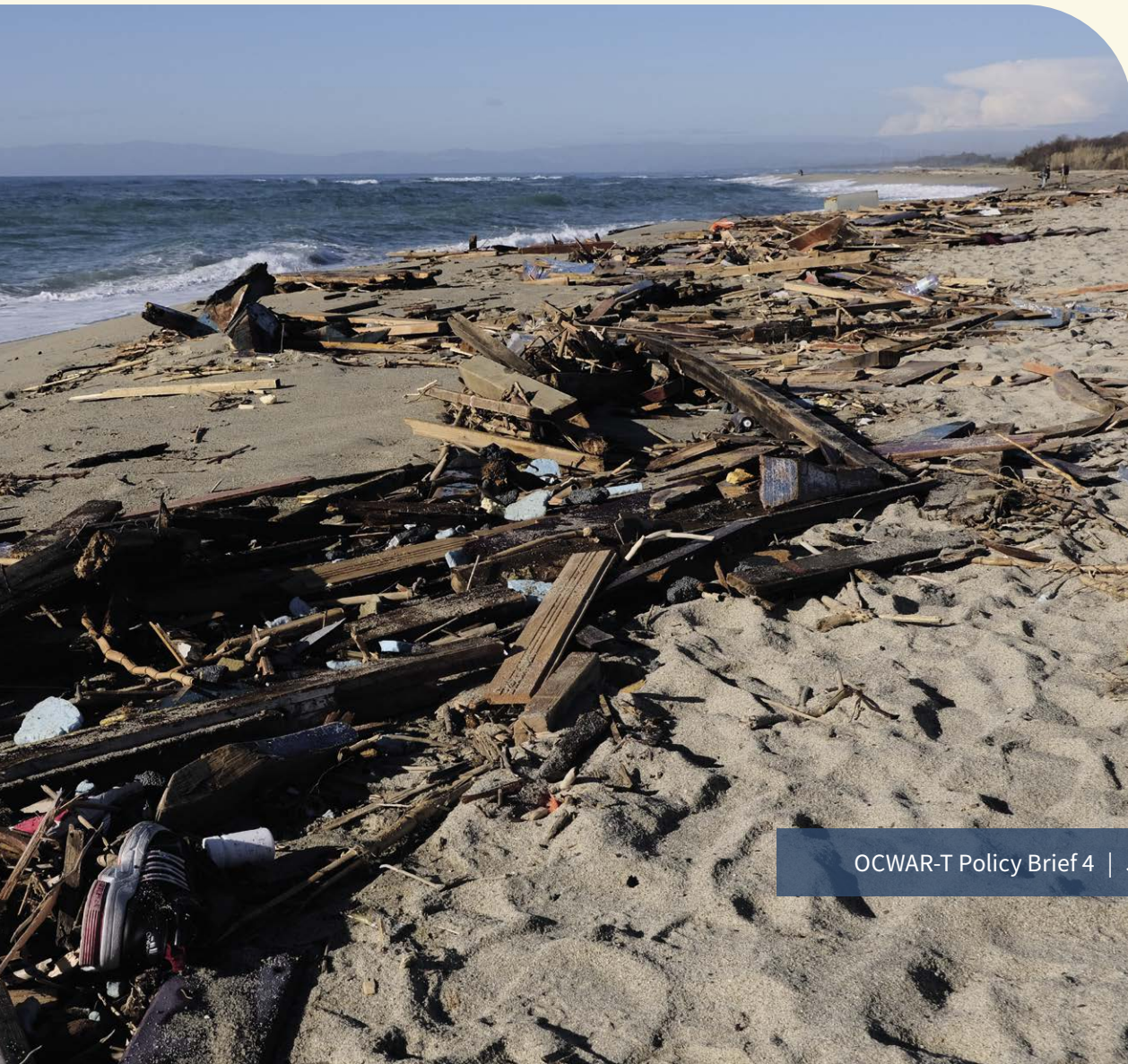




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Illicit financial flows from migrant smuggling in Senegal and Sierra Leone

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Summary

Despite robust anti-money laundering and anti-migrant smuggling policies, this study finds that there are few money laundering investigations and charges against smugglers in Senegal and Sierra Leone. Those countries' financial investigative agencies lack adequate resources and expertise to uncover the illicit proceeds of smugglers, which are often processed through cash and informal channels. This is compounded by a lack of reporting of suspicious transactions by entities vulnerable to money laundering, such as real estate companies.

Recommendations

Key recommendations to Senegal and Sierra Leone

- Prioritise 'follow the money' approaches through a deterrence model of rigorous financial investigations and asset seizures.
- Provide earmarked funds to the FIU for under-investigated illicit flows such as those from migrant smuggling.
- Cooperate with civil society to better understand the evolving patterns, typologies and money laundering risks of migrant smuggling.
- Provide tailored capacity-building initiatives to enhance the operational capacities of financial intelligence units.
- Promote and incentivise reporting of suspicious transactions by formal and informal financial institutions, real estate companies and accountants.



OCWAR-T

Organised Crime: West African Response to Trafficking

Introduction

West Africa's economy is largely cash-based and informal.¹ This makes it vulnerable to a range of illicit financial flows (IFFs) that fall outside regulatory frameworks and are difficult to respond to. IFFs cover a number of financially related crimes, including illicit earning, and the transfer and use of illicit funds across state borders.² Unlike other illicit economies, the migrant smuggling economy has only recently been recognised as having significant risk for IFFs.³

Migrant smuggling is a lucrative criminal activity estimated to attract over \$10 billion profit annually for smugglers globally. Profits from migrant smuggling from East, North and West Africa to Europe are estimated at about \$6.57 billion.⁴ Moderate estimates from West Africa to Europe alone are over \$100 million⁵ – profits from and demand for smuggling services are lower within the Economic Community of West African States (ECOWAS) region due to the free movement protocol.

Tracing the IFFs of migrant smuggling is complex and challenging globally, and even more so in West Africa's large informal and cash-based economy. Sierra Leone and Senegal are making progress in terms of investigating money laundering cases linked to organised crime. However, there are few reported cases of 'follow the money' approaches on migrant smuggling investigations in those countries.

This policy brief examines the IFFs dynamics arising from migrant smuggling in Senegal and Sierra Leone. It specifically examines the IFFs value chain and dynamics in those countries, with a particular focus on how illicit proceeds from migrant smuggling are generated, moved and utilised. The choice of Sierra Leone and Senegal as case studies highlights the increasing role of Senegal as a regional hub and major transit point for Sierra Leonean migrants seeking better lives abroad.

The policy brief further examines the strengths and weaknesses of current national and regional responses to illicit flows from migrant smuggling. This analysis provides a basis for recommendations linked to regulatory support and institutional capacity to disrupt these illicit flows.

The research for this brief used a mixed data collection approach, including a comprehensive literature review as well as key informant interviews (KIs) and focus group discussions (FGDs) in both Sierra Leone and Senegal.

Migrant smuggling market in Sierra Leone and Senegal

Surveys in Sierra Leone and Senegal show that most irregular migrants move for economic reasons.⁶ Families, friends and societal pressures have normalised migration – irrespective of the means – as the pathway to better lives in contexts of the high cost of living and high unemployment. Smuggling networks capitalise on the desperation of irregular migrants⁷ amid increasing anti-migrant policy in Europe and security risks along migrant routes. Smugglers in Sierra Leone and Senegal maintain strong links and networks with smugglers and armed groups in North Africa to guarantee the safe passage of clients and to ensure consistent patronage.⁸

Sierra Leonean migrants highlight Senegal as a preferred transit hub that enables them to work and raise funds for their families or for their upward journey through North Africa to Europe or the Middle East.⁹ Cases of detained Sierra Leoneans have been reported across Senegal, especially in Diamniadio, a district near Dakar where massive construction projects have attracted cheap labour, including migrant workers.

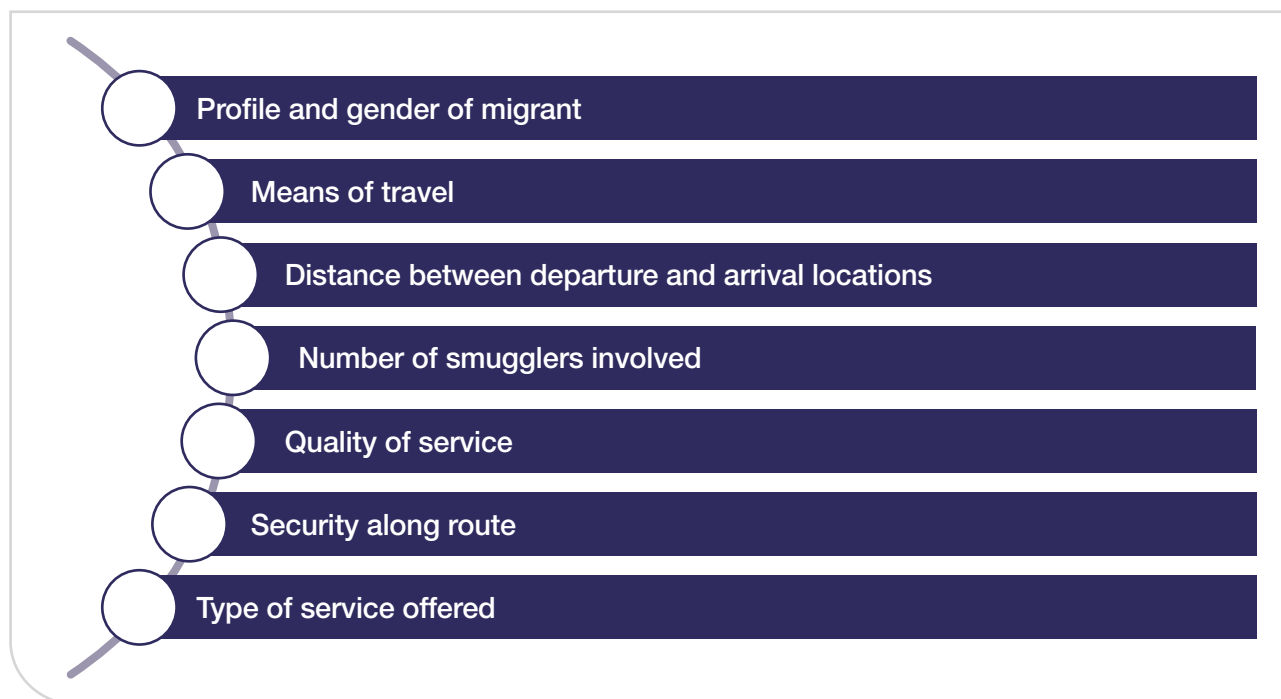
Three key dynamics account for the migration flows through Senegalese migrant routes. Firstly, relatively established smuggling networks in Senegal serve as launchpads to North African countries via land routes. Departure points to North Africa from Senegal have been reported in communities

Families, friends and societal pressures have normalised migration – irrespective of the means – as the pathway to better lives in contexts of the high cost of living and high unemployment

Three key dynamics account for the migration flows through Senegalese migrant routes

in the north-western and north-eastern parts of Louga region.¹⁰ Returned migrants from Senegal who adopted a pay-as-you-go migratory approach indicated that the total costs paid when they arrived at their destination in Europe were between \$600 and \$800.¹¹ This cost estimate is cheap compared to other options because the pay-as-you-go migrants who were interviewed prefer to only make payments when it is of high necessity in order to cut costs. The fees paid at each leg of the journey vary due to the diversity of routes and travel options, as well as other factors (Chart 1).

Chart 1: Factors determining fees



Full-package travel options to Europe are costly, ranging from about \$1 000 to \$1 500. On some occasions, migrants on full-payment options are allowed to pay later or make part payments. However, they face significant security risks if they fail to pay in transit and at destination points. A case in Senegal shows how migrants on a pay-later option were held captive in Morocco for several days until their parents paid an agreed fee.¹²

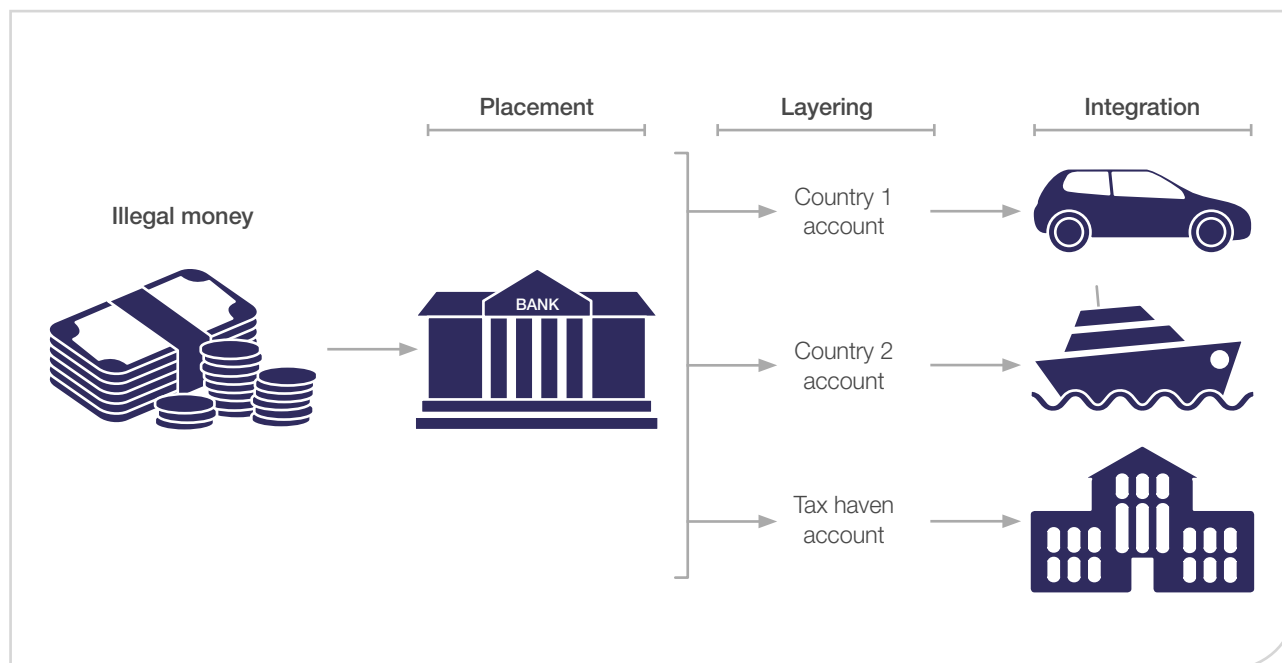
Secondly, an emerging situation is the increasing use from 2020 of the sea route from Senegal to the Spanish Canary Islands as a gateway to Europe due to increasing restrictions via the Mediterranean route.¹³ By 2023, however, there seems to be some decrease in the use of the sea routes, thereby suggesting that the COVID-19 restrictions over land borders played a role in the increased use of sea routes between 2020 and 2022. Coastal cities such as Saint Louis and Mbour are major departure points to the Canary Islands and attract a variety of West African migrants, including Senegalese and Sierra Leoneans.¹⁴ Smugglers operating this route mostly demand full payment upfront, ranging from about \$400 to \$600.

Lastly, the research in Sierra Leone shows that Middle East countries such as Lebanon, Oman, Kuwait and Saudi Arabia are frequently cited as destinations of choice for Sierra Leonean migrants. Due to the distance to the Middle East, smugglers in Sierra Leone provide a mix of land and air travel options. Migrants are transported by road to regional hubs such as Senegal (and Ghana), from where they proceed by air. Mixed travel serves the dual purposes of reducing flight costs through using regional hubs, where flights are cheaper, as well as helping to evade Sierra Leone's increasing scrutiny of illegal labour recruitment to the Middle East. The Middle East programmes often require full-package fees of between \$800 and \$1 200.

Payment processes for smuggling fees and challenges these pose

This section examines the nature of routine cash payments for smuggling, informal money transfers and the use of smuggling proceeds, based on data from Senegal and Sierra Leone.

Chart 2: Stages of money laundering



Source: Bali Process¹⁵

Smuggling fees are often distributed across origin, transit and destination countries via cash or money transfers. Returned migrants in Sierra Leone and Senegal told the research team that smugglers pay and hand them over to their collaborators in other countries.¹⁶ Additionally, they are required to carry physical cash to pay smugglers, armed groups and law enforcement agencies that control migrant routes. When physical cash payments are not feasible, funds are transferred to collaborators across borders using money service businesses such as Western Union, World Remit, Transfast, Orange Money, WAVE and Moneygram.

In most cases, however, smugglers prefer using informal money remitters such as the currency exchange services (foreign currency black market) and the hawala system of payment. This makes it easy to transfer funds in swift, paperless and anonymous ways, making it difficult to trace the funds to any specific individual. The use of informal money transfer systems removes the risk and time factor of transporting cash and avoids transfers of large amounts via the banking sector to partners across borders.

The 2020 annual report from Senegal's financial intelligence unit (FIU), the Cellule Nationale de Traitement des Informations Financières (CENTIF), indicates very few reports of suspicious transactions from formal money service businesses and electronic money institutions – about 6 out of 213 reports received in 2020.¹⁷ The numbers are low compared to the relatively more frequent practice by banks and financial institutions, which provided about 158 suspicious transaction reports.

Smuggling fees are often distributed across origin, transit and destination countries via cash or money transfers

Prominent sectors used to launder migrant smuggling proceeds

The complex chain of beneficiation along migrant routes often complicates efforts to assess the volume of illicit proceeds across origin, transit and destination countries. However, migrant smugglers often invest their proceeds in their countries of origin or residence. In Senegal and Sierra Leone, law enforcement agencies provided accounts of smugglers attempting to integrate illicit funds into the formal economy through investments in the real estate sector and travel agencies, owning and running bars and restaurants, selling second-hand vehicles and using faith-based or charity organisations.¹⁸ These investments conceal the origin of the funds, generate significant profits for smugglers and further corrupt economic and political structures.

Legislation criminalising migrant smuggling and related money laundering offences

Sierra Leone and Senegal have made significant improvements in anti-migrant smuggling policies which target both smugglers and their proceeds. Chart 3 provides an overview of the anti-migrant smuggling laws in both countries.

Chart 3: Anti-migrant smuggling provisions in Sierra Leone and Senegal

	Sierra Leone	Senegal
Law and relevant section	<ul style="list-style-type: none"> • Anti-Human Trafficking and Migrant Smuggling Act, 2022[*] • Part VI, sections 20–23. 	<ul style="list-style-type: none"> • Law to Combat Trafficking in Persons and Related Practices and to Protect Victims, 2005^{**} • Chapter II, articles 4–7.
Jail term and fine provisions	<ul style="list-style-type: none"> • Smuggling offence: A minimum of seven years' imprisonment with no alternative of a fine. • Smuggling involving exploitation: A minimum of 10 years' imprisonment with no alternative of a fine. • Aiding migrant smuggling, such as falsification of document: A fine and/or a minimum of 10 years' imprisonment. 	<ul style="list-style-type: none"> • Smuggling, fraud or falsification of travel documents: 5 to 10 years' imprisonment. • A fine of 1–5 million CFA for smuggling, fraud or falsification of travel documents.
Confiscation	<ul style="list-style-type: none"> • Article 30 provides that 'Property, including but not limited to money, valuables, real estate property and vehicles, belonging to a person who is convicted of an offence of human trafficking under section 12 or migrant smuggling under section 20 that was used or intended to be used or was obtained in the course of the offence, or benefits gained from the proceeds of the offence, shall be forfeited to the State.' 	<ul style="list-style-type: none"> • Article 7 provides that 'judgment establishing that the offender is guilty shall order the confiscation of: <ul style="list-style-type: none"> – the means of commission of the offence; – the proceeds of the offence.'
Who oversees implementation?	<ul style="list-style-type: none"> • National Task Force on Human Trafficking – established in 2005 under the Anti-Human Trafficking Act of 2005. 	<ul style="list-style-type: none"> • The National Committee to fight against Human Trafficking (CNLTP)^{***} – established in 2010.

Notes: ^{*} Sierra Leone Anti-Human Trafficking and Migrant Smuggling Act, 2022, www.parliament.gov.sl/uploads/acts/ANTI-HUMAN%20TRAFFICKING%20AND%20MIGRANT%20ACT,2022.pdf.

^{**} Law No. 2005-06 of 10 May 2005 on the fight against trafficking in persons and similar practices and the protection of victims, <https://sgbv-ihrda.uwazi.io/api/files/16353410219225paac37n365.pdf>.

^{***} The Senegalese police has a division located within the Directorate of Air and Border Police dedicated to fighting migrant smuggling and related practices.

Sierra Leone adopted an Anti-Human Trafficking and Migrant Smuggling Act in July 2022, addressing a longstanding legal vacuum on migrant smuggling. Senegal enacted an anti-trafficking in persons law in 2005, which includes a prohibition against migrant smuggling.

Sierra Leone and Senegal also have anti-money laundering laws that require investigation of illicit proceeds (Chart 4).

Chart 4: Anti-money laundering laws in Sierra Leone and Senegal

	Sierra Leone	Senegal
Anti-money laundering provisions	Anti-Money Laundering and Combating of Financing of Terrorism Act (AML/CFT) of 2019 (first promulgated in 2012 and amended in 2019).	Anti-Money Laundering Law of 2018 (first promulgated in 2004).
Implementing agency	FIU established in 2012.	CENTIF established in 2004.

The field research in Sierra Leone and Senegal indicates that the ‘follow the money’ approach involving confiscation and asset recovery is not pursued as a policy objective when investigating migrant smuggling crimes. The approach acts as a key deterrent by preventing smugglers and their beneficiaries from benefiting from criminal proceeds. Law enforcement officials emphasised that a knowledge gap on the extent of the proceeds generated from migrant smuggling contributes to institutional downplaying of smuggling crimes compared to other forms of organised crime.¹⁹ While Sierra Leone and Senegal share similar constraints, the next sections highlight the dominant challenges faced by each.

Investigative challenges in Senegal

Due to agency prioritisation, many of the money laundering cases under investigation in Senegal are ‘high-level’ cases on other forms of crime such as drug trafficking, tax offences and corruption. Respondents from the CENTIF in Senegal observed that because of the cash-based transactions, it is difficult to independently investigate smuggling proceeds without a meaningful report about potential crime.²⁰ They also noted that the amount of money deposited by migrant smugglers is often below reporting thresholds, and informal money remitters and hawala systems do not report suspicious activities.

Senegal’s CENTIF is underfunded and understaffed, with limited capacity to conduct independent money laundering investigations.²¹ This has significant implications not only for the success of money laundering cases, but also for the capacity to investigate and deter corrupt officials from undermining investigations.

Furthermore, Senegal lacks a registry of beneficial ownership including information on property seized, frozen or confiscated.²² The lack of such a registry has led to corruption, whereby offenders and illicit groups bribe officials to secure the return of seized and confiscated properties. In July 2021, Senegal established a National Office for the Recovery of Criminal Assets (ONRAC) to improve the confiscation of illicit proceeds.

Despite Senegal’s improved efforts to combat money laundering, the country remains on the Financial Action Task Force’s (FATF) grey list of countries that do not comply with international standards against money laundering and terrorist financing, thereby requiring increased monitoring.²³ The FATF notes that Senegal has not met the deadlines to implement its action plans, such as enhanced monitoring, sanctioning of non-compliant entities and confiscation of proceeds. This includes the need to ascertain beneficial ownership through a ‘know your customer’ approach across the board.

Senegal remains on the FATF grey list of countries that do not comply with international standards against money laundering and terrorist financing

Investigative challenges in Sierra Leone

The Intergovernmental Action Group Against Money Laundering's (GIABA) 2020 evaluation report on Sierra Leone shows that criminal investigations do not prioritise a 'follow the money' approach due to limited resources and low levels of expertise in investigative units.²⁴ Another challenge is the inability to secure witnesses for both criminal offences: migrant smuggling and its associated money laundering.

There is a widespread impression that migrant smugglers play a vital role in supporting irregular migrants, especially in rural communities. Migrants are thus not willing to testify against smugglers.²⁵ Returned migrants indicated that some security forces provide protection services to smugglers and travel agents.²⁶ Hence, migrants are reluctant to serve as witnesses for fear of being targeted by both criminals and security officials.²⁷

Some returned migrants noted that allegedly corrupt judges dismiss cases unless powerful elites, international organisations like the International Organization for Migration (IOM), or prominent civil society organisations are involved.²⁸ This points to the complicity of some officials in law enforcement, justice, immigration, customs, passport offices, border police and other related government agencies.

Regional and international cooperation

No single country can address the challenge of migrant smuggling and its IFFs due to the cross-border nature of the crime. 'Follow the money' approaches to addressing migrant smuggling necessarily require multi-agency cooperation and parallel investigations following a smuggler's arrest.

Senegal and Sierra Leone have cooperated effectively with ECOWAS, GIABA and FATF to conduct relevant mutual evaluations and follow-up evaluations to improve money laundering policies and implementation. Sierra Leone and Senegal are also part of the GIABA FIUs Forum, which encourages cooperation among its members. However, cooperation with countries outside the ECOWAS region is difficult when there is no bilateral cooperation agreement in place.

No single country can address the challenge of migrant smuggling and its IFFs due to the cross-border nature of the crime

Conclusion

The nature of IFFs from migrant smuggling in Sierra Leone and Senegal described in this policy brief draws attention to the diversity of routes, travel options and other factors that make it difficult to estimate actual smuggling fees. However, the research shows that smugglers charge about \$800–\$1 200 for full-package trips to the Middle East, about \$1 000–\$1 500 for full-package trips to Europe, about \$400–\$600 to the Canary Islands, while pay-as-you-go options range from \$600–\$800 via the inland route to Europe.

The broad spread of these cash-based proceeds along origin, transit and destination countries complicates 'follow the money' investigations and attempts to estimate proceeds utilised in a specific country.

Illicit proceeds from migrant smuggling have been invested in real estate; the sale of second-hand vehicles; travel agencies; the hospitality industry, such as restaurants, clubs and hotels; mining; and charity/faith-based organisations. Vulnerable entities such as real estate agents, accountants and travel agencies tend not to carry out due diligence on clients' source of income, nor do they obtain relevant identification or report suspicious investments.

While Sierra Leone and Senegal have made significant progress in enacting laws against migrant smuggling and its associated anti-money laundering provisions, very few cases of migrant smuggling are investigated for money laundering. This is linked to the perception of migrant smuggling as having a low risk for money laundering. Added to this, the FIUs of Senegal and Sierra Leone lack adequate resources and expertise to conduct investigations into illicit flows from migrant smuggling.

Recommendations

Sierra Leone and Senegal

- Senegal and Sierra Leone should prioritise a ‘follow the money’ approach through rigorous financial investigations and seizures of property linked to migrant smuggling, in order to deter would-be smugglers, smugglers and their beneficiaries.
- The governments of Sierra Leone and Senegal should enhance human resources and budget allocations for FIUs to enable them to carry out investigations. Funds could be specifically earmarked for under-investigated illicit flows such as migrant smuggling.
- Sierra Leone and Senegal should work with civil society organisations to better understand evolving smuggling patterns, typologies and money laundering risks.
- Senegal should revise its 2005 Anti-Human Trafficking Act by removing provisions relating to migrant smuggling. Instead a separate law should be enacted criminalizing migrant smuggling in line with the Palermo Protocol, and provisions regarding associated asset seizures should be expanded to enable prosecutors to go beyond the proceeds of an offence, to also target benefits gained from the proceeds of the offence (currently set out in s7 of the Trafficking Act).
- Governments should develop tailored capacity-building initiatives to enhance the operational capacities of FIUs in Sierra Leone and Senegal.
 - This includes training on how to conduct parallel investigations on both the criminal offence and its associated money laundering crimes by tracing the pattern of remittances via formal and informal money remitters, as well as repetitive transfers in small amounts from different regions to the same person in sensitive countries of destination.
 - Sierra Leone and Senegal should promote inter-agency cooperation, especially between the police, financial institutions, judicial officials and civil society to ensure effective data collection and investigations.
- Senegal and Sierra Leone should promote and incentivise reporting of suspicious transactions by formal and informal financial institutions as well as real estate agents and accountants.
 - The governments of Sierra Leone and Senegal should provide regular training to informal money remitters, accountants and real estate agencies on the importance of obtaining relevant ‘know your customer’ details and identifying suspicious transactions. This includes awareness raising on the potential sanctions for infringement.
- Sierra Leone and Senegal should enhance their strategic response to migrant smuggling by including ‘migrant smuggling’ in the titles of the national task forces responsible for addressing both human trafficking and migrant smuggling. This inclusion will enhance analytical and operational understandings of, and engagements with, smuggling patterns beyond exploitative cases.

ECOWAS

- The ECOWAS Commission and GIABA should support member states to develop relevant cooperation mechanisms with countries outside the region to facilitate investigations, prosecutions and confiscation of smuggling proceeds.
 - This requires supporting member states to have focal points and joint teams for both criminal and financial investigations on migrant smuggling.
 - This includes breaking language barriers by translating key legislation into all languages used in the region. For instance, investigators in Sierra Leone and Senegal are often constrained due to language differences.

Notes

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