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Enhancing Africa's response to transnational organised crime

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POLICY BRIEF

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Shaping crime

Risks and opportunities in Africa's aviation infrastructure

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Summary

The development of transport infrastructure boosts trade and stimulates economic growth. However, this infrastructure can also benefit criminal networks, which use air transport to traffic illicit goods such as drugs, wildlife and gold. Their activities are disguised from regulatory bodies, and many act in collusion with corrupt officials. However, this can be countered by implementing effective oversight measures. This is crucial considering the substantial expansion of African air traffic in recent years, forecasts that Africa will continue to be one of the fastest-growing regions in the world for aviation, and the challenges that the aviation sector globally is facing due to the COVID-19 pandemic.

Key findings

- Across Africa, air transport has played a role in allowing for illicit arms flows and highly-prized natural resources to be transported in and out of conflict zones.
- Exploitation of infrastructure by criminal groups has the potential to derail sustainable development and undermine the benefits that investments in infrastructure aim to create.
- Some criminal groups use corrupt links to officials at airports or monitoring air travel, or to people working in the aviation industry.
- Regional and international bodies have undertaken an array of initiatives aimed at countering criminal threats to African aviation.
- With effective oversight measures, illicit commodities and the networks involved in moving them can be detected and intercepted.

Trafficking through air transport as a threat to sustainable development

The development of transport infrastructure – including aviation infrastructure – is often seen as a strategy for boosting trade and stimulating economic growth.[1] The United Nations (UN) has prioritised the growth of infrastructure as a means of sustainable economic growth. This is enshrined in Goal 9 of the Sustainable Development Goals (SDGs) and also contributes to other goals across the SDG framework. The African Union's 'Agenda 2063' also contains commitments to create a single continental air transport market as well as a free trade area for goods, services and capital.[2]

At the same time, however, the development of aviation infrastructure also offers opportunities for criminal groups. Just as infrastructure boosts legitimate trade, so illicit economies are boosted by increased connectivity between source and destination markets for trafficked goods. Where airspace is not effectively regulated, connectivity to conflict zones and regions where governance is precarious can empower criminal and armed groups, which can exploit illicit economies.

The development of aviation infrastructure offers opportunities for criminals

Across Africa, using air transport for the trafficking of illicit goods has a long history. Air transport has played a role in allowing for illicit arms flows and highly-prized natural resources to be transported in and out of conflict zones. Illicit flows of goods such as drugs, wildlife and gold have been documented passing through commercial hub airports. Criminal networks use corrupt links and methods of disguising their activities from regulatory bodies so as to move illicit goods with impunity.

Exploitation of infrastructure by criminal groups has the potential to derail sustainable development and undermine the benefits that investments in infrastructure aim to create. Trafficking drives corruption and undermines institutions.[3] The risks to development extend further, such as the threat to biodiversity posed by the illegal wildlife trade carried out by air routes. Analysis of the impact of illicit trade on development has warned that it poses a threat to achieving all 17 SDGs.[4]

This issue becomes all the more important considering the substantial expansion of African air traffic in recent years, and predictions that it will continue to grow rapidly. Projections from the International Air Transport Association have estimated that Africa will be one of the fastest-growing regions for aviation in the next 20 years.[5]

The aviation industry has been one of the sectors hardest hit by the COVID-19 pandemic. This has also impacted how criminal groups use air travel for trafficking goods. Companies, regulatory bodies and governments are developing strategies to grow the sector in a post-pandemic world. Civil society groups are campaigning for policies that will make the sector more sustainable. Some groups argue that, in developing the sector after the pandemic, strategies should be introduced to make the aviation sector better equipped to countering trafficking, criminal activity and corruption.[6]

At the same time, air infrastructure and its regulation can be seen as a 'choke point' where, with effective oversight measures, illicit commodities and the networks involved in moving them can be detected and intercepted. Policies and initiatives designed to counter trafficking through air routes have been developed by international organisations, regulatory bodies, the private aviation sector and civil society. However, some have argued that policymakers have historically focused more on countering terror threats to the exclusion of countering illicit trade.[7]

This policy brief, drawing from a review of the available evidence on air trafficking in Africa, outlines some key factors which make the aviation sector vulnerable to exploitation by criminal groups. Key case studies demonstrate these factors in action. The policy brief also highlights strategies and initiatives which have been developed to target trafficking through airports.

Organised crime threats through aviation infrastructure

Organised crime groups use different methods to move illicit commodities through airports.[8] Some move commodities through international hub airports, exploiting vulnerabilities in screening procedures to pass undetected. Commodities such as drugs can be smuggled in luggage, swallowed and transported by mules, hidden within licit goods, in freight shipments and through courier services. Air cargo carriers are used to transport illicit arms shipments into conflict zones

as well as natural resources from remote areas. Small airfields and aircraft, including small private planes, are used to access remote areas and to evade monitoring systems used for larger aircraft. Across these different methods, criminal groups may use corrupt links either to officials operating at airports or monitoring air travel, including police and customs, or to people working in the aviation industry. False documentation, shell companies and other methods to disguise the ownership of companies and shipments involved in illicit trade by air may also be used to facilitate illicit flows. The sections below highlight some major commonalities across different air trafficking cases.

1. Regional hub airports: the challenge of capacity and transit

Regional hub airports in Africa are vulnerable to trafficking activity. These hubs are attractive to criminal groups because their geographic locations and varied flight routes provide traffickers – of drugs, wildlife and other illicit products – with a gateway to demand markets around the world. For example, South Africa's OR Tambo airport and Ethiopia's Bole International airport in Addis Ababa have both become key transit points for drug mules travelling from Africa to other regions. Both provide interregional connectivity to destination markets in Asia and Europe.[9]

As the volume of air traffic has increased in the past decade, traffickers are able to evade overwhelmed customs and enforcement officials, and exploit weaknesses in screening technology, capacity and routes where corruption is rife to be able to transport wildlife products quickly and efficiently. Rates of detection have reliably been found to be low.[10] This can in part be connected to different challenges facing authorities at each point in trafficking routes: at source airports, screening of goods is primarily carried out to identify security threats rather than illicit cargo; in transit, the brevity of many layovers means screening luggage and air freight is an overly time-consuming task; and at destination airports, customs and enforcement authorities may prioritise actions to preserve tax revenue and prevent importation of diseases, rather than many types of trafficking.[11]

Recent analysis from the USAID Reducing Opportunities for Unlawful Transport of Endangered Species (ROUTES) Partnership about the convergence of wildlife trafficking with other illicit activities in the aviation industry has found that transport hubs are often conduits for more than one crime type. According to a ROUTES database analysis, almost two-thirds of cities analysed that reported significant airborne wildlife trafficking were also linked to other (non-wildlife) trafficking instances.[12]

Regional hub airports in Africa provide traffickers with a gateway to demand markets around the world

Counter-trafficking work poses a strategic question for authorities managing regional hub airports, which are often transit points or points for connecting flights. Customs and enforcement officials reportedly find identifying trafficked goods in transit a challenge because the short duration of most layovers means that manually screening high volumes of passengers and shipments effectively is very difficult.[13]

2. General aviation and smaller airfields: an issue of oversight

'General aviation' refers to all civilian aviation operations other than those for commercial transport. It therefore includes everything from flying for sport, to air ambulances, aerial surveillance, agricultural flying and business and private aviation. Most general aviation flights are operated under visual flight rules with no recourse to air traffic control, and many smaller airfields are not subject to any administrative management or controls.

Organised crime groups have made use of non-commercial flights by private jets to transport illicit goods.[14] Private aviation is a fast and discreet means of transport for criminal groups as they are not subject to the same police and customs inspection checks as at major airports. Flight security measures are far less stringent, to the extent that private aviation has been described as the 'Achilles' heel' of aviation security.[15]

Some light aircraft also require only rudimentary infrastructure for takeoff and landing, meaning that they have wider geographical reach than commercial aircraft, can access hard-to-reach terrain and use

airstrips which require little effort to build and may be difficult to detect. The aircraft themselves may also be more difficult for ground control to detect.

For example, the European Monitoring Centre for Drugs and Drug Addiction (EMCDDA) has highlighted that drug trafficking organisations are increasingly making use of small aircraft to transport drugs via West Africa to Europe.[16] General aviation flights, including helicopters and light aircraft, traffic cannabis resin to Europe from Morocco, often carried out at low altitude to avoid detection by domestic radar.[17]

3. Corruption in the aviation industry: an enabling factor

Systemic corruption is a frequent 'enabler' for evading and breaking rules within the world of civil aviation, including for the purpose of trafficking goods and allowing persons linked to criminal groups to travel. Observers have argued that corruption is a major issue in the international air cargo industry and that international authorities should take greater action to counter it.[18]

Concerning the African continent, corruption has been highlighted as a significant cost to the aviation industry, and international bodies have felt unable to counter it effectively.

Corruption is a major issue in the international air cargo industry

The director-general of the International Air Transport Association (IATA), a trade association of global airlines, stated in 2019 that corruption is a 'pity' for African aviation. While the IATA has made efforts to educate the industry about eliminating corruption, government-level corruption remains systemic, leaving little that the association can do to support afflicted airlines and countries.[19]

This reflects wider trends across the continent. In 2019, ENACT's Organized Crime Index for Africa found that state actors and state-embedded actors constitute the most important group responsible for driving transnational organised crime on the continent.[20] In a heavily regulated industry like aviation, it is perhaps no surprise that corrupt state actors play a major role.

Analysis of airborne illicit arms trafficking in Africa by post-Soviet actors has also emphasised that relationships with high-level government officials in the supply-side, transhipment and delivery countries are a crucial factor in the success and continuity of arms flows. This includes relationships with transport ministries and aviation authorities.[21]

Case study 1: Historical illicit arms flows by air to conflict zones in Africa

Gunrunning to conflict zones via air transfer was a major factor in international sanctions and UN monitoring of conflicts in Africa from the late 1990s to the early 2000s. Control of airspace and monitoring of aviation companies were seen as critical in allowing illicit transfers to happen.

The most infamous figure involved was international arms trafficker Viktor Bout, who ran a network of air cargo companies that specialised in transporting arms to conflict zones, embargoed states and armed groups.[22] Bout was arrested in 2008 in Bangkok when attempting to sell arms to United States investigators posing as FARC (Revolutionary Armed Forces of Colombia) rebels. He was sentenced to 25 years in prison following his trial in New York in 2011.[23]

In 2000, Bout was named in two UN reports as a key dealer undermining sanctions by supplying arms to rebel groups in Sierra Leone and Angola. Bout reportedly oversaw flights carrying heavy military equipment – such as anti-aircraft missiles and mortar bombs – from Bulgaria via Togo to Angolan rebel group UNITA (National Union for the Total Independence of Angola) between 1997 and 1998.[24] He also supplied arms to the Liberian-backed Revolutionary United Front of Sierra Leone, in violation of a UN embargo. In both instances, these armed groups used control of diamond mines to raise funds for weapons.[25]

Bout also supplied weapons to more than 20 armed groups participating in conflict in the Democratic Republic of Congo (DRC) between 2000 and 2002,

and used his aircraft to transport coltan (for which prices were soaring on the international market) from rebel-held areas in DRC to neighbouring East African states.[26]

By 2000, Bout had amassed a fleet of up to 60 aircraft operated under a complex network of shell companies registered around the world. Using aircraft and company registration in 'less scrupulous' countries was a key tactic in evading sanctions and detection.

The report of the UN Panel of Experts on Sierra Leone argued that irregularities such as shifting plane registration between companies, having aircraft registered under multiple different numbers or shifting between national registers allowed Bout and others like him to avoid international oversight.[27] Liberia, used by Bout and others, had become known as a 'flag of convenience for the fringe air cargo industry' where there was a 'total lack of oversight of Liberian registered planes operating on a global scale'.[28] It was widely 'acknowledged that [Liberian-registered] planes operating in Africa and from airports in the United Arab Emirates are commonly used for illicit arms shipments'.[29] The Security Council recommended that all Liberian-registered aircraft be immediately grounded.

A 2004 UK parliamentary report on arms flows in the eastern DRC argued that a lack of airspace control in the region was a key part in creating a governance vacuum into which private figures (with illicit interests) then stepped.[30] Natural resource flows were facilitated by aircraft using makeshift runways and small airfields, and avoiding oversight by submitting false flight plans and diverting from planned routes. Armed groups obstructed UN personnel on the ground from monitoring airfields and air traffic.

The systems within which Bout operated continued after his imprisonment. An investigation by the Conflict Awareness Project in 2012 shed light on the continuing operations of Bout's former associates. Some had set up arrangements in Mauritius to traffic weapons to conflict zones, using shell companies owning their aviation assets to evade detection and circumvent sanctions.[31]

Case study 2: Conflict gold trade from the eastern DRC

Armed groups in the eastern DRC benefit from illegal taxation of artisanal and small-scale goldminers, raiding mines for gold and collaborating with smugglers to transport gold illegally. UN monitoring from 2015 estimated that, at the time, gold was the main source of financing for criminal and armed groups in the eastern DRC.[32]

Commercial airlines and major regional transport hubs play a critical role in the flow of conflict gold from eastern DRC to the international market. Gold is transported out of producing regions overland and over DRC's eastern borders to Uganda and Rwanda.[33] Official statistics show that only around 200 kg of gold is exported legally from the country each year.[34] However, artisanal gold production is estimated to be much higher – at around 10 000 kg per year – with as much as 98% of gold mined in the DRC leaving the country illegally.[35]

After overland smuggling, gold is primarily transported out of the region via air, as hand luggage, to refineries in the United Arab Emirates (UAE), in particular Dubai. The UAE is known as a destination for conflict-related and illegally mined gold. The London Bullion Market Association, which is the standard-setting body, has accredited no refineries in the UAE because of concerns about weaknesses in customs, cash transactions and hand-carried gold.[36] Customs data indicate that the UAE imported US$15 billion worth of gold from Africa in 2016, much of which was not recorded in the exports of African states, including the DRC.[37]

Entebbe, Nairobi and Lubumbashi airports have been highlighted as major regional hubs for gold flows from the eastern DRC. UN monitoring from 2017 found from interviews with people involved in the gold sector that smugglers bribe customs agents at these airports to pass unhindered through controls. The airlines plying these routes rely on customs authorities to ensure that passengers have the correct documentation for the gold they carry.[38]

International and non-governmental organisations (NGOs) monitoring the eastern DRC conflict have repeatedly recommended that action be taken by airlines and airport authorities to stem gold flows.[39] The UN Group of Experts recommended that airlines work with the IATA to produce recommendations for guidelines to enhance the control of gold transported in carry-on luggage.[40] The Sentry, a conflict-monitoring NGO, recommended that donor governments provide assistance to airlines servicing key smuggling routes to improve their capacity to detect smuggled gold.[41]

Case study 3: Illegal diamond trade from the Central African Republic

Different sides of the ongoing civil war in the Central African Republic (CAR) have profited from illegal trading in the country's rich diamond resources.[42] Struggles for territory have been centred around diamond-producing areas. Armed groups have positioned themselves directly at mines and at major transport routes, including airstrips and border crossings, in order to control production and transport of diamonds.[43]

Observers have argued that transport links, including airline operators, customs and airport security, have become key facilitators of the conflict. The direct perpetrators of violence rely on them as they (knowingly or unwittingly) provide access to the international transport links that make the enrichment of conflict actors possible.[44] An analysis of the CAR illicit diamond trade from late 2019, endorsed by the UN Security Council Panel of Experts on the CAR conflict, argues that impunity through transport routes, particularly Bangui airport, is a major factor driving the illicit diamond market.[45]

Diamonds are smuggled overland out of diamond-producing areas to the capital Bangui and across land borders with Cameroon.[46] However, some are also moved through internal flights to the capital from smaller airstrips. Bangui airport is a vulnerable point for trafficking out of the country and estimated to be the principal route of illicit diamonds, due to issues of corruption: agents with access to planes on the tarmac can deliver packages of diamonds to smugglers; poor security checks and searches mean diamonds may not be identified on persons or in cargo; and high-status or protected persons are not subject to security checks.[47] Reports have also emerged of flight crews being implicated in diamond smuggling.[48]

There are also higher-level links between the aviation sector and diamond trading out of CAR. BADICA – a diamond trading and export company based in Bangui – was sanctioned by the UN Security Council in 2015 for allegedly smuggling diamonds from areas under rebel control through flights run by its sister company, Minair.[49] This included flights from several airstrips where rebel groups were known to impose landing 'taxes' on operating airlines.[50] Both companies are reportedly controlled by a financier of the rebel coalition in CAR.[51]

Case study 4: Wildlife trafficking through Africa's commercial airports

Africa contains major source regions for diverse types of wildlife, from ivory and rhino horn to marine species, pangolins and reptiles. All of these are trafficked along airborne routes, in air freight, checked luggage, air mail as well as in passengers' personal items and clothing. As such, wildlife trafficking provides a useful lens to show how vulnerabilities in commercial air routes can become susceptible to criminal exploitation.[52]

Data on wildlife trafficking through airports shed light on what the key vulnerabilities in transport networks are as well as emerging hubs of vulnerability. The C4ADS (Center for Advanced Defense Studies) air seizure database brings together open-source data on wildlife seizures and instances of trafficking, collected by C4ADS under the ROUTES Partnership, a USAID-led initiative to counter airborne wildlife trafficking.[53] The database covers ivory, rhino horn, reptiles, birds, pangolins, marine products and mammal seizures, which together account for 81% of known trafficked wildlife, according to the United Nations Office on Drugs and Crime (UNODC).[54]

From 2009 to 2019, more than 180 000 individual wildlife specimens or wildlife products were seized at African airports according to the C4ADS data.[55] The latest available data for trafficking instances between 2016 and 2018 show that African airports most prominently associated with trafficking are generally either located close to significant remaining wild populations of a commonly trafficked species (such as airports in South Africa, DRC, Mozambique and Madagascar), or are significant international airports with connecting flight routes to demand regions (as in Kenya, Ethiopia and South Africa). In particular, transit hub airports may be associated with greater numbers of trafficking instances than points of origin as well as a more diverse range of species. The data therefore suggest that large international commercial airports face a particular risk of being used as stopover points by trafficking groups.

Some hub airports may be associated with multiple types of trafficking. South Africa's OR Tambo airport in Johannesburg, for example, reported the second-highest number of seizures of wildlife products in Africa between 2016 and 2018, according to analysis from the ROUTES programme.[56] This was second only to Jomo Kenyatta International Airport, Nairobi. OR Tambo has also been highlighted as regional transit hubs for drug trafficking routes, as mules apprehended carrying drugs destined for Asian markets have primarily passed through one of these points.[57] The intersection of drug and wildlife trafficking demonstrates how similar weaknesses in screening procedures and monitoring may be exploited by criminals moving different commodities. This again underlines the importance of commercial flight routes in transporting illegal goods to demand regions.

Opportunities for intervention: aviation as a 'choke point' for illicit flows

What these four case studies collectively demonstrate is that, over the past decades, multiple instances have been documented where the air transport industry has facilitated illicit flows, either unwittingly or intentionally. A lack of airspace control has allowed illicit commodities to flow, and loopholes in international aviation regulations have been exploited. The aviation industry, including commercial airlines and air cargo carriers, has been called on to do more to counter trafficking. Corruption among high-level state actors and lower-level officials at airports has allowed trafficking to take place. International bodies such as the UN and civil society monitoring groups have documented these cases in detail.

At the same time, air transport can be seen as an opportunity for policymakers and law enforcement to intervene to counter illicit flows. As a seminal 2009 report on air transport and illicit flows from the Stockholm International Peace Research Institute (SIPRI) argued:

> *Transportation represents the 'choke point' for destabilizing or illicit commodity flows. Air and maritime transport actors are far easier to trace than arms brokers, drug cartels or resource smugglers as the former must legitimately register their aircraft, vessels and associated companies. As such, transporters are the only non-state actors involved in destabilizing or illicit commodity flows required to operate overtly. This characteristic makes them possible to track via databases, flight and maritime records and field research and subject to control.*[58]

This argument holds true today, as evidenced by examples where investigators, journalists and civil society groups have exposed illicit flows using information on air transport.[59]

The aviation industry has been called on to do more to counter trafficking

When attempting to traffic through commercial airports, traffickers must pass through the physical infrastructure of airport security measures and interdictions can be made. In short, transportation is a point where criminal actors are forced to operate overtly and come into contact with law enforcement, and, as passengers and flight operators, they are closely monitored.

Developments in aviation regulation and policy have meant that the sector has become highly securitised over the past two decades. This includes embedding information vetting into the screening process prior to travel, via Advanced Passenger Information (API) and Passenger Name Records (PNR). API allows a

basic determination of whether a passenger can proceed with travel based on biographical information checked against watch lists.[60] PNR tracks more detailed information, which can be kept on file and is passed on to intelligence and law enforcement agencies, including biographical and contact information, itinerary plans, travel history and baggage information.[61] This information can be used in criminal investigations.

The International Civil Aviation Organization (ICAO) is the world's leading civil aviation regulatory body. It issues standards and recommended practices (SARPs) for aviation authorities including those relating to security and measures to minimise criminal exploitation of air travel. The ICAO also undertakes security audits based on its SARPs to determine states' performance.[62] ICAO supports African civil aviation sectors in improving their aviation security capacities.[63]

Regional and international bodies have undertaken an array of initiatives aimed at countering criminal threats

With respect to African aviation, ICAO audits suggest there are vulnerabilities. Audit results for 2018 showed that Africa remains the region with the greatest number of countries with low or non-existent overall effective implementation rates.[64] In terms of security and safety, including the risk to air infrastructure from organised crime threats, Africa is in a vulnerable position. Similar challenges relating to security have been highlighted in previous audits and ICAO meetings.[65]

The Africa Civil Aviation Commission (AFCAC) was formed in 2007 and is a specialised agency of the African Union. It aims, among other things, to foster the implementation of ICAO SARPs and development regulations for the African air sector consistent with the best international practices in civil aviation.[66] One of the main strategic objectives of the AFCAC relates to security.

Regional and international bodies have undertaken an array of initiatives aimed at countering criminal threats to African aviation. These include, but are not limited to:

- **Initiatives led by regulatory bodies** such as the ICAO. The ICAO No Country Left Behind (NCLB) initiative, which began in 2014, is focused on working with states to implement SARPs.[67] ICAO also works with the African Union on a range of initiatives, including those related to security.[68]
- **International donor-funded development programmes** such as the European Union's *Global Illicit Flows Programme*.[69] It includes the **Airport Communications Programme (AIRCOP)**, which works to increase law enforcement capacity at key airports along trafficking routes,[70] as well as the **Monitoring and Controlling General Aviation along the Cocaine Route (COLIBRI)** programme, which focuses on 'general aviation' outside major commercial airports.[71] The **UNODC-WCO** (World Customs Organization) **Container Control Programme** aims to build capacity in countries seeking to improve risk management, supply chain security and trade facilitation at ports, land borders and airports to prevent the cross-border movement of illicit goods.[72]
- **Partnerships bringing together civil society, public and private sectors, such as USAID's ROUTES Partnership**, which brings together transport and logistics companies, government agencies, development groups, law enforcement, conservation organisations, academia and donors to disrupt wildlife trafficking activities as a counter-wildlife trafficking initiative.[73] The United for Wildlife initiative likewise brings together public and private bodies to counter wildlife trafficking through information-sharing and training initiatives.[74]

This overview of regulatory bodies and development initiatives, while not exhaustive, demonstrates that policymakers have initiated programmes designed at minimising the vulnerabilities of aviation to organised crime, as highlighted in the case studies.

The impact of COVID-19

At the time of writing – a year since the COVID-19 pandemic led to lockdowns around the world – it is in many ways too early to tell what the impact and legacy of the pandemic will be. The aviation sector has been one of the hardest hit by the pandemic: according to UN estimates, there was a 60% drop in passenger numbers in 2020 compared to the previous year.[75] The economic impact for the industry, and therefore its ability to engage in initiatives for counter-trafficking and to develop capacity, will be severe. Likewise, the fiscal impact may mean that governments are less willing to invest additional resources in making air routes resilient to organised crime.

Reports have emerged that some criminal networks using air trafficking routes have instead shifted to routes by sea. This was predicted in the early months of the pandemic by monitoring from UNODC.[76] Early evidence suggests this prediction was correct. Analysis from the Regional Maritime Information Fusion Centre (RMIFC) in Madagascar, which monitors maritime security threats in the Indian Ocean, reported that shipping has proven more attractive for illicit trades because most seaports continued to operate during the COVID-19 lockdown period.[77] Wildlife trafficking trends in West Africa,[78] and wildlife trafficking by sea globally, have followed the same trend, with trafficking networks looking to maritime routes where possible.[79]

However, while a potential shift to maritime routes may be a cause for concern for port authorities and maritime regulation, it does not fundamentally change the vulnerabilities demonstrated in air transport. As air travel accelerates and countries lift lockdown and quarantine restrictions, it seems reasonable to predict that trafficking by air may likewise accelerate again.

Companies, regulatory bodies and governments are developing strategies to develop the sector in a post-pandemic world. Civil society groups are campaigning for policies that will make the sector more sustainable. Some groups are also arguing that, in developing the sector after the pandemic, strategies be introduced to make the aviation sector better equipped to countering trafficking, criminal activity and corruption.[80]

Conclusion: is enough being done to counter trafficking through air transport?

The case studies highlighted in this brief demonstrate that air transportation has, both historically and in recent years, been instrumental in the transfer of many illicit commodities, from drugs and weapons to wildlife and precious metals. These flows have contributed to prolonging conflicts by providing a lifeline of revenue to criminal groups, driven corruption and undermined effective regulation and governance, and degraded biodiversity and natural resources. The vulnerabilities in the aviation sector to exploitation by organised crime groups are both practical (in terms of the challenges of comprehensively monitoring persons and cargo travelling by air) and regulatory (as the case studies have shown, in some cases the control and regulation of aviation has been found to be lacking).

However, at the same time, regulation of the aviation sector offers a 'choke point' for illicit flows, and a ready-made opportunity for intervention. Policies which recognise this opportunity have been developed to counter criminal threats by aviation authorities, and there are examples of development programming which has been dedicated to building the capacity of customs and enforcement to interdict trafficking through airports.

The key question is whether these efforts to counter trafficking via air transport are an adequate and effective response to the threat. As the case studies demonstrated, countering trafficking is often not a policy priority for overstretched customs and enforcement authorities, and weaknesses in controlling airspace and a lack of accountability in the private sector have enabled commodities to be moved unchecked. The aviation sector faces many security challenges, from increasingly sophisticated cyber-attacks to terror threats,[81] and the new challenges posed by COVID-19. Counter-trafficking initiatives will only ever be one among a series of competing priorities.

However, as this brief has shown, the impacts of illicit trade flows and organised criminal activity are far-reaching, breeding corruption and derailing development. In attempts to 'build back better' after the COVID-19 pandemic, ensuring that transport infrastructure is not the unwitting friend of organised crime groups could have a long-lasting and positive impact.

Notes

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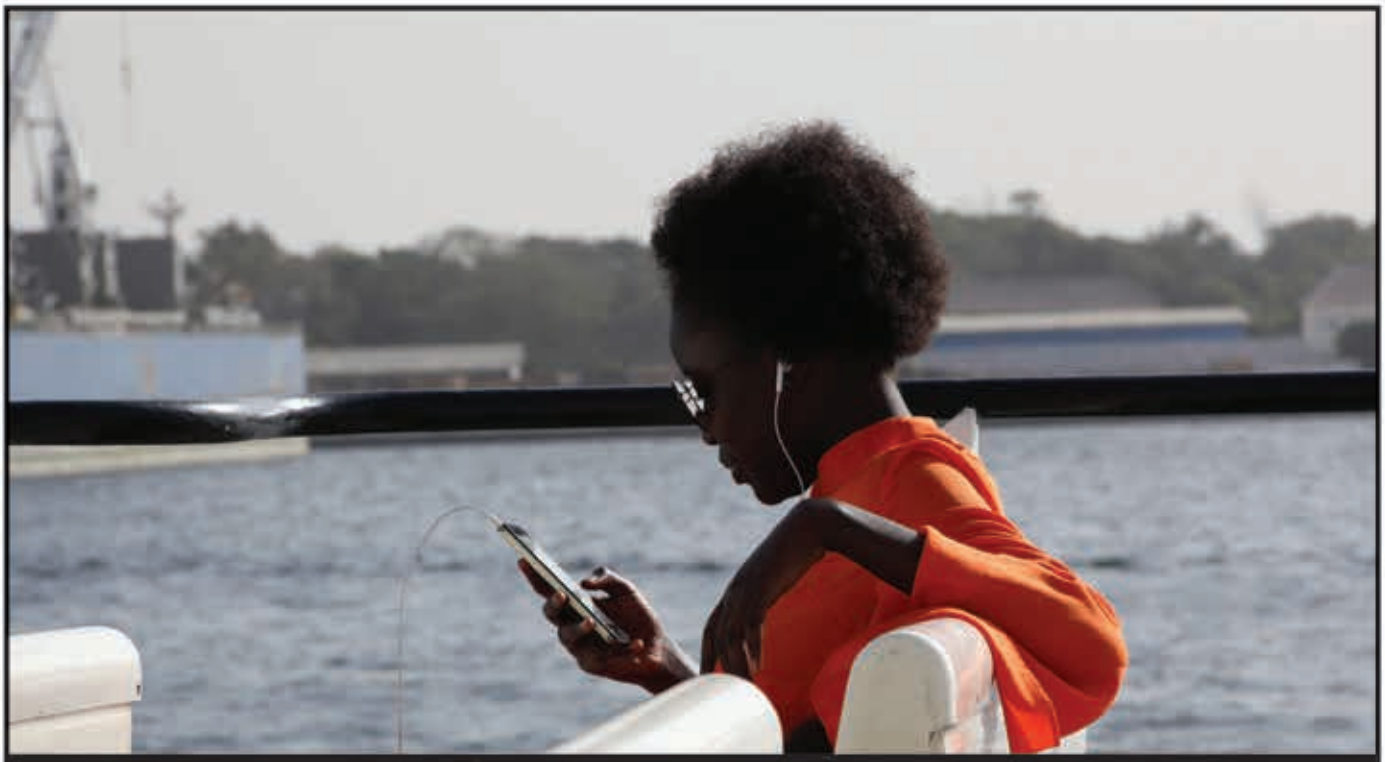

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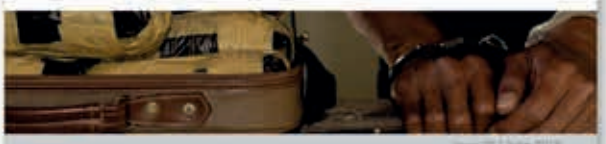

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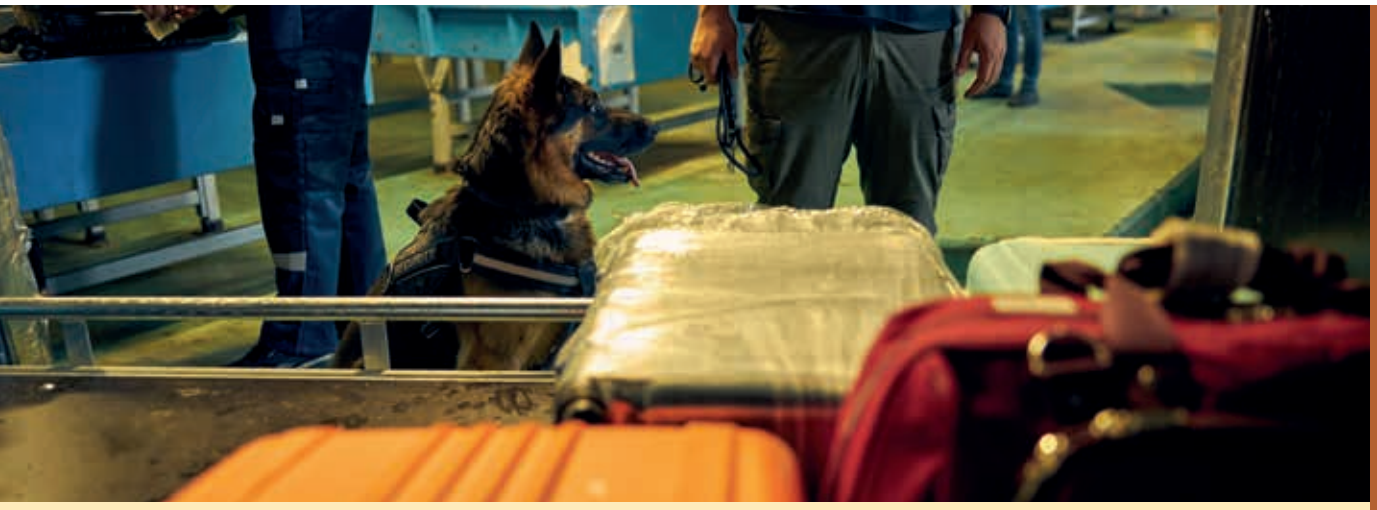

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About ENACT

ENACT builds knowledge and skills to enhance Africa's response to transnational organised crime. ENACT analyses how organised crime affects stability, governance, the rule of law and development in Africa, and works to mitigate its impact. ENACT is implemented by the ISS and INTERPOL, in affiliation with the Global Initiative Against Transnational Organized Crime.

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