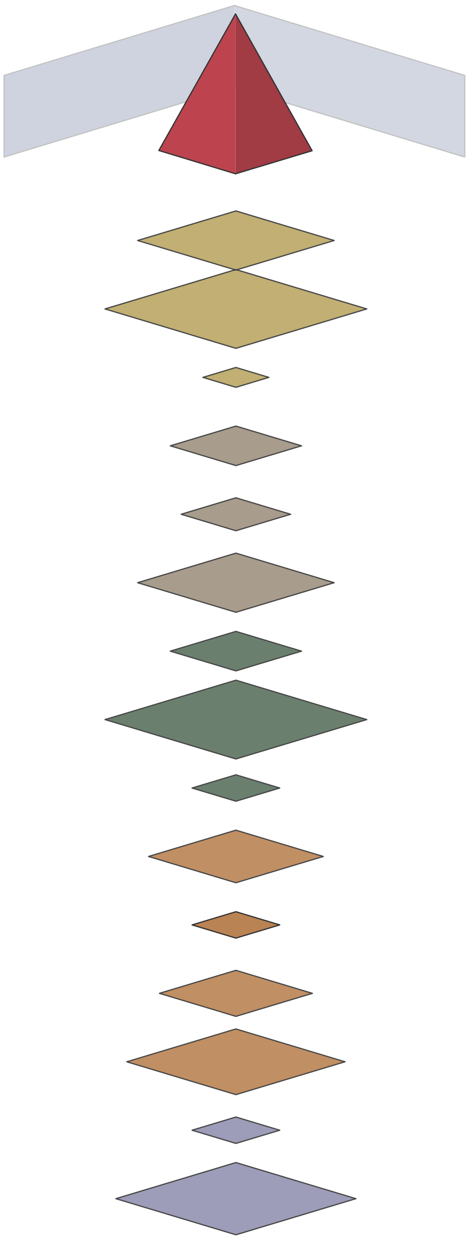
enact
Enhancing Africa's response to transnational organised crime

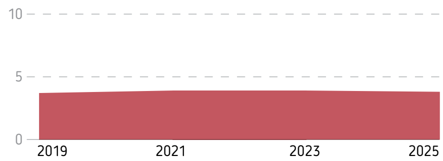
This project is funded by the European Union

COMOROS



3.83 ↘0.08
CRIMINALITY SCORE

52nd of 54 African countries ↘1
12th of 13 Southern African countries -



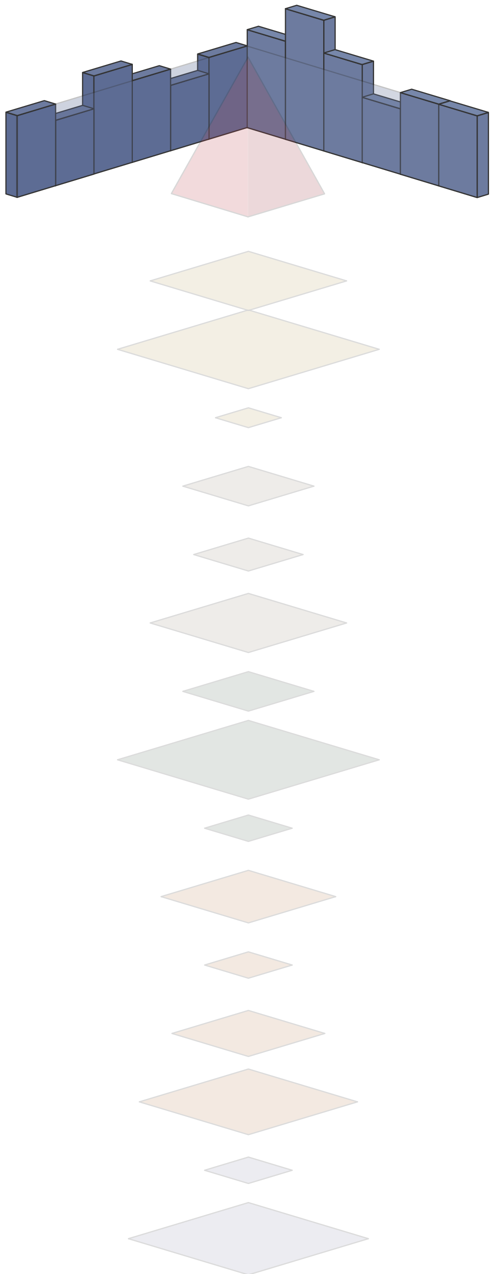
CRIMINAL MARKETS	3.67	↘0.07
HUMAN TRAFFICKING	4.50	↘0.50
HUMAN SMUGGLING	6.00	↘0.50
EXTORTION & PROTECTION RACKETEERING	1.50	0.00
ARMS TRAFFICKING	3.00	↘0.50
TRADE IN COUNTERFEIT GOODS	2.50	↘1.00
ILLICIT TRADE IN EXCISABLE GOODS	4.50	↗0.50
FLORA CRIMES	3.00	0.00
FAUNA CRIMES	6.00	0.00
NON-RENEWABLE RESOURCE CRIMES	2.00	0.00
HEROIN TRADE	4.00	↘0.50
COCAINE TRADE	2.00	0.00
CANNABIS TRADE	3.50	0.00
SYNTHETIC DRUG TRADE	5.00	↗0.50
CYBER-DEPENDENT CRIMES	2.00	↗0.50
FINANCIAL CRIMES	5.50	↗0.50

CRIMINAL ACTORS	4.00	↘0.10
MAFIA-STYLE GROUPS	1.50	↗0.50
CRIMINAL NETWORKS	4.50	0.00
STATE-EMBEDDED ACTORS	7.00	0.00
FOREIGN ACTORS	5.00	0.00
PRIVATE SECTOR ACTORS	2.00	↘1.00

ISS INSTITUTE FOR SECURITY STUDIES
INTERPOL
GLOBAL INITIATIVE AGAINST TRANSNATIONAL ORGANIZED CRIME

Africa ORGANISED CRIME INDEX 2025

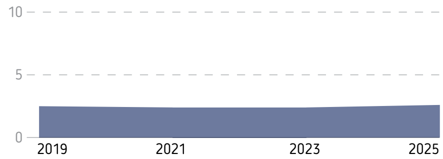
COMOROS



2.63 ↗0.25

RESILIENCE SCORE

43rd of 54 African countries ↗2
13th of 13 Southern African countries -



POLITICAL LEADERSHIP AND GOVERNANCE	2.50	↗0.50
GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY	2.00	0.00
INTERNATIONAL COOPERATION	3.00	0.00
NATIONAL POLICIES AND LAWS	2.50	0.00
JUDICIAL SYSTEM AND DETENTION	2.00	0.00
LAW ENFORCEMENT	2.50	↗0.50
TERRITORIAL INTEGRITY	3.00	0.00
ANTI-MONEY LAUNDERING	4.00	0.00
ECONOMIC REGULATORY CAPACITY	3.00	0.00
VICTIM AND WITNESS SUPPORT	2.00	↗0.50
PREVENTION	2.50	↗1.00
NON-STATE ACTORS	2.50	↗0.50

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CRIMINALITY

Criminal markets

PEOPLE

Comoros is both a source and a transit country for human trafficking. It plays a role in transnational trafficking routes and vulnerable individuals are at risk of labour and sex trafficking. Children, particularly those from rural areas, are exploited in domestic servitude, street vending and agricultural labour. The market also extends beyond national borders and Comorian victims have been identified in Oman and Tanzania. Foreign nationals from countries such as Cameroon, Burundi, Rwanda, the Democratic Republic of the Congo (DRC), Madagascar, Tanzania and Uganda have been exploited in Comoros during their transit through the country. The government has increased efforts to combat trafficking, including establishing anti-trafficking units, but challenges remain and the trafficking of economic migrants and asylum-seekers continues.

Human smuggling is a significant market in Comoros, where most migrants are trying to reach Europe via Mayotte, especially during the seasonal peak between September and April. The use of rustic boats known as kwassa-kwassa to transport individuals across the maritime border is widespread, and criminal networks including fishermen facilitate irregular migration. While local actors probably profit from this trade, international networks may also be involved. The smuggling network includes migrants from African countries such as Burundi, Cameroon, the DRC, Madagascar, Tanzania and Uganda. Law enforcement has intercepted several smuggling attempts but high demand sustains the illicit trade. In particular, the Balladur visa has created significant barriers between the islands, severely restricting movement between Anjouan and Mayotte and fuelling irregular migration. Often called the 'visa of death', it limits legal migration pathways, pushing many to attempt perilous sea crossings. This has driven a surge in human smuggling, which has become a major criminal market due to the islands' strategic transit role.

Extortion and protection racketeering is not a prevalent criminal market in Comoros, and only limited and sporadic incidents have been reported.

TRADE

Arms trafficking occurs in Comoros but the country is not a hub for illicit weapons trade. Regional dynamics show sporadic transnational arms flows, particularly on maritime routes. Reports indicate that traditional fishing vessels and dhows facilitate smuggling, and arms trafficking is often linked to other illicit activities, such as piracy and drug trafficking. However, there is no substantial evidence of a well-established domestic market for illicit arms in Comoros.

Counterfeit consumer goods are not extensively documented but the demand for cheaper products suggests ongoing circulation of such illicit goods, and the market exists with limited influence.

The illicit trade in excisable goods, particularly smuggling of cigarettes and alcohol, is a well-established market in Comoros. Recent seizures, including contraband-laden kwassas intercepted en route to Mayotte and a large shipment of rum concealed in onion bags from Madagascar, illustrate the sophistication and persistence of these illicit operations. These activities are often facilitated by organized networks, some of which involve foreign actors. The networks are supported by local participants such as impoverished fishermen, effectively drawing private-sector actors into the market. The smuggling trade is interconnected with other illicit markets in the region, notably human smuggling, through shared logistics and overlapping networks. Demand for illicit goods remains high, driven by the affordability of smuggled products in a low-income context. Despite their illegal status, these goods – especially alcohol – are socially accepted due to economic necessity.

ENVIRONMENT

Flora crimes in Comoros are closely linked to the Madagascar illicit timber trade. Ebony and rosewood are trafficked through the islands on their way to international markets. Corruption plays a significant role in facilitating this trade and state-embedded actors are reportedly involved.

Fauna crimes are consolidated and Comoros operates as a transit hub for Malagasy tortoises and lemurs trafficked to global markets. Illegal, unreported and unregulated (IUU) fishing is a major concern, driven largely by foreign actors, including Chinese networks operating in the Mozambique Channel. The depletion of marine resources due to IUU fishing has significantly affected local communities, contributing to the market's significant influence on society.

The illicit trade in non-renewable resources is not widespread and there are only sporadic and anecdotal reports of gold smuggling. However, corruption is a key facilitator and state-embedded actors play a role in enabling the smuggling of gold. This trade is largely transnational, foreign actors profiting more than domestic ones.

DRUGS

Comoros is a transit country for heroin trafficking, with routes connecting east Africa to Asia. Heroin arrives primarily from Tanzania and to a lesser extent Madagascar, foreign networks playing a dominant role. The government has strengthened border security but corruption is a challenge, enabling traffickers to operate with relative ease. Domestic heroin consumption appears limited, largely due to affordability constraints.

Cocaine trafficking is less prominent but still a concern. Comoros is primarily a transit point, and corruption in law enforcement enables the continuation of the cocaine trade, though demand is minimal.

Cannabis trade is moderately consolidated, Comoros acting as a transit hub for shipments from Madagascar. Cannabis is the most widely used illicit drug in Comoros as communities perceive it as a relatively low-risk substance. Authorities have seized some shipments but enforcement is inconsistent due to corruption and limited resources.

The synthetic drug market has expanded, and rising methamphetamine seizures off the coast in recent years – including the largest to date in February 2024 – highlight the country's vulnerability to transnational trafficking and its role in the synthetic drug trade. Synthetic cannabinoids, including chimique, have been present in recent years, and precursors reportedly arrive from China via Mayotte. Domestic consumption is relatively low but the country plays a significant role in regional trafficking networks.

CYBER-DEPENDENT CRIMES

Cyber-dependent crime in Comoros is relatively undeveloped but risks are increasing with expanded internet access. There is limited reporting of malware and other cyber-attacks.

FINANCIAL CRIMES

Financial crimes, including fraud and embezzlement, are persistent challenges, and high-profile corruption cases highlight deep-seated systemic issues. State-embedded actors play a significant role, often diverting illicit proceeds to finance political campaigns. Unregulated online banking operations complicate financial oversight, as some institutions operate without Central Bank recognition. Currency counterfeiting is also a concern and fake francs periodically enter circulation and affect the local economy.

Criminal actors

There is no confirmed presence of mafia-style groups in Comoros. However, local media sources suggest these groups may exist and be involved in illicit activities such as human trafficking, smuggling, drug trafficking and counterfeiting. However, due to limited reporting and media attention, little is known about their structure and operations.

Criminal networks engage in various illicit activities, including human trafficking, human smuggling, arms trafficking, trade in counterfeit goods, illicit trade in excisable goods and fauna crimes. Prominent entrepreneurs play key roles in sustaining these markets. Reports suggest that funds derived from drug trafficking have been directed toward political campaigns, highlighting potential links between criminal networks and the democratic process.

State-embedded actors are prevalent in facilitating criminality and the extent of their involvement appears to depend on economic incentives. Reports indicate that state actors selectively intervene in illicit activities when financial benefits are involved, as seen in cases of extortion at ports. Evidence suggests corruption is prevalent at various levels of the state apparatus, and high-ranking officials have been implicated in financial crimes. Studies have noted that drug funds have allegedly been used to finance election campaigns, though details remain undisclosed.

Foreign actors play a notable role in the Comoros criminal landscape, particularly through transnational trafficking networks. Diaspora groups from Tanzania and Madagascar are implicated in heroin and human trafficking. However, the level of control they exert is not clearly documented. Certain regions, such as Anjouan and Grande Comore, are more susceptible to foreign criminal influence due to their geographic locations. Despite agreements between Comoros and international organizations to combat human trafficking, arms smuggling and drug trafficking, these foreign networks continue to exploit regulatory weaknesses in criminal markets. Moreover, Chinese networks operating in the Mozambique Channel continue to threaten local communities and marine ecosystems through their involvement in IUU fishing.

The private sector in Comoros, particularly the fishing and mining industries, has shown signs of penetration by organized crime, although to a limited extent. These industries provide avenues for laundering illicit proceeds, enabling criminal actors to legitimize their earnings.

RESILIENCE

LEADERSHIP AND GOVERNANCE

The governance landscape in Comoros is characterized by political instability and external pressures. Over the years, the government has taken a public stance against organized crime, emphasizing the importance of international cooperation, particularly with France, to address irregular migration and crime. However, opposition parties have accused the president of electoral fraud, leading to heightened political tensions and contested electoral outcomes. Allegations of voter suppression and fraud during the January 2025 parliamentary elections sparked violent protests, resulting in injuries, arrests and confrontations with security forces. The opposition continues to challenge the election results, citing irregularities including documented instances of ballot stuffing. Concerns persist about the legitimacy of the democratic process and the level of public confidence in the government, particularly given reports of low voter turnout in the last elections and allegations of political financing using proceeds from illicit trade. Moreover, systemic corruption and poverty are pressing concerns, affecting broader governance structures. The government has prioritized economic development, digitalization and poverty reduction but these efforts have not been explicitly linked to dismantling organized crime networks.

Government transparency and accountability are limited and there are persistent governance challenges. The state budget is publicly available but broader efforts to combat corruption have been met with scepticism. There is ongoing nepotism, which opposition leaders view as an attempt to consolidate power and perpetuate corruption in the state infrastructure. Government operations are characterized by opacity, and various reform initiatives have failed. Financial asset disclosures by public officials are not made public, and Comoros offers no opportunities for public participation in the budget process.

Comoros has ratified several international instruments addressing transnational organized crime, including the UN Convention against Transnational Organized Crime and the UN Convention against Corruption. The country has also acceded to agreements targeting illicit drug trafficking and environmental crimes. However, Comoros is yet to ratify the Arms Trade Treaty. There is limited publicly available information about the effectiveness of extradition agreements and cross-border asset seizure processes. Nevertheless, Comoros cooperates in regional law enforcement through the Indian Ocean Commission, working with Madagascar, Mauritius, Seychelles and France (Réunion) to combat illicit activities such as money laundering and wildlife trafficking. The country's response to tackling cybercrime has included participation in a meeting of regional intelligence chiefs in Mombasa to enhance collaboration against cyber-dependent crimes.

Comoros' national legal framework addressing organized crime is a mixture of indigenous, Islamic and French civil and criminal laws. There are policies to combat human trafficking and child labour but the legal framework is insufficient in tackling crimes such as drug trafficking and arms smuggling. Notably, Comoros lacks legislation on cybercrime, leading to ambiguity about the legality of such activities and potentially facilitating a parallel legal trade. The government recently approved the 2024–2026 Anti-Trafficking National Action Plan, demonstrating a commitment to improving victim protection and law enforcement capabilities. However, the legal framework is fragmented and there are gaps in regulating firearms brokering and organized smuggling operations.

CRIMINAL JUSTICE AND SECURITY

Comoros lacks specialized judicial units dedicated to tackling organized crime, and the judiciary faces significant challenges related to corruption and inefficiency. There is limited publicly available information about judicial resources or external financial or technical support for judicial reforms. Concerns about judicial independence have intensified, particularly after high-profile cases that underscored broader concerns about the judiciary's reluctance to investigate politically sensitive cases. The prison system struggles with capacity constraints and overcrowding. Although recent EU-supported efforts have improved conditions for women and minors through the construction of separate detention facilities, broader challenges persist. The extent of criminal influence in the prison system is unclear, as is the prevalence of corruption among prison personnel.

In terms of law enforcement, Comoros lacks clearly defined units dedicated to organized crime. While national efforts to combat major crimes are limited and often ineffective, the country has begun enhancing its law enforcement capacity through international partnerships. Domestically, law enforcement remains weak, with limited resources and poor implementation of crime-related policies. Public reliance on informal systems and the lenient handling of offences such as the sale of counterfeit medicines point to serious enforcement gaps. While there is no available information on community policing or public trust in law enforcement, intelligence sharing probably occurs through international cooperation frameworks. Overall, while external support is strengthening capacity in certain areas, the local law enforcement system remains underdeveloped and poorly equipped to tackle organized crime effectively. For instance, while precursor chemicals are imported from China via Mayotte, Comoros lacks the analytical capacity, strategic policies and law enforcement resources to systematically detect, intercept or dismantle synthetic drug operations.

Border security is a significant challenge due to Comoros' weakly controlled maritime borders and its strategic location on major trafficking routes. The territorial dispute with France over Mayotte has complicated migration control efforts. Despite international patrols in the Mozambique Channel, arms trafficking and drug smuggling continue to exploit gaps in maritime enforcement, exacerbated by the lack of surveillance equipment. There is no direct evidence of corruption among border officials but limited resources hinder effective interdiction of criminal activities. However, international cooperation on port security programmes has strengthened border screening and enhanced surveillance coordination.

ECONOMIC AND FINANCIAL ENVIRONMENT

Comoros has taken steps to combat money laundering, including criminalizing the practice and running training workshops for institutional representatives. However, the effectiveness of these measures is uncertain. The country is not on the Financial Action Task Force blacklist or grey list but its anti-money laundering framework lacks transparency on enforcement mechanisms. There are no reported measures targeting the use of crowdfunding or online gambling for illicit financial transactions.

The economic regulatory environment is constrained by weak institutional frameworks, financial transparency and governance indicators. Public sector inefficiencies and a lack of regulatory oversight have hindered economic development, creating conditions that may inadvertently facilitate illicit activities. The private sector and industry bodies could play a role in mitigating organized crime but there is no reported evidence of direct regulatory incentives or criminal group involvement in economic market regulation. However, vulnerabilities persist in the fishing sector, where smuggling continues unabated.

CIVIL SOCIETY AND SOCIAL PROTECTION

Comoros has demonstrated a commitment to victim and witness support, particularly in addressing human trafficking. The government has collaborated with international organizations to enhance victim identification and referral mechanisms, resulting in an increase in identified trafficking victims. However, state-run services are inadequate and rely mainly on NGOs and international partners for victim assistance, including temporary shelter, medical care and vocational training. The absence of long-term housing solutions and a systematic victim assistance programme undermine the country's ability to provide sustained protection.

Efforts to prevent organized crime are limited. The government established national competent authorities and implemented action plans to address human trafficking. However, there are no publicly available reports on community engagement initiatives, and no whistle-blowing mechanisms. The government has occasionally taken steps to identify and dismiss officials implicated in human rights abuses, but it has rarely pursued prosecutions.

The role of non-state actors in Comoros is constrained by state-imposed restrictions on press freedom and civil society organizations. Journalists and activists frequently face harassment, particularly during election periods. Self-censorship is widespread and authorities pressure journalists to disclose sources under threat of criminal defamation charges. Comoros has been criticized for its human rights record and there have been reports of arbitrary arrests, political repression and limited freedom of assembly. Civil society organizations play a role in supporting victims of human trafficking but broader efforts to counter organized crime are hindered by government restrictions.