

ESAAMLG REPORT

Illicit Cross-Border Movement of Cash and Bearer Negotiable Instruments in the ESAAMLG Region

September 2025





The Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) was officially established in 1999 in Arusha, Tanzania through a Memorandum of Understanding (MOU). As at the date of this Report, ESAAMLG membership comprises 22 countries and also includes a number of regional and international observers such as AfDB, COMESA, Commonwealth Secretariat, East African Community, Egmont Group of Financial Intelligence Units, FATF, GIZ, IMF, SADC, United Kingdom, United Nations, UNODC, United States of America, World Bank and World Customs Organization.

ESAAMLG's members and observers are committed to the effective implementation and enforcement of internationally accepted standards against money laundering and the financing of terrorism and proliferation, in particular the FATF Recommendations.

For more information about the ESAAMLG, please visit the website: www.esaamlg.org

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This Typologies Report was adopted by the ESAAMLG Task Force of Senior Officials and approved by the Council of Ministers at the September 2025 meeting in Addis Ababa, Ethiopia.

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ABBREVIATIONS AND ACRONYMS

ACFE	Accredited Certified Fraud Examiner
AML	Anti-Money Laundering
AML/CFT	Anti-Money Laundering/Counter Terrorist Financing
BNIs	Bearer Negotiable Instruments
C	Compliant
ESAAMLG	Eastern and Southern Africa Anti-money Laundering Group
FATF	Financial Action Task Force
FIA	Financial Intelligence Authority
FIU	Financial Intelligence Unit
LC	Largely Compliant
LEA	Law Enforcement Agency
MER	Mutual Evaluation Report
MVTS	Money or Value Transfer Services
NRA	National Risk Assessment
PEP	Politically Exposed Person
PC	Partially compliant
SAR	Suspicious Activity Report
STR	Suspicious Transaction Report
TF	Terrorist Financing
UN	United Nations
UNDP	United Nations Development Programme
UNSCR	United Nations Security Council Resolution
VA	Virtual Assets
VASP	Virtual Assets Service Provider
VIENNA CONVENTION	United Nations Convention against Illicit Traffic in Narcotic
KYC	Know Your Customer

EXECUTIVE SUMMARY

1. The Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) undertook a study on *'Illicit Cross-Border Movement of Cash and Bearer Negotiable Instruments (BNIs) in the ESAAMLG Region'*. The illicit movement of cash and BNIs is a problem faced by both developed and developing nations. However, the cash-intensive nature of developing economies compounds the risk. The global push for eased movement of persons and goods, facilitated by free movement agreements globally and in the ESAAMLG region, also contributes to the movement of high volumes of cash and to a certain extent, BNIs across the region.
2. The main objective of the study was to better understand the extent of illicit cross-border movement of cash and BNIs for the purposes of money laundering and terrorist financing. A particular focus was made on identifying trends, methods, and techniques employed, as well as the underlying associated predicate offences. Further, the study was meant to identify commonly used routes in the region, origin and destination jurisdictions, and commonly used currencies and the main threats associated with the cross-border transportation of cash and BNIs, as well as the key drivers and factors that facilitate their movement.
3. The study has revealed that there are challenges that are preventing success stories in combating ML or TF arising from illicit cross border cash and BNI movements in the ESAAMLG region. The challenges include limited coordination and cooperation among domestic competent authorities involved in managing cash and BNI cross border movements. Also, there is limited international cooperation, undermining the overall effectiveness of efforts to prevent illicit cross border cash movements and BNIs.
4. A key finding of the study is the insufficient research and trend analysis conducted by Financial Intelligence Units in the region. Only a small percentage of member FIUs have produced typology reports related to illicit cross border cash and BNI movements, limiting the ability to detect and respond to emerging risks. Other findings includes that there are limited coordination and cooperation among agencies. There is insufficient law enforcement information which means that the study could not generate a picture of characteristics, patterns and common behaviours to a particular ML type detected from illicit cross border cash and BNIs movements. The study also established that weak border controls were the major driver for inward movements, followed by corruption, and weak financial systems and economic stability while for outward movements, the major drivers identified included diversified economies, tax evasion, informal trading and capital account restrictions. Member countries have implemented mitigation measures to address the risks of illicit cross-border movement of cash and BNIs and these measures need strengthening. There are mechanisms for international cooperation, but few cases are available where there is evidence that these mechanisms were effectively utilized. The region has developed legal and institutional frameworks to address illicit cross-border movement of cash and BNIs. However, these frameworks are not effectively being utilised resulting in few identified money laundering or

terrorist financing cases investigated or prosecuted. Some member countries have adopted electronic based declaration processes, which seem to be more effective in preventing illicit cross-border movement of cash and BNIs. Criminals involved in illicit cross border movement of cash and BNIs commonly conceal the cash and BNIs on their bodies, in clothing luggage, and hidden compartments of vehicles, aiming to falsely declare the cash at border points and eventually evade detection. The most intercepted currencies in illicit cross-border movements of cash and BNIs are the United States Dollar, South African Rand, and Euro.

5. The study has made several recommendations for the ESAAMLG member countries to consider adopting. There is need strengthen coordination and collaboration among relevant domestic and international agencies in addressing the issue of illicit cross-border movement of cash and BNIs. FIUs should prioritize the development of detailed trends analysis and typologies related to illicit cross-border movement of cash and BNIs. Member countries should adopt cutting-edge technologies and mechanisms, including the use of electronic declaration systems, cash-sensitive scanners, and sniffer dogs trained in detecting bulk cash. They should also improve the maintenance of statistics relating to Cross Border Reports, investigation cases arising from both the Cross Border Reports and other sources, joint investigations, prosecutions, convictions, and requests related to illicit cross-border cash movement and BNIs. Member countries should continue to develop and modernize their statutory frameworks to ensure that they are equipped to address contemporary illicit cross border crimes effectively. Lastly, regular training of border officials in the use of modern technologies should be prioritized to ensure the successful implementation of these advancements which will result in preventing illicit cross border cash and BNI movement.

CHAPTER 1: INTRODUCTION

6. This study was undertaken following the 2008 Report on **Cash Courier-Based Money Laundering** (hereinafter referred to as the 2008 study) that identified predominant use of cash, porous borders, lack of required expertise as key causes that led to the growth of the illicit cross-border movement of cash. At the time of the 2008-study, Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) regimes in the region were not well developed. As a result, it became apparent, as per its findings, that while ESAAMLG member countries had Anti-Money Laundering (AML) laws, very few had legislation on combating the financing of terrorism.
7. Regarding dealing with illicit cross-border movement of cash, the study found that most jurisdictions limited themselves to the use of exchange control and customs laws when pursuing offences related to the illicit cross-border cash movement¹. This was primarily attributed to the limited understanding of the relationship between illicit cross border movement of cash, money laundering, and terrorist financing. In line with these and other findings, member countries were urged to come up with legislation and institutional arrangements meant to address the gaps.
8. The 2008 report also recommended increased awareness-raising, training, and capacity-building, as well as improvements in domestic, regional and international cooperation. Furthermore, the findings and recommendations of the 2008 report provided the context and background upon which this study was undertaken.

1.1 Problem Statement

9. In present-day integrated economies, the international payments and the movements of cash are voluminous, with almost every segment of the economy requiring cross-border payments at one time or another². While the legal movement of cash is necessary for economies to operate, the abuse of this system for the purposes of money laundering or financing terrorism remains a present threat. In response to this apparent threat, the Financial Action Task Force (FATF) issued Recommendation 32, aimed at ensuring that terrorist and other criminals are prevented from financing their activities or launder proceeds of crime through the physical cross-border transportation of cash and Bearer Negotiable Instruments.
10. The illicit movement of cash and BNIs is a problem faced by both developed and developing nations. However, the cash-intensive nature of developing economies compounds this risk. Furthermore, the eased movement of persons and goods, facilitated by free movement agreements within ESAAMLG, also contributes to the high volumes of cash movement.
11. These factors of movement of people and cash intensiveness of the economies on their own are not the source of the problem, the key issue is ensuring that criminals and

¹

https://www.esaamlg.org/index.php/methods_trends/readmore_methods_trends/10.

² Skinner, C. P. (2023, April 25). COINS, CROSS-BORDER PAYMENTS, AND ANTI-MONEY LAUNDERING LAW. Harvard Journal on Legislation, 60(2), 301-351.

terrorists do not exploit these systems. If the methods used by criminals to take advantage of the systems are not well understood, governments would fail to adopt effective regulatory and policy measures to combat illicit movement of cash and BNIs for money laundering and terrorist financing purposes. It is therefore imperative, for the sake of protecting the integrity of ESAAMLG's member countries financial systems, that this criminal activity and its typologies are well understood.

1.2 Scope and objectives

12. While the crimes of illicitly moving cash and BNIs across borders is widespread, for the purposes of the study it will be examined primarily in the context of ML and TF. Therefore, while attention will be given to the illicit movement of cash or BNIs across borders in general, in undertaking analysis, making relevant findings and recommendations, emphasis will be placed on their use as a channel for ML and TF.
13. The objectives of the study are as follows:
 - a) Determine the extent of illicit cross-border movement of cash and BNIs within the ESAAMLG Region, with particular focus on identifying trends, methods, and techniques employed, as well as the underlying most proceeds-generating associated predicate offences for ML or TF through physical transportation.
 - b) The study will also seek to identify commonly used routes in the region, origin and destination jurisdictions, and commonly used currencies. In this context, it will also seek to identify the main threats associated with the cross-border transportation of cash and BNIs, as well as the key drivers and factors that facilitate their illicit movement.
 - c) Determine the comprehensiveness of ESAAMLG countries' legal and institutional frameworks, and their effectiveness in addressing and curbing the illicit cross-border movement of cash and BNIs. For anti-money laundering and counter-terrorist financing purposes, this will be achieved by examining the level of compliance with the requirements of Recommendation 32.
 - d) The study will conclude with findings and recommendations to address the identified gaps, which are expected to strengthen member countries legal and institutional frameworks for combating ML and TF arising from the illicit Cross-Border Movement of cash and BNIs.

1.3 Methodology

14. The study has used both quantitative and qualitative data. information was obtained from member Countries through Questionnaires. The information relates to the legislative and institutional frameworks, and statistics for the period of study on the illicit movement of cash and BNIs. Furthermore, members countries were requested to provide case studies to illustrate how the courts have dealt with these crimes in their jurisdictions.

15. To supplement the information received from member countries, the project team relied on previous studies relating to the illicit movement of cash and BNIs, both in general and specifically in the ESAAMLG region, as well as open-source information. This was done to ensure the validity and reliability of the data.
16. The data collected using questionnaires were subjected to interpretative analysis with the intention of gaining further knowledge and understanding of the current status of the misuse of cross-border cash movement and BNIs for money laundering and terrorist financing purposes.

1.4 Limitations of the study

17. The primary limitation of this typology study was the initial quality and completeness of the data collected from member countries. While the project team re-issued and recirculated questionnaires to encourage members to provide missing or updated information, some countries remained partially or entirely non-responsive, and certain questions were left unanswered. To partially address these gaps, the project team supplemented the responses with information from open-source and other independent verifiable sources. This multifaceted approach was necessary to ensure that the final analysis was as comprehensive and accurate as possible.
18. The incompleteness of the data limited the study's ability to provide a fully comprehensive overview of the scale and patterns of illicit cross-border movement of cash and BNIs in the region. Additionally, the outcomes of the study are limited in their ability to present a complete overview of the problem in the region.
19. Additionally, the study focused on official points of entry and did not capture activity at non-official or informal border crossings, which are often used by criminals and terrorists and pose significant enforcement challenges. Furthermore, the effectiveness of the public awareness and understanding of declaration or disclosure obligations was not assessed in this study. The study could not determine whether criminals and terrorists choose one jurisdiction over another based solely on the weaker sanction regimes.
20. Lastly, the information available also did not include cases with formal money laundering or terrorist financing charges. However, this does not imply that illicit cross-border movement is unrelated to ML or TF activity; rather, it highlights the need for jurisdictions to consider alternative law enforcement measures, such as investigations, interdictions, and disruptions, where formal charges are not applied.
21. Overall, these limitations underline that, while the study provides valuable insights, the findings should be interpreted in the context of partial data coverage, reliance on official sources, and gaps in linkage to formal ML/TF charges.

1.5 General global contextualization

22. United Nations (UN) and the FATF have developed and adopted international legal and regulatory frameworks that establish the obligations for countries to address challenges related to illicit cross border movement of cash and BNIs. According to Article 7 (2) of the UN Convention against Transnational Organized Crime and Article 14 (2) of the UN

Convention Against Corruption, countries are required to comply and adopt feasible measures, including reporting requirements, to detect and monitor the movement of cash and BNIs across borders. Furthermore, FATF Recommendation 32, on Cash Couriers, is designed to prevent criminals and terrorists from laundering illicit proceeds or financing their activities through the physical cross-border transportation of cash and BNIs.

23. A study by the FATF in 2015 found that cash remains an important means of settlement across the globe, with an estimated USD 4 trillion in circulation and between 46% and 82% of all transactions in all countries being conducted in cash. However, the use of cash presents governments with the unintended consequence of having to address criminal activity related to the physical movement of cash. In light of this, FATF issued a recommendation aimed at mitigating the risks presented by the illicit movement of cash and BNIs across borders³.

1.6 ESAAMLG Overview

24. ESAAMLG economies are cash-intensive and experience significant movement of people and goods across jurisdictions. These characteristics have contributed to an increase in the cross-border movement of cash and BNIs. Most of this cash is legally earned and legitimately used and moved across jurisdictions. However, there have been indicators demonstrating that this system can be abused for illicit purposes. This was one of the reasons why member countries called for a study of this nature, to better understand the magnitude of the problem in the region.
25. To better understand where the loopholes are, it was imperative that Recommendation 32 technical compliance be assessed. Some ESAAMLG member countries were found not to be fully compliant with the requirements of Recommendation 32. Of the 19 countries that have successfully completed the second round of mutual evaluations, three (3) member countries were found to be compliant; eight (8) were largely compliant; and eight (8) were found to be partially compliant. In addition to the issues, several member countries have indicated that in their National Risk Assessments, the illicit movement of cash across borders has been identified as a high-risk for money laundering and terrorist financing.
26. Despite these deficiencies, it should be noted that members countries have implemented not only laws and regulations, but also systems at ports of entry to enable the declaration or disclosure of cash and BNIs. These measures are detailed in the institutional framework section of this report.
27. The presence of these declaration systems is important because the aim is to detect the physical cross-border movement of cash and BNIs, restrain cash and BNIs that are suspected to be related to ML/TF, stop or restrain cash and BNIs that are falsely declared or disclosed, apply appropriate sanctions for making a false declaration.
28. It can therefore be concluded that member countries have implemented one of the recommendations of the 2008 study by establishing a legislative framework to

³ 4Hanafi, A., & Ali, M. (2022). *Journal of Money Laundering Control*, 25(3), 540-550.

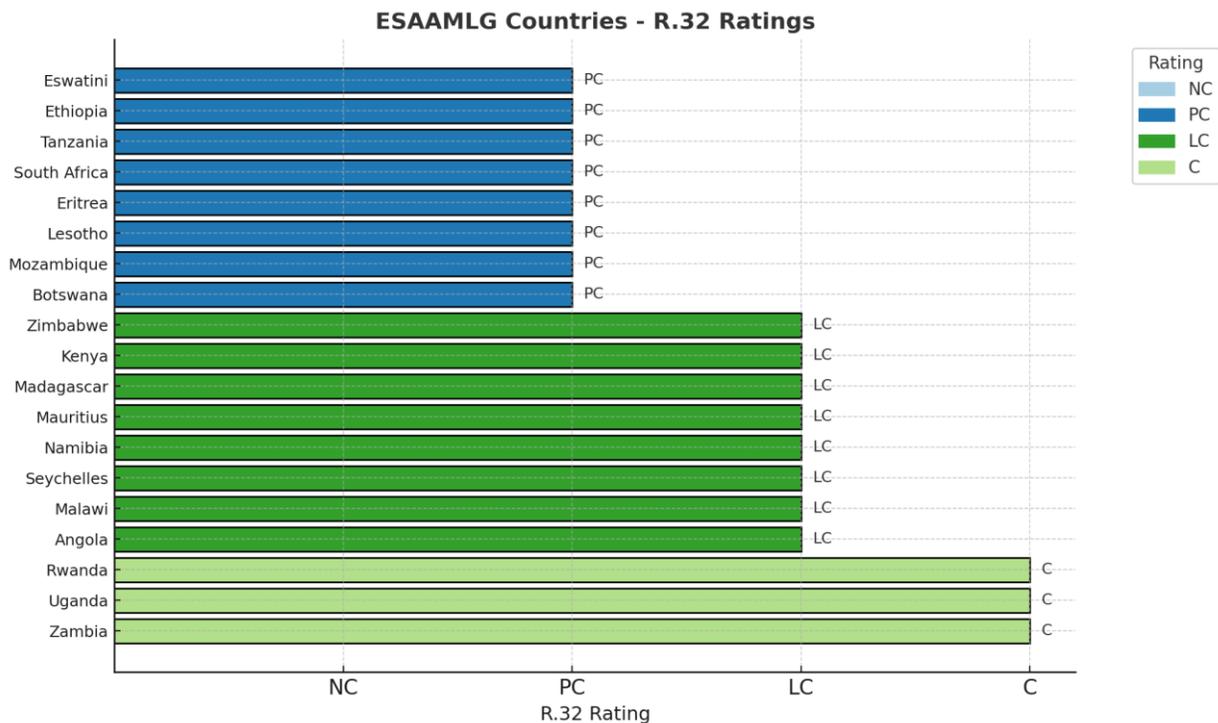
successfully identify, investigate, prosecute, and secure convictions related to ML/TF cases arising from the illicit cross-border movement of cash and BNIs.

1.7 Compliance with FATF Recommendation

29. The FATF Recommendation 32 on Cash couriers requires countries to have measures to detect the physical cross-border movement of cash and BNIs. These measures include requiring all persons (natural and legal) who physically transport cash and BNIs exceeding a pre-set threshold of USD/EUR 15,000 to submit a truthful declaration to the designated competent authorities.
30. Despite this requirement, most member countries were rated partially compliant (PC) with respect to Recommendation 32 in their Mutual Evaluation Reports. To address these deficiencies, 66.6% of those member countries rated PC or NC sought a re-rating on Recommendation 32 and have since achieved a Largely Compliant or Compliant rating.

Table

1



31. This is largely influenced by the following factors:
 - a. **Incomplete Legal Coverage of BNIs:** Despite Recommendation 32 explicitly covering BNIs, several jurisdictions have banned their use, while others classify BNIs as financial instruments allowed to operate in the country. In the jurisdictions that allow the use of BNIs, most of them have not established a declaration system for their cross-border movement. Furthermore, one member country has implemented a declaration system for incoming and outgoing cross-border movement of BNIs exceeding USD 10,000 or its equivalent in other currencies. However, the declaration system does not cover BNIs transported via mail and cargo. In addition, there are no

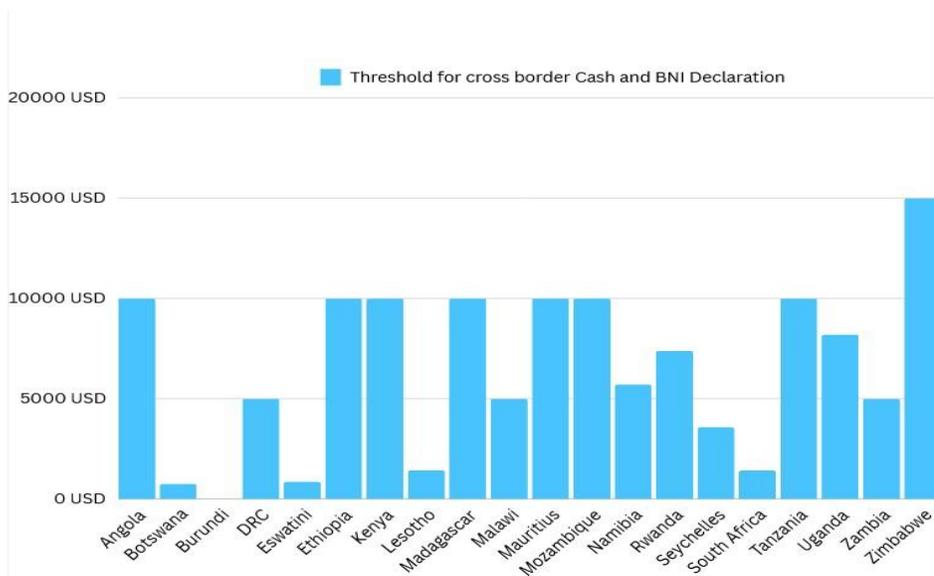
provisions authorizing customs authorities or relevant competent authorities to inquire into the origin and intended use of the currency. This deficiency directly weakens the ability to prevent criminals from laundering the proceeds of their crimes and terrorist actors from moving their cash through the physical cross-border transportation of BNIs.

- b. **Varying Sanction Regimes:** While sanction regimes across ESAAMLG jurisdictions are generally assessed as proportionate and dissuasive, there is a wide variation in the type and severity of penalties applied for false declarations or disclosure (with fines ranging from approximately USD 615 to USD 100,000 and imprisonment ranging from 1 to 30 years). Although the uniformity of sanctions is not required under Recommendation 32, and there is no evidence suggesting that criminals choose one jurisdiction over another based solely on the weaker sanction regime, this variation can be of some use by criminals and terrorists to determine which country to operate based on the sanction regime. Based on the results of the MER, 16.7% of jurisdictions are rated 'Partially Met' and 5.6% are 'Not Met' on the sanctions sub-criterion (32.5), indicating weakness in the application or deterrent effect of sanctions in certain cases.
- c. **Limited Detection Capabilities:** While control methods such as baggage scanners are in place at major entry points, detection of cash and BNIs remain constrained. Smaller or less-trafficked entry points often rely primarily on manual inspections or random profiling, which reduce the likelihood of detecting illicit cash or BNIs. This limitation affects the ability to achieve the objective of Immediate Outcome 8, which is to assess how effective a country's declaration or disclosure system identifies and seizes non-declared or falsely declared cross-border movement of cash and BNIs.
- d. **Weak Information Exchange:** The MERs identified as major deficiency the lack of adequate coordination among Custom, Immigration and other relevant authorities on issues related to implementation of Recommendation 32. Furthermore, the declaration systems do not allow for international cooperation and assistance, in accordance with recommendations 36 and 40, to facilitate the identification of illicit cross-border movement of cash and BNIs. It is important to note that the 2008 study recommended that countries exchange information domestically, regionally and internationally in order to combat illicit movement of cash.

CHAPTER 2: OVERVIEW OF LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 Declaration/ Disclosure Systems

32. Most of the member countries have in place a declaration or disclosure system for the incoming and outgoing cross-border transportation of Cash. However, several countries have not implemented a similar system for BNIs (cheques, promissory notes, and bearer bonds). This lack of formal declaration or disclosure requirement for BNIs represents a potential vulnerability that could be exploited by criminals and terrorists to move large sums of illicit funds undetected. Furthermore, in some jurisdictions, Customs authorities lack legal power to identify BNIs, and in certain cases, officers have limited or no understanding of the existence of BNIs. The absence of these mechanisms may facilitate ML/TF by creating an unmonitored channel, which, if exploited, could be used to fund illicit activities such as organized crime and terrorism.
33. Most countries reported that the limited use of BNIs is primarily due to advancements in financial technologies and services, which now provide seamless platforms and options for real-time cross-border transactions. FATF recommendations and related regulatory compliance also contribute to the reduced reliance on BNIs, as many jurisdictions have prohibited or restricted their use. For institutions that continue to issue or accept BNIs, enhanced due diligence measures and KYC measures are being implemented, and any suspicious transactions are reported to regulator, sector supervisory, and the FIU in accordance with AML/CFT obligations.
34. Regarding the cash declaration system, the threshold for incoming and outgoing physical cross-border transportation of cash and BNIs in the region varies between USD 750 and USD 15,000. Graphic 1 illustrates the threshold for Cross-border Cash and BNIs Declaration.



2.1 Types of Declaration Systems

35. There are three main types of declaration systems used in the ESAAMLG region for individuals or entities carrying amounts above a set threshold: (i) a written declaration for all travelers; (ii) a written declaration only for amounts exceeding the threshold; and (iii) an oral declaration required for all travelers. Among these, the most common approach in the region requires a written declaration for amounts above the threshold, balancing compliance with traveler convenience. While eight (8) member countries require written declarations from all travelers, four (4) have opted for an oral declaration system, which may offer greater flexibility but presents challenges in enforcement and oversight. In addition, several member countries have adopted a combination of declaration methods.
36. The written declaration system offers several advantages, particularly in preventing illicit cash and BNI movements, enhancing transparency, and supporting the detection of suspicious cases of ML or TF. However, it also presents challenges, including inconvenience for travelers, the potential exploitation by corrupt officials through solicitation of bribes, and privacy concerns. To mitigate some of these challenges, countries such as Mauritius, Seychelles and South Africa have introduced electronic or online declaration mechanisms. These mechanisms allow travelers to submit declarations prior to travel and receive confirmation electronically, thereby improving efficiency, reducing manual errors, and strengthening overall risk management.
37. While the use of multiple declaration systems can enhance flexibility, it is essential to ensure that such measures do not hinder the legitimate movement of people and goods. A well-balanced declaration system should promote financial transparency while maintaining efficiency and minimizing undue burdens on travelers and businesses.
38. In line with FATF Recommendation 32, most member countries have in place a robust legal framework that provides for prevention, detection, and prosecution of ML or TF offences related to the illicit cross border movement of cash and BNIs. These legal frameworks establish cash and BNIs declaration or disclosure systems for all natural persons entering and leaving the country to declare cash or BNIs above the set threshold. This requirement also extends to cash and BNIs contained in cargo and mail, supported by customs procedures applicable to the general movements of goods.
39. Competent authorities, primarily customs and revenue authorities, are empowered to request and obtain additional information from the carrier upon discovery of a false declaration, false disclosure, or a failure to declare or disclose cash or BNIs. They are also authorised to stop or restrain cash or BNIs for a reasonable period to determine whether there is evidence of ML or TF. Moreover, the legal framework provides for proportionate and dissuasive sanctions against people who make a false declaration, or who transport cash or BNIs linked to ML or TF.
40. In Lesotho, the Customs and Excise Act of 1982, (Sections 14 (1) and 14 (2)), as amended, require all travelers entering and departing the country to declare all goods in their possession. In addition, the Money Laundering and Proceeds of Crime Act 2008 (MLPCA), as amended (section 28), and ML(Currency and Bearer Negotiable Instruments Declaration) Regulations, 2015, (ML Regulations) as amended (regulation

3 and 6) requires all travelers traveling entering or leaving Lesotho to declare cash and BNIs when their value exceeds the prescribed threshold.

41. In Tanzania, the Anti-Money Laundering (Cross-Border Declaration of Currency and Bearer Negotiable Instruments) Regulations, 2016 provide guidance on the thresholds for declaring cash and/or BNIs when entering or departing the country. The regulations also set out procedures for making such declarations and explain the consequences of failing to declare or false declaration. Furthermore, it also empowers customs officers to enforce compliance with the declaration requirements.
42. In Kenya, section 12 (1) of the Proceeds of Crime and Anti-money Laundering Act (POCAMLA) requires all travelers to declare cash and monetary instruments of USD 10,000 or its equivalent and above, when entering or leaving the country. The framework also provides for coordination with Assets Recovery Agency and prosecution by office of the Officer of the Director of Public Prosecutions (ODPP) for investigation and prosecution.
43. In Mauritius, Section 131A of the Customs Act establishes a legal framework governing the physical cross-border transportation of cash. It further empowers the customs officer to stop or restrain, where there are reasonable grounds to suspect that the cash, BNI, may be linked to money laundering, financing of terrorism or any other criminal offence. The law also requires the customs officer to disseminate the relevant information to FIU, the Police, the Financial Crimes Commission and other relevant bodies for investigation purposes.
44. The key gaps identified include the absence of a prescribed threshold for BNIs, weak enforcement and sanctions, inadequate coordination and implementation of regulatory measures, insufficient powers for customs and law enforcement authorities, and loopholes in declaration requirements. These shortcomings create vulnerabilities that can be exploited by criminal networks, money launderers, and terrorist financiers. Collectively, the gaps potentially exposes the financial systems to heightened risks and undermine the effective monitoring and control of the illicit movement of cash across borders.

2.3 Criminalization and Sanctions Related to Illicit Cross-Border Movement of Cash and BNIs

2.3.1 Criminalization

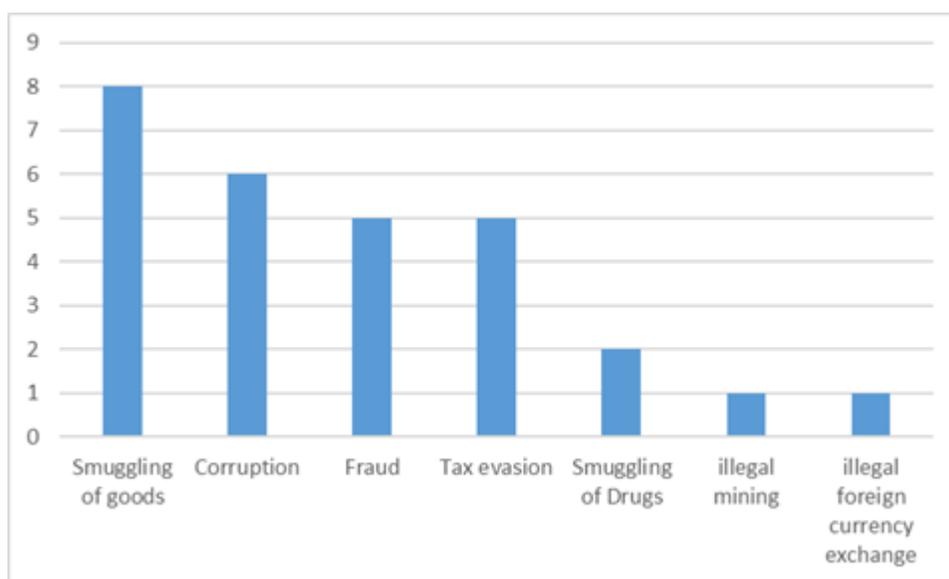
45. The study found that most of the member countries have legal frameworks criminalizing the illicit cross-border movement of cash and BNIs. These provisions are typically embedded within broader legislative frameworks such as AML laws, customs regulations, or general criminal codes. While embedding these provisions in broader legislation ensures that illicit cash and BNIs movements are addressed, the effectiveness of public awareness and understanding of declaration obligations was not assessed in this study.

46. Similarly, most jurisdictions have enacted laws criminalizing money laundering and terrorist financing. In the context of cross-border movement of cash and BNIs, this movement can facilitate ML or TF by enabling the transfer of illicit cash across jurisdictions for laundering purposes. This legal framework strengthens enforcement by allowing authorities to investigate and prosecute individuals involved in the movement of cash or BNIs intended to conceal or launder the proceeds of crime.
47. The absence of legal provisions in certain jurisdictions creates a potential vulnerability that could be exploited to facilitate ML or TF through cross-border movements of cash and BNIs. While such gaps may weaken regional AML and CFT efforts, the extent to which they create a haven for financial crime depends on enforcement practices, cross-border cooperation, and evidence of actual exploitation, which was beyond the scope of this study.
48. In the absence of explicit criminal provisions, authorities may lack the necessary tools to effectively investigate and prosecute illicit cross-border movement of cash and BNIs. To mitigate this vulnerability and strengthen regional AML/CFT frameworks, it is important for all jurisdictions to criminalize such movements and align their legal systems with the international AML/CFT standards.

2.3.2 Crimes associated with illicit cross-border movement of cash and BNIs

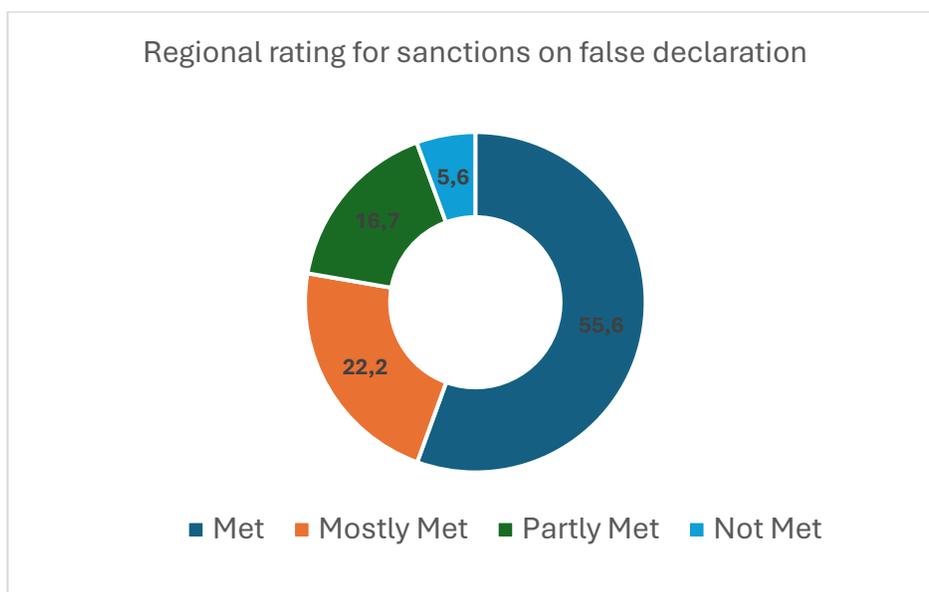
49. Member countries were asked to identify the primary predicate offences associated with illicit cross-border movement of cash and BNIs for money laundering and terrorist financing purposes. Responses from 12 jurisdictions indicate that the most frequently reported predicate offences include smuggling of goods, corruption, fraud, tax evasion, smuggling of drugs, illegal mining, and illegal foreign currency exchange.

Graphic 2: Predicate Offenses Associated with Illicit Cross-Border Movement of Cash and BNIs



2.3.3 Sanctions

50. Most jurisdictions in the ESAAMLG region have legal provisions holding individuals liable for failing to comply with mandatory declaration requirements for cross-border movements of cash and BNIs. Liability is enforced through criminal prosecution, administrative penalties, or civil sanctions, and measures consistent with Recommendation 4, which enable the confiscation of such cash or BNIs. However, the scope and severity of these sanctions vary across jurisdictions, which can affect the overall effectiveness of enforcement. As noted earlier, FATF Recommendation 32 does not require jurisdictions to adopt a uniform sanction regime; rather, it requires that sanctions be proportionate and dissuasive.
51. Jurisdictions in the ESAAMLG region apply different combinations of sanctions for violations of cross-border movement of cash and BNIs. Only three jurisdictions in the region have a legal framework that imposes all three types of sanctions, namely criminal, administrative, and civil. Nine jurisdictions apply a combination of two sanction types, while the remaining jurisdictions rely primarily on apply criminal sanctions alone. Overall, criminal sanctions are the most applied (85% of jurisdictions), followed by administrative sanctions (60%), with civil sanctions being the least utilized (30%). Chart 1 illustrates the regional rating for sanctions on false declaration.



52. According to the chart, 77.8% of the member countries were rated “Met” or “Mostly Met” under Recommendation 32.5, which assesses whether sanctions for declaration violations are proportionate and dissuasive.
53. A key challenge identified in the study is the significant variation in penalties imposed on people who violate declaration requirements. However, the study could not determine whether criminals choose one jurisdiction over another based solely on the

weaker sanction regime, or how this variation could be exploited by criminals and terrorists to determine which country in which to operate based on the sanction regime. Furthermore, the study identified that jurisdictions that have not fully aligned with Recommendation 32 pose a significant risk, as gaps in their legal frameworks could weaken the region's ability to combat financial crimes such as money laundering and terrorist financing.

54. Despite the variation in the sanction regimes, findings from Mutual Evaluations suggest that, overall, sanction regimes in the region are largely proportionate and dissuasive. Nevertheless, continued efforts are required to strengthen the consistent application of enforcement mechanisms across jurisdictions, particularly to ensure that sanctions are effectively applied in practice and contribute to the deterrence and disruption of the illicit cross-border movement of cash and BNIs.

2.3.4 Institutional Frameworks

55. As required under Recommendation 2, most jurisdictions have an AML/CFT committee responsible for dealing with matters related to ML and TF, which in most cases includes dealing with violation of cross-border movement of cash and BNIs. Furthermore, most member countries have designated one or more competent authorities responsible for ensuring compliance with cross-border cash and BNIs declaration requirements.
56. Responses from the questionnaire indicate that most jurisdictions have formally empowered institutions to enforce these obligations. In most cases, customs and revenue authorities are the primary institutions responsible for administering and enforcing declaration systems at ports of entry and exit. Depending on the national legal and institutional framework, other institutions such as immigration and citizenship authorities, Police, Central Banks, Treasury Administrations, and Financial Intelligence Units may also have a complementary role in supporting compliance, investigations, sharing information, and the storage of seized cash or BNIs.
57. The study also reveals that most of the jurisdictions have mechanisms in place that allow effective operational cooperation and, where appropriate, coordinated and timely sharing of relevant information between the authorities mentioned above. However, no jurisdiction has reported the existence of a committee specialized in dealing with issues related to the violations of cross-border movement of cash and BNIs.

CHAPTER 3: UNDERSTANDING OF ML/TF RISKS ASSOCIATED WITH ILLICIT CROSS-BORDER MOVEMENT OF CASH AND BNIS.

3.1 Understanding of ML/TF Risks

58. Recommendation 1 of the FATF Standards require countries to identify, assess, and understand the money laundering and terrorist financing risks to which they are exposed, and to apply mitigation measures proportionate to those risks. This risk-based understanding should guide the implementation of all FATF recommendations, including Recommendation 32. Within the ESAAMLG region, several jurisdictions have identified the illicit cross-border movement of cash and to lesser extent BNIs as a relevant ML/TF risk in their national risk assessments. As reflected in countries' responses to the questionnaire, the risk manifests primarily through the physical transportation of cash across borders as means to move, conceal, or transfer proceeds of crime or funds intended for illicit purposes. The extent and nature of this risk, however, vary across jurisdictions depending on factors such as geographic location, economic system, volume of cross-border movement, border controls, and the prevalence of cash-based economic activities.
59. To assess whether member countries understand the ML/TF risks arising from the illicit cross border movement of cash and BNIs, the project team administered a questionnaire and reviewed available National Risk Assessment (NRAs) Reports. Responses and NRAs findings show that member countries have assessed the adequacy of border controls and customs measures relating to cross-border movement of cash and BNIs. In these jurisdictions, such assessments typically consider factors such as declaration and disclosure systems, enforcement capacity at the border points, and coordination among relevant competent authorities.
60. Most member countries have not conducted stand-alone or dedicated risk assessments focused on cross-border movement of cash and BNIs. Instead, these risks are generally considered within their broader National ML/TF/PF risk assessments. Furthermore, several countries reported to have completed typology studies on illicit cross-border movement of cash. The depth and consistency of risk understanding, however, varies across the region, with some jurisdictions yet to complete a national ML/TF risk assessment. In such cases, mitigation measures relating to the cross-border movement of cash or BNIs are primarily implemented through general customs and border control procedures, rather than being informed by a comprehensive ML/TF risk-based analysis.
61. The study further identified structural factors within the ESAAMLG region that may heighten vulnerability, including the prevalence of informal Cross-Border Trade (ICBT) and porous borders, which can limit the effectiveness of declaration systems, and control mechanisms. Several jurisdictions also reported challenges in conducting joint border operations and establishing multi-agency task forces, which constrains cooperation in joint investigations, information sharing, and intelligence-led responses to illicit cross-border movement of cash and BNIs.

62. The study finds that both licensed and unlicensed entities may facilitate the cross-border movement of cash and BNIs, particularly in areas where borders are less controlled. While some member countries have reported that the associated ML risk is relatively high and the TF risk is lower, the overall level of vulnerability remains influenced by gaps in the legal enforcement framework governing cross-border declaration and disclosure.

3.2 Preventative Measures to Address ML/TF Risk from Illicit Cross-Border Movement of Cash and BNIs

63. All responding member countries indicated that they have both a legal and an operational framework to regulate the cross-border movement of cash and BNIs. These frameworks typically include legislation, judiciary oversight, and enforcement agencies such as police and immigration authorities, Ministry of Finance, FIUs, intelligence agencies, and marine patrols. The study identified several vulnerabilities within these frameworks including gaps in legislation, inconsistent enforcement, and limitations in operational capacity that may hinder the effective prevention, detection, and control of illicit cross-border movement of cash and BNIs.
64. Cash is moved across borders for a variety of reasons, both legitimate, such as travel for business or personal purposes, and illegitimate. Illicit cross-border movement of cash and BNIs can occur when individuals attempt to exploit jurisdictions with weaker AML/CTF controls to introduce illicit funds into the financial system. In this context, the risk of detection at air and seaports can be considered lower than for transactions conducted through regulated financial institutions, where reporting requirements and oversight mechanism are more robust.
65. Therefore, the illicit cross border movement of cash and BNIs across the ESAAMLG region continues to be a problem. Criminals and terrorists continue to freely conduct transactions in cash, moving proceeds of crime quickly and anonymously, including across borders. Their choice of a jurisdiction to operate in can be driven by the high usage of cash, weaknesses in border controls, and low understanding of the ML/TF risks in that jurisdiction, thus highlighting the need for member countries to adopt stronger AML/CFT controls.

CHAPTER 4: CUSTOMS AUTHORITIES

66. Customs authorities in the ESAAMLG region have produced 43,527 cross-border cash movement reports, most of which are related to false declarations or failure to declare. These reports were generated based on operations carried out by border officers using various tools and methods, including sniffer dogs, random profiling, body and luggage inspections, vehicle searches, border patrols, and advanced systems such as Advanced Passenger Information (API) and Passenger Name Record (PNR). Despite these efforts, reliance on random profiling remains the primary strategy, with limited use of information from other sources, thereby reducing the overall effectiveness of detection.
67. Information sharing is primarily focused on predicate offences such as drug and human trafficking, with comparatively less attention given to illicit cross-border movement of cash and BNIs. This suggests that, while addressing drug and human trafficking is fundamental, it is also important to allocate resources to tackle the illicit cross-border movement of cash and BNIs.
68. As required under Recommendation 32, most customs authorities in the ESAAMLG region are empowered with powers to detect and pursue illicit movement of cash and BNIs. These powers include the use of special investigation techniques and the ability to inspect ships, planes, vehicles, and high-risk individuals. Although, significant enforcement gaps remain, in relation to the effective implementation of these powers consistently across the region which may result in identifications of new cases.
69. A significant issue is the manual nature of the declaration systems. In most jurisdictions, travelers are required to submit forms manually, and these forms are often not shared in a timely manner with authorities in the country of exiting and the destination country (sometimes taking a day or more after passengers have arrived). This delay hampers the ability to identify high-risk travelers and prevent the movement of illicit funds, allowing criminals and terrorists to successfully move the illicit cash or BNI. Additionally, varying thresholds for declarations across jurisdictions may contribute to inconsistencies in processing and sharing information, especially because a declaration may not trigger an alert if it falls below the required threshold. Furthermore, due to limited resources, countries tend to allocate more resources to analyse declarations above the threshold, which may encourage criminals to declare amounts just below the threshold to avoid detection.
70. In some instances, customs officials have been implicated in facilitating the illicit movement of cash and BNIs in exchange for a commission. Such activities undermine enforcement efforts and underscore the need for greater accountability within customs authorities.

4.1 Customs Cooperation and Coordination

71. Member countries face significant challenges due to the lack of effective mechanisms for sharing information and intelligence on the illicit cross-border movement of cash and BNIs at both regional and international levels. While most countries report having mechanisms for cooperation and information sharing, these mechanisms are generally not specifically designed to address the movement of illicit cash and BNIs. Current

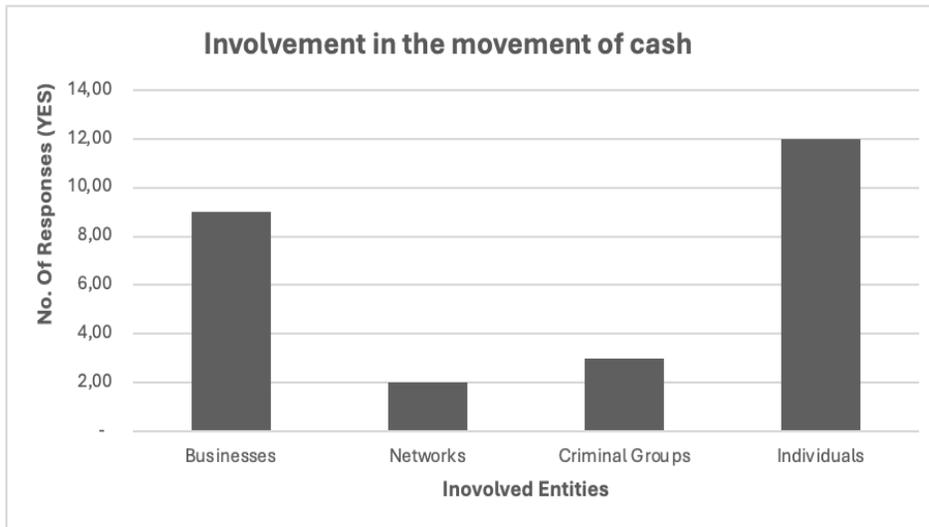
frameworks, such as Customs Mutual Assistance Agreements, inter-agency arrangements, and collaboration with the Regional Intelligence Liaison Office (RILO), are mostly bilateral or part of broader World Customs Organization mechanisms. This lack of formalized, targeted inter-agency cooperation at the operational level significantly hampers the ability to conduct coordinated investigations and share real-time intelligence effectively.

- 72. This vulnerability allows criminals to exploit gaps in the region’s information-sharing systems. As a result, illicit movement of cash and BNIs often goes unnoticed. The absence of an effective region-wide information-sharing mechanism further exposes vulnerabilities at border points. In many cases, declarations made by travelers do not reach the destination country, enabling the undetected movement of illicit cash and BNIs.

4.2 Concealment Methods

- 73. Regarding the illicit cross-border movement of cash, most countries noted that the common perpetrators were individuals acting on their own behalf or those acting on behalf of businesses.

Graphic 3: Involvement in the movement of cash



- 74. For individuals and business, most activities are related to the purchase of goods and services across neighboring countries, with drug trafficking, smuggling of goods, corruption, fraud, tax evasion, illegal mining, and illegal foreign currency exchange being the predicted offences. It was also noted that the common nationalities involved were citizens of neighboring countries. Only one jurisdiction noted the involvement of foreign nationals from outside the region, specifically Chinese, Indians and British citizens.

4.3 Concealment techniques

75. This part of the report presents an overview of the most commonly identified concealment techniques used to transport illicit cash and BNIs across borders. These include concealment in handbags, passenger baggage, food items, on the person, false-bottom containers, goods packages, motor vehicles, and electronic devices. Each technique exploits the lack of systematic inspection regimes or the absence of advanced detection technologies, particularly at high-traffic or informal border crossings.
76. A recurring trend observed is the preference for high-denomination banknotes, such as USD 100 bills, due to their high value-to-size ratio and weight, which enable the transport of significant sums in compact volumes. This practice further complicates detection efforts and highlights the urgent need for enhanced cross-border cooperation, improved risk-based profiling systems, and the deployment of modern detection tools.
77. The concealment strategies outlined in this part of the report underscore the need for a coordinated and intelligence-led response by customs, border security, and other relevant authorities to detect, seize, deter, and disrupt the illicit movement of cash and BNIs linked to money laundering and terrorist financing.

4.3.1 Concealment in handbags

78. Handbags remain a discreet yet effective concealment method for smuggling high-denomination cash and BNIs across ESAAMLG borders. In most jurisdictions, officers have sufficient authority to conduct random searches, including the inspection of handbags, where there is suspicion of illicit cross-border movement of cash or BNIs. This gap is exploited by smugglers who benefit from profiling biases and under-enforcement. Criminals often conceal cash in layered purse compartments or within handbags modified to include inner pockets and linings.



is

79. The use of handbags is especially prevalent in informal border settings where manual inspection is minimal, and there is no scanner or x-ray infrastructure in place.

4.3.2 Concealment in passenger's baggage

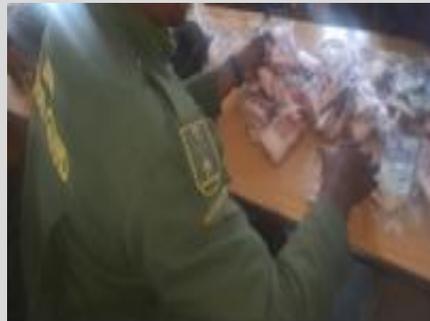
80. Cabin baggage allows for structured concealment of cash in a manner that appears innocuous during random screening. Individuals often layer money within clothing, pack it in sealed food containers, or conceal it beneath the inner lining of suitcases and backpacks. Countries with busy airports report multiple incidents of cross-border cash being discovered in carry-on bags at departure terminals, especially in cases where no currency declaration had been made.



81. For instance, in one case, the baggage was superficially screened but required secondary inspection to uncover cash rolled tightly and packed between garments. The problem is compounded by weak internal airline profiling systems and the absence of risk-based passenger assessments at some entry points.

Case Study 1: SA man nabbed for smuggling cash to Eswatini

A 39-year-old South African man has been caught trying to take a black plastic bag filled with thousands of rands in cash into Eswatini at the Oshoek port of entry. The Border Management Authority (BMA) reported that the man was intercepted by border guards attempting to cross into Eswatini while in possession of a black plastic bag containing cash amounting to R424 800.



A South African man was caught trying to take a black plastic bag with money amounting to more than R420 000 into eSwatini at the Oshoek port of entry. Picture: Border Management Authority (BMA).

Case Study 2: Zambia cash concealment technique

A 27-year-old Indian National was arrested on his way to Dubai in the United Arab Emirates when his attempt was thwarted by a multi-agency team at the Kenneth Kaunda International Airport. He was intercepted with \$2,320,000 in cash and seven pieces of Gold valued at \$500,000. The money was packed into a black bag, which was then placed inside a larger polypropylene suitcase.



4.3.3 Concealment of money in food

82. Criminals often conceal cash within food items or their packaging to evade detection by authorities, particularly during cross-border movements. In many instances, the individuals involved can obtain travel authorisations or licences for such goods from the relevant Ministry of Agriculture. However, the Ministry is typically unaware of the illicit intent to hide money within these products. Without adequate supervision and inspection, such consignments may cross borders undetected, posing a significant risk to the integrity of border controls and financial security.



4.3.4 Concealment on the person

83. Body concealment techniques are widely used by individual smugglers transporting currency across borders, particularly where inspection of travelers is weak or inconsistent. Currency is wrapped in plastic, strapped to thighs, back, or stomachs, or inserted into clothing seams. This method persists in several jurisdictions across the region where body scanning is not consistently in use and pat downs are not routinely applied especially at land crossings with high foot traffic.
84. As such, individuals crossing land borders have frequently been intercepted with substantial amounts of cash concealed under their clothing. In one case, a traveller was found to have hidden multiple bundles of USD notes in socks and waistbands while attempting to move from one jurisdiction to another. This practice poses a significant risk due to its scale and the difficulty of detection without dedicated human searches or body scanners.



Case Study 3: Attempted Cash Smuggling through HKIA

In December 2019, three Angolan women were arrested at Hosea Kutako International Airport (HKIA) in Namibia while attempting to travel to China via Namibia, carrying undeclared cash totaling USD 157,261.18. The money, concealed in underwear, bras, shoes, and adult diapers, was detected by airport screening machines and confirmed during a body search.

The cash were in multiple currencies, including USD, EUR, and NAD. Investigations revealed that the women had entered Namibia by road via Oshikango border post without declaring the funds and were frequent travelers from Angola.

They were charged under the Financial Intelligence Act (FIA) and Exchange Control Regulations, later pleading guilty in 2020. Each received a NAD 50,000 fine under the FIA and NAD 15,000 under the Exchange Control Act. The final decision on the forfeiture of the seized funds is still pending.

This case highlights vulnerabilities in land border entry, the use of body concealment

4.3.5 False bottoms of containers

85. Containers with false bottoms or hidden compartments are frequently used for large-scale smuggling of cash and BNIs. These modified storage units are engineered to avoid visual detection or basic X-ray scans and are typically employed in passenger luggage or commercial consignments. This concealment method is particularly concerning

because it facilitates bulk cash smuggling, which may be linked to organized criminal networks. Detection of such containers requires advanced tools, as conventional scanning systems at border control points are not always effective.

4.3.6 Within goods packages

86. Cash is increasingly being smuggled within legitimate trade shipments, such as textiles, food items, or electronics, to disguise the illicit nature of the cash. This method exploits lower levels of customs scrutiny applied to low-value or familiar goods and can also be used to justify frequent cross-border movements. The technique also overlaps with trade-based money laundering (TBML), as cash may be concealed in packages labelled as business deliveries.



87. In one incident, cash was wrapped in plastic and concealed in sacks of groundnuts, and declared as part of an agricultural export consignment. In another jurisdiction, cash was hidden in bales of second-hand clothing being transported through informal border posts. These concealment strategies are difficult to detect unless random physical inspections are conducted.

4.3.7 Under car seats or spare tyres

88. Motor vehicles are routinely used to smuggle large amounts of currency across land borders, with cash hidden under car seats, within dashboards, fuel tanks, or spare tyre compartments. This method is prevalent in countries with busy land borders. Effective detection of these concealment methods require trained enforcement teams and access to under-vehicle inspection tools.



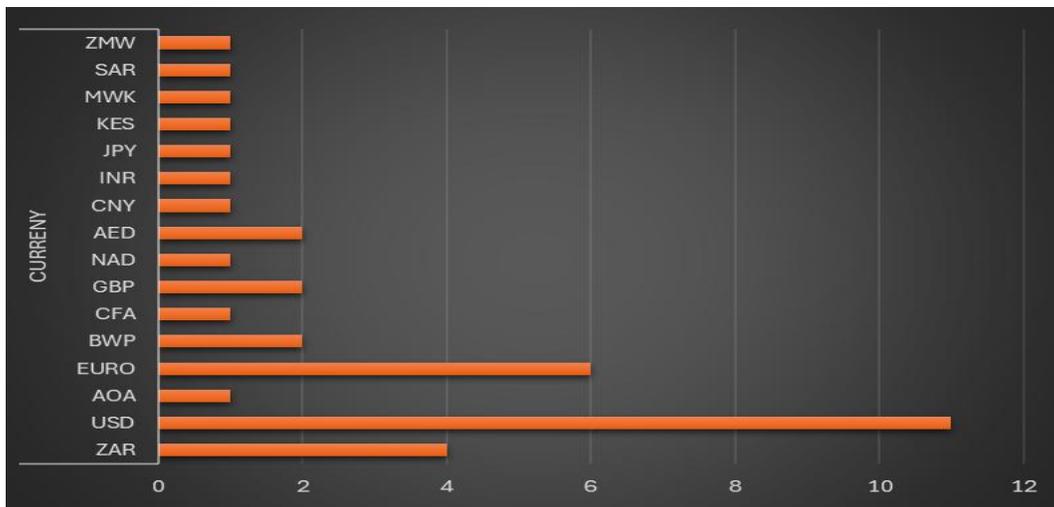
4.3.8 Inside electronic devices

89. Illicit cash and BNIs are also concealed inside hollowed-out electronics, such as radios, printers, and desktop computers. These items are often declared as personal effects or low-value exports, which gives them a lower risk profile during inspection. Smugglers exploit the fact that most border posts lack the capacity to disassemble such items for thorough searches.

4.5 Currency Seizures and Convictions

90. Data from 2019 to 2023 revealed that 20% of member countries do not maintain comprehensive statistics on illicit cross-border cash and BNI movements. However, 12,295 cases involving significant amounts of various currencies including ZAR, SCR, USD, EUR, GBP, KZS, CFA, NAD, BWP, KW, AED, and HKD were recorded. Despite the high number of cases, only 74 convictions were reported, primarily related to cash smuggling and failure to explain the source of cash. The most prominent currencies seized included the Euro, USD, and South African Rand. Countries of origin for concealed cash included Germany, Nigeria, China, India, United Arab Emirates, Portugal, Vietnam, Pakistan, and ESAAMLG member countries. This cash was often intended for diverse destinations, including the United Arab Emirates, Europe and Asia.

Graphic 4: Prominent currencies seized



91. In summary, while notable efforts have been made to address illicit cross-border cash and BNI movements, significant challenges persist, including inconsistent enforcement mechanisms, gaps in information-sharing frameworks, and evolving concealment techniques. Strengthening national and regional cooperation, improving legal frameworks, and enhancing real-time information sharing are critical to effectively combating these financial crimes.

4.6 Movement routes

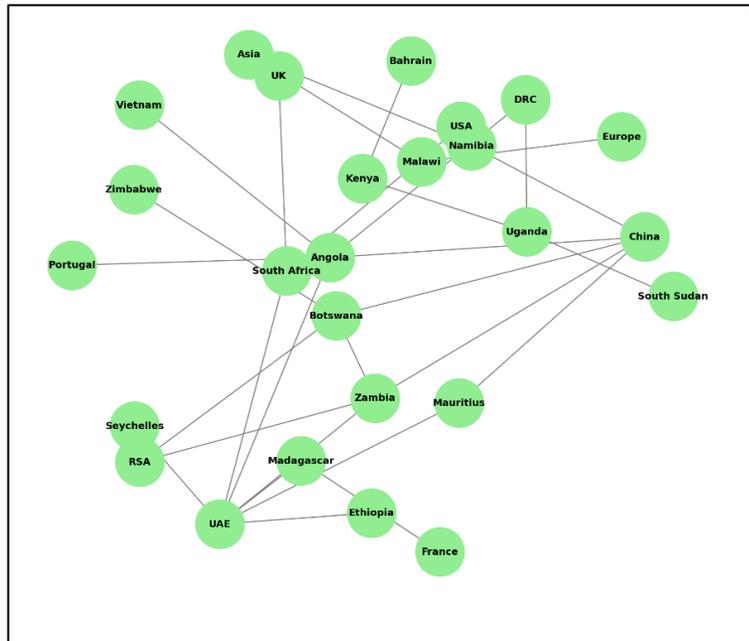
92. As part of efforts to identify the routes used by criminals, this study examined both inward and outward patterns of illicit movement of cash and BNIs involving member countries. The assessment focused on the primary routes used to move cash and BNIs across borders, as well as the jurisdictions most frequently implicated in these activities. The routes presented below were identified based on operations carried out by law enforcement agencies, which led to the detection of individuals who failed to declare or falsely declared cash and BNIs. For this study, inward routes are established

based on the country where the individual was detected, while outward are based on the country from which individual began their journey.

4.6.1 Inward

93. The study assessed cross-border movement patterns into member countries by analysing the frequency and origin of inbound routes used by individuals transporting cash and BNIs. A total of 34 routes were identified, of which 25 originate within the ESAAMLG region, while nine involve countries outside the region.

94. Based on the identified cases, Zambia emerged as the country with the highest number of incoming routes⁴, as well as the highest number of detections, followed by Botswana⁵, Namibia⁶, and South Africa⁷. Although there is no definitive explanation as to why criminal networks favour these countries as transit points or destinations to move cash and BNIs, available analysis suggests that the nature and volume of business activities in these jurisdictions may be a primary driver. In many instances, individuals attempt to enter these countries without fulfilling the required cash and BNIs declaration obligations.



4.6.2 Outward

95. The study identified a total of 28 routes used by criminals to move cash and BNIs, both within and outside the ESAAMLG region. Of these 28 routes identified, 20 leads to destinations outside the ESAAMLG region. The countries most frequently targeted by criminal leaving the ESAAMLG region includes the United Arab Emirates (UAE), with seven routes and China, with five identified routes. Other individual routes lead to Portugal, Vietnam, the United Kingdom, the United States of America, and France. Additionally, one route leads to an unspecified European country, while two routes connect to unspecified Asian countries.

⁴ Zambia identified individuals arriving from South Africa, Zimbabwe, Mozambique, Nigeria, Madagascar, Angola, Germany, Zambia, Namibia, USA, DRC, Botswana, India, Tanzania, Kenya, Malawi, Israel, Turkey and Russian.

⁵ Botswana identified individuals arriving from South Africa, Zimbabwe, Mozambique, Nigeria, Madagascar, Angola, Germany, Zambia and Namibia.

⁶ Namibia identified individuals arriving from South Africa, Angola, and Germany.

⁷ South Africa identified individuals arriving from Mozambique, Nigeria and Madagascar.

96. In addition to the international routes, the study identified eight routes within the ESAAMLG region, highlighting ongoing challenges in intra-regional illicit cash movements. Specifically, two routes were reported into the Democratic Republic of the Congo (DRC), and another two into South Africa. The remaining routes involve Zimbabwe, Zambia, Kenya, and South Sudan, each accounting for one identified route.

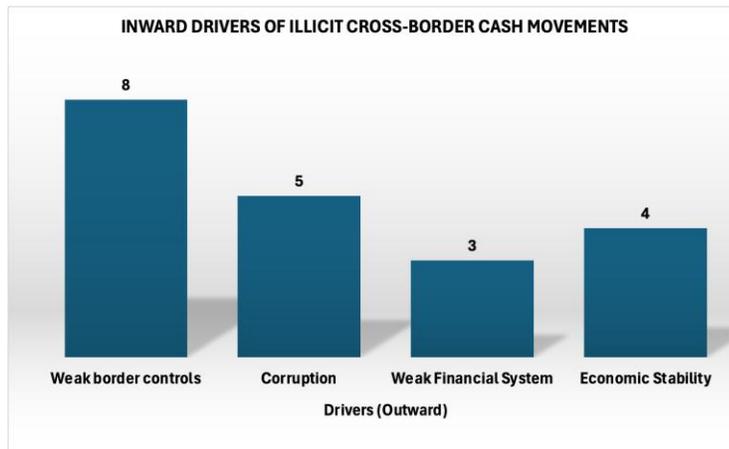
4.7 Nationality of main actors involved in cross-border movement of cash and BNIs in the region

97. The report shows that 58.82% of couriers originate from outside ESAAMLG, confirming the use of transcontinental routes and highlighting the elevated risk of transnational organised crime. Nationalities such as China, Nigeria, and Vietnam indicate deep global linkages, while local nationals enable internal movement and facilitate integration into domestic markets. This dual dynamic complicates enforcement and underlines the need for:
- Strengthened international cooperation and real-time information sharing;
 - Enhanced border security and risk profiling measures; and
 - Targeted strategies addressing both transnational networks and local socio-economic vulnerabilities.
98. Such measures are essential to align the region's response with the FATF Standards, improve operational effectiveness, and safeguard the integrity of member countries financial systems.
99. Of the 17 nationalities recorded, 7 (41.18%) are from member countries, and 10 (58.82%) are from outside the region. This distribution underscores the significant role of external actors and highlights the region's exposure to transnational criminal networks.
100. The prevalence of non-regional nationalities among couriers indicates the existence of sophisticated, multi-jurisdictional networks that exploit ESAAMLG's geographic position as both a destination and transit hub. This reinforces the need for enhanced cross-border cooperation, targeted risk assessments, and coordinated enforcement responses across member countries.
101. Analysis indicates that non-regional nationalities engaged in cash courier activities within the region originate from Brazil, China, Côte d'Ivoire, Gambia, Guinea, Mali, Nigeria, Lebanon, and Vietnam, reflecting the region's integration into transcontinental illicit value transfer networks.

4.8 Main drivers of the illicit cross-border movement of cash and BNIs

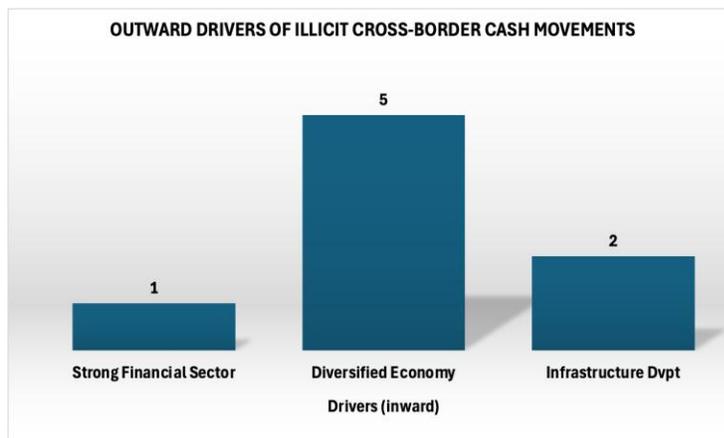
102. Analysis of the drivers of illicit cross border movements of cash was divided into two categories: inward and outward drivers. Most member countries indicated that weak border controls were the primary driver for inward movements, followed by corruption, economic stability and weak financial systems.

Graphic 5: Inward Drivers of Illicit Cross-Border Cash Movement



103. For outward movements, the major drivers identified included diversified and stable economies. Other contributing factors included tax evasion, informal trading, and capital account restrictions. Member countries also cited grey imports such as motor vehicles, illicit movement of goods (contraband) and the need for funds repatriation.

Graphic 6: Outward Drivers of Illicit Cross-Border Cash Movement



104. For BNIs, only one jurisdiction reported notable inward drivers, which included corruption, a weak financial system and economic instability. regarding outward drivers, the jurisdiction also cited strong financial sector and a diversified economy.

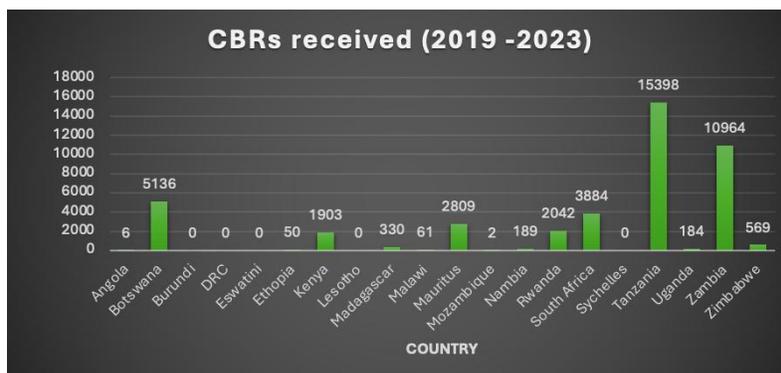
105. Despite successful instances of identifying illicit cross-border movements of cash and BNIs, criminals continue to develop new methods to conceal these cash.

CHAPTER 5: FINANCIAL INTELLIGENCE UNITS

5.1 FIU access to information on cross border movement of Cash and BNIs

106. The FIUs in the region play a crucial role in combating money laundering and terrorist financing. One of the role it plays is by monitoring the cross-border movement of cash and BNIs. In line with Recommendation 29 of the FATF Standards, FIUs should have access to all relevant information necessary to effectively carry out their functions, including obtaining additional details from competent authorities. Such access is essential to strengthen the FIUs' capacity to detect and investigate potential illicit movement of cash and BNIs.
107. In the region, most FIUs are reported to have access to information on the declaration of cross-border cash and BNI movements. From 2019 to 2023, a total of 43,527 Cross-Border Reports were received by 75% of the FIUs in the region, reflecting their access to data on the cross-border movement of cash and BNIs. This access enables FIUs to produce strategic and operational analyses, including those related to terrorist financing, which are subsequently shared with law enforcement agencies.

Graphic 7: Number of CBRs Received from 2019 to 2023



108. A notable trend observed in the data is the significant decrease in the total number of declarations across jurisdictions between 2019 and 2021, primarily attributed to COVID-19 and the resulting severe restrictions on cross-border movement of cash and BNIs. These travel limitations reduced opportunities for individuals to attempt illicit cross-border cash movements. However, as travel restrictions began to ease in subsequent years, the number of cross-border declarations gradually increased, suggesting a potential resurgence in illicit activities and underscoring the importance of reinforcing border security measures and information-sharing mechanisms.

5.2 Use of Information (Cross Border Reports)

109. The results show that, while most FIUs receive information related to the cross-border movement of cash and BNIs, only a few have successfully converted this information into useful intelligence. In the process of analysing CBRs, FIUs seek additional

information from competent authorities which include customs, immigration and reporting institutions. During the review period, 74 operational and strategic analysis were conducted and disseminated to law enforcement agencies, which resulted in the initiation of 74 investigations. However, the limited number of operational and strategic analyses suggests that from the 43 527 cross border reports submitted to FIU, only a few declarations were linked to illicit cross border movements of cash and BNIs, as well as money laundering and terrorist financing.

Case study 4: Among Customs, FIU and Law Enforcement Agencies

Upon arrival at the international airport of Country C, Mr. X and Mr. Y declared to a Customs Authority Officer that they were in possession of a total amount of USD 550,000.00 in cash. The individuals stated that the funds were being imported on behalf of Company T, in which both serve as directors. In accordance with established procedures, the Customs Authority submitted a cross-border cash declaration report to the FIU. Following an analysis of the report and based on reasonable grounds to suspect that the cash might be linked to the laundering of criminal proceeds through the physical couriering of cash, the FIU disseminated the case to the relevant law enforcement agency for further investigation.

5.3 Illicit use of cash: key factors and motivations

110. The cross-border movement of cash occurs for a variety of reasons, encompassing both legitimate and illegitimate purposes. Within the context of criminal activity, this practice assumes relevance and complexity. This section seeks to examine in greater detail the underlying motivations for the movement of cash for criminal ends.
111. The use of cash by criminal actors represents a deliberate choice, underpinned by a set of characteristics that endow physical currency with a high degree of anonymity, portability, and independence from formal financial control mechanisms. Cash enables transactions to be conducted outside the regulated banking system, impedes the traceability of operations, and effectively breaks financial audit trails—factors that are particularly advantageous for concealing the illicit origin of funds.
112. The cross-border movement of cash, whether through individuals, cargo or postal channels, constitutes a fundamental technique within money laundering and terrorist financing (ML/TF) schemes, as it facilitates the placement, movement and subsequent integration of criminal proceeds into the formal economic and financial system, thereby reducing the risk of detection by the competent authorities. This continued preference for physical cash, despite the growing sophistication of digital payment systems, highlights the structural vulnerabilities that jurisdictions face in combating ML/TF and underscores the need for coordinated action among national entities and effective international cooperation frameworks.

5.4 Trends and Typologies

113. The findings reveal a significant gap in the production of typology reports relating to illicit cross border cash and BNI movement within the region, with only 10% of FIUs having compiled and issued such reports. This is concerning, as typology reports are a crucial tool for identifying emerging risks, including trends, threats, vulnerabilities and consequences associated with illicit movement of cash and BNIs. These reports provide critical insights into the methods used by money launderers and financiers of terrorism, enabling authorities to better target enforcement efforts. Furthermore, 35% of the FIUs noted their ability conduct to establish trend analyses on illicit cross-border movements of cash and BNIs, as well as related money laundering and terrorist financing risks. Only one country reported a case involving illicit use or cross-border movement of BNIs.
114. The cross-border movement of cash, whether by individuals or through cargo or mail channels, constitutes a fundamental technique in money laundering and terrorist financing schemes. It facilitates the placement, movement and subsequent integration of criminal proceeds into the financial system, thereby reducing the risk of detection by competent authorities. This continued preference for physical cash, despite the growing sophistication of digital payment systems, highlights the structural vulnerabilities faced by jurisdictions in combating ML/TF and underscores the need for coordinated action among national entities and effective international cooperation frameworks.
115. Among the most frequently reported currencies involved in illicit cross-border cash movements, the US Dollar, South African Rand, and Euro are dominant, reflecting the ongoing preference for stable and widely recognized currencies. These currencies are often chosen due to their long-term value stability, which makes them attractive for illicit actors seeking to preserve the value of their proceeds over time. Moreover, the widespread use of these currencies across multiple international markets facilitates their easy movement across borders, further contributing to the challenge of detecting and intercepting illicit cash and BNI movements.
116. It was also observed that the cross-border movement of cash was primarily associated with several offenses, as travellers smuggle cash to neighbouring countries to purchase goods and services. It is important to highlight that the inherent risks of money laundering, terrorist financing, remain prevalent in the cash-intensive and largely informal economies of certain member countries. Cash offers clear advantages to criminals, particularly due to its anonymity in terms of origin, ownership, and use. Regarding BNIs, only one member country reported the existence of cases, patterns, or indicators linking the physical movement of BNIs to broader illicit financial flows.

5.5 Challenges Faced by FIUs in executing their duties

117. FIUs in the region face several challenges that hinder their effectiveness in addressing illicit cross-border movement of cash and BNIs. One of the primary issues is the inadequate submission of Cross-Border Reports (CBRs) by customs authorities, or the submission of reports that lack sufficient information. This gap undermines the ability of FIUs to generate meaningful intelligence reports and initiate investigations, disrupting the entire AML/CFT value chain. Additionally, the frequent rotation of

customs personnel further exacerbates the issue, as it makes the transfer of AML/CFT knowledge challenging, leading to inconsistent reporting or, in some cases, no reporting at all.

Graphic 8: Challenges Faced by FIUs



118. The transnational nature of the crimes associated with cross-border cash and BNI movements presents additional complexities, particularly given that many predicate offences are perpetrated by foreign nationals. This reality significantly hampers efforts to profile and investigate the individuals involved. In such circumstances, international cooperation becomes indispensable. Nevertheless, the current levels of collaboration among member countries in addressing cross-border movements of cash and BNIs remains inadequate, thereby further constraining the overall effectiveness of efforts to combat these illicit activities.

5.6 Capacity Building

119. The training programs for customs and border control authorities, facilitated by FIUs in the region, has been effectiveness somewhat in enhancing the detection and prevention of illicit cross-border movement of cash and BNIs. These efforts have the potential to significantly strengthen the region’s capacity to fight crimes associated with illicit movement of cash and BNIs. By focusing on personnel at key points of entry, the training equips frontline staff with the necessary skills and knowledge to identify suspicious activities such as illicit cash and BNI movements and implement AML/CFT measures.
120. To maximize the effectiveness of these programs in combating financial crimes, it is crucial to broaden the scope of training to include not only frontline officers but also custom senior staff. This could improve intelligence-sharing capabilities, ensure a more coordinated approach across different levels of customs and FIUs.

CHAPTER 6: LAW ENFORCEMENT AND OTHER COMPETENT AUTHORITIES

121. Most member countries have specialized units dedicated to identifying and investigating ML and TF activities, and they employ special investigative techniques, including parallel financial investigations. However, despite the regulation and measures in place, the ML/TF risks still arises, especially because of the informal sector, and organized criminals who often seek to launder many hundreds of thousands of dollars, may arguably see the risk of detection at air, land and sea ports as being lower than the risks associated with having proceeds of crime reported officially when transactions are undertaken at financial institutions.

6.1 Identification of illicit cross-border movement of cash and BNIs cases

122. The ESAAMLG region continues to face significant vulnerabilities, with criminal groups actively attempting to move illicit cash and BNIs across different jurisdictions. These criminal syndicates often exploit unofficial border crossings (see case below), such as remote or less-patrolled entry points, to bypass border security measures. In addition to cash and BNIs, these groups may smuggle other illicit goods, taking advantage of weak or under-monitored areas. The offenders behind these illegal activities are typically foreign nationals, who, in many cases, collaborate with local individuals who have knowledge of the region's customs and border operations. This cooperation allows the criminal syndicates to effectively navigate and evade law enforcement, making the region more susceptible to illicit cross-border of cash and BNIs movement.

Case study 5: South African Male arrested in Botswana

A South African citizen male was arrested in 2020 by Botswana Police officers along Botswana border line. Upon arrest, he was found in possession of cash amounting to ZAR 508,400.00 which he failed to satisfactorily account for. He was subsequently charged with offences of entering Botswana through ungazetted point of entry and failure to declare goods. Parallel financial investigations were also conducted and did not reveal any legitimate source of such cash. The matter was concluded before court and the cash was forfeited to the state.

123. This study revealed that between 2019 and 2023, customs authorities in the region filed a total of 43,527 cross-border reports (CBRs), indicating significant activity related to the movement of goods and people across borders. However, at the time these reports were filed, potential money laundering or terrorist financing elements were not identified. This is because customs authorities were primarily focused on collecting traveler information, and the responsibility for conducting further analysis and identifying potential illicit activities lies with the FIUs. The value associated with the filed CBRs amounted to approximately \$30,628,654 in various currencies, with most of the cash being in U.S. dollars. This highlights the importance of enhanced analysis and collaboration between customs and FIUs to identify suspicious activities and prevent illicit movement of cash and BNIs.

124. The study has revealed that LEAs in the ESAAMLG region have a common approach to identifying illicit cross-border movement of cash and BNIs cases. The information received shows that most of the countries use non-intrusive inspections with scanners, physical examination of baggage and cargo, intelligence gathering and risk profiling, enhanced surveillance at border crossings, and recruitment of sources of information. There are also cases where information was provided by intelligence agencies from other countries. Below are presented the common approach to identifying illicit cross-border movement of cash and BNIs cases:

1. **Non-intrusive inspection (NII):** the use of scanners to identify illicit goods, including cash and BNIs, without the need to physically open or dismantle shipments.

Case study 6: Concealed cash and weapons in Uganda/ South Sudan Border

The Non-Intrusive Inspection (NII) team at Elegu One Stop Border Post successfully intercepted an illegal firearm, ammunition, and undeclared currency during routine baggage inspection in July 2025.



A 27-year-old female South Sudanese national arrived at Elegu Customs on Wednesday, 23 July 2025.

In line with standard operating procedures, all luggage and cargo entering Uganda is subjected to mandatory scanning using the NII scanner equipment. The scanner operator and image analyst discovered a concealed pistol, thirteen rounds of live ammunition, and South Sudanese currency totalling 3.7 million pounds (\$28, 400).

2. **Physical examination of Baggage and Cargo:** Customs officers conduct physical inspections of luggage and shipments to verify their declared and undeclared contents. These searches may be performed using handheld devices and other tools to help identify concealed items within baggage or cargo.
3. **Intelligence Gathering and Risk Profiling:** Law enforcement agencies analyse travel patterns, financial transactions, and intelligence reports to identify high-risk individuals and consignments.
4. **Enhanced Surveillance at Border Crossings:** The use of advanced surveillance technologies, such as CCTV and automated license plate recognition systems, to monitor activities at border entry and exit points.

5. **Recruitment of informants:** Law enforcement agencies employ various methods to recruit informants to combat crimes in general, including the illicit cross-border movement of cash and BNIs.
125. The identified cases show that criminals frequently employ techniques such as concealing cash in clothing, accompanying luggage, cargo consignments, and motor vehicles to smuggle illicit funds across borders (see analysis under Chapter 4 (Customs Authorities)). Most of these smuggling activities may occur at land port, which are the most commonly used point of transit. To a lesser extent, airports are also utilized, while seaports are the least frequently involved in these criminal activities. This pattern reflects the varying levels of security and monitoring at each type of port, with airports often being more susceptible to high-volume smuggling operations due to the large number of travellers and cargo passing through.

Case study 7: South Sudan to Uganda Cash Smuggling Operation (2020)

In 2020, South Sudanese authorities uncovered a significant cross-border cash smuggling operation involving the illegal movement of large sums of cash and foreign BNIs from South Sudan to Uganda. Couriers hid cash in compartments within vehicles, often using unofficial crossing points to avoid detection. The money, primarily in U.S. dollars and Sudanese pounds, was linked to illicit activities like arms trading and human trafficking.

South Sudanese authorities seized large amounts of money at the border and arrested several smugglers. The investigation revealed the funds were intended for illegal transactions. As a result, South Sudan strengthened its border controls and increased cooperation with Uganda.

6.2 Investigation, Prosecution and conviction of illicit cross-border movement of cash and BNIs cases

126. The ESAAMLG region faces challenges in effectively investigating and prosecuting cases related to the illicit cross-border movement of cash and BNIs. One major issue is the difficulty in obtaining information about criminal activities carried out by individuals operating in other jurisdictions, which hampers cross-border cooperation and intelligence sharing. Additionally, investigators and prosecutors in the region are often not sufficiently prepared or equipped to handle the complexities of these cases. Moreover, the illicit movement of cash and BNIs is not always prioritized within law enforcement agencies, leading to insufficient resources and attention dedicated to addressing this issue. As a result, efforts to combat these crimes remain less effective, allowing criminal syndicates to exploit gaps in the system.

Case study 8: Six women arrested at JKIA, custom officials intercept Sh102 million in cash

Six women have been arrested at the Jomo Kenyatta International Airport trying to smuggle Sh102 million into the country. They were arrested by Kenya Revenue Authority customs officials.

The officials were clearing an Ethiopian Airline flight when the six arrived carrying a luggage containing shoes and clothes. "The images showed items that looked like currency. Upon secondary verification, it was confirmed that the luggage contained US currency amounting to 857,300 US dollars," officials said. The suspects were coming from India aboard Ethiopian airline

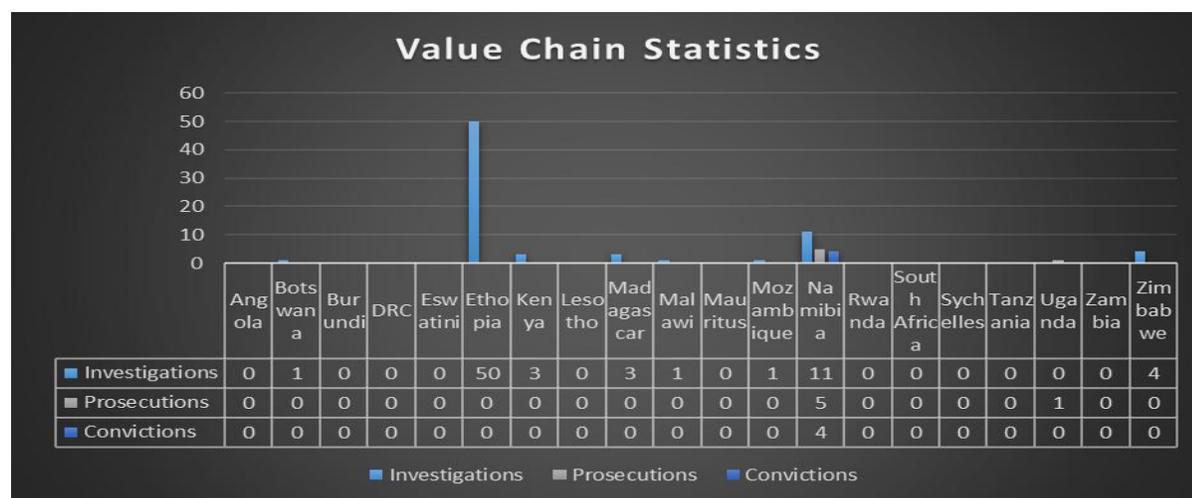
flight Number ET 318. The money was intercepted and seized and deposited into the customs warehouse for further investigations. The women said they are regular travellers, and they import clothes and shoes. The money was held as investigations continue.



Source: https://www.the-star.co.ke/news/2022-10-07-six-women-arrested-at-jkia-trying-to-smuggle-sh102-million?utm_source

127. The study revealed that, out of the 43,527 cross-border reports (CBRs) filed, only 74 investigations were initiated, 6 prosecutions pursued and 4 convictions were secured in relation to money laundering related to illicit cross border of cash. Most of the cases investigated were linked to various predicate offences, including smuggling, corruption, fraud (forgery), tax evasion and violations, drug trafficking, cigarette smuggling, and illegal mining and the ML element was not established. Despite the high number of reported predicate offences, the investigation and prosecution rates remain alarmingly low. This discrepancy suggests that, while a considerable number of illicit activities are being detected, there may be significant barriers to successfully pursuing cases and securing convictions. These barriers could include a lack of resources, coordination, or specialized expertise among investigators, as well as gaps in legal frameworks or enforcement mechanisms, all of which contribute to the ongoing challenges in addressing financial crime in the region.

Graph 8: Statistics



128. From the diagram above a total of 74 investigations were initiated during the review period. 6 prosecutions were reported with 5 from Namibia and 1 from Uganda. Only 4 convictions were reported, all of which were from Namibia.
129. As a result of the 4 convictions, the region was able to seize US\$327,000. However, when considering the total number of cross-border reports filed during the review period, the results highlight a low level of effectiveness in addressing cases related to the illicit cross-border movement of cash and BNIs. Despite some countries initiating investigations, the number remains low compared to the volume of CBRs.
130. One jurisdiction reported two cases specifically related to cross-border movement of BNIs, although in most cases the jurisdictions did not provide sufficient information in this regard which significantly hampered the analysis on the number of ML/TF investigations resulting from BNIs in the region.

Case study 8: Mauritius (BNIs)

In January 2025, Customs officers on duty at a courier service, upon examination of two parcels declared to contain documents consigned from Canada and addressed to a local resident, found thirty certified cheques of a total astronomical value of GBP 1,516,250,300,300. The cheques were all signed and 25 of them were not dated. Customs detained the cheques and initiated a preliminary investigation by interviewing the local addressee of the 2 parcels. Not satisfied with the explanation tendered, the case was referred to the Financial Crimes Commission (FCC) for an in-depth and comprehensive investigation which is still ongoing.

6.3 Prevalent predicate offences generating the most illicit cross-border movement of cash

131. Member countries identified seven major predicate offenses which are mostly prevalent and common amongst countries. These include false declarations, concealment of valuables, non-declarations, tax evasion, smuggling, illegal dealings in gold and possible human trafficking. With regards to groups or actors involved, individuals were the most common perpetrators, followed by criminal groups. The study also indicated that most perpetrators are citizens within the regions, particularly neighbouring countries. Only a few cases were noted including other foreign jurisdictions outside the region, which were China, Nigeria, United Arab Emirates, Portugal and Turkey. Amongst these Nigerians, Chinese and United Arab Emirates individuals were the most detected carrying out cash. In terms of entry and exit points, land borders were the most used. Movements through airports were minimal suggesting that land borders are more porous and therefore, more easily exploited by individuals and criminal groups from the region.

CHAPTER 7: COORDINATION AND COOPERATION

7.1 Mechanisms Used

132. ESAAMLG member countries have in place both international and domestic mechanisms they use in their coordination and cooperation in combating illicit cross-border movement of cash and BNIs.
133. International cooperation is a crucial element in the efforts of FIUs to combat transnational crimes such as illicit movement of cash and BNIs. According to the available data, 18 out of 21 countries in the ESAAMLG region, representing 86%, have established mechanisms for cooperation with other jurisdictions in investigations related to illicit cross-border movement of cash and BNIs. This demonstrates a strong regional commitment to information sharing and collaborating on addressing cross-border financial crimes.
134. However, while these mechanisms are in place, challenges persists. Many jurisdictions lack clear procedures for providing feedback on requests, whether received or sent out. This absence of structured procedures can create inefficiencies in cooperation, slowing down responses to requests from other jurisdictions. Moreover, many member countries do not maintain updated statistics, which complicates efforts to effectively track the status and outcomes of requests. The lack of comprehensive reporting and record-keeping hinders the region's ability to monitor the effectiveness of cross-border cooperation and improve cooperation over time.
135. In the ESAAMLG region, the most commonly utilized mechanisms for international cooperation in combating illicit cross-border cash movement and BNIs include correspondence between competent authorities through platforms such as INTERPOL and Mutual Legal Assistance (MLA). These mechanisms enable jurisdictions to request and provide assistance in investigations related to financial crimes.
136. Additionally, the Egmont Group channel plays a vital role in facilitating the exchange of intelligence between FIUs across borders. Through this channel, FIUs can share critical information on illicit financial activities, strengthening the global response to financial crimes. Some jurisdictions have also formalized their cooperation by establishing Memoranda of Understanding (MoUs). These agreements further enhance the ability of countries to exchange information on a broad range of crimes, including the illicit movement of cash and BNIs.
137. Together, these mechanisms provide a solid framework for both domestic and international collaboration, but improvements in their efficiency and transparency could further strengthen the region's ability to tackle illicit financial flows.

Table: 1 Types of mechanisms used in coordination and cooperation

Mechanisms implemented	Number of countries
Correspondences with competent authorities through INTERPOL	7
Mutual Legal Assistance (MLA)	6
MOUs and bilateral agreement	6
EGMONT Group channel	4
Sharing information with international counterparts through FIU	3
Asset Recovery Inter-Agency Network for Southern Africa (ARINSA)	2
Other mechanisms	13

138. Several countries in the region utilize a range of mechanisms to combat the illicit cross-border movement of cash and BNIs. Among the 13 listed approaches, some of the most notable mechanisms include: Approach and interrogation techniques; Customs Risk Management and Customs risk profiles; Customs Mutual Assistance Agreements; Bilateral international cooperation; International administrative assistance; Joint investigations; Intelligence Units; The use of Treaties and informal channels; Sharing intelligence through the Regional Intelligence Liaison Office (RILO); and Concealment methods and routes.
139. These mechanisms highlight the variety of tools available for international cooperation in the region. However, while many countries are utilizing a range of strategies, there is still room for further strengthening coordination and improving the consistency of these efforts across jurisdictions.

7.2 FIUs Coordination and Cooperation

140. FIUs in the region have demonstrated they have challenges in fostering both domestic and international cooperation. The findings indicate a notably low level of collaboration between FIUs and their respective domestic agencies, which significantly hinders the region’s overall capacity to address money laundering and terrorist financing effectively.

141. In terms of domestic cooperation, only 50% of member FIUs engaged in inter-agency collaboration within their jurisdictions, amounting to a total of 106 engagements during the review period. International cooperation was even more limited, with just 31 engagements reported by 40% of member FIUs. While these figures indicate some level of interaction beyond national borders, the overall volume remains insufficient to adequately address the growing threat of illicit cross-border movement of cash and BNIs.
142. Cross-border movement of cash and BNIs involves two separate jurisdictions: the origin and destination countries. For a criminal investigation and prosecution to succeed, one jurisdiction must be able to obtain evidence from the other to support its case. This highlights the critical need for greater cooperation between countries to effectively identify money laundering and terrorist financing risks, identify the predicate offences involved, determine where the offences are committed, and track the proceeds of crime laundered through illicit cross border movement of cash and BNIs. Without this level of cooperation, illicit cross border movement of cash and BNIs investigations may fail, leaving these crimes unchecked.

7.3 Specific Institutions to Monitor Requests

143. The study revealed that majority of the member countries have established institutions that monitor requests related to illicit cross-border movement of cash and BNIs. Fifty-five percent (55%) of countries have set up one or more designated institutions to oversee these activities. These institutions include:
 - Office of the Attorney General & Ministry/Department of Justice
 - Investigation Bureaus.
 - National Public Prosecution Authority (National Prosecuting Authority);
 - Financial Intelligence Unit (FIU)/Financial Intelligence Center (FIC); and,
 - Revenue Authorities.
144. These institutions play a crucial role in ensuring coordinated efforts to illicit cross border movement of cash and BNIs and strengthen the region's ability to combat money laundering and terrorist financing. However, forty-five percent (45%) of countries in the region lack such specific institutions, which presents significant challenges in effectively monitoring requests and coordinating activities. Without dedicated institutions, there is a heightened risk of inefficiencies in cross-border cooperation, making the region vulnerable to exploitation by criminals engaged in illicit cross border movement of cash and BNIs.
145. The absence of comprehensive statistics could be attributed to two main factors:
 - The **low prevalence** of the offense in certain regions.
 - **Gaps in the identification** of cases related to illicit cross-border cash movements and BNIs.

146. Furthermore, the lack of effective mechanisms for sending and receiving requests related to illicit cross-border cash movement and BNIs points to potential deficiencies in identifying, detecting, and investigating such offences. This creates significant challenges in coordination and monitoring, ultimately leading to delays in situational analysis and reducing the effectiveness of regional efforts to combat illicit cross border movement of cash and BNIs.

7.4 Information sharing

147. Relating to information sharing with the intended destination or the country of origin, it was observed that only two (02) countries provided feedback after joint investigations.
148. Despite the presence of designated institutions in place in most member countries and related mechanisms to collaborate with other jurisdictions, there are no statistics to demonstrate these countries have effectively conducted international joint investigations on illicit cross-border movement of cash and BNIs.

CHAPTER 8: FINDINGS AND RECOMMENDATIONS

8.1 Findings

- I. **Limited coordination and cooperation among agencies:** Despite having established mechanisms for information sharing, there is a significant lack of coordination and cooperation both domestically and internationally regarding the illicit cross-border movement of cash and BNIs.
- II. **Deficient research and trend analysis by FIUs:** FIUs in the region have shown deficiencies in conducting comprehensive research and trend analysis related to illicit cross-border movement of cash and BNIs. Only 10% of member FIUs have produced typology reports related to Illicit cross border movement of cash and BNIs, limiting the ability to identify emerging predicate offences.
- III. **Law enforcement data:** The study did not benefit from law enforcement information and that meant it could not generate a picture of characteristics, patterns and common behaviours to a particular ML or TF type detected from illicit cross border cash and BNIs movements.
- IV. **Drivers and facilitators:** The study established that weak border controls were the major driver for inward movements, followed by corruption, and weak financial systems and economic stability. For outward movements, the major drivers identified included diversified economies, tax evasion, informal trading and capital account restrictions. Insecurity in some area is also another driver.
- V. **Mitigation measures in place but inadequate:** While countries have implemented mitigation measures to address the risks of illicit cross-border movement of cash and BNIs, these measures need strengthening, particularly in light of evolving trends and porous borders.
- VI. **International cooperation frameworks with limited cases:** Member countries have established mechanisms for international cooperation, but there are few actual cases where these mechanisms were effectively utilized, suggesting a need for more active engagement.
- VII. **Constantly improving the legal and institutional frameworks:** Most Member countries have developed legal and institutional frameworks to address illicit cross-border movement of cash and BNIs. However, these frameworks are not effectively utilised leading to few ML or TF cases investigated or prosecuted arising from Illicit cross border movement of cash and BNIs.
- VIII. **Electronic declaration practices:** Three countries have adopted electronic/online based declaration processes, which have proven effective in preventing illicit cross-border movement of cash and BNIs, setting a model for the region.
- IX. **Common concealment methods:** Criminals commonly conceal cash and BNIs on their bodies, in clothing, and hidden compartments of vehicles, aiming to falsely declare the cash at border points and eventually evade detection.

- X. **Frequently intercepted currencies:** The most intercepted currencies in illicit cross-border movements of cash and BNIs are the United States Dollar, South African Rand, and Euro.
- XI. **Enhance declaration systems:** Several countries have implemented declaration systems for cash and BNIs at border points, enabling customs authorities and LEAs to identify, and conduct investigations into potential offences and enhancing monitoring efforts. There is need to enhance the systems in order to be able to isolate declarations that create suspicion of ML or TF.
- XII. **Established control methods:** All member countries have implemented control methods to detect illicit cash and BNI cross border movements, with baggage scanners being most common. However, traveller profiling and consignment searches are found to be the most effective methods.

8.2 Recommendations

- a) **Enhancement of coordination and collaboration:** It is imperative that there be strengthened coordination and collaboration among relevant domestic and international agencies in addressing the issue of illicit cross-border movement of cash and BNIs. Such cooperation will significantly enhance the overall effectiveness of the efforts undertaken to combat these illicit activities.
- b) **Role of Financial Intelligence Units (FIUs) in trend analysis and typologies:** It is recommended that FIUs prioritize the development of detailed trends analysis and typologies related to illicit cross-border movement of cash and BNIs. This will facilitate the identification of emerging risks related to money laundering and terrorist financing, thereby improving detection capabilities and supporting more effective investigations and prosecutions.
- c) **Adoption of advanced technological solutions:** Member countries are encouraged to adopt cutting-edge technologies and mechanisms, including the use of electronic declaration systems, cash-sensitive scanners, and sniffer dogs trained in detecting bulk cash. These innovations will greatly enhance the capacity of authorities to detect and prevent illicit cross border movement of cash and BNIs.
- d) **Improvement of data management and statistics:** It is vital that countries in the region improve the maintenance of statistics relating to CBRs, Investigations arising from both CBRs and other sources, joint investigations, prosecutions, convictions, and requests related to illicit cross-border cash movement and BNIs. This will ensure effective monitoring, assessment of efforts and help in better coordination between agencies. It will also help to develop measures to counter the emerging trends in illicit cross border cash and BNI movements.
- e) **Continuous development and modernization of statutory frameworks:** It is recommended that countries continue to develop and modernize their statutory frameworks to ensure that they are equipped to address contemporary financial crimes effectively. Additionally, regular training of officials in the use of modern technologies should be prioritized to ensure the successful implementation of these advancements.

Annexes

QUESTIONNAIRE ON THE ILLICIT CROSS-BORDER MOVEMENT OF CASH AND BEARER NEGOTIABLE INSTRUMENTS (BNIS) IN THE ESAAMLG REGION

Purpose:

As you may be aware, during the 49th Task Force of Senior Officials Meeting held in Kampala, Uganda, the Risks, Trends, and Methods Group (RTMG) informed member states that the report on the *Illicit Cross-Border Movement of Cash and Bearer Negotiable Instruments (BNIs)* in the ESAAMLG region had not been finalized due to significant gaps in the available data. As a result, the RTMG will require additional time to complete and submit the report. To address these information gaps, the RTMG has agreed to recirculate a revised questionnaire aimed at gathering the necessary data.

Country	
Name of Institution/Agency:	
Type of Institution (e.g., FIU, Customs, Law Enforcement, Central Bank, etc.)	
Date	

1	Are BNIs (e.g., bearer cheques, promissory notes, traveller's cheques, money orders, bearer bonds) commonly issued, used, or transported within your jurisdiction? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure
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	<p>If yes, please specify the types of BNIs in circulation and their typical use. Kindly provide examples or case studies to support your response.</p> <table border="0"> <thead> <tr> <th data-bbox="380 261 554 293">Type of BNI</th> <th data-bbox="1549 261 1604 293">Yes</th> <th data-bbox="1692 261 1738 293">No</th> </tr> </thead> <tbody> <tr> <td data-bbox="380 326 596 358">Bearer Cheques</td> <td></td> <td></td> </tr> <tr> <td data-bbox="380 391 827 423">Promissory Notes (Bearer Form)</td> <td></td> <td></td> </tr> <tr> <td data-bbox="380 456 569 488">Bearer Bonds</td> <td></td> <td></td> </tr> <tr> <td data-bbox="380 521 653 553">Traveller's Cheques</td> <td></td> <td></td> </tr> <tr> <td data-bbox="380 586 779 618">Money Orders (Bearer Form)</td> <td></td> <td></td> </tr> <tr> <td data-bbox="380 651 814 683">Bills of Exchange (Bearer Form)</td> <td></td> <td></td> </tr> </tbody> </table> <p>The only form of BNIs in circulation in Mauritius is bearer cheque issued by bank customers to pay third parties for purchases of goods or payment of services. For year 2024 and 2025 there was 1 case related to BNI respectively</p>	Type of BNI	Yes	No	Bearer Cheques			Promissory Notes (Bearer Form)			Bearer Bonds			Traveller's Cheques			Money Orders (Bearer Form)			Bills of Exchange (Bearer Form)		
Type of BNI	Yes	No																				
Bearer Cheques																						
Promissory Notes (Bearer Form)																						
Bearer Bonds																						
Traveller's Cheques																						
Money Orders (Bearer Form)																						
Bills of Exchange (Bearer Form)																						
2	<p>Are BNIs used in your jurisdiction to purchase goods or pay for services?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure</p> <p>If yes, please describe:</p> <ul style="list-style-type: none"> • Examples of goods or services commonly paid for using BNIs • Sectors or businesses where BNIs are most frequently used • Any applicable oversight or reporting requirements 																					
3	<p>Do banks or other financial institutions in your jurisdiction accept or process BNIs?</p>																					

	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure </p> <p>If yes, please indicate which types are accepted:</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 70%;">Type of BNI</td> <td style="width: 10%; text-align: center;">Yes</td> <td style="width: 20%; text-align: center;">No</td> </tr> <tr> <td>Bearer Cheques</td> <td></td> <td></td> </tr> <tr> <td>Promissory Notes (Bearer Form)</td> <td></td> <td></td> </tr> <tr> <td>Bearer Bonds</td> <td></td> <td></td> </tr> <tr> <td>Traveller's Cheques</td> <td></td> <td></td> </tr> <tr> <td>Money Orders (Bearer Form)</td> <td></td> <td></td> </tr> <tr> <td>Bills of Exchange (Bearer Form)</td> <td></td> <td></td> </tr> </table> <p>Are there any specific conditions or due diligence measures required when processing these instruments? Please provide an example if available.</p>	Type of BNI	Yes	No	Bearer Cheques			Promissory Notes (Bearer Form)			Bearer Bonds			Traveller's Cheques			Money Orders (Bearer Form)			Bills of Exchange (Bearer Form)		
Type of BNI	Yes	No																				
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Bills of Exchange (Bearer Form)																						
4	<p>Apart from the standard declaration system for cash and BNIs, is there a mechanism in place to identify false declarations or disclosure of BNIs or failure to declare or disclose them?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure </p> <p>If yes, please describe its effectiveness and how it supports the identification, investigation, and prosecution of ML/TF cases.</p>																					

5	<p>Are there legal obligations in your jurisdiction requiring the declaration of BNIs at entry and exit points?</p> <p>√Yes as per section 131A of the Customs Act-Please see below for extract of the law</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not sure</p>
6	<p>Has your jurisdiction identified any cases involving the illicit use or cross-border movement of BNIs?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not sure</p> <p>If yes, please provide details:</p> <ul style="list-style-type: none"> • Type(s) of BNI involved • Concealment method(s) used • Countries of origin and destination • Associated criminal activity (if applicable) • Value of BNIs seized or identified
7	<p>Based on the identified cases, have any links been established with ML, TF, or related predicate offences?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not sure</p> <p>If yes, please describe the nature of these links and any actions taken by the relevant authorities.</p>

8	<p>What methods or typologies have been observed in the misuse of BNIs for transferring funds into or out of your jurisdiction? (Please explain.)</p> <p>Are there any emerging trends, new tactics, or red flag indicators involving the cross-border transportation of BNIs?</p> <table border="0" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 80%;">Emerging Trends</th> <th style="text-align: center; width: 10%;">Yes</th> <th style="text-align: center; width: 10%;">No</th> </tr> </thead> <tbody> <tr> <td>Use of third parties to transport BNIs</td> <td></td> <td></td> </tr> <tr> <td>Inconsistent or false declarations at border crossings</td> <td></td> <td></td> </tr> <tr> <td>Attempts to avoid the use of financial institutions</td> <td></td> <td></td> </tr> <tr> <td>Travellers carrying large denominations of BNIs</td> <td></td> <td></td> </tr> <tr> <td>Other (please specify)</td> <td></td> <td></td> </tr> </tbody> </table>	Emerging Trends	Yes	No	Use of third parties to transport BNIs			Inconsistent or false declarations at border crossings			Attempts to avoid the use of financial institutions			Travellers carrying large denominations of BNIs			Other (please specify)		
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Other (please specify)																			
9	<p>Are there any <u>legislative or operational</u> gaps hindering the monitoring of BNIs for ML and TF risks?</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Not sure</p> <p>If yes, please elaborate.</p>																		
10	<p>Have you identified any patterns or indicators linking the physical cross-border movement of cash with broader financial flows?</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Not sure</p> <p>If yes, please describe:</p> <ul style="list-style-type: none"> • Identification methods used 																		

	<ul style="list-style-type: none"> • Observable financial trails or integration techniques • Role of financial institutions, MSBs, and informal networks • Connections to TF, organized crime, or predicate offences • Existing tracking and analysis mechanisms 																		
11																			
12	<p>Has your country implemented measures to enhance the identification and quality of cross-border cash declarations?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not sure</p> <p>If yes, please describe:</p>																		
13	<p>What types of individuals or entities are most frequently involved in the illicit cross-border movement of cash?</p> <table border="0" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%;"></th> <th style="width: 20%; text-align: center;">Yes</th> <th style="width: 20%; text-align: center;">No</th> </tr> </thead> <tbody> <tr> <td>Actor Type</td> <td></td> <td></td> </tr> <tr> <td>Businesses</td> <td></td> <td></td> </tr> <tr> <td>Networks</td> <td></td> <td></td> </tr> <tr> <td>Criminal Groups</td> <td></td> <td></td> </tr> <tr> <td>Individuals</td> <td></td> <td></td> </tr> </tbody> </table>		Yes	No	Actor Type			Businesses			Networks			Criminal Groups			Individuals		
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	<p>If yes, please provide examples and describe:</p> <ul style="list-style-type: none"> • Links to organized crime, terrorist organizations, or PEPs • Common nationalities or courier profiles • Motivations for involvement 																																	
14	<p>What are the main drivers of the illicit cross-border movement of cash in your jurisdiction?</p> <p><i>Drivers for Outward Movements:</i></p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Driver</th> <th style="text-align: center;">Yes</th> <th style="text-align: center;">No</th> </tr> </thead> <tbody> <tr> <td>Weak border controls</td> <td></td> <td></td> </tr> <tr> <td>Corruption</td> <td></td> <td></td> </tr> <tr> <td>Weak financial system</td> <td></td> <td></td> </tr> <tr> <td>Economic instability</td> <td></td> <td></td> </tr> <tr> <td>Other (specify)</td> <td></td> <td></td> </tr> </tbody> </table> <p><i>Drivers for Inward Movements:</i></p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Driver</th> <th style="text-align: center;">Yes</th> <th style="text-align: center;">No</th> </tr> </thead> <tbody> <tr> <td>Strong financial sector</td> <td></td> <td></td> </tr> <tr> <td>Diversified economy</td> <td></td> <td></td> </tr> <tr> <td>Infrastructure development</td> <td></td> <td></td> </tr> <tr> <td>Other (specify)</td> <td></td> <td></td> </tr> </tbody> </table>	Driver	Yes	No	Weak border controls			Corruption			Weak financial system			Economic instability			Other (specify)			Driver	Yes	No	Strong financial sector			Diversified economy			Infrastructure development			Other (specify)		
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	<p>Are there specific sectors or industries commonly exploited (e.g., import/export, remittances)? If yes, please provide examples.</p> <p>No</p>																								
15	<p>Classify the prevalent predicate offences generating the most illicit cross-border movement of cash by major border points:</p> <table border="1" data-bbox="262 406 1938 568"> <thead> <tr> <th data-bbox="262 406 714 568">Predicate Offence</th> <th data-bbox="714 406 1029 568">Country/Border Point</th> <th data-bbox="1029 406 1428 568">Groups/Actors Involved</th> <th data-bbox="1428 406 1938 568">Recipient States</th> </tr> </thead> </table> <p>Two cases were detected by Customs at the Airport where:</p>	Predicate Offence	Country/Border Point	Groups/Actors Involved	Recipient States																				
Predicate Offence	Country/Border Point	Groups/Actors Involved	Recipient States																						
16	<p>What is the approximate number of people crossing your borders daily, monthly, and annually (Please provide the figure in USD)?</p> <p>Land border</p> <p>Not applicable for the case of Mauritius as there is no land border</p> <table border="1" data-bbox="262 1055 1938 1406"> <thead> <tr> <th data-bbox="262 1055 462 1185">Timeframe</th> <th data-bbox="462 1055 714 1185">Estimated air passenger arrivals</th> <th data-bbox="714 1055 1029 1185">Number of Cash/BNI Declarations</th> <th data-bbox="1029 1055 1344 1185">Number of BNI Declarations</th> <th data-bbox="1344 1055 1638 1185">Value of Declared in Cash</th> <th data-bbox="1638 1055 1938 1185">Value of Declared in BNIs</th> </tr> </thead> <tbody> <tr> <td data-bbox="262 1185 462 1250">Daily</td> <td data-bbox="462 1185 714 1250"></td> <td data-bbox="714 1185 1029 1250"></td> <td data-bbox="1029 1185 1344 1250"></td> <td data-bbox="1344 1185 1638 1250"></td> <td data-bbox="1638 1185 1938 1250"></td> </tr> <tr> <td data-bbox="262 1250 462 1315">Monthly</td> <td data-bbox="462 1250 714 1315"></td> <td data-bbox="714 1250 1029 1315"></td> <td data-bbox="1029 1250 1344 1315"></td> <td data-bbox="1344 1250 1638 1315"></td> <td data-bbox="1638 1250 1938 1315"></td> </tr> <tr> <td data-bbox="262 1315 462 1406">Yearly (Yr 2024)</td> <td data-bbox="462 1315 714 1406"></td> <td data-bbox="714 1315 1029 1406"></td> <td data-bbox="1029 1315 1344 1406"></td> <td data-bbox="1344 1315 1638 1406"></td> <td data-bbox="1638 1315 1938 1406"></td> </tr> </tbody> </table>	Timeframe	Estimated air passenger arrivals	Number of Cash/ BNI Declarations	Number of BNI Declarations	Value of Declared in Cash	Value of Declared in BNIs	Daily						Monthly						Yearly (Yr 2024)					
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Sea border						
Timeframe	Estimated arrivals via seaports	Number of Cash Declarations	Number of BNI Declarations	Value of Declared in Cash	Value of Declared in BNIs	
Daily						
Monthly						
Yearly (Yr 2024)						

ESAAMLG TYPOLOGIES PROJECT ON ILLICIT CROSS-BORDER MOVEMENT OF CASH AND BEARER NEGOTIABLE INSTRUMENTS IN THE ESAAMLG REGION

PROJECT QUESTIONNAIRE

May-2024

To: ESAAMLG Member countries

During the 45th meeting of the Task Force of Senior Officials held in April 2023 in Arusha, Tanzania, the Task Force approved the typologies project on the “*Illicit Cross-Border Movement of Cash and Bearer Negotiable Instruments (BNIs) in the ESAAMLG Region*” which was scheduled to be completed by April 2024. However, during the 47th meeting of the Task Force of Senior Officials held in April 2024 in Lubango, Huila, Angola, the Task Force decided that the project should be completed in April 2025. Based on the above, this questionnaire is part of the study and it’s designed to collect information for the purpose of producing a report on the Illicit Cross-Border Movement of Cash and Bearer Negotiable Instruments BNIs in the ESAAMLG Region.

Background information

The Money Laundering (ML) and Terrorist Financing (TF) risks are strongly linked to transforming the proceeds derived from illegal activities into physical cash to evade detection. This converted cash often finds its way to foreign jurisdictions, either to reintegrate into the formal financial system or to support criminal operations, including the financing of terrorism.

Undeniably, Illicit cross-border movement of cash and Bearer Negotiable Instruments (**BNIs**) continues to pose a great concern in the ESAAMLG Region and globally. To assess the magnitude of this risk, the project team on Illicit Cross-Border Movement of Cash and BNIs in the ESAAMLG Region developed this questionnaire to solicit information and data from member countries about the illicit cross-border movement of cash and BNIs. The information received will be analysed and used to produce a report on the Illicit Cross-Border Movement of Cash and BNIs in the ESAAMLG Region.

The overall objective of the typology project is to determine the extent of illicit cross-border movement of cash and BNIs in the ESAAMLG Region, how it occurs, its organizational structure, the main actor involved, the most affected area, gaps in the existing legislation, and the main drivers for the illicit cross-border movement of cash and BNIs. The typology aims to understand the money laundering and terrorist financing (ML/TF) element associated with these crimes. It is expected that the recommendations made by typology report will be used by the member countries and other stakeholders to develop institutional capacity, policies, strategies, and other measures to combat ML/TF arising from the Illicit Cross-Border Movement of Cash and BNIs.

The information obtained through this questionnaire will assist the Project Team in carrying out the study.

The questionnaire is divided into the following sections:

Section A: General Information and Legal framework relating to illicit cross-border cash movement and BNIs.

- Section B:** Preventive measures
- Section C:** Customs Authority
- Section D:** Financial Intelligence Unit
- Section E:** Law Enforcement and Other Competent Authorities
- Section F:** International Cooperation

Respondents are requested to return their completed questionnaires by 25th June 2024 to the ESAAMLG Secretariat through your national coordinator/contact person.

THANK YOU FOR PARTICIPATING IN THE PROJECT.

May 2024

Country:	
Name(s) of Institution(s) filling out the questionnaire:	
Authority:	
e-mail:	
Date:	

GENERAL INFORMATION AND LEGAL FRAMEWORK RELATING TO ILLICIT CROSS-BORDER CASH MOVEMENT AND BNIS.

1	i- Does your national legislation have provisions to criminalize illicit cross-border movement of cash and BNIs? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please specify under which law and the relevant section(s) of the law.
----------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	<p>ii- Does your jurisdiction hold individuals liable who fail to comply with mandatory disclosure and declaration requirements to enforcement action through criminal prosecution or the use of administrative pecuniary penalty?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please specify under which law and the relevant section(s) of the law.</p>																
2	<p>i. Does your jurisdiction criminalise the offense of money laundering and terrorist financing?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please specify under which law and the relevant section(s) of the law.</p> <p>ii. How does your jurisdiction define predicated offenses for money laundering?</p> <p>Please specify under which law and the relevant section(s) of the law.</p>																
3	<p>i. Does your jurisdiction have proportionated and dissuasive criminal sanctions for natural persons convicted of:</p> <p>Table 3.1.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="width: 60%;">Offense</th> <th style="width: 15%;">Administrative</th> <th style="width: 15%;">Civil</th> <th style="width: 10%;">Criminal</th> </tr> </thead> <tbody> <tr> <td style="text-align: left;">Illicit cross-border movement of cash and BNIs</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="text-align: left;">Money Laundering</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="text-align: left;">Terrorist Financing</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Offense	Administrative	Civil	Criminal	Illicit cross-border movement of cash and BNIs				Money Laundering				Terrorist Financing			
Offense	Administrative	Civil	Criminal														
Illicit cross-border movement of cash and BNIs																	
Money Laundering																	
Terrorist Financing																	

4

i. Does your jurisdiction implement a declaration system or a disclosure system for incoming and outgoing cross-border transportation of currency and bearer negotiable instruments (BNIs)?

Yes No

If yes, please specify under which law and the relevant section(s) of the law.

ii. The declaration or disclosure is required for all physical cross-border transportation, whether by travellers or through mail and cargo?

Yes No

If yes, please specify under which law and the relevant section(s) of the law.

iii. Does your jurisdiction have any thresholds for cross-border movement of cash and BNIs using either of the systems above?

Yes No

If yes, please specify under which law and the relevant section(s) of the law.

iv. What is the declaration or disclosure requirements for individuals or entities carrying or moving value exceeding a pre-set maximum threshold?

Table 4.1.

Requirement	Yes	No
Written declaration for all travellers	<input type="checkbox"/>	<input type="checkbox"/>
Written declaration for amounts above threshold	<input type="checkbox"/>	<input type="checkbox"/>
Oral declaration for all travellers	<input type="checkbox"/>	<input type="checkbox"/>
Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>

	<p>If yes, please specify under which law and the relevant section(s) of the law.</p> <p>v. Does your jurisdiction have a competent authority responsible in ensuring compliance of the declaration or disclosure requirements?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide the name and the legal power.</p> <p>vi. How is the declaration or disclosure requirements monitored and enforced by relevant authorities?</p>
5	<p>In relation to the 2008 ESAAMLG study on cash couriers, has your jurisdiction implemented any of the six (6) recommendations?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please list them.</p>
<p>PREVENTATIVE MEASURES</p>	
6	<p>i. Has your jurisdiction taken measures to identify and understand ML/TF risks associated with illicit movement of cash and BNIs?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, what were the key findings of the risk assessment?</p> <p>ii. Is the information about the risks shared with other competent authorities?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

	<p>If yes, please list them?</p> <p>None</p>
7	<p>Do reporting entities in your jurisdiction identify and mitigate risks related to illicit cross-border movement of cash and BNIs?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide information on the mitigation's measures implemented.</p>
8	<p>Are the border control agencies in your jurisdiction involved in preventing the illicit movement of cash and BNIs cross-border s for anti-money laundering purposes?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>How are border control agencies involved in preventing the illicit movement of cash and BNIs a cross-borders for anti-money laundering purposes?</p>
CUSTOMS AUTHORITY	
9	<p>i. In line with question 4 (v), the Customs Authority in your jurisdiction has enough and adequate legal powers to deal with matters related to the illicit movement of cash and BNIs a cross-borders.</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide the legal powers.</p> <p>Do the Customs Authority in your jurisdiction have powers to use special investigative techniques?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>and have such powers been used to assist with investigations?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

If yes, which types of special investigative techniques have been used?

Do the Customs Officials in your jurisdiction share information relating to illicit cross-border cash and BNIs movement with other agencies?

Yes No

If yes, which agencies? (Complete Table 9.1)

Table 9.1.

Institution	2019	2020	2021	2022	2023

Describe the control measures in place for Customs Officials and other LEAs entrusted with combating illicit cross-border cash and BNIs, as well as border control.

Use of scanners

Use of sniffer dogs

Random profiling and search of consignments Any other (specify): Which of the methods above is more effective in your jurisdiction, and why?

Does the customs authority under your control make use of thermal sensors capable of precisely detecting and monitoring the presence of cash and BNIs?

Yes No

If so, kindly describe its effectiveness.

Does the Custom authority in your jurisdiction have mechanisms (MoU) for co-operation and co-ordination on information sharing, and joint operations with Customs Authorities from other jurisdictions on illicit cross-border cash and BNIs?

Yes No

If yes, please list them.

10

Does the Customs Authority in your jurisdiction utilize technology and data analysis to enhance the detection and prevention of illicit cross-border cash and BNIs movements?

Yes No

If yes, please describe the process.

Does the Customs authority in your jurisdiction maintain comprehensive statistics of cases recorded on all illicit cross-border cash movement?

Yes No

If yes, please provide the breakdown in years, the amount, and the number of cases. (Complete Table 10.1)

Table 10.1.

Year	Number of cases	Amount involved

If yes, please provide the breakdown of the number of convictions, proceed seized and confiscated. (Complete Table 10.2)

Table 10.2.

Year	Number of Convictions	Proceed seized	Value Confiscated

iii. Please list the commonly identified concealment methods used in your jurisdictions?

- iv. Please list the most prominent currencies seized in your jurisdiction?
- v. Please list the associated country of the origin of the concealed currency?
- vi. Please list the intended destinations of the concealed currency.

SECTION E: FINANCIAL INTELLIGENCE UNIT

11 Does the FIU in your jurisdiction receive information on declaration or disclosure for incoming and outgoing cross-border transportation of currency and BNIs?
 Yes No

If yes, please provide the statistics on the number Cross-Border Reports (CBRs). (Complete Table 11.1)

Table 11.1.

Year	Number of CBRs
2019	
2020	
2021	
2022	
2023	

Does the FIU in your jurisdiction share information with other agencies (domestic and regionally) about money laundering and terrorist financing relating to the illicit cross-border movement of cash and BNIs?
 Yes No

If yes, please provide statistics. (Complete Table 11.2)

Table 11.2.

Year	Domestically	Internationally
2019		
2020		
2021		
2022		
2023		

Does any of the information provided above resulted in Financial Intelligence Report, leading to an investigation of case of illicit cross-border cash and BNIs?
 Yes No

If yes, please provide the statistics on the number of Investigations, Seizures, Prosecutions, Confiscations/Forfeitures and Convictions. (Complete Table 11.3)

Table 11.3.

Cases	2019	2020	2021	2022	2023
Investigations	-	-	-	1	-
Seizures	-	-	-	-	-
Prosecutions	-	-	-	-	-
Confiscations/Forfeitures	-	-	-	-	-
Convictions	-	-	-	-	-

Can the FIU provide sanitized cases of ML and TF disseminated to LEAs as a result of information derived from cash declarations or disclosures received?

Is the FIU in your jurisdiction able to establish trends of suspected money laundering/terrorist financing based on the analysis of CBRs connected with the illicit cross-border movement of cash and BNIs?

Yes No

If yes, what are the trends?

From the information related to the trends, does the FIU use the data to develop typology reports relating to illicit cross-border movement of cash and BNIs?

Yes No

If yes, how many typology reports have been issued? (Complete Table 11.4)

Table 11.4.

2019	2020	2021	2022	2023

<p>12</p>	<p>What challenges are encountered by the FIU when executing its duties in combating ML/TF related to illicit cross-border movement of cash and BNIs? (please, tick the boxes that apply to your jurisdiction)</p> <ul style="list-style-type: none"> - <input type="checkbox"/> Inadequate or no reports and other information being escalated to the FIU concerning illicit cross-border movement of cash and BNIs. - <input type="checkbox"/> Inadequate financial resources - <input type="checkbox"/> Inadequate coordination and cooperation between domestic agencies - <input type="checkbox"/> Inadequate coordination and cooperation with international stakeholders - <input type="checkbox"/> Transnational nature of the crime of illicit cross-border movement of cash and BNIs. - <input type="checkbox"/> Difficulty in bringing kingpins to book. - <input type="checkbox"/> Interference of Politically Exposed Persons (PEPs) - <input type="checkbox"/> Inadequate training and expertise - <input type="checkbox"/> Other: specify <p>Please explain how the above challenges are hindering the FIU in executing its duties of providing relevant competent authorities with quality financial intelligence and other information to enable effective combating of illicit cross-border movement of cash and BNIs and associated ML/TF.</p> <p>Does the FIU in your jurisdiction undertake a domestic capacity program to enhance the quality of Cash Declaration Reports (CDRs)?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please list them below:</p>
<p>SECTION F: Law Enforcement and Other Competent Authorities</p>	
<p>13</p>	<p>i. Does your jurisdiction have a specialized unit responsible for identifying and investigating ML and TF cases related to illicit cross-border movement of cash and BNIs?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

If yes, please provide the name:

Does the specialized unit in your jurisdiction have powers to use special investigative techniques, and have such powers been used to assist investigation of cases of illicit cross-border movement of cash and BNIs?

Yes No

If yes, please provide the legal power or sample case to support the submission:

ii. Does your jurisdiction conduct parallel financial investigations on cases of illicit cross-border movement of cash and BNIs?

Yes No

If yes, please provide the legal power or sample case to support the submission.

iii. Has any of the investigations involved extra-territorial issues/investigations?

Yes No

If yes, please indicate the cases and nature of the investigation assistance requested.

iv. From investigations carried out on illicit cross-border movement of cash and BNIs or associated ML/TF cases, are there indications/evidence of small or large criminal organized groups, including terrorist groups?

Yes No

If yes, please indicate the names of small or large criminal organized groups, including terrorist groups.

v. Who are the main perpetrators of illicit cross-border movement of cash and BNIs and associated ML/TF in your jurisdiction?

Actors	Yes	No
Locals	<input type="checkbox"/>	<input type="checkbox"/>
Foreigners	<input type="checkbox"/>	<input type="checkbox"/>
Both locals and Foreigners	<input type="checkbox"/>	<input type="checkbox"/>
Not known	<input type="checkbox"/>	<input type="checkbox"/>

vi. From investigations carried out on the illicit cross-border movement of cash and BNIs or associated ML/TF cases, are there indications or evidence of local or international legal persons evolving in these activities?

Yes No

If yes, please provide a sanitized version of the case.

14 i. What is the total amount of cash and BNIs crossing the border per year above the threshold?

Table 14.1.

Year	2019	2020	2021	2022	2023
Amount					
USD equivalent					

ii. Which border (s) in your jurisdiction are more vulnerable to illicit cross-border movement of cash and BNIs?

Please describe why these border (s) are more vulnerable.

iii. What are the main underlying predicate offense activity that are associated with illicit cross-border movement of cash and BNIs for ML/TF purposes? Specify the nature of the activity (e.g. corruption, smuggling of goods, etc)

Please provide the statistical information based on the number of declarations or disclosures (**inward and outward**).

Table 14.2.

Border name	2019		2020		2021		2022		2023	
	inward	outward								

Please provide the breakdown on the number of declaration or Disclosure as per nationality.

Table 14.3.

Nationality	2019		2020		2021		2022		2023	
	inward	outward								

	<p>iv. Do LEAs in your jurisdiction conduct any type of risk assessment to identify the trends and methods used by criminal organization (s) to conduct illicit cross-border movement of cash and BNIs activities?</p> <p>v. What are the most prevalent methods used for illegal cross-border transportation of cash and BNIs (eg by air, by road, as carry-on body or any other method)?</p> <p>vi. What are the most prevalent techniques used for illegal cross-border transportation of cash and BNIs (eg false declaration and disclosure)?</p>
<p>15</p>	<p>i. What challenges are encountered by Law enforcement Agencies and Competent Authorities when executing their duties in combating ML/TF related to illicit cross-border movement of cash and BNIs? Please, tick your answers in the box provided below.</p> <p><input type="checkbox"/> Inadequate financial resources</p> <p><input type="checkbox"/> Interference by PEPs</p> <p><input type="checkbox"/> Statutory laws deterring other institutions from sharing information.</p> <p><input type="checkbox"/> Inadequate legal provisions</p> <p>Others (Specify)</p>
<p>16</p>	<p>Are there any specific programs or initiatives aimed at strengthening the investigative skills of personnel in identifying and investigating cases of illicit cross-border movement of cash and BNIs associated ML/TF?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

If yes, please list them below.

SECTION G: INTERNATIONAL COOPERATION

17 Does your jurisdiction have mechanisms in place to assist other jurisdictions in investigations of illicit cross-border cash movement and BNIs?

Yes No

If yes, please Describe the mechanisms available for assisting other jurisdictions.

Does your jurisdiction have specific Institution which is responsible for sending or receiving requests for information to/from foreign counterparts related to the predicate offense of illicit cross-border cash movement and BNIs?

If yes, please provide the statistic on the number of requests sent and responses received related to illicit cross-border cash movement and BNIs. **Table 17.1.**

YEAR	TOTAL NUMBER OF REQUESTS SENT		TOTAL NUMBER OF RESPONSES RECEIVED	
	Cash	BNIs	Cash	BNIs
2023				
2022				
2021				
2020				
2019				

18	<p>i. Has your jurisdiction received a request from foreign counterparts on MLA on the joint investigation of illicit cross-border cash movement and BNIs?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide a sanitized version of the case.</p> <p>ii. From the case above, was your competent authority able to initiate an ML and TF investigation?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide a sanitized version of the case.</p> <p>iii. From the cases identified, did your authority share the information with the intended destination or the country of origin?</p>

19	<p>Does your jurisdiction have a platform to share with other jurisdictions illicit cross-border cash and BNIs movement cases, trends, and even kingpins detected in your jurisdiction (e.g. posting finalized cases on your website, advising the countries who may have interest in the cases at hand)?</p> <p style="text-align: center;"><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, please provide additional information about the platform.</p>
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GENERAL GLOSSARY

Terms	Definitions
Competent Authorities	<p>Competent authorities refer to all public authorities (including financial supervisors established as independent non-governmental authorities with statutory powers) designated for combating money laundering and/or terrorist financing. In particular, this includes the FIU; the authorities that have the function of investigating and/or prosecuting money laundering, associated predicate offences and terrorist financing, and seizing/freezing and confiscating criminal assets; authorities receiving reports on cross-border transportation of currency & BNIs; and authorities that have AML/CFT supervisory or monitoring responsibilities aimed at ensuring compliance by financial institutions and Designated non-Financial Businesses and Professions</p>

	(DNFBPs) with AML/CFT requirements. Self-Regulatory Bodies (SRBs) are not to be regarded as competent authorities.
Confiscation	The term confiscation, which includes forfeiture where applicable, means the permanent deprivation of funds or other assets by order of a competent authority or a court. Confiscation or forfeiture takes place through a judicial or administrative procedure that transfers the ownership of specified funds or other assets to be transferred to the State. In this case, the person(s) or entity(ies) that held an interest in the specified funds or other assets at the time of the confiscation or forfeiture loses all rights, in principle, to the confiscated or forfeited funds or other assets. Confiscation or forfeiture orders are usually linked to a criminal conviction or a court decision whereby the confiscated or forfeited property is determined to have been derived from or intended for use in a violation of the law.
Criminal activity	Criminal activity refers to: (a) all criminal acts that would constitute a predicate offence for money laundering in the country; or (b) at a minimum to those offences that would constitute a predicate offence as required by Recommendation 3 of the FATF recommendations.
Currency	Currency refers to banknotes and coins that are in circulation as a medium of exchange. <i>(FATF, Definition)</i>
Bearer Negotiable Instruments (BNIs)	Bearer negotiable instruments (BNIs) include monetary instruments in bearer form such as: traveller's cheques; negotiable instruments (including cheques, promissory notes and money orders) that are either in bearer form, endorsed without restriction, made out to a fictitious payee, or otherwise in such form that title thereto passes upon delivery; incomplete instruments (including cheques, promissory notes, and money orders) signed, but with the payee's name omitted. <i>(FATF Definition)</i>

Foreign counterparts	Foreign counterparts refers to foreign competent authorities that exercise similar responsibilities and functions in relation to the cooperation which is sought, even where such foreign competent authorities have a different nature or status (e.g. depending on the country, AML/CFT supervision of certain financial sectors may be performed by a supervisor that also has prudential supervisory responsibilities or by a supervisory unit of the FIU).
Illicit Financial Flows	Illicit financial flows refer to the movement of money a cross-border s that is illegal in its source (e.g. corruption, smuggling), its transfer (e.g. tax evasion), or its use (e.g. terrorist financing). (<i>IMF, Definitions</i>).
Money Laundering offence	Money laundering offences refer not only to the primary offense, but also to ancillary offences.
Other Agencies	For the purposes of this study, please refer to the definition of competent authorities.
Property	Property means assets of every kind, whether corporeal or incorporeal, moveable or immovable, tangible or intangible, and legal documents or instruments evidencing title to, or interest in such assets.
Seize	The term seize means to prohibit the transfer, conversion, disposition or movement of property on the basis of an action initiated by a competent authority or a court under a freezing mechanism. However, unlike a freezing action, a seizure is affected by a mechanism that allows the competent authority or court to take control of the specified property. The seized property remains the property of the natural or legal person(s) that holds an interest in the specified property at the time of the seizure, although the competent authority or court will often take over possession, administration or management of the seized property.

Supervisors	Supervisors refers to the designated competent authorities or non-public bodies with responsibilities aimed at ensuring compliance by financial institutions and/or DNFBPs with requirements to combat money laundering and terrorist financing. Non-public bodies (which could include certain types of SRBs) should have the power to supervise and sanction financial institutions or DNFBPs in relation to the AML/CFT requirements. These non-public bodies should also be empowered by law to exercise the functions they perform, and be supervised by a competent authority in relation to such functions.
Terrorist Financing	Terrorist financing is the financing of terrorist acts, and of terrorists and terrorist organisations.