significant influence on the political economy of the islands, particularly in Anjouan, where unregulated labour brokering remains common, and businesses have emerged in connection with the smuggling industry. Extortion and protection racketeering are not common in the country, with historic and sporadic reports of such criminal activities.

TRADE

The arms trafficking situation has remained unchanged in recent years, with criminal brokers who operate in the Indian Ocean continuing to facilitate the illegal flow of arms. These arms are trafficked to be used in other criminal activities including drug trafficking, piracy, and armed robbery, as well as illegal, unreported and unregulated (IUU) fishing.

Counterfeit goods are prevalent on the streets of the capital Moroni, where it is easy to buy fake kofias (a traditional Comorian hat) believed to be shipped from China. Although genuine kofias are considered luxury products, counterfeit versions can be acquired for a negligible cost. Authorities recently discovered medicines with no manufacturer labelling, raising concerns about their safety and authenticity. The illicit import of excisable goods is also a moderately profitable and attractive market in the Comoros. Although alcohol consumption is not common, raids to seize illicit alcoholic beverages do take place.

ENVIRONMENT

The Comoros is a large producer of vanilla, where an illicit trade runs parallel to the legal trade. The illegal vanilla trade is reported to be a major contributor to unregulated and illicit deforestation in the country. The islands also continue to serve as transit points for illegal timber from Madagascar. Fauna crimes have been on the rise in the Comoros because of poverty and the global demand for exotic animal products. The archipelago's location along the southern route between Asia and Africa makes it vulnerable to wildlife trafficking. Wildlife trafficking, particularly of turtles and lemurs, is influenced by the proximity of Madagascar, which is a significant source of trafficking. Madagascan tortoises are shipped to the islands and then sent to China or Tanzania. IUU fishing remains a challenge, as Asian fleets operating in the country are not held accountable for disregarding national laws. Gold trafficking through the Comoros is also on the rise as networks smuggle gold from Southern Africa to the Middle East, using the country as a transit point. Traffickers typically bribe authorities and security guards at the airport to transport merchandise to Dubai.

DRUGS

The Comoros continues to be a small destination market for heroin, but its role as a transit point for the drug has gained prominence along the Africa-Asia routes. Its proximity to redistribution hubs like Madagascar suggests a possible evolution of the market. Although heroin use remains low in the country, consumption seems to be increasing. The main destinations for the heroin that transits through the Comoros are countries within Africa, and to a lesser extent Europe and North America. The local market for cocaine is limited because of the country's location, which makes transportation



expensive and unattractive for locals. Nevertheless, the Comoros remains vulnerable to cocaine trafficking as a transit point, given its weak governance and proximity to major trafficking routes.

Meanwhile, cannabis consumption remains widespread, and increasing quantities of the drug are entering the country from Madagascar and Tanzania. The routes from Mahajanga and Nosy Be in Madagascar are known for cannabis smuggling. According to Comorian authorities, the rise in cannabis smuggling is due to the reduction of local production on the islands. Synthetic drugs have not been seized lately, but they are smuggled on fishing ships also used for human and cannabis smuggling on their way back to the Comoros. Synthetic cannabis is the most consumed synthetic drug in the country, and most of it is produced locally. Precursor chemicals usually come from China via Mayotte.

CYBER-DEPENDENT CRIMES

The Comoros has poor internet connectivity and low digitization. For this reason, there have been no reports of sophisticated cyber-attacks in the country, and any such incidents involving Comorian citizens have occurred outside the country.

FINANCIAL CRIMES

Evidence suggests that the country's poor governance creates an environment that is conducive to financial crime, particularly in the form of corruption. Government corruption is widespread in the Comoros, and the weak governance in the country makes it vulnerable to the embezzlement of public funds. Digital scams in the country mainly involve cyber-enabled financial crimes like identity theft and fraud, which aim to fraudulently collect money.

Criminal Actors

Corruption among state-embedded actors is known to be widespread in the country with public officials facilitating criminal activities. Little has been done by authorities to fight criminality, and there is evidence of high-level involvement in cases of drug, tortoise, and human trafficking as well as smuggling. The degree of state involvement in the smuggling of people and drugs almost equates to state collusion.

International criminal organizations, often with the participation of state actors, are responsible for human trafficking and smuggling in the Comoros. It is suspected that Madagascan nationals control the vanilla-smuggling market, while Tanzanian actors dominate the drug-trafficking market and facilitate human smuggling to Mayotte. Malagasy actors also play a role in drug trafficking. Despite efforts by the Comorian government and international organizations, irregular migration continues to be encouraged by these organized groups, leading to continued trafficking.

Organized crime in the form of mafia-style groups is not prevalent in the Comoros. However, the country's increasing role as a transit point for drugs and human trafficking, coupled with its weak governance, creates conditions that allow established criminal networks to thrive. Local criminal networks are known to be involved in a variety of criminal markets, including drug trafficking and human smuggling, among others. Private actors collude with organized crime groups in many activities, including the fishing and mining industries.

RESILIENCE

LEADERSHIP AND GOVERNANCE

The political situation in the Comoros has been unstable since the referendum in 2018 that allowed the current president to lift the constitutional limits on presidential terms. Since winning the referendum and securing his re-election in 2019, the president has cracked down on the opposition and limited press freedom. Although

some civil society representatives participated in the national dialogue, it has become particularly challenging for the Comoros to achieve national and social cohesion. 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. Petty corruption persists



at all state levels, and significant connections are required to obtain any contracts or to access social programmes. Corruption with impunity is normal, and it is common for Comorians to pay bribes to avoid compliance with regulations and arrests. The government and justice bodies are perceived to facilitate drug and human trafficking in the country.

The Comoros has a mixed record in international cooperation. It has only ratified five of the international treaties addressing organized crime, and its reluctance to act against IUU fishing has resulted in being identified by the EU as a non-cooperating third country. However, since 2021, the government has shown more openness to cooperating with NGOs. Political relationships with France remain deadlocked since Mayotte, a French department, is considered part of the archipelago. The Comorian legal framework is outdated, with limited law enforcement against organized crime. Nevertheless, some improvements have been made through the introduction of a national policy for the protection of children against child labour and a national action plan to combat trafficking. Arms-control regulations and laws against drug trafficking are weak. The new penal code punishes all offences related to cybercrime, and the law aims to protect users in the event of a crime in the digital space.

CRIMINAL JUSTICE AND SECURITY

The judicial system in the Comoros is under-resourced, overburdened, and heavily influenced by the executive, making it difficult for citizens to have equal access to justice. Although court orders are generally respected, judicial inconsistency and corruption have facilitated criminal activities. Overcrowding and food deprivation are common problems in the prison system, and cases of political prisoners and arbitrary detention have been reported.

Although the Comorian government has made efforts to improve law enforcement capabilities through NGO-provided training programmes, corruption remains a significant challenge. Officials often collude with organized crime groups, and police officers have been known to accept bribes to ignore drug trafficking and even to participate in criminal activities. The challenges facing law enforcement include inadequate training, unwillingness to enforce the law, and a lack of accountability within police ranks and the military, leading to widespread human rights abuses.

The Comoros has weak border security because of limited maritime surveillance and under-resourced security

infrastructure at the main ports. The lack of patrolling and monitoring capacity of its shoreline facilitates illegal trades such as drug trafficking and irregular migration. Despite the presence of international maritime forces, the Comoros' territorial waters remain extremely porous. Additionally, the country lacks the capacity to exert real sovereignty in disputed territories, such as Mayotte and the Banc du Geyser. The country's limited capacities pose a challenge to its territorial integrity.

ECONOMIC AND FINANCIAL ENVIRONMENT

The Comoros has been making efforts to combat money laundering and terrorist financing, but its criminal code and specific laws are still weak and do not meet international standards. Although some forms of money laundering, particularly those involving e-commerce, are impossible because of the country's underdeveloped financial sector, this also makes it difficult for the government to identify and estimate the proceeds of illicit activities.

In addition, the country struggles with a weak economic regulatory environment and a lack of capacity to effectively collect taxes. Most of the economy operates in the informal sector, making tax collection a significant challenge. To improve transparency and tax collection, the government has implemented cash registers and introduced a new general tax code. Despite some economic recovery following the COVID-19 pandemic, the country still faces significant challenges such as high inflation, with almost a quarter of the population living in extreme poverty and nearly a third of children suffering from malnutrition. These challenges contribute to profitable illicit activities, including child labour and trafficking, within the archipelago.

CIVIL SOCIETY AND SOCIAL PROTECTION

The Comorian government's efforts to support and protect victims remain inadequate and insufficient. Although the government provides financial support to listening centres for medical care and legal advisory services for victims of human trafficking, and trains law enforcement authorities, it has not developed effective victim-identification procedures and has not improved the limited care services and shelters in place. Rehabilitation initiatives for drug users are undertaken by some civil society organizations, but these are often privately funded and lack the necessary resources.

The Comoros' efforts to prevent human trafficking have been slow and inadequate, despite some advances in public awareness. Although the government has adopted an anti-trafficking national action plan, officials



lack training and resources to conduct prevention activities, and results have yet to be measured. Inspectors investigating child labour have not reported on removals or assistance to children during inspections. Although the government conducted awareness campaigns targeting local authorities, religious leaders, and the general public on Grande Comore, it did not conduct campaigns targeting vulnerable populations on Anjouan or Moheli.

Comorian authorities continue to restrict civil society and repress opposition demonstrations, leading to a shrinking space for civic engagement. The government has arrested and prosecuted participants in protests against the administration, as well as opposition leaders, some of whom were released with conditions such as not making public statements to the media. NGOs face bureaucratic obstacles and underfunding, and their workers are reported to face repression. Journalism is also targeted by the state, with journalists harassed for their content and reporting, leading to increasing self-censorship.

