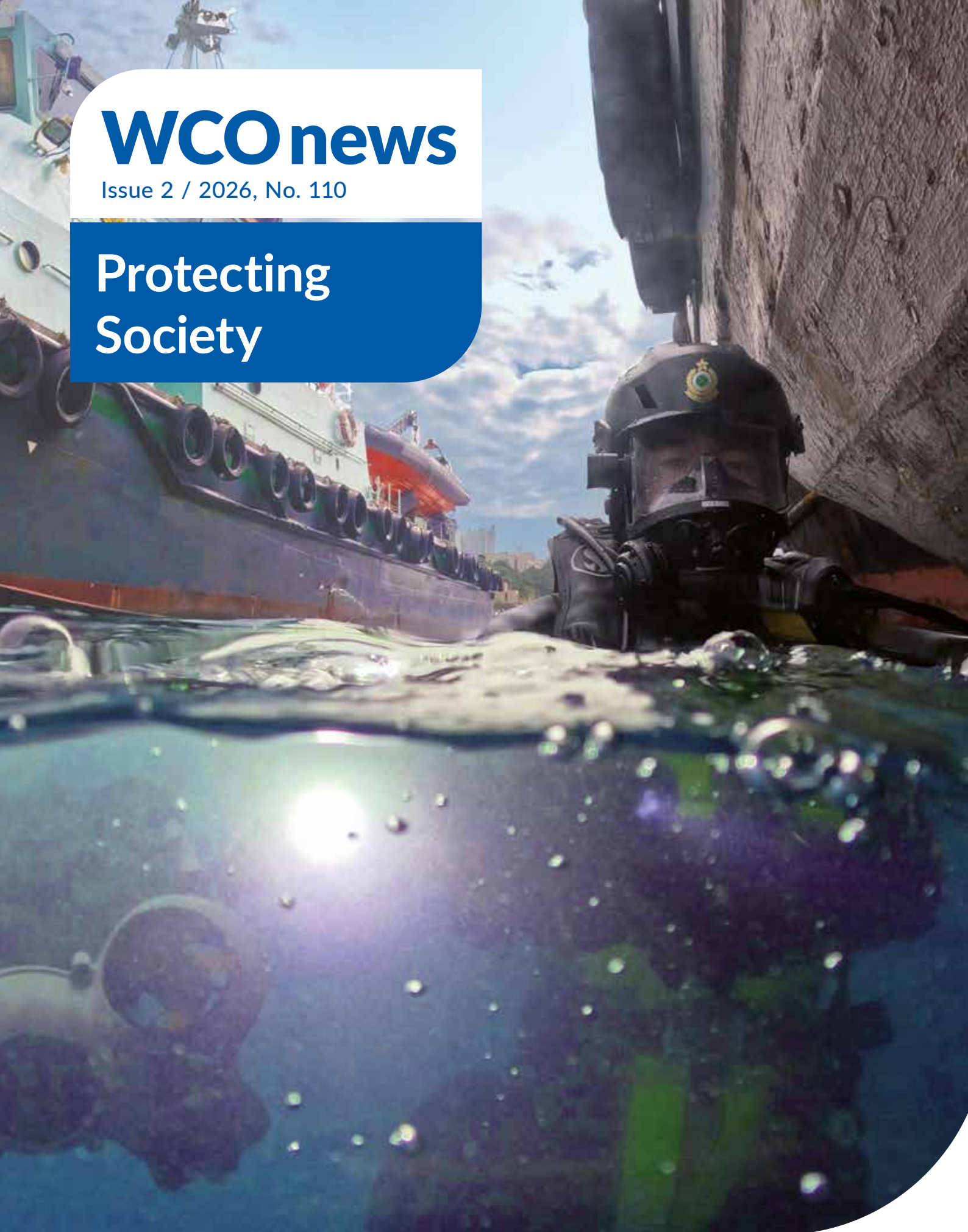


# WCO news

Issue 2 / 2026, No. 110

## Protecting Society



# AUGMENTED X-RAY

Uncover hidden threats with Augmented X-Ray detection

With increasing global trade and evolving threats — smuggling, fraud, and illicit trafficking — inspection efficiency is critical.

The Smiths Detection Augmented X-Ray technology (AXR) delivers unrivalled image clarity and detection capabilities, helping customs operators quickly identify concealed items and focus inspections where it matters most — reducing delays, risks, and unnecessary disruptions.

## From image to insight instantly

AXR transforms X-ray images into intelligent, decision-ready information. Operators don't just see — they understand, detect, and decide faster than ever.



**AXR-Image Stabilisation** ensures clear, stable images even on uneven terrain.



**AXR-In Depth** locates precisely objects across the entire width of the container.






**AXR-De-Overlapping** identifies areas of interest to highlight concealed goods.



**AXR-Wall Removal** removes steel container walls from the X-ray image to highlight organic materials.

## Upgrade to augmented inspection

Designed for the unique challenges of port and border control, AXR integrates seamlessly into existing HCVM DM and HCVP DM systems without additional hardware. Transform your existing systems into high-performance inspection tools:

-  Improve detection accuracy
-  Increase throughput and efficiency
-  Maximise your existing systems

Find out how Customs are already experiencing AXR.



Scan for more info or request a demo

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Photo: Customs of Hong Kong, China

The diving team of Hong Kong Customs is responsible for carrying out underwater missions, such as searching for contraband and collecting evidence to support its maritime operations. A new model of portable underwater drone was introduced in 2024. It is often used to capture images of the submerged part of a vessel to identify suspicious objects requiring further inspection by a diver.

**Publication date:** 26 June 2026

**Online edition:** [mag.wcoomd.org](http://mag.wcoomd.org)

**Online subscriptions**

<http://www.wcoomd.org/en/media/wco-news-magazine/subscriptions.aspx>

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**Editorial note**

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**Acknowledgements**

The Editorial Team wishes to express its sincere thanks to all who contributed to this publication.

**Illustrations**

Our thanks also extend to all who provided photos, logos, and drawings to illustrate this issue.

**Design** [www.inextremis.be](http://www.inextremis.be)

*inextremis*

# Customs protecting society through vigilance and commitment

By Ian Saunders, WCO Secretary General





Ian Saunders, WCO Secretary General

Every year, the WCO chooses a theme for the Organization and the global Customs community. It provides focus and serves as a source of inspiration to keep Customs striving toward greater effectiveness. It also helps to remind us of our priorities and encourages us to align our efforts, understanding that the greatest achievements only come through collective effort. This year, the WCO has called on its Members to elevate the profile of Customs as a protector of society under the theme *“Customs protecting society through vigilance and commitment”*.

This theme is built around a simple, but often overlooked, truth: Customs officers keep societies safe and their ability to fulfill their missions directly impacts the quality of life that people enjoy. This theme is about the officers on the frontline, as well as those that build the ecosystem that enables them to do their enforcement work well.

This article is about how the theme is taking form – through the efforts of the WCO, the committed actions of its Members, and the successful engagement of partners around the world.

### **Customs as a shield against a wide range of threats**

Customs administrations collectively are entrusted with the regulatory management of the flow of global trade and are expected to support multiple governmental imperatives simultaneously: border security, revenue collection, economic growth, and societal protection.

The results of recent WCO enforcement operations, all of which address the substance of the theme, are both encouraging and alarming. From one perspective, they can be explained by increased enforcement capacities and vigilance; however, they also reflect a challenging reality: all modes of cross-border transport and the very infrastructure of trade continue to be used and abused by criminal networks to illicitly move goods, people, wildlife and money.

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*“This theme is built around a simple, but often overlooked, truth: Customs officers keep societies safe and their ability to fulfill their missions directly impacts the quality of life that people enjoy. This theme is about the officers on the frontline, as well as those that build the ecosystem that enables them to do their enforcement work well.”*

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The WCO's operations enable participants to take stock of the efficiency of procedures and work practices, exchange in real-time information on suspicious shipments and seizures, and identify trends and modus operandi by analyzing information reported by others.

Some smuggled commodities are of increasing concern. Synthetic opioids, notably “fentanyl”, “nitazenes” and their analogues, are the most significant emerging drug threat due to their high lethality in very small quantities, rapid chemical adaptation to circumvent controls and increasingly sophisticated supply chains. Within the small arms and light weapons domain, the rise of modular weapon systems presents another significant enforcement challenge. A related issue is the trafficking and diversion of drone components, including dual-use electronics, navigation modules, optics, communications equipment and power systems.

### **Data and intelligence sharing matters more than ever and must be a collective endeavour**

Understanding how criminal networks work, what they trade and how they illicitly move goods is critical to detect and deter these activities. To face this challenge, the WCO has put at the disposal of its Members several applications to support information collection and sharing.

These include the Customs Enforcement Network (CEN) Suite, comprising the CEN application itself, the CEN Communication Platform (CENcomm) and the national CEN (nCEN).

As the forerunner, the CEN is, at its core, a database of seizures and offences as well as images. In many instances, consulting the CEN has led to the identification of Customs violations. The operational exploitation of CEN data is also reflected in the activities of the Regional Intelligence Liaison Office (RILO) network. On average, around 100 intelligence alerts are shared annually by RILOs through the CEN, based on the analysis of enforcement data and regional intelligence.

The WCO continues to encourage WCO Members to contribute more to the CEN database, both in their own



# WCO RECENT OPERATIONS AT A GLANCE

## OPERATION DEMETER XI



**Focus:** illicit waste, potent greenhouse gases, and other hazardous chemicals



Duration  
**5 weeks**



Reporting countries: **39**

### KEY RESULTS

- **15,509 tonnes** of waste and **220,716** pieces of unweighed waste
- **168 tonnes** of ozone depleting substances

## OPERATION THUNDER 2025\*



**Focus:** illegal trafficking of wild fauna and flora



Duration  
**30 days**



Reporting countries: **47**

### KEY RESULTS

- Nearly **30,000** live animals
- Over **30 tonnes** of remains, parts and derivatives of animals, plants and timber

\* jointly coordinated by the WCO and INTERPOL

## OPERATION STOP IV



**Focus:** illicit medical products and IPR infringing goods sold online



Duration  
**19 days**



Reporting countries: **48**

### KEY RESULTS

- **171.7 million** pieces and **27 tonnes** of medicines
- **5.5 million** pieces and **68 tonnes** of IPR-infringing goods

## OPERATION CALYPSO 2 - CARIBBEAN



**Focus:** illicit Small Arms and Light Weapons (SALW), their components, ammunition and narcotics



Duration  
**3 weeks**



Reporting countries: **23**

### KEY RESULTS

- **119** small arms and light weapons
- **332** firearms parts
- **61,258** firearm ammunitions
- Over **7 tonnes** of narcotics
- Over **700 000** in USD

## OPERATION COCAIR VIII



**Focus:** narcotics and cash



Duration  
**10 days**



Reporting countries: **18**

### KEY RESULTS

- **1,901 kg** of narcotics
- **381,858** EUR in undeclared currency

## OPERATION LYNX - AFRICA



**Focus:** illicit trade in excisable products



Duration  
**5 weeks**



Reporting countries: **10**

### KEY RESULTS

- Over **16 million** cigarettes
- Over **55,000 litres** of beverages

## OPERATION TENTACLE - MIDDLE EAST AND NORTH AFRICA



**Focus:** money laundering operations, cash and high-value commodities



Duration  
**6 weeks**



Reporting countries: **10**

### KEY RESULTS

- Over **45 kg** of gold, **111 kg** of gemstones
- Over **2 million** in USD
- **8.6 million** USD in mis-invoiced goods

→ Thousands of interceptions

→ One common mission

→ Illegal goods stopped before reaching markets

→ Customs delivering on its mandate to protect society

interest, and to strengthen the global Customs community. Having CEN as a resource alone isn't enough; convincing Members to make optimal use of it is essential. To showcase the value of the CEN, and ultimately the value of the data itself, as well as to support Customs administrations that lack the analytical capability required to process the data contained in the CEN in a meaningful way, a data visualization feature has been introduced. This feature enables the transformation of complex CEN datasets into visual outputs, supporting trend analysis, route identification and strategic briefings at national, regional and global levels through interactive dashboards.

Complementing the analytical strength of the CEN, CENcomm underpins the operational dimension of the work carried out by Customs and law enforcement agencies. This secure, web-based system allows closed groups of officers to exchange messages and share information in real time for the duration of an operation or project. We just completed a major modernization of CENcomm, transforming it into a more intuitive, secure and effective tool. The upgraded platform offers enhanced collaboration features, real-time geolocation to support the more precise identification of seizure locations and trafficking hotspots, improved data exchange functionalities and a modern interface accessible across devices.

**Closing data collection and analysis gaps is crucial for our success**

Aware that some Members did not have any application to collect, store, analyse, and disseminate law enforcement information efficiently in order to establish robust intelligence capabilities, the WCO developed in 2013 the national Customs Enforcement Network (nCEN). Today, the nCEN has been deployed in 59 countries and, in places where data is



Amidst impressive stacks of seized contraband, a Customs officer conducts a meticulous examination to verify and assess the goods that have been intercepted

systematically reported, its deployment improves targeting capacities.

There is also the Cargo Targeting System (CTS), which enables risk management through the analysis of electronic cargo manifest, bill of lading and air waybill data and has been deployed in 26 Member administrations. Preparations are underway for a regional deployment in seven Central African countries, financed by the European Union.

Since 2022, the WCO has hosted a collaborative geospatial data platform, the WCO Geoportal. The platform supports user-contributed data and the integration of external geospatial datasets, and its data can be incorporated into local geospatial workflows. Developed for the participants in the WCO COLIBRI Project, which has been funded by the EU to help administrations responsible for enforcement implement effective controls in general aviation, it is today a multi-project platform with the potential to support additional projects that can benefit from the use of geospatial data.

The WCO's support to Customs analysis has been taken further in recent years with the development of initiatives aimed at enabling Members to better understand the potential of artificial intelligence (AI) and machine learning (ML).

To help close the gap between administrations in these areas, while acknowledging that technology deployment must remain Member-driven and sensitive to operational realities, WCO





WCO Secretary General Ian Saunders and WCO Council Chair Bashir Adewale Adeniyi with members of Dutch Customs drone team during the 46th session of the WCO Enforcement Committee

Members contributed to a comprehensive set of [resources](#)<sup>1</sup> under the Smart Customs Project, funded by China Customs. Leveraging these resources, regional and national workshops are regularly held to develop recommendations and roadmaps with participants.

Additionally, under the BACUDA Project, funded by Korea Customs, Customs-specific [algorithms](#)<sup>2</sup> in open-source programming languages have been developed and a scholarship programme has been created to enable Customs data analysts to spend three months in Korea to deepen their knowledge about practical applications of AI in Customs administrations, data visualization and data storytelling - understanding how to communicate findings effectively is just as critical as the data analysis itself.

### Customs must mobilize to counter the exploitation of general aviation by traffickers

Several years ago, the Organization began work on general aviation, recognizing it as a vector exploited by criminal networks. Two WCO enforcement initiatives - the Synthetic Drugs Detection Project, funded by the US Department of State, and the COLIBRI Project - aim to address this threat by working with Members to improve risk assessment, strengthen operational readiness at general aviation airports, and enhance cooperation between Customs services, civil aviation authorities, and law enforcement agencies.

According to a survey just conducted, the 16 Customs administrations participating in the COLIBRI Project indicated that it has elevated general aviation control from a peripheral activity to a structured, intelligence-driven, and internationally coordinated enforcement domain. Many administrations now use the WCO Geoportal in daily operations, and some are developing national platforms to receive flight General Declaration data in advance, develop clear indicators of

growing digital maturity and implement improved pre-arrival risk analysis.

These projects also contributed to the development of new risk indicators for general aviation that have been included as a new chapter in Volume 2 of the WCO Customs Risk Management Compendium.



## COUNTERING THE EXPLOITATION OF GENERAL AVIATION

### Activities conducted up to June 2026



**35** basic training sessions and  
**1** advanced training on data analysis



**8** webinars on the Geoportal and/or CENcomm



**18** national mentoring missions



**4** focal point meetings and  
**6** expert meetings



**1** expert accreditation workshop and  
**1** train-the-trainers workshop on the IT tools



**3** enforcement operations



**1** international forum



Engaging over **2,000** individuals,  
**25** countries and more than  
**100** government agencies

Czech Customs officers taking samples of seized goods



1 <https://scp.wcoomd.org/reports>

2 <https://bacuda.wcoomd.org/#aihs>



A Customs detector dog with its handler, and assisted by a Police officer, inspects a foreign vessel berthed at the port and loaded with containers



Customs officers meticulously check the thickness of plastic bags to ensure compliance with regulations that prohibit the importation of plastic bags with a thickness of less than 50 microns

### Profiling postal and express consignments must become a core Customs competency

In line with e-commerce being a focus area in its Strategic Plan, the WCO has undertaken work to improve Customs' enforcement posture in the postal and express environment. Risk indicators have been updated and refined thanks to the input of experts from Customs, WCO, International Narcotics Control Board (INCB) and Universal Postal Union (UPU), who have been working together to identify ways to strengthen operational responses to synthetic drugs trafficking through mail and express channels.

Data from the CEN shows that the number of cases of New Psychoactive Substances (NPS) reported in 2025 doubled to 7,721 cases (+108.8%) compared with 2024 and that 78.9% of the seizures concerned postal shipments. But NPS and drugs in general are not the only commodities moving in postal and express consignments. This mode of transport accounts for 44.8% of all cases reported in the CEN.

These findings can be explained in part by the fact that WCO flagship enforcement operations focus on these modes of transport; they also underscore the importance of Customs developing specialized risk profiling capacities across a wide range of commodities.

### Developing capacities to use geospatial intelligence (GEOINT) is another promising area of work

A new body of knowledge – almost a discipline in itself – GEOINT combines satellite imagery, geographic information systems (GIS), remote sensing, positioning data and analytics to provide a visual representation of geographic features, activities and changes over time. It does not replace human expertise or inter-agency cooperation; it augments them, providing a single geospatial framework where agencies can overlay data, coordinate responses and target resources more effectively.

To support administrations utilizing GEOINT, the WCO has created a pool of officers able to train their peers on GEOINT through the Master Trainer Programme, an initiative funded by the Japan International Cooperation Agency (JICA). So far, the pool counts 15 trainers from WCO Members in Africa who are equipped to integrate GEOINT into Customs operations in their respective countries. In addition, a further 28 officers are undergoing training and are expected to qualify as Master Trainers by June 2027. The WCO Geoportal has been made available to all participating administrations, and several have today established dedicated GEOINT units or are in the process of doing so.



WCO Secretary General speaking in Trade Tech: Delivering for People session at the World Economic Forum Annual Meeting 2025 in Davos-Klosters, Switzerland. Copyright: World Economic Forum

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## Interagency cooperation is one line of engagement that must continue

The challenges that we face are bigger than any one of us, no matter where we are from. Customs cannot be successful if it sees itself as having to manage threats alone. All WCO capacity building activities have increasing cooperation at the national and international levels at heart, and many are conducted with the technical support of our partners. Training, workshops and enforcement operations often bring together Customs, relevant national agencies, industry stakeholders, and international and regional organizations such as INTERPOL, the Secretariats of the Multilateral Environmental Agreements, UPU and INCB to ensure a comprehensive and cohesive approach to combatting specific threats or challenges.

Evaluation of key programmes and initiatives shows that Customs, Police, Tax authorities, Financial Intelligence Units, and other specialized agencies are working together more systematically and cultivating stronger relationships to protect society – using the combination of Customs presence and experience and the expertise and authorities of other agencies to more effectively stop transborder criminality.

## Telling the story of Customs protecting society

For Customs to receive the support it deserves, we need to collectively highlight the decisive and vital role Customs plays. In telling the world how we are helping to deliver greater efficiency, security, and prosperity, we create the possibility of greater understanding, greater appreciation, and greater investment.

As Secretary General of the WCO, one of my goals is to raise awareness of why Customs matters and I have engaged with several media in recent months to explain that, beyond collecting revenue, Customs protects the safety, security and well-being of our societies – every single day.

This edition of the magazine also forms parts of these efforts, and I am appreciative of the many Customs administrations who contributed to this edition. Telling their story in the June 2026 edition of *WCO News* was one of the tangible actions I asked WCO Members to take in line with our theme. I am pleased so many of them responded to the invitation and have offered glimpses of Customs protecting society through vigilance and commitment.



# Protecting society against synthetic drugs: introducing INCB GRIDS tools

By the International Narcotics Control Board (INCB)

## The challenges of synthetic drug trafficking

The rapid evolution of the illicit synthetic drug market in recent decades presents a severe challenge for drug control, the rule of law and public health. Newly emerging synthetic drugs and new psychoactive substances (NPS) can be many times more potent than drugs such as heroin, while being smaller in size and therefore more difficult to interdict at borders.

The methods used by synthetic drug traffickers are many and varied. Today, they source specially engineered chemicals diverted from the chemical and pharmaceutical industries, exploit legitimate e-commerce marketplaces and social media platforms, and smuggle their products through millions of small international postal and express mail service (EMS), express courier and air cargo consignments, often using consolidated freight forwarding.

## WCO, INCB and UPU team up

The WCO, the Universal Postal Union (UPU) and the International Narcotics Control Board (INCB) began coordinating efforts against the exploitation by traffickers of postal and express carriers' services in 2018. This coordination now takes place under the WCO's Synthetic Drugs Detection

Project – Mail Channel (WCO-SDDP-MC) initiative, which aims to provide Customs with the skills, methods and networks needed to detect synthetic drugs in high-volume environments.

## Adding the technology stack

The INCB contributes to the WCO initiative through its Global Rapid Interdiction of Dangerous Substances (GRIDS) Programme, which coordinates the development of science-based resources, technologies and training for the safe interdiction of fentanyl opioids, specifically designed for front-line officers operating in postal and express courier channels. INCB GRIDS provides the operational technology stack that helps officers and analysts connect information across borders in real time. The objective is to reduce the time between detection, information-sharing and coordinated action. In a world where traffickers move at digital speed, the Customs response must move faster than the next parcel on the conveyor belt.

## Incident communication system

While the large volume of consignments handled by Customs officers may be seen as a vulnerability, it also provides an opportunity. The identification of routing patterns, methods



In November 2025, officers from Thai Customs learned how to use INCB targeting tools and safe interdiction practices during a training organized by the WCO and INCB

used by senders and recipients, concealment techniques and other indicators can be turned into actionable intelligence if captured and shared quickly enough.

At its core, GRIDS is based on the principle that every seizure or suspicious shipment should become a global signal. The IONICS (Project ION Incident Communication System) suite is the secure communication and targeting backbone that enables seizure information to travel faster than traffickers. It is designed for real-time communication of incidents involving suspicious shipments, trafficking, manufacturing or production of NPS, fentanyl-related substances and other synthetic opioids and related chemicals. The result is not simply “reporting” but actionable coordination among governments and international agencies, including Customs risk analysts and postal operators’ security officers.

### Supporting analysts and front-line officers

In 2025, 14,204 incidents related to postal shipments were reported via IONICS, with opioids being the most frequently seized NPS (21%). INCB tools, paired with other international and national systems and training, provide a stronger basis for answering operationally critical questions: Am I seeing a new route emerge? What is this new substance, and is it increasing in my region or at my borders? Is a particular chemical appearing in contexts other than legitimate use? Are concealment methods changing in ways that require retraining?

To improve the capacity of front-line officers, the INCB also delivers, through its GRIDS Programme, science-based training on safe interdiction approaches, information exchange and the development of actionable intelligence. It also supplies personal protective equipment (PPE) and field test kits to law enforcement, regulatory and Customs agencies. Training materials are available in all UN languages and more.

One of the main challenges consistently observed is the high turnover of trained personnel, including changes due to promotions, reassignments, or departmental rotations. This requires continuous efforts to:

- update and maintain active focal points;
- ensure continuity in access to and operational use of the tools; and
- deliver repeated training to newly appointed front-line officers.

This dynamic underscores the importance of sustained engagement and regular capacity-building to maintain an effective and informed user network.

### Scanning novel opioids on online platforms

Traffickers exploit not only postal channels but also digital marketplaces, using e-commerce platforms to sell and distribute dangerous substances globally. The INCB’s SNOOP (Scanning Novel Opioids on Online Platforms) tool provides enforcement officers with an AI-powered system that monitors online marketplaces continuously and identifies suspicious wholesale vendors of synthetic opioids and related chemicals. It enables investigators to identify vendor and shipper details, flag risk indicators and consolidate payment and trafficking information to support detection and disruption at borders, as well as the dismantling of supply sources.

### Results

The GRIDS Programme facilitates both automated and targeted communications. For example, the IONICS platform generates daily automated notifications for users, sharing incidents relevant to their respective countries. In addition, the GRIDS Cyber-Communications Centre disseminates alerts and notifications on emerging substances, trends and operationally relevant developments.

BIC Facility  
Code

**CONTAINERS  
BIC-CODE  
REGISTER**

SCEU 439897 1  
SCEU 748392 0  
MSCU 139483 6  
MSCU 113509 1  
MSCU 940302 0

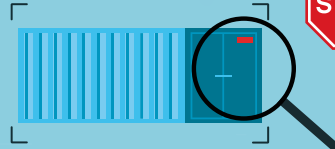
 Global  
Container  
Database

Tare weight

Size Type

Lost or stolen

**XXXU 388756 5**



CUSTOMS



# ENHANCE VIGILANCE ON CONTAINERIZED TRADE

Customs authorities rely on many data sources to identify high-risk containers. Among them, BIC provides e-BIC, a real-time, automated access to the International BIC Code Register — the global database recording and listing container owner codes according to the ISO container marking standard, as stipulated in international customs conventions.

Free of charge and available via API or CSV download, e-BIC enables customs administrations to keep their profiling systems up to date and detect any inconsistencies in owner codes.

Contact us at [bic@bic-code.org](mailto:bic@bic-code.org) to sign up for e-BIC: An essential tool for facilitating legitimate trade and enhancing threat assessment.

*For more information on e-BIC and other services such as the Global Container Database, the BIC Facility Code Database and Global Container Geofence Library:*





NCB-WCO training on intelligence exchange and risk profiling, November 2025, Bangkok, Thailand



Information exchanges via IONICS have proven their value. In 2025 alone, 53 information packages shared through this system initiated government investigations or resulted in the dismantling of NPS trafficking organizations.

For example, in 2025, analysis of IONICS incident data on intercepted postal parcels containing hazardous substances enabled the identification of at least 13 similar shipments of psychotropic and opioid pharmaceuticals originating from Macaé (Rio de Janeiro State, Brazil) and destined for multiple addresses in the United States. Intelligence sharing between U.S. Customs and Border Protection (CBP), the Brazilian Federal Police and the United States Drug Enforcement Administration (DEA) led to the launch of a coordinated investigation and subsequent enforcement action.

The most recent operational success was recorded in March 2026, when Brazil's Federal Police dismantled an international synthetic drug trafficking network. Once again, the investigation was directly triggered by intelligence derived from IONICS incident reporting, specifically postal parcel interceptions involving dangerous substances.

An alert generated by the GRIDS Cyber-Communications Centre, based on AI-supported analysis of 15 IONICS incidents shared by US authorities, identified suspicious postal shipments intercepted by CBP and the United States Postal Inspection Service (USPIS). These incidents constituted the primary intelligence lead that initiated the investigation.

The operation targeted a sophisticated criminal network exploiting online platforms to distribute synthetic opioids and benzodiazepines in pharmaceutical form through international postal channels. Law enforcement authorities executed search warrants at three locations, resulting in multiple arrests and the seizure of drugs, mobile devices and documentary evidence.

Operational analysis enabled authorities to map more than 900 shipments linked to the network, with distribution routes extending to the United States, Canada, Australia and the

Czech Republic. A related cocaine seizure connected to the same address further exposed the scale and diversification of the criminal activity.

### Upcoming developments aimed at automation

Another tool, the GRIDS Pre-flight Incident Notification Gateway (PING), is under development. It will allow international organizations or national government with IONICS access to automatically check whether a specific importer or exporter geospatial coordinates are associated with suspicious shipment or seizures dangerous substance reported via IONICS.

It was developed to allow the future Universal Postal Unions (UPU) Dangerous Good Search Tools (DGST) to ping IONICS signals and instantly obtain a stoplight match score for potential secondary inspection of shipments before they are loaded onto aircraft. Currently under development, the DGST uses machine learning to analyse postal EDI messages and aims to connect with external systems and databases to improve predictive capabilities.

PING automates what is currently possible manually by focal points without the burden of data exchange and could be expanded to connect with other systems and tools as it could handle millions of pings daily.

### How to join GRIDS

The INCB GRIDS Programme currently includes 5,751 registered focal points worldwide, representing a broad range of actors such as Customs, police, postal services, express carriers and health authorities.

Access to GRIDS tools is facilitated through official government nomination. Customs administrations interested in accessing the tools are encouraged to coordinate with their national authorities or contact the INCB directly for guidance through the nomination and onboarding process.

### More information

<https://www.incb.org/incb/en/grids.html>  
[incb.grids@un.org](mailto:incb.grids@un.org)



**Rapiscan**<sup>®</sup>

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CUSTOMS SCREENING SOLUTIONS  
PROTECTING PORTS & BORDERS WHILE FACILITATING TRADE**

Securing borders while facilitating trade requires proven, high-performance screening. Rapiscan's cargo and vehicle inspection technologies enable Customs agencies to detect threats and contraband with confidence while maintaining efficient, uninterrupted operations. Our AI-driven operator assist tools leverage machine learning and deep learning algorithms to support image analysis—helping operators identify anomalies with greater speed and confidence.



# Protecting society in a context of political and security crisis: revisiting Haiti

By the General Customs Administration of Haiti

Three years ago, we wrote about the security crisis in Haiti and its impacts on Customs.<sup>1</sup> Today, as the crisis continues, stifling the Haitian economy by increasing the cost of international trade transactions, we would like to revisit certain strategies and outline the results achieved so far.

Haiti is a small economy dependent on international trade for manufactured goods and food products, and it remains engulfed by violence. Gangs control around 80% of the metropolitan area of Port-au-Prince, including the entire coastline of Port-au-Prince Bay where the port, its terminals, the Customs office, warehouses, Customs clearance areas and fuel storage facilities are located. Two armed groups also control the road leading to the Malpasse border Customs office, situated 50.4 km from the capital on the border with the Dominican Republic.

Customs resilience is more essential to the country than ever. Customs must collect the revenue needed to finance the State; regulate trade flows and protect domestic production against unfair competition from smuggling; and reduce insecurity and violence by combating illicit trafficking and crime.

Moreover, Hurricane Melissa, which struck the south of the country in October 2025, once again highlighted the critical role played by Customs in emergency situations. Following the activation of Article 182(6) of the Customs Code, which authorizes the duty- and tax-free importation of goods intended for distribution to victims of natural disasters or for use on their behalf, joint teams comprising representatives of the Ministry of the Economy and Finance, the Directorate of Civil Protection and the Quarantine Service and Customs officials worked tirelessly around the clock to deliver foodstuffs, medicines, clothing and tents to affected populations, removing the usual administrative obstacles in view of the humanitarian emergency.

The 2,150 officials of the General Customs Administration of Haiti (Administration Générale des Douanes – AGD) operate in a dangerous environment. The Directorate General was relocated to the airport office after gangs took control of the port area. Officials assigned to the port rotate between the terminals and the airport in order to ensure continuity of operations.

Despite these constraints, the 17 field Customs clearance offices remain operational, 12 of which are located at ports and airports and four along the land border. In addition, there are nine local offices in free zones, and six road checkpoints monitoring the movement of goods and persons.

## Systematic inspection of imported goods

In response to the security crisis, the AGD introduced systematic physical inspections of imported goods, temporarily suspending the green channel normally granted to operators with an established compliance profile, while maintaining specific facilitation measures for operators whose risk profile is considered under control. This exceptional measure is intended to be lifted as soon as the security situation permits.

## Remote working and off-site inspections

In order to maintain continuity of service during the crisis, the AGD authorized remote working via ASYCUDA and physical inspections of goods at operators' premises, with the operators providing armoured transport for officials. These measures remain in force and raise corruption risks, which the AGD seeks

1 WCO News No. 101, Issue 2/2023, [https://mag.wcoomd.org/magazine/101-issue\\_2\\_2023/security-crisis-haiti/](https://mag.wcoomd.org/magazine/101-issue_2_2023/security-crisis-haiti/)



that the facilitation granted does not undermine the integrity of the control system.

Eligible companies benefit in particular from:

- the possibility of storing raw materials in factories under Customs control;
- simplified Customs clearance procedures and routing through the computerized “green channel”, reserved for transactions considered to present a low risk of fiscal non-compliance;
- pre-clearance or advance declaration procedures;
- exemption from penalties in cases of unintentional clerical errors;

to mitigate through the digital traceability of operations and the rotation of officials assigned to off-site inspections.

**Digitalization and facilitation measures for trusted operators**

The security situation and the inspection measures introduced have contributed to longer border clearance times. To address this issue, a new Customs Code entered into force in March 2023, enabling the implementation of significant facilitation measures for economic operators.

Among the most significant developments are the digitalization of supporting documents and their upload to the Customs IT system together with Customs declarations, in accordance with Article 95(1) of the Code. Together, these measures have considerably reduced processing times and strengthened the traceability of operations.

In addition, a Memorandum of Understanding between the Ministry of the Economy and Finance, the Association of Haitian Industries and the Chamber of Commerce and Industry of Haiti established a derogatory Customs facilitation regime for the industrial sector. The regime is reserved for operators engaged in recognized activities, which are members in good standing of the signatory organizations, have a satisfactory compliance record and agree to post-clearance controls, thereby ensuring

- waiver of fines for late declarations in duly justified cases;
- the bonded warehousing regime for eligible materials and inputs.

In order to benefit from these facilitation measures, companies must provide a comprehensive guarantee covering all of their Customs obligations.

**Significant increase in revenue**

Revenue increased significantly in 2023, partly owing to operational difficulties at the Port-au-Prince and Malpasse Customs offices, which led operators to use entry points that were better controlled.

A comparison of certain indicators for the period from October 2022 to April 2023 and the period from October 2025 to April 2026 reveals remarkable growth.

The number of containers processed rose from 35,171 to 42,033, representing an increase of 19.5%, while the total volume of goods rose from 1,880,513 tonnes to 2,641,319 tonnes, an increase of 40.5%, reflecting not only a rise in the number of declarations but also a substantial increase in cargo density.

REVENUE	Total from October 2022 to 30 April 2023		Total from October 2025 to 30 April 2026	
AGENCY	%	Revenue in billions of gourdes	%	Revenue in billions of gourdes
Directorate General for Taxation	44%	43,026	39%	50,437.46
General Customs Administration	56%	54,244	60%	76,969.63
Treasury (miscellaneous revenues)	0%	42	1%	833.84
<b>Total</b>	<b>100%</b>	<b>97,312</b>	<b>100%</b>	<b>128,241</b>

The revenue figures are equally striking. Duties and taxes collected now amount to approximately 11 billion gourdes per month, equivalent to more than USD 84 million, representing 60% of state tax revenue, an increase of four percentage points. This increase is all the more significant given that it occurred in a context where the exchange rate appreciated, moving from 156 gourdes to 130.75 gourdes to the US dollar. The increase in revenue therefore reflects a genuine expansion of the tax base for duties and taxes, as well as structural improvements in collection efficiency.

### Three flagship measures

Three initiatives produced tangible results during the period under review:

1. The optimization of workspaces constituted a key driver of operational modernization. The refurbishment and expansion of the premises now jointly housing the central, port and airport offices in Port-au-Prince, combined with the creation of dedicated counters according to the type of operation and operator profile, made it possible to streamline control activities, facilitate the processing of files and reduce unnecessary points of contact between users and officials, traditionally regarded as corruption risk factors. The impact on revenue was direct and measurable: the increase in duties and taxes collected confirms that the physical organization of workspaces is a genuine determinant of institutional efficiency, benefiting both the AGD's performance and the quality of service provided to economic operators.
2. Automated email notifications profoundly transformed a practice that had previously been a source of operational shortcomings. Before their introduction, Customs brokers were required to appear in person at Customs counters in order to be informed that their manifests had been signed, resulting in waiting times, missed payments and limited traceability of transactions. Automatic email alerts are now sent as soon as manifests are signed, significantly reducing Customs clearance times, limiting missed payments and strengthening the traceability of transactions, while freeing officials from a repetitive administrative task so that they can focus on activities with greater added value.
3. The establishment of the AGD communications unit, structured around three target audiences – economic operators, the media and researchers, and the general public – forms a coherent mechanism that strengthens institutional transparency and facilitates user compliance. Dialogue with the private sector takes the form of regular meetings with carriers, importers and Customs brokers. These meetings, supplemented by feedback mechanisms, make it possible to adjust procedures in real time and build lasting relationships of trust between the institution and its stakeholders.

### Future prospects and new initiatives

The results achieved testify to remarkable institutional resilience, but they should not obscure the scale of the challenges that remain to be addressed. Beyond the measures already introduced, the AGD is continuing its modernization drive by launching new initiatives aimed at facilitating trade, broadening the tax base and strengthening security.

#### **Strengthening staffing levels within the Customs Surveillance Directorate**

The Customs Surveillance Directorate is responsible for verifying the compliance of international trade operations, monitoring entry points and ensuring the safety of personnel and infrastructure. It is organized into services, sections and mobile units.

The inspections carried out by this Directorate are aimed, in particular, at stemming violence by combating the trafficking of arms, ammunition and equipment. Seizures carried out between October 2025 and April 2026 at Haiti's ports and airports resulted in the interception of the following:

- guns and AR-15- and TL-15-type assault rifles;
- ammunition magazines of various calibres (9 mm, 7.62, .380, .40, .45 and .38 Special);
- frequency-jamming equipment intended to disrupt anti-drone systems,
- full military uniforms, assault boots and balaclavas;
- weapons concealed in sacks of rice, loudspeakers, stuffed toys and thermos flasks.

Officials perform their duties under difficult conditions, and staffing levels are often inadequate. Management of the border with the Dominican Republic – Haiti's second-largest trading partner, from which imports have increased significantly in recent years – is particularly challenging. At Ouanaminthe, the second most important crossing point with the Dominican Republic, staffing levels are well below what would be required for effective border surveillance. During periods of drought, the Dajabón River, which forms the natural border between the two countries, becomes little more than a symbolic obstacle, as water levels fall sufficiently for it to be crossed on foot, by motorcycle or by donkey.

The AGD plans to deploy more mobile units, since these play an integral role in strengthening the credibility of the Customs system and building trust among economic operators and international partners. The recruitment drive will be supervised by the Human Resources Management Office and will follow a transparent and merit-based procedure involving a public call for applications, the submission of documents demonstrating



that candidates meet the required qualifications, a written examination and an interview before an independent panel, followed by mandatory training at the National Customs School. This training will include a module on weapons handling and security protocols, reflecting the constant demands of the profession.

The aim of this merit-based recruitment drive is to train officials who act with integrity and who are capable of dealing with the pressures they will face. Yet a number of real problems have emerged in this connection, in particular a lack of good candidates, geographical limitations and low salaries which make the jobs less attractive, as well as the fact that most officials are male and women account for only around 27% of applicants.

### **Physical modernization of border posts and technological tools**

In view of disparities between border offices in terms of equipment, levels of digitalization and facilitation measures, the AGD is embarking on a programme of physical modernization aimed at upgrading all of the country's entry and exit points, deploying advanced inspection technologies and improving working conditions for staff as well as reception conditions for users and economic operators. The objective is to guarantee a Customs experience that is both uniform and compliant with international standards.

In particular, the mobile units will need to be equipped with surveillance drones, night-vision goggles and mobile non-intrusive inspection technology.

### **Planned installation of non-intrusive inspection equipment in Cap-Haïtien and Ouanaminthe**

The planned installation of non-intrusive inspection equipment in Cap-Haïtien and Ouanaminthe represents a significant step forward, although other measures will also be necessary to achieve a high level of operational efficiency in this connection, for example the increased presence of mobile units along uncovered trade corridors, a rigorous maintenance plan accompanied by training for local technicians, and enhanced physical protection for the equipment in the light of the tense security situation.

### **Improved risk management**

In response to the structural vulnerabilities that facilitate smuggling, fraud and losses of tax revenue, the AGD is launching a new analytical risk management initiative linked to the ASYCUDA system and supported by international partners, with the aim of targeting high-risk operations and ensuring that officials are deployed where they are most needed.

### **Establishment of an interinstitutional border security platform**

The fragmentary nature of the institutions responsible for border surveillance constitutes a critical weakness that criminal networks and armed groups exploit relentlessly. The establishment of an interinstitutional platform involving the Haitian National Police, the Directorate of Immigration, the Ministry of Agriculture, the Ministry of Public Health and other institutions operating at the borders has therefore become an imperative necessity. The platform would ensure the immediate sharing of intelligence among all the institutions involved, coordinate joint operations at the most vulnerable border crossing checkpoints and restore the effective monitoring of trade flows in order to curb illicit sources of funding that fuel insecurity.

### **Full deployment of the electronic Single Window and widespread use of online payment**

The full deployment of the electronic Single Window and the widespread use of online payment pursue a dual objective: simplifying Customs formalities and reducing corruption risks linked to direct contact between users and officials. By introducing a single interoperable platform which centralizes all operations – declaration, verification, assessment and payment – and which interfaces with the IT systems of other key stakeholders, notably the Ministries of Agriculture, Commerce and Public Health, the Directorate General for Taxation and the Bank of the Republic of Haiti, the AGD aims to improve transparency and efficiency while providing economic operators with a smooth, traceable compliance process accessible from anywhere in the country with access to a telecommunications network.

### **More information**

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# Enhancing vigilance: an overview of the Ukraine Customs canine programme

By the State Customs Service of Ukraine

In 2025, the State Customs Service of Ukraine recorded 1,173 attempts to import narcotics, psychotropic substances and precursors illegally. Of these, 626 were detected by one of the Service's 86 canine teams. The teams also helped uncover other types of illicit goods, with 246 seizures involving weapons, currency, tobacco products and amber made with their support.

These results testify to the value of working with detector dogs and to the expertise acquired by Ukraine Customs in this field. Well-trained dogs can conduct "incorruptible" olfactory inspections of vehicles and individuals and identify target odour molecules within seconds, even at minimal concentrations and even when prohibited items or substances are hermetically sealed to neutralize scent or masked by competing odours.

Ukraine Customs has worked with detector dogs since 1994, when a Canine Centre was established at the Black Sea Regional Customs office in Odesa. At the time, due to its geographical location, Ukraine had become a transit territory for significant quantities of raw narcotic materials, and the deployment of the first canine teams supported drug enforcement efforts.

The Centre was designed for the simultaneous training of 12 to 14 inspector-dog handlers and their service dogs. In 2010, it was relocated to the Ukraine Customs educational institution providing advanced training for employees, located in Khmelnytskyi. Service dogs are selected according to strict requirements relating to age (4 to 18 months), sensory capabilities (smell, hearing and sight), personality (innate drive for play) and behaviour (for example level of obedience or appropriate response to loud noises and external stimuli). Qualities and behaviour are assessed at the start of primary training through eight basic exercises.

Customs officers wishing to become dog handlers must also undergo a selection process aimed at assessing their knowledge of Customs legislation, regulations and procedures relating to canine teams, as well as protocols for service dog maintenance and care. Candidates must be able to assess a dog's health



based on external signs, distinguish between non-infectious and infectious diseases, provide first aid and take measures for the prophylaxis and prevention of the spread of infections.

The vast majority of canine teams are trained for dual specialization. Trainers use a hand-held signalling device called a clicker, which emits an audible "click" when pressed, to train dogs to adopt specific behaviours, develop stable search and detection skills and obey handlers flawlessly. Handlers learn not only how to work with service dogs, but also how to care for them. Working skills are honed to the point of automatism through practice once the canine team begins operational duties. They undergo regular retraining and benefit from the support of a network of regional trainers. It takes about 4,400 hours on average to train a canine team over the course of its 10-year career. Each canine team is unique, and the primary challenge is to develop a tailor-made competency development programme for each one.



Trainers also provide practical assistance to Customs offices in strengthening control measures and implementing canine team deployment methodologies. The use of dogs for optimum performance requires the ongoing education of units that need the support of a dog handler team. They must understand what the dog can achieve, how best to use it – for example how to design the search area to allow optimum access to targeted articles, areas or people so as to give the dog the best chance of success – and the support required before, during and after deployment.

The Canine Centre also administers and maintains the “Canine Services” information system. This software records data relating to the teams’ training, operational performance and participation in organized events. Access to this information is restricted to officials within the canine units. The system also contains information regarding the activities of canine units from other Customs administrations, collected from open sources and through communication during events.

It is worth noting that, due to the suspension of air and sea traffic, as well as the closure of checkpoints in high-risk directions following the full-scale invasion of Ukraine by the Russian Federation, some Customs canine units have been redeployed to the western borders. Currently, all these units are involved in Customs control procedures at railway and road checkpoints, as well as at international mail exchange facilities.

Many canine handlers are currently defending the State within the ranks of the Armed Forces of Ukraine. The canine training programme is, however, constantly being improved through

the integration of modern security solutions and expanded cooperation with Ukraine’s law enforcement agencies to exchange expertise and best practices, and even provide training for their canine teams.

In 2016, the WCO granted the Ukrainian Canine Centre the status of WCO Regional Dog Training Centre (WCO RDTC). Since then, canine teams from Poland and Slovakia have visited the centre for training, and participation in international forums has increased, with Ukrainian experts taking part in 40 in-person and online events aimed at sharing experience and lessons learned. Notably, throughout 2025, a series of intensive exchanges took place with colleagues from Slovakia, Poland, Romania and Moldova, alongside active participation in WCO canine-related initiatives. This active international engagement has enabled the implementation of new training tools designed to replicate actual operational environments, such as sound and light distractors, as well as new training methods such as clicker training, and new methodologies relating to service dog recruitment and accreditation protocols, for example.

Ukraine Customs is also actively engaged in the work of the WCO. It contributed to the development of WCO accreditation standards for RDTCs and is currently examining the content of the *WCO Compendium for Customs Canine Programmes: Best Practices and Guidelines* to enhance its programme further.

#### **More information**

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# Following the goods: how the Canada Border Services Agency disrupts trade-based illicit financial flows

By the Border Financial Crime Centre of the Canada Border Services Agency

As global trade volumes continue to grow and supply chains increase in complexity, Customs administrations are confronting threats and risks that extend well beyond traditional revenue, safety, and compliance concerns. Among these is the threat of trade-based illicit financial flows (TB-IFFs) which are linked to activities such as trade based money laundering (TBML), sanctions evasion, and financing of both proliferation of weapons of mass destruction (WMD) and terrorism.

Under TB-IFF schemes, legitimate trade frameworks are manipulated through methods like false invoicing, misdescription of goods, manipulation of quantities or values, and the misuse of trade documentation. However, their purpose differs from conventional Customs fraud. Rather than targeting duty evasion alone, TB-IFF schemes are designed to move, store, or disguise illicit value within legitimate trade flows.

## A cross-mandate threat

These flows cut across multiple sectors and mandates, impacting public agencies and private sector actors. Customs, tax administrations, police services, financial intelligence units, financial supervisors, banks, and participants in the trade sector may each observe fragments of activity, yet no single authority or sector sees the full picture. TB-IFF schemes exploit vulnerabilities in both the financial and trade systems, requiring coordinated public- and private-sector responses.

## Why Customs authorities matters

Customs authorities occupy a critical, unparalleled position at the intersection of goods, documentation, and trade data. Unlike financial or law-enforcement bodies that may see threat actors or transactions in isolation, Customs can assess how value moves in practice - through shipments, routes, counterparties, and commercial relationships - and whether activity aligns with legitimate economic behaviour.

Critically, TB-IFF schemes do not exploit commodities alone. It preys on legitimate trade chains: producers, intermediaries, logistics providers, financiers, and commercial practices that

enable lawful trade. Understanding how goods are normally produced, priced, financed, transported, distributed, and paid for is therefore essential to identifying when trade behaviour deviates from economic reality.

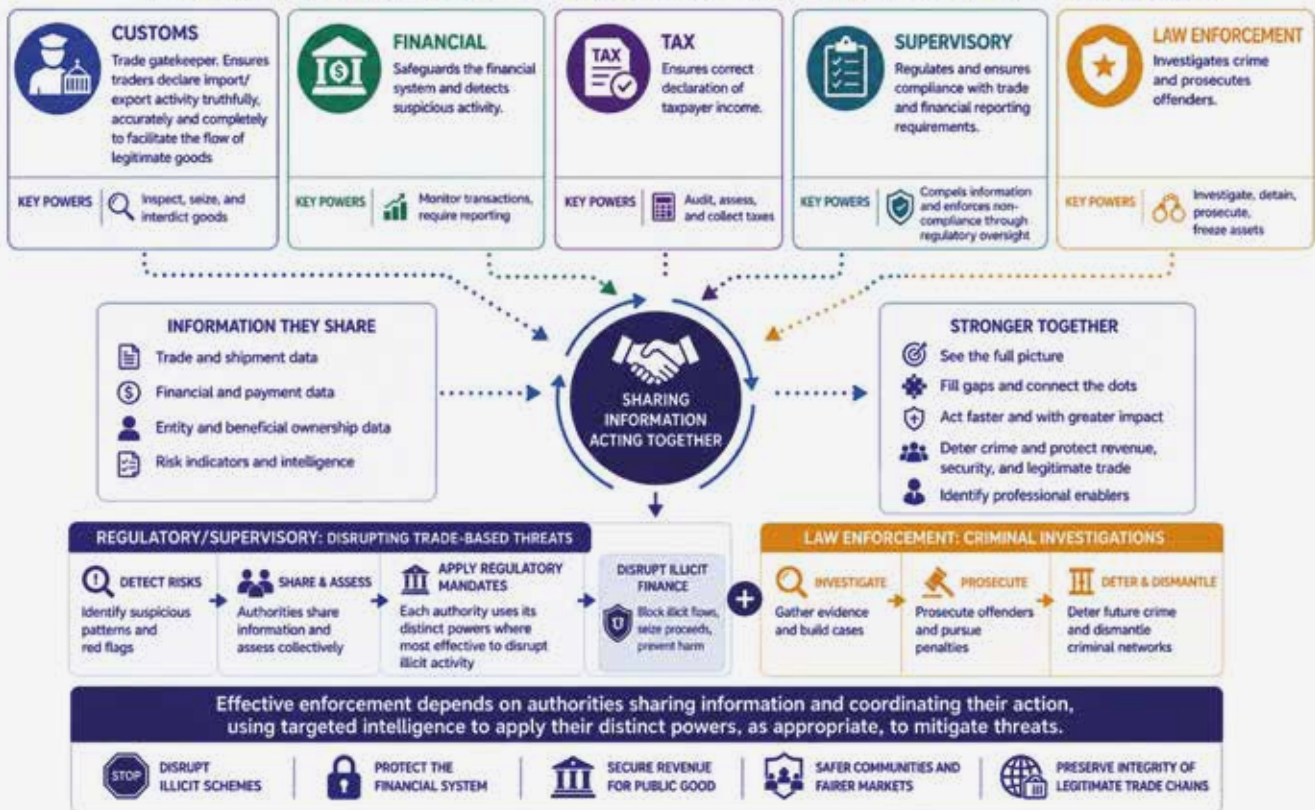
## From commodities to trade chains

Targeting TB-IFFs requires shifting from a focus on individual commodities to examining entire trade chains. In recognition of the central role of Customs in combatting TB-IFFs, the Canada Border Services Agency (CBSA) established what would become the Border Financial Crime Centre (BFCC) in 2020 to determine the prevalence of TBML in Canada, and to develop appropriate responses to enforce these threats. While institutionally Canadian, the BFCC model reflects a broader, international shift toward assessing TB-IFFs through a goods and trade chain centred perspective, integrating Customs and financial expertise, intelligence analysis, and enforcement authorities.

Years of experience have taught the CBSA that commodities alone rarely expose TBML. Illicit finance is more often revealed through anomalies in trade chains - counterparties inconsistent with sector norms, use of shell and front import/export companies with opaque or complex ownership structures, pricing or margins and payment processes lacking commercial logic, circular routing, or activity misaligned with a firm's declared business function. To be effective, Customs administrations must understand both what is traded and how value legitimately flows through a sector.

In 2025, the Government of Canada established a Trade Transparency Unit (TTU) within the BFCC. The TTU proactively identifies leads based on anomalous trade behaviour by applying advanced analytics methods to data to identify suspicious transactions and patterns of trade. Canada's TTU approach shares similarities with the United States method for trade transparency. However, the Canadian model aims to identify suspicious transactions from its own data holdings first, and using suspicious transactions as the basis of seeking corresponding trade transaction information from foreign

## TRADE-BASED ILLICIT FINANCE: DIFFERENT MANDATES. SHARED INFORMATION. STRONGER IMPACT.



customs partners. BFCC intelligence analysts develop leads referred by the TTU, along with those received from frontline border services officers, trade compliance specialists, as well as other foreign and domestic regulatory, intelligence and law enforcement partners, the trade sector, and the public. Analysts overlay Customs data with trade-chain information, financial transaction reporting and other open and proprietary data sources and validate their suspicions through examinations conducted by front-line border officers.

### From intelligence to action

Detection alone is not sufficient. In recognition of the threat posed by TB-IFFs, Canada introduced legislation to apply anti-money laundering controls at the border to all goods being imported and exported to and from Canada, as defined in the Canadian Customs tariff. These changes are supported by a dedicated Regulatory Investigations Unit (RIU) within the BFCC which applies goods forfeitures or monetary penalties to enforce non-compliant import and export anti-money laundering reporting requirements.

The Canadian BFCC model demonstrates a core truth: trade-based illicit financial flows cannot be countered by any one authority or type of enforcement alone.

By following the goods, understanding legitimate trade chains, and collaborating closely with financial, regulatory, and law-enforcement partners, Customs administrations can play a decisive role in safeguarding international trade and the financial systems.

### Case Study

The Border Financial Crime Centre's tactical intelligence team identified the exploitation of border processes by threat actors using commercial importations of a specific good known to be associated with money laundering to launder the proceeds of crime in Canada, and from there, into the financial systems of foreign jurisdictions. The volume and value of these shipments was assessed by the Agency to pose a significant threat to the integrity of the Canadian financial system.

Guided examinations of associated shipments were conducted by border officers using the intelligence collected to prepare and refer an intelligence assessment to law enforcement in Canada and the implicated foreign countries, as well as Canada's financial reporting regulator and financial intelligence unit (for probable non-compliance with Canada's anti-money laundering laws). While the case remains ongoing within the CBSA and domestic and foreign authorities, the threat actor has already been issued with one of the largest administrative monetary penalties made at that point for financial non-compliance and has ceased operating in Canada.

# Fighting money laundering: how Nigeria Customs increased its vigilance and commitment



By Salihu Safiyanu Mas'ud, Assistant Comptroller of Customs, Head of the AML/CFT Unit, Nigeria Customs Service

Nigeria has made significant strides in combating money laundering, recently being removed from the Financial Action Task Force list of Jurisdictions under Increased Monitoring<sup>1</sup> in 2025, and from the EU's high-risk jurisdictions list.

In October 2025, the Financial Action Task Force (FATF) recognized Nigeria's significant progress in strengthening its anti-money laundering (AML) framework and announced that the country was no longer subject to increased monitoring. The intergovernmental organization, founded in 1989 at the initiative of the G7 to develop policies to combat money laundering and promote their effective implementation, highlighted key improvements in Nigeria's legal and regulatory frameworks for tackling financial crimes, increased enforcement capabilities, and improved cooperation between the Central Bank of Nigeria (CBN), other regulatory bodies, and financial institutions to ensure compliance with AML regulations. Nigeria's progress is the result of a concerted effort by multiple agencies and stakeholders, including the Nigeria Customs Service (NCS).

## Money laundering definition

What constitutes money laundering offences in Nigeria? Under Nigerian law, money laundering occurs when a person or company, inside or outside Nigeria, engages in (1) concealing or disguising the origin of; (2) converting or transferring; (3) removing from jurisdiction; or (4) acquiring, using, retaining, or taking possession of funds or property, knowing they are partly or wholly proceeds of an unlawful act.

These "unlawful acts" include participation in organized crime; racketeering; terrorism and terrorist financing; illegal drug and psychotropic substance trafficking; illicit arms

trafficking and trafficking of stolen goods; counterfeiting and piracy; environmental crimes; smuggling; tax crimes; and any other unlawful acts in Nigeria, whether committed locally or elsewhere.

## Nigeria's cross-border money laundering typologies

Criminal proceeds are frequently and increasingly moved from one country to another, which gives law enforcement authorities – and Customs administrations in particular – the opportunity to intervene to confiscate those proceeds and/or prosecute criminal offences.

The NCS pays particular attention to two typologies of alleged money laundering and/or terrorist financing schemes that relate to Customs competency, namely:

- Illicit physical movement of currencies and other negotiable instruments: in compliance with the FATF Recommendations, regulations in Nigeria also require the declaration to Customs of cash or bearer negotiable instruments (BNIs) exceeding \$10,000 or its equivalent. Violations of the declaration requirement are criminal offences subject to forfeiture, a prison term, or both.
- Trade-based money laundering (TBML) and money laundering activities related to cross-border predicate offences. TBML involves disguising criminal proceeds by

<sup>1</sup> This list identifies countries that are actively working with the FATF to address strategic deficiencies in their regimes to counter money laundering, terrorist financing, and proliferation financing. When the FATF places a jurisdiction under increased monitoring, it means the country has committed to resolving swiftly the identified strategic deficiencies within agreed timeframes and is subject to increased monitoring. This list is often externally referred to as the grey list. Source: <https://www.fatf-gafi.org/en/countries/black-and-grey-lists.html>, consulted on 22 April 2026.



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moving money through trade transactions to legitimize illicit origins. Defined by the FATF, TBML uses trade as a conduit, not for its own sake, employing fraudulent documentation, misrepresenting prices or quantities, using shell companies, phantom shipments and transfer pricing, and abusing payment systems outside Customs control.

### NCS AML structure

To combat money laundering and terrorism financing, the Nigeria Customs Administration has a specialized unit that coordinates all anti-money laundering and terrorist financing (AML/CTF) activities. It implements the cross-border currency declaration system, detects and investigates TBML activities, and serves as a liaison for collaboration and coordination with the FIU, police, tax authorities, and other stakeholders. Internally, the unit acts as the focal point for AML efforts, supporting operational departments' requisite capacity and coordination to identify and address money laundering (ML) activities.

Over the years, personnel of the unit have developed expertise in intelligence gathering, passenger profiling, trade analysis, and investigative techniques, including using open-source profiling and virtual asset tracing tools. All officers undergo a basic course upon deployment, and routine on-the-job training. Currently, the unit has over 100 officers, with activities coordinated at headquarters and some, such as currency declaration, decentralized to border posts.

The specialized unit conducts the following activities:

- Administration of the currency declaration/reports: officers of the unit are trained and deployed to administer the currency declaration system at clearly designated points within the Customs zone at various border posts. The NCS has transitioned to an automated declaration process, in line with the Service's modernization drive. Officers of the unit are trained to assist travellers (only where necessary) carrying cash or BNIs above the statutory threshold in scanning the electronic QR code and completing the declaration process. The currency declaration system also covers shipments transported by postal operators and express carriers.
- Cross-border currency analysis and intelligence reports: the NCS operates an automated currency operations monitoring centre at NCS headquarters. It reviews all declarations and traveller manifests in real time to generate intelligence and support field operations. Analytical tools, such as Microsoft Power BI, help produce targeted reports that show trends and risk grades for routes, carriers, and destinations associated with money laundering offences. These reports analyse travel frequency, non-compliance history, links to money launderers, and criminal records.
- Analysis of advance passenger information (API): the Nigerian API, managed by the Nigeria Immigration Service, provides advance traveller movement intelligence, allowing Customs to target and arrest potential travellers on a watch list with greater precision. Other law enforcement agencies can access it with approval.
- Submission of suspicious transactions/activity report to the FIU, and use of financial intelligence: the unit serves as the AML/CTF liaison, coordinating intelligence sharing, training, and other engagement with the FIU.
- Review of suspected TBML cases reported by field offices, including trade mis-invoicing, phantom shipments, diversions, and criminal shipments.
- Case management and coordination for ML offences linked to cross-border crimes such as smuggling, environmental crimes, and narcotics: the unit guides relevant departments on managing high-profile interceptions and seizures, ensuring integrated financial investigations for ML. Notably, success has been seen in illegal wildlife trafficking via Nigeria's ports to Asia. Drug cases are usually transferred to the Anti-Narcotics Agency.

### NCS AML contributions to Nigeria's exit from the FATF grey list

While on the FATF list of Jurisdictions under Increased Monitoring (also known as the FATF "grey list"), the NCS AML Programme received support from several international bodies, including the FATF, WCO, and Inter-Governmental Action Group against Money Laundering in West Africa (GIABA). Through engagement, they gained guidance on updating Standard Operating Procedures, internal coordination, and collaboration with other agencies.

The WCO Secretariat supported the NCS as part of the activities carried out under Projects OCTAGON and TENTACLE. The NCS also participates in peer reviews and is currently preparing for a WCO mentoring mission, during which WCO experts will review and advise the AML/CTF Unit on how to further improve its processes and practices.

The NCS supported and significantly contributed to Nigeria's AML reform by strengthening Customs' legal and regulatory frameworks, completing the National Risk Assessment (NRA), and implementing key measures under the FATF International Co-operation Review Group (ICRG) Immediate Outcome action plan.

Specifically, Customs led the implementation of measures related to the cross-border currency declaration regime:

- a. A thorough ML risk assessment was performed, profiling border posts. Results showed that international airports are high risk for bulk cash movements, while land borders and seaports are susceptible to trade-based money laundering. This categorization helps prioritize the deployment of trained personnel and measures.
- b. Standard Operating Procedures were reviewed and updated to clarify the roles, functions and responsibilities of units and staff. The review eliminated doubts, uncertainty, and overreach that had previously complicated enforcement, investigations and prosecutions.
- c. Non-intrusive inspection (NII) equipment was deployed to ensure systematic scanning of baggage and cargo at the borders.
- d. An electronic currency declaration system was launched by the NCS in 2025 to address inefficiencies, such as delays in the manual process. The electronic system has significantly reduced processing time, improved integrity, and increased efficiency.
- e. Specialized ML training for frontline officers and other agencies covers passenger profiling, collaboration, and investigation techniques.
- f. Sensitization and awareness campaigns were conducted through signage, jingles, and media outreach to inform the public about existing regulations and penalties.

As expected, these efforts paid off, with remarkable outcomes: currency declarations increased by over 120% from 2024 to 2025, and only about 18 declaration violations occurred in 2025.

Couriers mainly conceal cash in hand-carry or luggage. We have selected two interesting cases to illustrate how we work. The first case involves a Nigerian national who was travelling back from the Middle East and had been placed on a watch list, based on operational intelligence. The API system monitored her journey and, upon arrival in Nigeria, her movements were closely watched. Although a Customs official reminded the traveller of the need to make a declaration if she was carrying cash above 10,000 USD or its equivalent, she said that she had nothing to declare. After the mandatory screening, the traveller was taken in for an enhanced search, during which carefully cellophane-wrapped bundles of various currencies, totalling

1,154 USD and 135,900 SAR (about 9,659 USD) were found concealed among "dates fruits" in the accompanying luggage.

The other case involved an outbound traveller heading to Europe, who was flagged for an enhanced search after suspicious behaviour was observed during the cabin bag screening process. During the search, Customs officials found bundles of currency wrapped in envelopes concealed in various compartments of the bag, totalling about 800,000 USD and 650,000 EUR.

In all cases detected by Customs, investigations are properly conducted, and penalties range from outright forfeiture of involved to possible imprisonment. In the two cases above, the suspects were prosecuted and convicted, and the funds were fully forfeited to the Federal Government of Nigeria, as stipulated by the relevant provision of the Money Laundering Act.

### **Investigating the financing of predicate offences and the destination of illegal proceeds**

NCS vigilance and enforcement operations have continued to disrupt illicit trade, thereby serving as predicate offences for cross-border money laundering, including TBML. These operations, encouraged by the WCO, cover disruptions linked to criminal wildlife trafficking, drugs and narcotics, as well as other trade-based money laundering schemes.

#### ***ML and illegal wildlife crimes***

In a wildlife trafficking case, the NCS led a multi-agency task force that dismantled a cross-border syndicate. Illicit goods were seized, criminals arrested, prosecuted and convicted, and their assets were confiscated. The syndicate was falsifying Customs export documents, describing protected wildlife as "dried fish" and "Ginger", and was using front companies registered as exporters of agricultural and seafood products. They had set up shell companies (i.e. entities without active operations, to obscure ownership) and transferred money through foreign remittances, wire transfers, and bureau de change (BDC) operators. They also laundered funds through buying real estate in Nigeria and abroad.

#### ***ML and cross-border drug trafficking***

Similarly, the "follow-the-money" approach is being applied to all drug seizures. According to the AML National Risk Assessment, drug and narcotics offences are rated high in Nigeria, hence the policy of integrated financial investigation for all drug cases. The NCS plays an important role in detecting and seizing these illicit substances during border enforcement, and supports the National Drug Law Enforcement Agency (NDLEA), which conducts investigations, prosecutions, and asset recovery. Observed *modi operandi* include concealing drugs in used vehicles and household items (furniture,

kitchenware, etc.), falsifying import documents, and using front and shell companies to obscure and evade detection.

### Trade-based money laundering

TBML shares many similarities with other offences that exploit the trade system, such as Customs fraud or the evasion of trade sanctions. TBML and other types of fraud can occur simultaneously, making it difficult to identify a TBML scheme. Moreover, there are no limits to the types of commodities or the variety of techniques that can be used for TBML. A challenge for Customs, therefore, is the lack of awareness and skills to suspect infractions which go beyond fraud and extend to potential ML activities. The NCS has identified this challenge and is conducting routine capacity building and sensitization for its frontline officers to report suspected cases for review and investigation. In a particular case referred to the NCS AML/CTF Unit from the port, investigations showed how simple mechanical tools and signal devices were outrageously over-invoiced, and the criminal use of shell companies to make import payments (consistently for all imports) to a third-party shell company (which was not the actual supplier of the goods) and to a high-risk money laundering jurisdiction.

Taken together, therefore, in order to effectively curtail and combat TBML, it is necessary to raise awareness among frontline officers regarding ML techniques. Enhancing data analytics will also be critical. To assess potential money laundering risks, Customs risk management systems must be reviewed and updated to incorporate financial intelligence for interpreting Customs and trade data.

### Challenges

Some of the challenges encountered by the NCS in combating cross-border money laundering include:

- Information fragmentation with Customs and financial institutions and other LEAs: whereas Customs hold the commercial trade data, the underlying transaction records are held (outside the view of Customs) in financial institutions that do not see the goods. Other domestic LEAs also have records of predicate crimes but these are also outside Customs' view and are rarely shared due to very protective information sharing policies.
- Inadequate or overlapping regulatory mandates among some authorities sometimes result in rivalry and a lack of clarity about actions. Cooperation agreements and joint investigation mechanisms for cross-agency cases will help strengthen effectiveness.
- The financial exclusion of part of the population and the use of informal payment systems by informal traders: Customs sometimes cannot link a trade transaction to a money transaction. There is therefore a need to reduce the informal economy and the use of informal service providers as a risk-mitigating measure. Efforts by the Central Bank of Nigeria to leverage on the rise and acceptability of digital payment platforms should be sustained and expanded to cover regional cross-border trade transactions.
- The prevalence of poverty and high unemployment among cross-border rural communities is pushing young individuals into becoming willing tools for criminal networks, including money launderers.
- Financial resource constraints which hamper the acquisition of cutting-edge technological tools and platforms, such as drones for surveillance of activities taking place in remote or very large territorial areas.

### Perspectives

The fight against money laundering is an ongoing effort. One area of work identified by the NCS to enhance the efficiency of its operations in this domain is greater collaboration and coordination with the FIU. International cooperation with peer Customs administrations on coordinated intelligence sharing and enforcement will also be very helpful. Internally, the NCS should consider integrating methods used to combat illicit financial flows, such as the Price Filter Method (PFM) which can highlight adverse trade mis-invoicing, into its automated cargo risk management system. It should also be intentional about sensitizing its frontline officers to suspect activity that goes beyond mere commercial fraud, revenue infractions, and recovery and extends into ML activities.

### More information

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# Collaborative Risk Management: How the UK Border Force teams up with a European express operator to stop non-compliant shipments

by UK Border Force

Across the world, Customs administrations and border authorities are being asked to manage rising volumes of shipments, increasingly complex threats, and more agile criminal networks, often without being granted additional resources. In such an environment, risk management is not a theoretical concept. It determines what is stopped, what is cleared, and what is missed.

But to be effective and efficient, risk management cannot rely solely on public authorities. Industry must accept its share of responsibility, improve data quality and cooperate with enforcement agencies to enable them to sharpen their targeting methods and allocate resources more effectively. Collaboration does not reduce Customs control. It strengthens it.

The experience in the United Kingdom, through cooperation between the UK Border Force and a European express operator, offers a practical illustration of how collaboration works in daily operations. It is not built on slogans or one-off initiatives. It is built on structure, discipline, and trust, with both sides clear about roles and accountability.

## **The operational reality behind the model**

In the UK, express consignments move at speed. Border Force assesses pre-arrival data against risk profiles for prohibited and restricted items and selects consignments for intervention. This activity sits within a wider enforcement ecosystem that includes cooperation with other government departments.

For an express operator, the operating model is equally unforgiving. Shipments are door-to-door, Customs clearance is part of the service, and the network is designed for fast processing. In this context, risk management can either become a blunt instrument that disrupts legitimate trade or a targeted capability that protects society while keeping trusted flows moving.

### **A formal foundation, kept alive through routine contact**

The UK approach is based around a Memorandum of Understanding (MoU) that sets out what information can be exchanged, for what purpose, and under what safeguards. It is supported by a legal review and a data protection assessment, and it gives both sides confidence in the boundaries of cooperation. But the real value comes from what happens after the document is signed.

Quarterly meetings provide a structured rhythm for addressing operational concerns, implementing improvements, and aligning emerging risks. Between meetings, direct contact points enable issues to be addressed as they arise. The goal is simple: fewer surprises, faster resolution, and a shared understanding of the risk picture.

This is where partnership becomes practical rather than aspirational.

### **Better outcomes by fixing a small problem: timing of data**

One of the most instructive lessons from the UK approach is that effectiveness is not always about collecting more data. Sometimes it is about getting the timing right. On certain high-risk routes, the window between receiving pre-arrival data and landing was too narrow. With limited time to run credibility checks, the safest operational response was to stop more shipments. That created pressure on both sides and reduced efficiency, as higher intervention volumes do not necessarily produce better results. A simple operational adjustment changed the outcome. Data was provided earlier for those routes, extending the assessment window by several hours.

The results were immediate and practical. Border Force had more time for a deeper analysis. Fewer shipments were stopped. Hit rates improved. Legitimate goods moved with less disruption. This is a minor change that many administrations can replicate without waiting for large-scale technology programmes.

### **When intelligence arrives late, trust keeps control effective**

Express networks move quickly, and intelligence available to the authorities does not always arrive on schedule. There are occasions when Border Force identifies a high-risk movement after it has already passed the express operator's initial sorting controls. In those cases, established communication pathways enable action to be taken even when the consignment is already in onward movement. In the UK model, consignments can, where possible, be recalled and presented for examination.

This is not a routine mechanism. It is an exceptional tool to use when there is a significant risk and speed matters. It relies on trust built over time and on confidence that recalls are proportionate and well-founded. It also reminds us that risk management is not only about algorithms. It is about relationships that function under pressure.

### **Trade referrals that sharpen the national picture**

A major strength of this partnership is the trade's referrals of suspected non-compliance shipments. Data alone cannot always reveal what someone sees when a shipment is physically managed, checked, or verified against its declaration. When anomalies and discrepancies are detected within express operators' processes, referrals are made for triage and assessment, and Border Force thereafter makes appropriate examination decisions.

This referral stream has delivered very strong outcomes. Border Security Command has recorded that over 50% of direct trade referrals involve illicit goods. Even when a referral does not lead to an immediate seizure, it may still deliver value. It refreshes the intelligence picture, reveals new concealment methods, highlights new routes, and supports broader disruption efforts. It also supports better targeting in areas where routine data visibility is limited, including certain export movements.

### **Joint capability building and operational refinements**

The partnership is strengthened by shared learning and practical refinement. Training has been delivered to express operators' operational managers to build an understanding of what Border Force officers look for in practice and which indicators call for suspicion. This supports higher-quality compliance referrals, earlier identification of harm, and reduced reputational risk for legitimate operators.

Operational improvements within Border Force's examination environments also matter. Better connectivity between IT systems and facility adjustments supports faster casework, better access to targeting information, and more efficient workflows. Detection dog operations have been supported through practical facility adaptations by express operators, enabling targeted activity in environments that are not naturally suited to it.

Finally, periodic sharing of seizure commodity trends with express operators helps align risk understanding and supports upstream prevention. These are not headline-grabbing changes. They are the kind of small, operational decisions that quietly improve outcomes every day.

### What makes this model appealing

This UK experience is presented as a good example of where joint risk management can work. Legal frameworks, mandates, and operating environments may differ, but the design principles are transferable.

- A clear legal basis and safeguards for information exchange
- Routine governance through structured meetings and direct working contacts
- Data that arrives early enough to be used, not just collected
- A trusted pathway to act quickly when time-critical intelligence emerges
- Active compliance controls within the industry to prevent repeat offending and stop risk upstream

### Looking ahead

UK Border Force remains committed to strengthening collaboration with all express operators and to continuing to improve how risks are identified and managed, thereby supporting both control and facilitation.

The core lesson is simple. Modern borders will not be secured by control alone, and trade will not be sustained by speed alone. The most effective risk management lies in the disciplined space between the two: where trust, data quality, and shared responsibility translate into practical outcomes.

# Integrity at the core of Customs modernization in Zambia

## By the Zambia Revenue Authority

The Zambia Revenue Authority (ZRA) fully appreciates and understands the risk that corruption poses to the fulfilment of its mandate. Since 2019, it has embedded integrity into its corporate strategy as a means of enhancing its ethical culture, which is ultimately expected to result in reduced malpractice, improved service delivery and enhanced institutional performance.

According to the [2024 Zambia Bribe Payers Index \(ZBPI\)<sup>1</sup> Survey Report](#) conducted by the Anti-Corruption Commission (ACC) and Transparency International Zambia, the "aggregate Bribery Index, that is the likelihood of an individual paying a bribe solicited by a public officer, in 2024 increased by 5.5 from

1.1 in 2022 to 6.6 in 2024 for the Zambia Revenue Authority (ZRA). ZRA has, however, made steady progress from the 12.0 rating in 2009 and 4.9 in 2019 to its current 2024 6.6 rating. While ZRA's performance score improved significantly over time, the recent increase highlights the need for sustained and targeted interventions.

### Moving towards a more structured and programmatic approach

Over the past two decades, the ZRA has undertaken several integrity promotion initiatives, including the establishment of an internal Integrity Committee in 2007, as stipulated by the [National Anti-Corruption Policy](#),<sup>2</sup> the adoption of

1 *The Zambia Bribe Payers Index (ZBPI) is a corruption measurement tool that measures the probability of public service seekers experiencing bribe-seeking behaviour by public officials in any Zambian public-sector institution.*

2 <https://acc.gov.zm/wp-content/uploads/2024/05/National-Anti-Corruption-Policy-1.pdf>



governance rules and integrity policies, the organization of awareness-raising and sensitization events such as the annual “Integrity Month”, the development of an integrity course for staff induction training and the inclusion of integrity in staff performance reviews.

Over time, the ZRA also invested heavily in modernizing and automating its tax and Customs systems and processes in order to minimize human interaction and enhance efficiency, accountability and transparency. The deployment of ASYCUDA World and Centralized Processing Centres (CPCs), as well as digital services for payments, tax registration and the submission of returns, significantly strengthened public trust and enhanced Customs and tax compliance.

Despite the efforts made to enhance integrity, there remained a need systematically to measure what was being implemented. While progress was visible, the ZRA decided to continue pursuing a comprehensive framework to assess how integrity was perceived internally and externally, and how reforms translated into measurable outcomes.

In 2018, the ZRA engaged with the WCO Mercator Programme,<sup>3</sup> designed to assist governments in implementing the Customs trade facilitation measures outlined in the WTO Trade Facilitation Agreement (TFA). Part of the technical support provided by the WCO was delivered under a partnership with the WCO Accelerate Trade Facilitation Programme, funded by the United Kingdom’s His Majesty’s Revenue and Customs (HMRC). The two partners initially focused on developing capacity to conduct WCO Time Release Studies (TRS), streamlining air cargo and expedited shipment operations, improving coordination with other agencies at the border, enhancing risk management, launching an Authorized Economic Operator (AEO) programme and modernizing the post-clearance audit (PCA) function.

From 2021 onwards, the work plan evolved to include integrity-related measures as a key enabler of the broader reform process. The objective was to enable ZRA Customs to move from fragmented initiatives to a more structured and programmatic approach aligned with the WCO Revised Arusha Declaration on Integrity in Customs. The approach was supported by a strong National Anti-Corruption Strategy, institutional leadership and political commitment. The President of the Republic of Zambia, His Excellency Mr. Hakainde Hichilema, established a “zero-tolerance” stance on corruption, declaring shortly after his inauguration in August 2021 that “The scourge of corruption has not only eroded our much-needed resources, but it has also robbed us of the opportunity for growth. We shall have zero tolerance for corruption. This will be our hallmark. The fight against corruption will be professional and not vindictive.” He further asserted that “We need ethical and servant leadership at all levels of society. We need morality, integrity and accountability.”

### **A comprehensive data-driven action plan**

This shift was anchored in the creation of an Integrity Technical Working Group (TWG), responsible for conducting internal corruption risk assessments and engaging stakeholders within Customs. In March 2022, the TWG took part in a comprehensive integrity diagnostic exercise and facilitated the conduct of a Customs Integrity Perception Survey (CIPS), a tool developed by the WCO to measure integrity behaviours and perceptions among Customs officials and private-sector stakeholders.

The CIPS concluded in August 2022, with 592 Customs officials and 638 private-sector representatives responding to the survey. In October, the TWG and WCO integrity experts from Türkiye and Pakistan met to review the survey results, conduct the assessment and develop a Comprehensive Integrity and Anti-Corruption Action Plan (2022-2024). Field visits to Lusaka Port and Kenneth Kaunda International Airport (KKIA), as well

3 See WCO News No. 83: <https://mag.wcoomd.org/magazine/wco-news-83/wco-mercator-programme>.

as meetings with relevant parties, enabled the TWG to collect the views of key stakeholders.

The final plan contained more than 33 specific actions and 100 sub-actions across key areas such as transparency, automation, audit and stakeholder engagement. The plan adopted a preventive, systems-based approach, addressing the root causes of corruption through process simplification, automation and strengthened oversight. It also emphasized collaboration with the private sector and other government agencies. As of June 2026, 26 actions and 52 sub-actions have been fully implemented, while six actions and 15 sub-actions have been partially implemented.

### Embedding integrity through legal and regulatory reforms

One of the most significant aspects of the ZRA's integrity journey has been the translation of policy objectives into legally binding requirements. A major milestone was the enactment of the new Border Management and Trade Facilitation (BMTF) Act No. 8 of 2025. The BMTF Act reduced officers' discretionary powers by automating procedures and decision-making processes and by providing an electronic audit trail for all processes and decisions.

It introduced:

- mandatory electronic submission of air cargo manifests before aircraft arrival within stipulated time limits, with an automated system to assess whether taxes should be applied;
- mandatory electronic exchange of information among all participating agencies through the Zambian Electronic Single Window System; and
- clearly defined competency and control powers for each agency, alongside a reduction in the number of agencies operating at ports of entry from 18 to 6.

The development of the BMTF Act was informed by practice, including work carried out to enhance coordinated border management at key border posts such as Chirundu

and Kazungula, with support from the World Bank. This demonstrates a clear link between technical assistance, policy development and legislative reform.

The WCO's support guided the development of an Inter-Agency Standard Regulation (Framework) on coordinated border management and led to a comprehensive data requirements harmonization exercise. This included the mapping of 54 clearance-related documents across 18 agencies, representing 973 data elements, a substantial proportion of which has already been harmonized and aligned with the WCO Data Model to enable connectivity among agencies' IT systems. This work provided the technical foundation for a paperless, integrated border environment, reducing duplication, limiting manual intervention and strengthening data integrity. To sustain momentum in coordinated border management, a dedicated working group has been established under the National Trade Facilitation Committee (NTFC). Ongoing efforts focus on finalizing inter-agency coordination frameworks, developing implementing regulations and advancing digital solutions, including new system modules enabling agencies without IT infrastructure to participate fully in automated processes.

### Rewarding and protecting whistleblowers

Another regulatory milestone was the amendment of the ZRA Act (Act No. 26 of 2023) which introduced provisions for whistleblower rewards and protection in order to encourage the reporting of tax evasion. Supporting this, the ZRA Whistleblower Reward Regulations (2024) and related guidelines have been developed and are pending approval. The ZRA also aligned its Code of Ethics with the WCO Eastern and Southern Africa (ESA) Regional Code of Conduct in order to align the Code with regional and international best practices.

### Strengthening digitalization and automation

Following the introduction of electronic payment systems, the available payment methods were expanded, eliminating the need for cash transactions at Customs offices by 99.97%.

With support from the WCO, the ZRA aligned air cargo procedures with the WCO Immediate Release Guidelines and TFA Article 7.8 on expedited shipments. This work prepared

Passenger clearance training at the Chirundu one stop border post



Meeting with stakeholders at Kazungula one stop border post





The Customer Relationship Management (CRM) system enhances service delivery, benefiting both taxpayers and the ZRA

the way for the integration, in November 2023, of an air cargo module (ASYEXPRESS module) into the ASYCUDA World system, enabling the automated declaration and clearance of different categories of air cargo. Since its rollout in 2024, the system has drastically improved efficiency: approximately 300 daily courier parcels that previously took more than 24 hours to clear are now processed within around two hours, representing a 97% reduction in clearance time.

The e-bond management module of the Zambia Electronic Single Window (ZESW) has also been enhanced with additional functionalities, and several other automated systems have been developed to process release orders, Customs temporary export permit applications, rules of origin certificates and passengers' Customs declaration forms. They follow the same principle: simplify processes, reduce discretion and enhance traceability.

### Centralizing complaint handling

A Customer Relationship Management (CRM) system was deployed in 2023 to centralize complaint handling, enabling better tracking, analysis and resolution of issues. This system provides management teams with real-time insights into potential integrity concerns and service delivery challenges. Training programmes on ethics and integrity-related risks have also been expanded, with a focus on line managers and front-line staff.

Collaboration with external institutions such as the Office of the Public Protector has further strengthened accountability mechanisms. A Memorandum of Understanding signed in July 2024 provides both staff members and stakeholders with an alternative external mechanism for reporting complaints, in addition to the existing internal mechanisms within the ZRA, thereby enhancing transparency and trust.

### Engaging with private-sector stakeholders

Recognizing that integrity is a shared responsibility, the ZRA used the momentum created by the CIPS to integrate consultation with the private sector and stakeholder engagement into key processes. Clearing agents and industry associations have been consulted on proposed reforms, and their feedback has been used to refine policies and procedures. For instance, stakeholder feedback on the appeals process contributed to the automation of that process, thereby reducing officers' discretionary powers. In addition, the clearing industry contributed significantly to the drafting of the new rules applying to Customs clearing and forwarding agents. Communication has also been enhanced through digital platforms, training sessions and outreach initiatives aimed at ensuring that both the requirements and the rationale behind reforms are clearly understood.

### Measuring impact to provide evidence of transformation

The impact of the ZRA's reforms is reflected in quantitative outcomes. The modernization and automation of Customs processes had a direct impact on revenue collection and on the number of trade transactions processed. Between 2021 and 2025, import declarations increased by 53% and export declarations by 25.2%. During the same period, the ZRA exceeded its revenue collection target, with revenue growing by 158.8%.

To assess the qualitative impact of the reforms, a second CIPS was conducted in February 2025. A total of 596 Customs officials responded to the survey against a target of 332, while 446 private-sector respondents participated against a target of 407.

A total of 91% of private-sector respondents reported confidence in the ZRA's leadership commitment to integrity, compared with 83% in 2021, while 93% had a positive perception of the impact of reform and modernization, compared with 80% in 2021. Responses to questions relating to the Code of Conduct, audit and investigation also showed notable improvement. When asked to "rate the level of integrity in Customs on a scale of 1 to 10", with 1 being the lowest and 10 the highest, private-sector stakeholders gave a score of 6.27 compared with 5.98 in 2021. Customs officers' perception of integrity also improved, rising from 6.64 in 2021 to 7.5 in 2024.

Although stakeholders acknowledged improvements in processes resulting from automation, they highlighted that certain challenges linked to regulatory complexity remained unresolved. Among the stakeholders surveyed, 55% agreed that the complexity of Customs regulations negatively affected their ability to comply with them, while a further 22% believed that client feedback was not reflected in Customs decisions or policies, and 10% disagreed that Customs had a client-service culture.

While the CIPS 2025 results show that the ZRA has made notable progress in improving perceptions of integrity, they also reveal ongoing challenges relating to regulatory complexity and stakeholder engagement. These two areas present key opportunities for targeted reform and stronger collaboration.

## From perception to risk management: institutionalizing integrity

Building on the insights generated by the CIPS, the ZRA moved to a more pragmatic stage of integrity management by developing its capacity to conduct corruption risk assessments.

Between July and November 2025, with support from the WCO, the ZRA developed a standard operating procedure (SOP) for conducting such assessments. This process involved re-establishing a dedicated Technical Integrity Working Group, supported by WCO experts from Türkiye, the Philippines and South Africa.

The SOP was piloted during an initial internal corruption risk analysis conducted in the fourth quarter of 2025. Based on the [WCO Guide to Corruption Risk Mapping](#),<sup>4</sup> the TWG developed a form to collect information from ZRA staff and external stakeholders on both regulatory and operational frameworks. The assessment covered 11 key Customs stations and operational units. In addition, input was obtained from representatives of four clearing and forwarding agents' associations. Representatives from the Zambia Police and the Anti-Corruption Commission were invited to participate in a meeting to provide their views and complete the form. The results were both revealing and actionable. A total of 51 corruption risks were identified and mapped across various operational and legal categories, providing the basis for the Comprehensive Customs Integrity Action Plan for 2026.

Key vulnerabilities were identified in clearance processes, passenger handling, legal frameworks, litigation and enforcement, and a heat map of the identified risks was created. The vulnerability of specific ZRA positions to the identified risks was also analysed, and guidelines on vulnerable positions and risk colour coding were developed.

The following recommendations were made:

- automation of all processes identified as carrying corruption risks;
- adoption of a change management plan to enhance ethical culture through staff and stakeholder engagement;
- development and implementation of specific policies relating to the licensing of clearing agents, coordinated border management, whistleblower management, asset declaration and lifestyle audits; and
- development of an institution-wide SOP for internal corruption risk analysis.

The introduction of corruption risk assessments provided a forward-looking approach to identifying and mitigating emerging risks, while also institutionalizing the culture of integrity within the ZRA.

## Way forward

While significant progress has been made, the ZRA recognizes that building integrity is a continuous journey, and additional measures have been planned in response to the issues highlighted by the CIPS 2025 results and the corruption risk assessment. This requires continuous leadership commitment, the establishment of priorities aligned with strategic objectives, the development of key performance indicators (KPIs) and ongoing stakeholder consultation.



ZRA joins the nation in commemorating Anti Corruption Day, reaffirming its commitment to integrity and accountability

The 2026 Integrity Action Plan includes actions and sub-actions from the previous plan that were not implemented, as well as new measures. It also focuses on performance measurement, with all strategic and operational units and offices now required regularly to conduct corruption risk assessments and apply developed key performance indicators.

As reforms continue, the ZRA's experience sends a clear message: when integrity is embedded in systems, processes and organizational culture, reforms become sustainable, measurable and transformative.

## More information

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<sup>4</sup> The Guide to Corruption Risk Mapping is based on information collated from WCO Members, academia and international institutions and is intended to provide WCO Members with general guidance for conducting a risk-mapping exercise as a tool to combat corruption.

# EXPORT CONTROL CENTRALIZED & STANDARDIZED



## EFFECTIVE RISK MANAGEMENT FOR GLOBAL EXPORT CONTROL COMPLIANCE PROCESSES

Export control management is a challenge. Many regulations are complex and change frequently, such as export classification, sanctions list screening and embargo checks, determining licensing requirements, and assessing end use and end users.

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# Digitalizing diamond and gold export controls in Sierra Leone and Liberia

By Aasmund Andersen, Revenue Development Foundation

Mineral export documentation for gold and diamonds often ends up passing through Customs officer's desks without comment, because they have no way to prove the documents are fake. Officers handle consignments from a great many jurisdictions, each with its own licence formats and signatures; spotting a forgery thus requires expert knowledge specific to the mining sector, and without a live link to the issuing authority there is no solid basis on which to hold a shipment.

The scale of the problem is considerable, and for African governments that export minerals the revenue losses are substantial. Significant volumes of artisanal gold and diamonds leave the African continent each year on the basis of forged documents.

The Kimberley Process Certification Scheme has long flagged artisanal production in the Mano River region in West Africa as a corridor where origin laundering is a persistent risk. The practical consequence for Customs is that a shipment presented as legitimately exported from one country may in fact have been smuggled across a land border, bought for cash and supplied with paperwork that looks correct but was never legitimately issued. Without a live link to the exporting authority, this cannot be detected at the point of import.

For this purpose, in 2024 a web-based verification portal was launched for exports from Sierra Leone, and this has now been extended to include Liberia. Funded by the European Union and supported by German Development Cooperation (GIZ), the portal draws live data from the Mining Cadastre Administration System (MCAS) - a licensing platform already used by many African mineral authorities. The MCAS system and the Customs verification portal have been developed by the Revenue Development Foundation (RDF) - an international non-profit consultancy. Every export document MCAS issues now carries a QR code; a Customs officer anywhere in the world can scan it with a mobile phone and, within seconds, confirm the exporter, the licence, the declared value, the mineral and the shipment's source of origin against the issuing government's official record.

## Digitalizing export permits at source

MCAS has been in use for over a decade in several jurisdictions and was recently deployed at Sierra Leone's National Minerals Agency (NMA) and Liberia's Ministry of Mines and Energy (MME). Both countries use it to administer the full licensing chain - exploration and mining licences, artisanal permits, dealer licences and export permits - and to operate the valuation desks that value gold and diamond consignments before export.



The newly integrated Valuations module extends MCAS from cadastre administration into the shipment workflow itself. Every consignment exported under a dealer or broker licence is now recorded digitally at the point of valuation, with royalties and export duties calculated automatically against the declared quantity, grade and market value. Receipts, invoices and formal export letters are generated by the system, replacing the manual paperwork that previously accompanied each shipment. Sierra Leone has even gone a step further and developed a new traceability module that links each shipment back to the artisanal production site, so that every gram of gold and every diamond carry a verifiable origin. This will be the last piece of the puzzle for NMA, showing the extent of their ambition to manage the chain of custody of gold and diamonds produced in Sierra Leone.

In December 2025 MME held an official launch in Monrovia, demonstrating how licence holders manage applications online and how payments are integrated directly with the Liberia Revenue Authority (LRA). At the same time, the MME Office of Precious Minerals (OPM) adopted the MCAS valuation module and processed the first gold shipment using the new system.

### Verifiable export documentation

The fraud pattern the portal is designed to defeat is well known to Customs: forged signatures, retired stamps and invalid permit codes on otherwise plausible paperwork, often attached to gold or diamonds whose true origin is a neighbouring country's informal workings rather than the producer named on the permit. By embedding a QR code tied to the live MCAS record, the issuing authority and the receiving Customs administration share the same source of authentication. Verification moves from a document examination exercise to a database search

- and every scan is logged, giving both sides an audit trail that supports post-clearance analysis and intelligence sharing.

Looking further ahead, RDF is extending the platform into a full digital chain of custody for gold and diamonds, tracking minerals from the mining site through valuation to export. For Customs and revenue authorities at the receiving end, this means an unbroken, verifiable audit trail for every consignment crossing the border - and for producer countries, alignment with international standards including the Kimberley Process Certification Scheme.

The work has been delivered in close partnership with the NMA in Sierra Leone and with the MME and LRA in Liberia. Since MCAS is provided free of charge to governments in developing countries, the model is built for long-term institutional ownership rather than vendor dependence. In February 2026, the Minerals Commission of Ghana hosted an RDF governance-systems workshop in Accra, bringing together all mining authorities running MCAS; Sierra Leone and Liberia presented their results on export traceability to much admiration from the participants.

Customs administrations interested in more information about the verification system or export procedures are invited to use the contact details below.

### More information

About RDF's systems: [info@revenuedevelopment.org](mailto:info@revenuedevelopment.org)

Sierra Leone NMA Previous Minerals and Trade department,  
Director Mohammed Bah: [mbah@nma.gov.sl](mailto:mbah@nma.gov.sl)

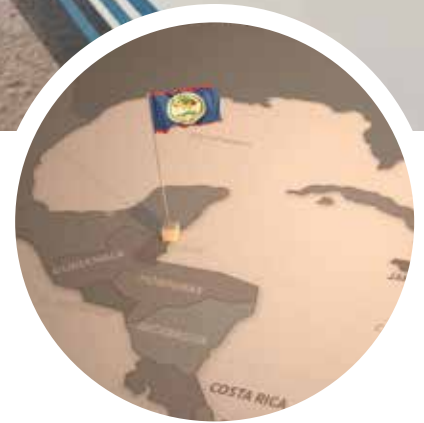
Liberia Ministry of Mines and Energy, Director Rebecca Fallah:  
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# Belize Customs builds capacities for intercepting general aviation aircraft

By the Belize Customs and Excise Department

The recent seizure of 551 kilograms of cocaine in an aircraft which had landed on a makeshift airstrip underscores the critical role of Belize Customs in the national architecture established to monitor the movements of general aviation (GA). It also highlights the importance of proactive intelligence gathering, operational coordination, and strong partnerships among national and international agencies.

On 10 April 2026, Customs officers from the Intelligence Unit were on patrol in the Neuland area, a recognized high-risk smuggling corridor in the northern region of Belize, when they detected an individual who had earlier evaded the control of a Customs mobile patrol.

They decided to proceed towards a secluded coastal strip of land large enough for a small plane to land. Here they found the suspect, as well as other individuals, a vessel, and a sport utility vehicle loaded with suspected aviation fuel. A tactical search of the individuals and the vehicle led to the seizure of communication devices, including cellular phones, a satellite phone, a walkie-talkie, and a firearm.

After seeing a vessel approaching, the officers decided to withdraw, requesting reinforcement from the Belize City Customs Enforcement Unit and the Police's Anti-Narcotics

Unit. In the meantime, the individuals attempted to get rid of the fuel and to destroy other potential evidential material by setting fire to the vehicle used in the operation. However, as their communication devices had been seized, they were unable to communicate with their partners in crime.

When the aircraft they were expecting landed, the required reinforcement had arrived. They arrested the individuals found on the site, as well as the pilot, two Mexican nationals and two Belizean nationals, and seized approximately 551 kg of cocaine, as well as the aircraft used in the operation.

## Ideal transit country

This modus operandi is well known and is not specific to Belize. However, the country's geographic position in Central America, combined with its extensive coastline and sparsely populated rural areas, makes it an ideal transshipment point for



criminal organizations trying to move drugs destined for larger markets in North America and other regions. Narcotics, as well as weapons, currency and other illicit goods, are moved by sea, land and air, sometimes combining all modes of transport. These operations are often supported by local ground crews who arrange and manage fuel supply, communications, transportation logistics, security, and the swift offloading and movement of contraband.

The aircraft used belong to a category called “general aviation” (GA), which encompasses all civil aviation activities except scheduled commercial airline services and military aviation. In Belize, GA activities include private aircraft operations, charter flights, agricultural aviation, tourism-related flights, and other non-commercial aviation activities. To enable administrative authorities to exercise control over international movements of GA aircraft, Belize legislation requires certain documents to be provided in order for these aircraft to be able to land in the territory, such as the flight plan, documents on the status of the aircraft, documents on the goods being transported, and documents relating to the persons on board and their luggage.

However, criminals exploit the flexibility offered to GA operators and the ability of experienced pilots to take off from, or land on, a stretch of flat ground or remote roads a few hundred metres long and a few dozen metres wide to evade traditional border control mechanisms. Makeshift airstrips are usually situated in isolated areas where communications infrastructure, surveillance coverage, and rapid law enforcement response capabilities remain limited due to their difficult access, particularly at night or in adverse weather.

Controls are further complicated by the mobility and increasing adaptability of organized criminal groups, who continually modify their operational methods, routes, landing sites,

communication techniques, and logistical support systems to evade detection. Small aircraft engaged in illicit activity can enter Belizean airspace quickly, land within minutes at improvised locations, offload contraband, and depart before authorities can mount a coordinated interception. Ground support teams operating in these areas are often well-versed in the topography of the area, highly organized, and equipped to rapidly transport narcotics, aviation fuel, and communication equipment away from landing sites immediately after an aircraft lands.

### **Intelligence collection, interagency coordination, mobility, and capacity building**

Criminal organizations’ activities not only threaten border security, but also pose broader risks to governance, public safety, economic stability, and institutional integrity. The presence of high-value narcotics trafficking operations increases the risk that foreign criminal organizations and cartels will expand their influence closer to Belize and attempt to establish logistical networks, local support structures, corruption channels, and operational footholds within the country.

Unlike larger countries with extensive radar coverage and dedicated aviation interdiction infrastructure, small developing states such as Belize must meet significant operational demands with limited resources. Monitoring vast coastlines, remote terrain, and multiple potential landing corridors simultaneously requires sustained intelligence collection, interagency coordination, mobility, and specialized operational planning.

### **Operation coordination among national and international partners**

The monitoring of the cross-border movements of GA is a joint undertaking involving the Belize Customs and Excise Department (BCED), the Belize Civil Aviation Authority, the

Belize Police Department, the Joint Intelligence and Operations Centre (JIOC Belize), and other national security agencies.

JIOC Belize plays a critical role in coordinating intelligence, operational communications, and interagency collaboration among law enforcement and security stakeholders. Aircraft involved in illicit trafficking often originate outside Belize, transit multiple jurisdictions, and are part of larger regional trafficking operations linked to organized criminal groups operating across Central America and beyond. The JIOC complements Belizean capacities to monitor air traffic through international cooperation. The JIOC receives information on suspicious aircraft movements from partners such as the United States Joint Interagency Task Force South, which has access to satellite surveillance tools to identify and track suspicious activities.

The BCED is actively participating in this architecture, exchanging and receiving intelligence, and coordinating operations. This collaborative approach has significantly improved Belize's ability to monitor high-risk areas, identify high-risk movements, and enable rapid enforcement responses.

### Specialized training

Detecting suspicious GA activity requires officers to analyse flight behaviour, logistical indicators, communication patterns, fuel movements and intelligence from multiple domestic and international sources. This work demands analytical capacity and access to timely intelligence.

To strengthen the skills of its officers, the BCED engaged with the WCO Synthetic Drugs Detection Project (SDDP), which organized specialized training to strengthen analytical thinking and operational decision-making capacities among frontline officers and intelligence personnel. The WCO experts shared practical knowledge on intelligence development, risk management, targeting methodologies, and interagency coordination. Case studies were also used to deepen the officers' understanding of how criminal organizations exploit vulnerabilities in aviation systems to facilitate illicit trafficking.

One of the most important lessons from the WCO training was the need to prioritize proactive intelligence gathering over reliance on reactive enforcement measures. Officers were encouraged to focus on behavioural indicators, unusual flight activity, logistical anomalies, suspicious fuel movements, communication disruptions, and coordinated targeting operations to identify high-risk activities. The training significantly influenced the way frontline officers carry out controls related to general aviation. Participants received specialized instruction on how organized criminal groups exploit this mode of transport, as well as on risk indicators, aircraft inspection techniques, and methods to strengthen the monitoring and control of suspicious flights, crews and passengers. The knowledge and operational techniques



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acquired during the training were directly applied during the operation, leading to the interception of the aircraft mentioned at the beginning of this article.

### Way forward: enhancing communication and monitoring systems

Enhancing enforcement capacities further requires sustained investment in aerial and coastal surveillance technologies to expand monitoring coverage across remote and vulnerable areas frequently exploited by organized criminal groups. Greater access to real-time aviation intelligence databases and improved information-sharing systems would significantly enhance Belize's ability to identify suspicious flight activity, track high-risk movements, and coordinate timely operational responses.

Strengthening communication systems for remote operations is also critical, particularly in isolated coastal and rural areas, where enforcement personnel often struggle to maintain secure, reliable communications. Continued and sustained investments in drone surveillance and other advanced monitoring tools would provide additional operational benefits by enhancing reconnaissance, situational awareness, and evidence collection in challenging environments.

The BCED also recognizes the need to expand interagency operational training exercises to improve coordination among Customs, law enforcement, military, and intelligence agencies during high-risk interdiction missions. Activities aimed at exposing enforcement officers to international best practices, with the support of international partners such as the WCO, will continue.

### More information

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# From ports to runways: how Belgium Customs is enhancing controls on private aviation

By Belgium's General Customs and Excise Administration

With organized crime activities shifting to the smaller airfields used for general aviation, Belgium's General Customs and Excise Administration (Belgium Customs) has committed itself to information sharing, risk analysis and collaboration with Belgian Defence under the **National Airspace Security Centre (NASC)** project.

## The “waterbed effect”: when pressure simply pushes the threat elsewhere

Although efforts by Belgium Customs to step up its controls at Belgian ports have undoubtedly paid off in terms of combating drug trafficking and other forms of illicit trade, this success story has also resulted in a phenomenon that is all too familiar to law enforcement authorities: the “waterbed effect”.

In response to the pressure exerted at ports, crime organizations are tending to shift their flows to entry points they consider less conspicuous, such as aerodromes used for general aviation, airstrips used by ultra-light aircraft and heliports.

This strategic change presents new monitoring and control challenges against a background of limited resources. In Belgium, six international airports and some 150 smaller aerodromes are given over to general aviation operations. Targeting those operators specifically involved in trafficking is especially complex, given the wide variety of profiles, itineraries and purposes involved.

## The NASC project: an innovative and targeted response

With these considerations in mind, the NASC pilot project was launched on 1 April 2025, the ultimate objective of which was to establish a mechanism for monitoring and controlling extra EU flights on landing at all Belgian aerodromes.

The NASC's operational scope covers all flights categorized as general aviation, in particular business aviation, sport and recreational aviation, private jets, helicopters and ultra-light motorized aircraft, these various segments proving ripe for



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exploitation by traffickers due to their flexibility and reduced visibility.

Information sharing lies at the core of the NASC project. The NASC's role is to supply to Customs and the Federal Police operational information on flights deemed to be high risk so that they can respond with targeted and efficient action. The project focuses fully on maximizing resources, having recourse to detailed risk analysis rather than systematic checks.

Two types of complementary approach have been implemented:

1. Reactive approach: where an aircraft is identified as suspicious, an inspection team from Customs or the Federal Police is despatched to the landing site on its arrival to conduct the necessary checks.
2. Ex-post approach: the information obtained during inspections is gathered together and analysed for the purpose of supporting and enhancing broader judicial investigations, thereby facilitating the identification of crime patterns, networks and possible repeat offending.

### Role of Customs

A liaison officer from Belgium Customs is posted to the Control and Reporting Centre (CRC) at Beauvechain Air Base which serves as a strategic base for the deployment of Belgian special forces' combat helicopters and aircraft. Working within the military ranks stationed at the air base, this officer analyses flight movements by reference to specific risk criteria.

The main task of the NASC officer, namely to monitor the primary radar images captured by Belgian Defence, is performed under military supervision. The central risk criterion relies on the detection of aircraft, which are visible on the primary radars that emit waves and detect rebounding signals for the purpose of obtaining information on the targets located in their emission area but which cannot be identified on secondary

radars, their sole function being to query aircraft by sending out a coded signal and measuring the signals emitted by the aircraft's transponder.

Any such inability to identify an aircraft may indicate a voluntary deactivation of the transponder with the intention of avoiding identification and tracking. Where deactivation is intentional, this clearly points to suspicious conduct and the aircraft then becomes the specific focus of attention.

Once a suspicious aircraft has been identified, the objective is then clear: an inspection team is to be sent as a matter of urgency to the purported landing location. Speedy intervention is key to ensuring the effectiveness of the operation and to securing the evidence.

### A promising first year

Belgium Customs recently marked one year since it began working with the NASC. The results of its involvement are encouraging. Many instances of suspicious conduct have already been detected, with sensitive information being passed to police departments and competent prosecuting authorities.

In the light of such data, it has been possible to open new criminal cases or to enhance ongoing investigations, thereby stepping up the campaign against organized crime.

The NASC is expected to deliver significant results in the short term. By combining Customs expertise, military capabilities and analytical intelligence, this innovative mechanism is establishing itself as a critical component in securing Belgian airspace in the face of illicit trafficking.

According to Kristian Vanderwaeren, Head of Belgium's General Customs and Excise Administration, "This collaboration is an excellent initiative. We can now work more effectively and deploy our human and material resources in a much more targeted fashion."



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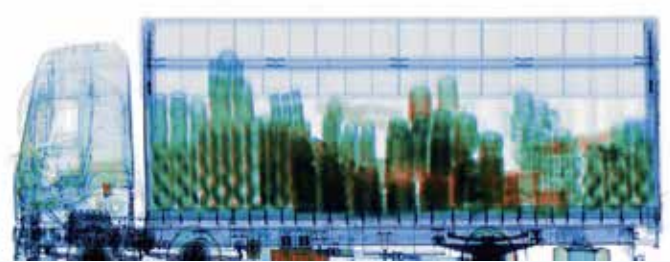
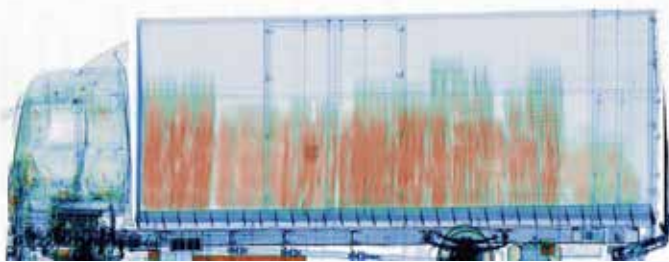
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# Combating waste trafficking: good practices, lessons learned and challenges

By the WCO Secretariat with the contribution of the Customs administrations of Belgium, Gambia, Malaysia and Indonesia

Since 2009, the WCO has been coordinating Operation DEMETER with the aim of equipping Customs officers with the knowledge, tools and cross-border networks needed to address illicit trade related to waste, ozone-depleting substances (ODS) and hydrofluorocarbons (HFCs) with agility and precision. This article looks more specifically at waste trafficking, with the Customs Administrations of **Gambia, Belgium, Indonesia** and **Malaysia** sharing their views on the challenges they face and the lessons they have learned while combating this increasingly complex form of environmental crime.

Countering illegal trade in waste is a challenging and highly relevant issue for governments and industries. Human health and safety concerns, environmental protection issues, the involvement of organized criminal groups and the economic aspects linked to the reuse of raw materials all call for increased attention and enhanced enforcement in the context of waste trade, transport and treatment.

Most regulations governing the cross-border movement of waste are based on the Basel Convention of 1989 (ratified by 191 parties as of June 2026), its Ban Amendment (ratified by 104 parties as of June 2026), its Plastic Waste Amendments (for which four parties have submitted a notification of non-acceptance) and its E-waste Amendments (for which three parties have submitted a notification of non-acceptance). Many countries have also adopted stricter waste regulations, in some instances banning the import or export of specific categories of waste.

While the prior informed consent (PIC) procedure established under the Convention provides an essential safeguard, enforcement remains complex due to differences in national legislation, definitions and control capacities. In addition, procedures are still largely paper-based, although digitalization efforts led by the Basel Convention Secretariat are under way. Some countries are also developing IT systems to digitalize procedures, with the aim of improving traceability and addressing illegal waste shipments.

## Waste trafficking typologies and enforcement challenges

Article 9 of the Basel Convention defines the scenarios in which any transboundary movement of waste is deemed illegal traffic.

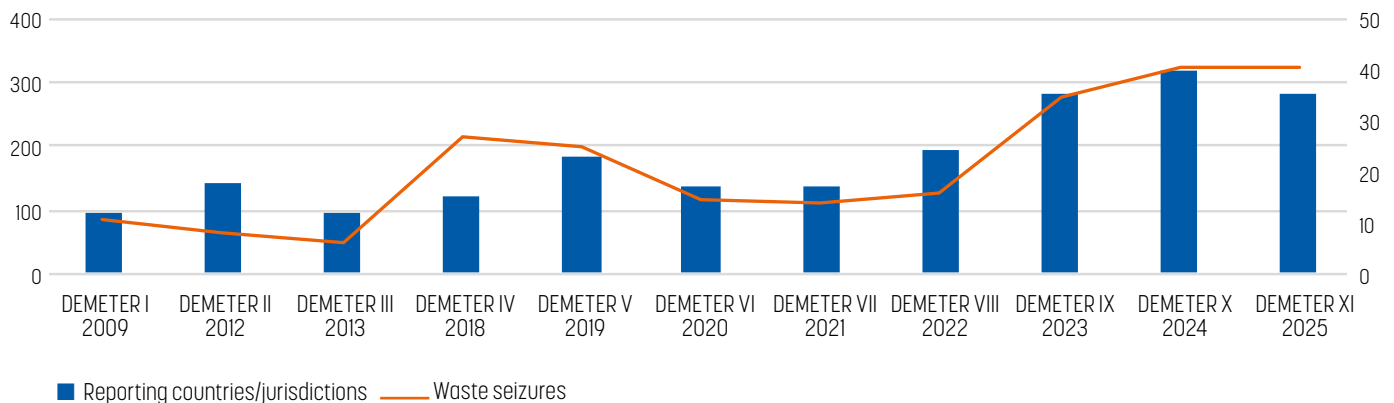
Customs controls focus on verifying the legality of commercial shipments and detecting smuggled goods. Commonly observed methods used by traffickers include:

- non-compliance with the Basel Convention prior informed consent (PIC) procedure (no notification document and consent prior to export, and no movement document accompanying the shipment);
- deliberate or accidental mislabelling (e.g. miscellaneous, personal goods, second-hand goods, non-hazardous material);
- use of incorrect Harmonized System (HS) codes or Basel codes;
- lack of conformity between the declared and actual content of a consignment (e.g. quantities of waste, degree of contamination or nature of the waste);
- falsification of test certificates indicating the condition of the goods;
- mixing of legal and illegal goods; and
- concealment.

Several challenges have been identified by enforcement authorities:

- the definition and classification of waste, scrap and secondary materials can differ from one country to another;

## Number of Reporting Countries/Jurisdictions and Reported Waste Seizures during Operations DEMETER



- national legislation may define additional waste types as hazardous and introduce requirements concerning transboundary movement procedures applicable to those wastes;
- the distinction between end-of-life products, non-hazardous waste and secondary raw materials may vary across jurisdictions and may therefore not be subject to further scrutiny;
- Customs goods nomenclature, based on the WCO HS, focuses on the nature, composition and physical properties of goods in order to classify them, whereas the Basel Convention focuses on the intention to discard when defining waste, i.e. “substances or objects which are disposed of or are intended to be disposed of or are required to be disposed of by the provisions of national law”; and
- there is a lack of cooperation between Basel Convention competent authorities, Customs and law enforcement authorities.

### WCO Operation DEMETER

To strengthen Customs capacities, enhance collaboration at national and international levels and collect more data on seizures in order to obtain a clearer picture of illicit international waste flows, the WCO has been organizing Operation DEMETER since 2009.

As of June 2026, 11 iterations of Operation DEMETER have taken place, with substances controlled under the Montreal Protocol on Substances that Deplete the Ozone Layer having been added to the list of targeted commodities in 2019. China Customs has played an instrumental role in the organization of each operation, from funding critical capacity-building activities to providing consistent operational support.

Although the number of participating administrations has varied from one iteration to another, the ratio of seizures to

administrations has grown steadily (see graph above). In total, participants have seized 535.2 million kg and 2 million individual items of waste.

As part of the preparation for the operations, guidance documents on developing risk profiles have been produced and training has been provided to Customs officers and, where possible, to officials from national environmental agencies. Some national environmental agencies also play a crucial role during operations. Members of the European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) supported their Customs counterparts at the borders. Environment and Climate Change Canada took joint action with the Canada Border Services Agency, and various national environmental agencies from countries such as Gambia provided critical support to Customs.

This strategy has been paying off. Between Operation DEMETER VIII in 2022 and Operation DEMETER XI in 2025, the total number of reported seizures surged by 194.2%, although the number of reporting administrations increased by only 44.4%, a clear indicator of both stronger engagement and more strategic enforcement.

### Belgium

Belgium Customs has participated in all iterations of Operation DEMETER and is convinced that, if all enforcement partners involved in this initiative continue to work together to improve their inspection capacity, the number of relevant inspections will continue to increase.

Within the Administration, various services are involved in matters related to waste:

- the “legislation” department, which examines all legal and administrative provisions and informs, in cooperation with the “working methods” department, all other relevant departments;

- the risk management team, which develops risk profiles in cooperation with the national competent authorities;
- on-site inspectors, who review the documentation relating to shipments identified as presenting a risk, conduct physical inspections or use non-intrusive inspection equipment if necessary – a combination of these three types of inspection is also possible; if they suspect that a shipment is illegal, they stop and hold it and contact the national competent authority; and
- the prosecution department, in cases where the national competent authority seizes the shipment.



During Operation Demeter XI, Belgian Customs, in cooperation with environmental inspection authorities, stopped shipments with various refrigerators, freezers and TVs that should be considered e-waste

Participation in the DEMETER operations has enabled the Administration to enhance its targeting capacities by analysing alerts and information exchanged among participants concerning shipments that have been identified as presenting a risk or that have been held or seized. Information relating to inspection results is particularly useful when sufficiently detailed. With this in mind, Belgium Customs provides detailed data during operations and systematically submits seizure reports to the WCO Customs Enforcement Network (CEN) database outside the operational framework.

An important development was the signing of a cooperation agreement on 13 July 2021 between the Belgian Federal State and the three Belgian regions – the Flemish Region, the Walloon Region and the Brussels-Capital Region – which have full authority over waste policy, regarding cross-border shipments of waste.

The agreement aims to coordinate policy on the import, export and transit of waste in Belgium, taking into account the responsibilities of the Federal State (Customs, Justice and Police) and the regions (inspection services and competent administrations). The cooperation agreement specifically defines the roles of all actors and authorities involved, methods for exchanging information, formal cooperation with third parties, financial guarantees and administrative costs, as well as the creation of a policy control coordination group.

All relevant enforcement partners involved in supervising and controlling waste shipments, including Customs, are represented in the coordination group, which meets regularly to discuss key operational matters such as:

- the exchange of data;
- risk management for different waste streams, control prioritization and inspection methodologies;
- training opportunities – all parties provide relevant enforcement partners with access to their specialized training;
- ways to strengthen cooperation; and
- participation in activities such as WCO enforcement operations.

These discussions have proved useful in improving the preparation and conduct of inspections, with Customs inspectors and officials from the competent authorities working more closely together.

## Gambia



During Operation DEMETER XI, Gambia Revenue Authority seized 2890 pieces of used tyres imported from Germany

In Gambia, Customs considers that illegal trade in waste is increasing due to the high profits it generates and the involvement of organized criminal groups.

The number of seizures has increased substantially in recent years due to:

- the training of front-line officers from Customs and other enforcement agencies at the border;
- the creation of a department dedicated to environmental offences and crime within the Customs administration; this department is specifically responsible for developing and updating risk indicators;

- regular meetings with competent agencies such as the National Environment Agency (NEA), the National Registrar of Hazardous Pest and Chemicals Controls, the National Security Council and the National Environment Management Council (NEMAC) to define clear roles and responsibilities and establish effective communication channels (a popular messaging application is used to ensure the fast and efficient exchange of information among specific users); and
- participation in the WCO DEMETER operations since 2023, which has fostered cooperation among enforcement agencies, particularly in the control of transshipment operations; the increasing sophistication of smugglers also requires close monitoring of evolving methods, including concealment techniques; and participation in the operations, especially during the preparatory and post-operation phases, has been critical in developing knowledge in this area.

Although Gambia Customs has strengthened its capacities, challenges remain. While the WCO has provided guidance on developing risk profiles for plastic waste and e-waste, as well as training, staff rotation requires continuous capacity-building efforts. Training should therefore be organized regularly, with a focus on search techniques and investigation methods, including how to question suspects.

Another challenge is improving compliance among economic operators. Information on regulations and procedures is available on the Gambia Revenue Authority (GRA) website, and Customs officers working at help desks answer operators' questions as well as provide them with flyers and brochures. However, heated debates have arisen over the definition of waste, with operators challenging Customs decisions to classify as waste materials that they consider to be intended for recycling or repurposing, or used equipment destined for legitimate repair, refurbishment, reuse or failure analysis.

## Malaysia

In recent years, the number of seizures and repatriation procedures related to waste has increased in Malaysia. The illegal importation of e-waste became so alarming that the country banned e-waste imports in February 2026. Rather than indicating only a surge in criminal activity, this trend also reflects improved detection capacity resulting from advances in risk profiling, intelligence sharing and engagement with the private sector.

Capacity-building initiatives led by the WCO and partner organizations have significantly enhanced Customs officers' technical knowledge and improved risk-profiling methodologies, including the analysis of seizure data reported to the CEN database and open-source data.

Cooperation has increased with environmental protection authorities, licensing and regulatory bodies, port and maritime agencies, and other law enforcement units such as the newly

created Malaysian Border Control and Protection Agency. Roles and responsibilities have been clearly defined, formal cooperation frameworks established and communication channels set up, enabling inspections to be carried out jointly. Joint operations are also conducted, with one recent operation leading to the dismantling of a network involved in the illegal importation of controlled substances.

Inter-agency coordination has also been strengthened through the creation by the government of the Multi-Agency Task Force (MATF), spearheaded by the Malaysian Anti-Corruption Commission (MACC), with the objective of ensuring a coordinated approach to tackling corruption and financial crime, focusing particularly on dismantling complex criminal networks across various sectors. The MATF brings together key government agencies to coordinate investigations, legal action and asset recovery. These include the Attorney General's Chambers, the Royal Malaysian Police, the Inland Revenue Board, the Royal Malaysian Customs Department, the Ministry of Finance and the Malaysian Border Control and Protection Agency. MACC investigations led to the freezing of over 1 million Malaysian ringgit in bank accounts and cash linked to illegal e-waste disposal and implicated high-level officials.

Royal Malaysian Customs Department (RMCD), together with the Department of Environment (DOE) has engaged with waste management companies to improve compliance and with logistics providers and shipping lines to facilitate swift communication regarding shipments identified as potentially infringing the law. Results have shown improved awareness and increased compliance, with some operators expressing support for stronger enforcement to ensure a level playing field. Challenges nevertheless persist, including varying levels of understanding of regulations. The private sector generally values clearer and more accessible information on regulatory requirements. Stakeholders also emphasize the need for simplified procedures, better guidance on classification and documentation and more consistent enforcement practices.

Efforts have also been made to raise public awareness of the environmental and health risks associated with illegal trade through press conferences, workshops and seminars.

To strengthen Customs enforcement capacities further, the following measures are being considered:

- increased investment in technology and detection tools, as the Administration currently has limited technical expertise in identifying certain substances;
- expansion of specialized training programmes, as smuggling methods and concealment techniques are evolving rapidly, with trends including increased use of transit and transshipment routes to obscure origin and destination, as well as diversion of controlled substances into the national

territory through free trade zones; specific training could therefore be developed to enhance detection methods;

- strengthening of legal frameworks and penalties, as the fines imposed are sometimes lower than the profits generated by a single illegal shipment;
- improvement of real-time data-sharing mechanisms; and
- promotion of the global harmonization of regulations, as discrepancies in waste classification and definitions at international level complicate enforcement efforts.

## Indonesia

In Indonesia, lessons learned have also underscored the importance of establishing a centralized coordination mechanism to ensure more effective and streamlined enforcement. The fight against environmental crime linked to international trade is overseen by the Customs Enforcement Unit, which acts in close cooperation with the Ministry of the Environment as the lead agency on environmental matters, the Indonesian National Police (POLRI) and the Attorney General's Office.

In collaboration with the Ministry of Environment, Indonesia Customs has established a Memorandum of Understanding (MoU) to strengthen synergy in the supervision of import and export commodities related to environmental protection.

Customs officers have at their disposal non-intrusive inspection equipment (X-ray scanners), laboratories, data analysis tools and seizure reports. Since 2022, they have participated in Operation DEMETER, the preparation phase of which includes training and the review of risk profiles.

Data on waste seizures by Indonesia Customs show an increasing share of e-waste in the volume of intercepted waste, with as many as eight e-waste cases reported during the five

weeks of Operation DEMETER XI. The cases were developed through post-seizure analysis.

There has also been a shift from homogeneous cargo to mixed cargo, involving hazardous waste blended with recyclable materials, which challenges Customs' technical capacity to identify illicit cargo. Smuggling methods have also become more sophisticated, with an increasing number of cases involving falsified documents and the deliberate use of incorrect but plausible HS codes. Trade routes have likewise diversified and become more complex, with countries of departure spread across East Asia, North America and Europe.

Another challenge lies in the complexity of repatriation procedures to the country of origin of the sender of illegal goods. As a result, such goods often have to be destroyed in Indonesia, which in turn creates additional impacts, including financial costs, time constraints, and the risk of illegal disposal into the environment. Through increasingly strengthened and refined regulations, Indonesia Customs, together with relevant government agencies, has established provisions requiring import suppliers from the country of origin to assume responsibility and to take back any waste they have shipped if violations are found in the imported goods.

There is also inconsistency in coordination among the various actors involved at port level. Corruption is another risk that can arise at different stages of the waste management chain, even before transactions take place, for example in the obtaining of permits or licences.

The final challenge concerns the availability of information, particularly regarding regulatory changes, with some operators complaining that they do not receive adequate and timely information to support compliance with applicable regulations. Indonesia Customs is committed to providing such information through its information offices and digital platforms.



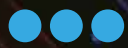
45 tonnes of shipments containing various types of used electronic devices were intercepted by Indonesian Customs during Operation DEMETER XI



During Operation DEMETER XI, Indonesian Customs, in collaboration with the Indonesian Navy, seized 156 bags of used clothing, along with other items such as food and beverages



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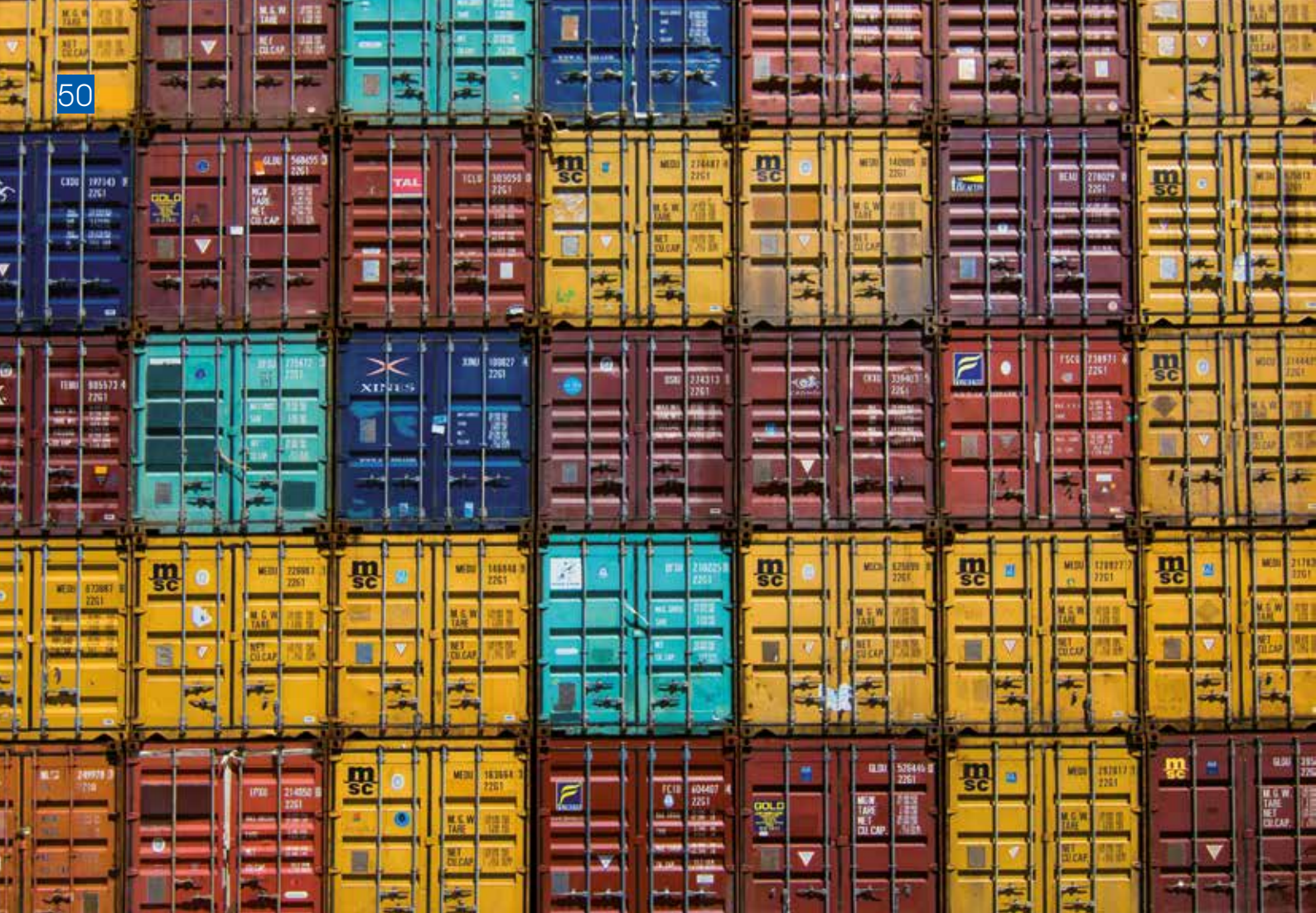


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# Scanner inspection of containers: developments, technological innovations and impact on Cameroon Customs performance at the Port of Douala

By **Éric Pekassa Nsangou**, Cameroon Customs

The use of non-intrusive inspection (NII) equipment for container control purposes has gradually emerged as a key measure for modernizing the work of Customs administrations around the world. Against a background of increased trade, the growth in transnational crime networks and the demand for greater logistical fluidity, Customs administrations are now having to reconcile measures to promote the effectiveness of controls, secure the international logistical chain and facilitate trade.

With a view to meeting these objectives, a scanning mechanism has been developed for inspecting containers at Cameroon's ports. At the Port of Douala, the system has gradually evolved since 2016 from a targeted control mechanism based on risk analysis to an almost systematic model for scanning containers on import and export. This article analyses the various phases of implementation of the container scanning system at the Port of Douala, the technologies mobilized, the operational and economic repercussions observed and the outlook for the mechanism's further development.



## Background to and development of the scanning mechanism at the Port of Douala

The introduction, back in 2005, of a procedure for scanning containers at the Port of Douala was part of a developing strategy to modernize Customs inspections and measures to secure trade flows.

This reform was introduced in the course of the adoption by the World Customs Organization of the SAFE Framework of Standards to Secure and Facilitate Global Trade. Among the measures promoted under the Framework are the use of non-intrusive inspection techniques and an enhanced risk management strategy.

The mechanism originally relied on the use of a mobile scanner positioned at the end of the Customs clearance procedure for targeting high-risk containers. The scanner was the pivotal component in a partnership established between the State of Cameroon and a company specializing in goods inspection.

In a significant development, the Government of Cameroon decided in October 2016 to set up a systematic procedure for inspecting containers on their import and export. To satisfy that requirement, the original mobile scanner was replaced with two large-capacity fixed scanners for inspecting import operations.

In July 2017, a device for scanning exports was installed with a view to extending inspections to all outward flows. The mechanism was subsequently upgraded in July 2021 with the installation of a second export scanner positioned outside the container terminal, its operations coming on stream in March 2022.

Since then, Douala Port's scanning system has been operating across practically all containers both on import and on export.

**Table 1: Volume of scans (NIIs) on containers at the Port of Douala between 2020 and 2025 (Source: Cameroon Customs)**

Imports		
Year	Containers unloaded	Containers scanned
2020	124,679	124,180
2021	115,025	114,894
2022	113,511	113,066
2023	121,444	121,284
2024	129,890	129,708
2025	128,358	128,066
<b>Total</b>	<b>732,907</b>	<b>731,198</b>
Exports		
Year	Containers pre-shipment	Containers scanned
2020	68,803	68,549
2021	77,388	77,123
2022	75,518	76,086
2023	60,997	61,498
2024	64,786	64,830
2025	65,462	65,571
<b>Total</b>	<b>412 954</b>	<b>413 657</b>

Analysis of this data shows that the almost full scanning target is met globally, even though some container categories are still not subject to this procedure. The discrepancies noted on import are mainly explained by the existence of specialized containers which, on account of their technical configuration or dimensions, cannot be presented for scanning, such as flat rack containers with no side walls, open top containers without a solid roof, tank containers and oversized shipments. These consignments are usually subject to a physical inspection by Customs services.

In terms of exports, since 2022 the number of scanned containers appears to exceed slightly the number of containers actually shipped out. This situation can be explained by the fact that only those containers that have been scanned beforehand are admitted into the export terminal, while some shipments may ultimately be removed or withdrawn for different commercial or logistical reasons: breach of contract, cancellation of the export procedure or change of packaging.

## Technology architecture and systems integration

The system used at the Port of Douala relies on an integrated technology architecture connecting X ray scanners, digital platforms and artificial intelligence tools.

The four high-capacity scanners currently in operation at the port are each capable of processing up to 100 containers per hour. The data generated is stored centrally on a digital platform developed by the operator to ensure that the information coming from different manufacturers' equipment is managed in a consistent manner.

Recent integration of artificial intelligence solutions has significantly strengthened the analytical capabilities of Customs services through the application of image interpretation, automated anomaly detection, predictive modelling by reference to HS codes and automated cross-referencing of declaration data and scanner images.

The D-TECT platform is interconnected with various information systems operating in the port environment, such as the CAMCIS (Cameroon Customs Information System) portal for Customs matters, the container terminal operating system NAVIS and the Single Window for External Trade platforms.

The benefits of these interconnected systems are that information can flow quickly and support can be given for the further development of an integrated digital environment for overseeing external trade.

### Operational repercussions and Customs performance

The wider rollout of scanning operations has fundamentally transformed Customs control methods at the Port of Douala.

Immediately after their unloading, containers are moved to inspection sites where the scanner images are automatically compared with the data on the manifest and Customs declarations. This centralized information solution provides inspectors with a streamlined analysis facility for detecting instances of fraudulent concealment, identifying false declarations, targeting consignments requiring physical inspection and enhancing risk management.

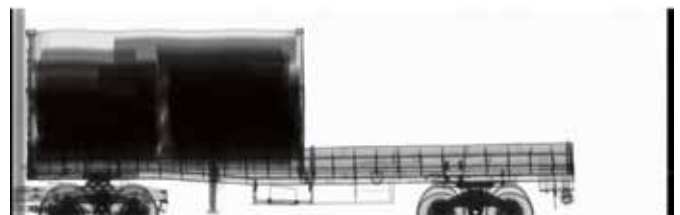
Over the years, the use of scanner images has become a valuable tool in support of the decision-making of front-line inspectors, Customs re-inspection services and risk management units.

In 2025, almost 90% of declarations subject to correction in the Littoral 1 Customs sector were detected as a result of scanner image use. In the absence of such images, the control operations would most likely have resulted in corrections which were less targeted – and possibly less effective – and took longer to establish.



Scanner image of a container showing a heterogeneous load

The image above shows a container on import; only the vehicles it was carrying had been declared in the Single Administrative Document (Document Administratif Unique (DAU)<sup>1</sup>). This document sets out all the information needed for importing the goods concerned and, on despatch, triggers the clearance process per se in the CAMCIS<sup>2</sup> system. Following verification of the images, the inspector handling the declaration discovered other goods in the container, whereupon the ensuing physical inspection identified the types and quantities of those goods and, consequently, the Customs duties and taxes payable.

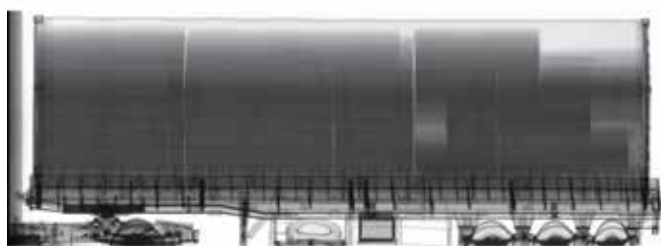


Scanner images of a container of wood for export

The two images above show two containers filled with (squared) logs, although the shipment had been declared for Customs purposes as sawn timber in order to benefit from the associated Customs duty and tax exemption. Additional duty and taxes were payable in respect of these containers following verification of the scanner images and establishment of the discrepancies. For comparison purposes, the following image shows a container of sawn timber.

1 <https://logistiquemagazine.com/les-cles-de-la-transparence-comprendre-chaque-ligne-de-votre-facture-de-dedouanement-a-limportation-au-cameroun-partie-3-formalites-de-dedouanement/>

2 <https://logistiquemagazine.com/dedouanement-en-ligne-2-0-decryptage-des-fonctionnalites-de-camcis/>



Sample image of a container of sawn timber

Furthermore, the Customs sector with responsibility for the Ports of Douala feature prominently in the budgetary performance of Cameroon Customs.

**Table 2a: Directorate General of Customs revenue performance (Source: Cameroon Customs)**  
(amounts in billion CFA francs)

Financial year	Target	Result	Achievement rate
2021	804.7	852.3	105.9%
2022	863.9	898.4	104.0%
2023	973.7	1,022.6	105.0%
2024	1,094.6	1,056.3	96.5%
2025	1,136.2	1,155.6	101.7%

**Table 2b: Performance of Littoral 1 Customs sector (Source: Cameroon Customs)**  
(amounts in billion CFA francs)

Financial year	Littoral 1 target	Littoral 1 result	Achievement rate
2021	580.6	611.6	105.3%
2022	568.4	591.3	104.0%
2023	640.8	674.2	105.2%
2024	669.2	660.8	98.7%
2025	681.0	690.3	101.4%

These results highlight the central role played by the Port of Douala in generating national Customs revenue. Scanning contributes to this performance by improving the detection of tariff fraud, enhancing value verification, identifying undeclared goods and safeguarding the tax base.

That said, it is still difficult to measure the impact of scanning measures on trade facilitation in a comprehensive manner. The data nonetheless shows a gradual improvement in the timescales needed to process declarations despite the increase in trade volumes. In 2025, the average time required for processing declarations associated with scanned containers was estimated at some 1.2 days. However, the mechanism is still subject to potential disruption. It is apparent from

the difficulties arising during the first quarter of 2026 in the “scanners crisis” that technical or contractual failings can have an immediate knock-on effect on port fluidity and clearance timescales.

### Mechanism limits and challenges

In spite of these positive results, the container scanning system at the Port of Douala is facing various challenges.

Some of the major limitations include the technological dependence on a private operator, congestion risks in the event of equipment breakdown, inadequate management of outsized shipments, the increasing need for specialist maintenance, the need for the continuous training of image analysts and the cyber-security challenges associated with the interconnection of digital systems.

The systematic inspection of containers also raises the issue of maintaining a balance between trade security and trade facilitation. Imposing controls too broadly could result in logistical slowdowns if technical and human capabilities do not keep up with changes in trade flows.

### Outlook

The outlook for developing the scanning mechanism at Cameroon’s ports is part of a rationale promoting digital transformation and inter-administrative integration.

In line with its contractual obligations, the scanning operator at the Port of Douala plans to set up a national centralized platform for pooling analysis functions and sharing data between several administrations, including Customs, the port authorities, the police, the gendarmerie and other inspection and monitoring services. This project comes under the dynamic process for modernizing the Single Window of External Trade Operations and is intended to create a fully fledged external trade digital ecosystem.

A platform of this nature would facilitate, for instance, the automatic transmission of scanner images, secure access to data by authorized administrations, traceable and actionable archive storage, the rollout of joint inspections and more effective intelligence sharing.

Future developments should also focus on broadening artificial intelligence capabilities, improving automated detection systems, developing smart warning solutions following data cross-referencing and upgrading mobile equipment to accommodate outsized shipments. These changes will need to be accompanied by measures to strengthen Customs officers’ technical and analytical capabilities.

### More information

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# EU Customs Reform: A game changer in a changing world

By Gerassimos Thomas, Director-General for Taxation and Customs Union, European Commission

Every day, while Europeans go about their lives, Customs officers supervise the traffic of billions of goods at the EU's external borders at seaports, airports, and land border crossings. The EU's Customs Union is a guardian that most citizens will never notice, yet one that touches many goods they consume, wear, or rely on. Few systems shape the daily lives of Europeans as profoundly as the EU Customs Union.

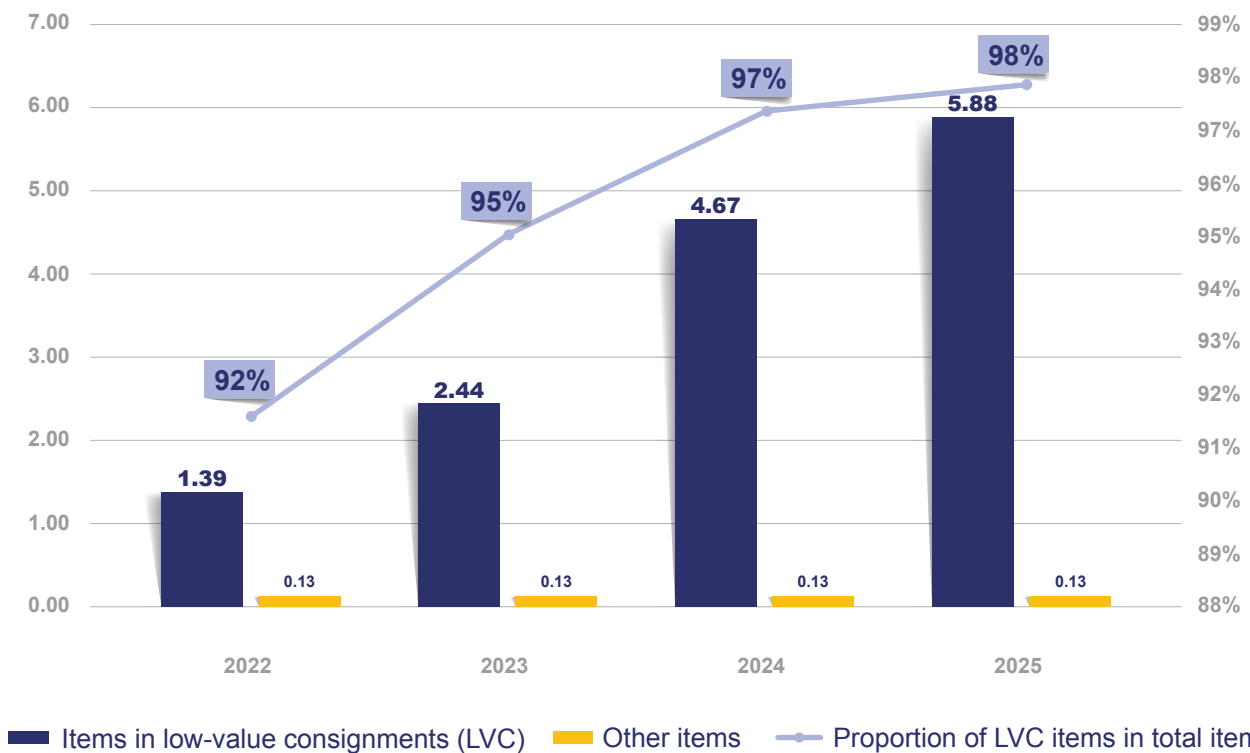
The Customs Union has been a pillar of European integration since its establishment in 1968. It has quietly underpinned prosperity, security, and the free movement of goods across the EU. This system means that goods entering the EU face common Customs duties, regardless which EU external border they cross. Once inside the EU, goods can move freely without further Customs duties or controls. Naturally, this requires strong coordination and information sharing across the 27 EU Member States.

Yet today, this foundational system stands at a crossroads. Since 1968, the world has changed quite drastically and is forcing us to adapt with it. The challenges we face, from growing trade volumes to the expansion of e-commerce, evolving security threats and complex global supply chains, an ever-growing consideration of citizens for safe, environmentally friendly

and socially responsible products, concern us all and demand urgent change from the EU and from the international trade and Customs community.

This is why, after intense negotiations, the EU agreed in March 2026 on a landmark Customs Reform that reinvents EU customs for the 21st century. At its core, the reform will help us better coordinate the currently fragmented national systems within a unified, data-driven architecture, transforming EU Customs into an even more dynamic, intelligence-led force capable of meeting modern threats and economic imperatives. The time is now to implement this reform gradually and in a spirit of collaboration, coordination and in cooperation with the international customs and trade community.

In fact, the stakes could not be higher. Our EU Customs Union safeguards one of the world's largest single markets, which provides a shared space for 450 million citizens and 26 million businesses. With a GDP of 18 trillion euros, the EU Single Market is the world's second-largest economy and the world's largest trading block, accounting for about 15% of world trade. Trade volumes are growing - every year 600 million traditional items are imported into the EU and more than 530 million items are exported from the EU to third countries. We have



accelerated our global trade policy: only in the last year and a half, the EU reached out to conclude, Free Trade and Economic Partnership Agreements with major economic players such as Mercosur, India, Indonesia, Mexico, and counting.

Yet the real test of these free trade agreements lies in their implementation and that is where Customs play a key role. From rules of origin checks to tariff classifications, Customs are facilitating international trade and ensure that FTAs deliver. Without efficient Customs processes, even the most ambitious trade deals risk becoming paper victories - their success depends on how they work in practise.

### New challenges and expanded responsibilities for Customs

The work of Customs is growing more complex as the sheer scale of challenges expands at an unprecedented pace. Consider these numbers: in 2025 alone, 5.9 billion e-commerce items were imported into the EU. That is over four times the volume recorded in 2022. This presents critical risks: not only an increased chance for unsafe goods or hazardous materials to find their way into the EU market but also increased exposure to practises of unfair competition, for instance through counterfeit goods or mis-declared shipments designed to evade duties.

Furthermore, Customs' mandate has expanded far beyond revenue collection towards increasingly safeguarding broader social values from sustainability and public health to the rule of law. To this end, EU Customs enforce more than 350

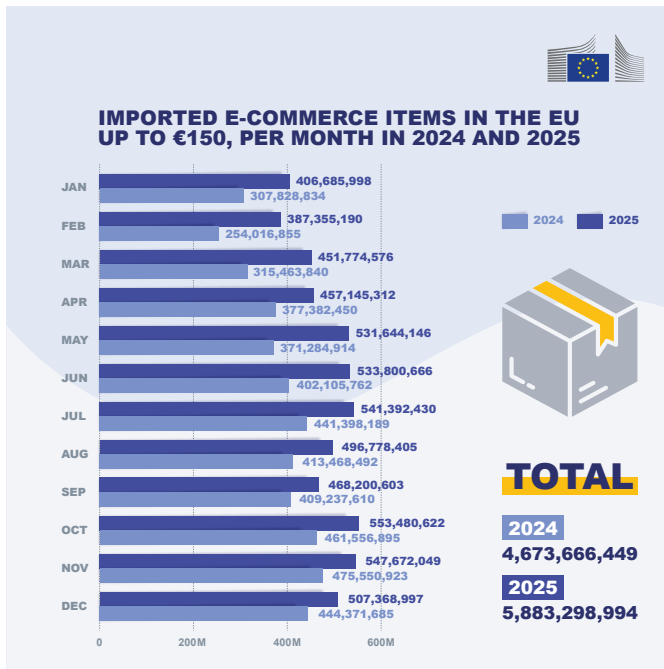
pieces of legislation, from measures to fight organised crime, smuggling, drug trafficking and terrorism, to enforcing sanctions and ensuring products compliance with health, safety, environmental and labour standards. In addition, Customs had to adapt to a variety of new challenges in the past years, like Brexit and COVID.

In light of these expanded responsibilities and the number of cases Customs are dealing with, the limitations of today's systems become glaring. Effective Customs controls can no longer be performed solely by visual checks, not even with the support of laboratories or certification systems. What efficient Customs controls essentially need is real-time data sharing to identify high risk shipments before they enter the EU market.

### The driving forces that are pushing the current model to its limits

In the last years we observed a multiplication of challenges that demand urgent changes.

First, the explosion of e-commerce confronts Customs with new financial, counterfeit and compliance risks. Many products fail to comply with EU rules and standards and pose serious safety and security concerns for consumers. Targeted inspections carried out across the EU 27 throughout 2025 in cosmetics, personal protective equipment (PPE), food supplements, toys, and electronics revealed alarming non-compliance: over 60% of checked products failed EU standards due to missing labels, forbidden ingredients, or absent safety documentation. In one of the studies, laboratory tests even found 84% of sampled



toys to be dangerous, exposing consumers to risks like unsafe chemicals or faulty designs. Buying cheap might be appealing to consumers in the moment but there is a hidden cost - health hazards and environmental harm. Moreover, these products create an unfair level playing field between EU companies that must apply EU standards and their international competitors that do not necessarily fulfil these requirements. It is important to ensure everyone is playing by the same rules – and the EU Customs Reform will address this.

Secondly, the reality is that EU Customs are not yet functioning 'as one' - the Customs Union currently lacks a centralised operational arm. There are 27 Customs authorities, with different control priorities and on-the-ground practices, operating 111 IT interfaces and systems that do not often communicate with each other. This is a situation that can make us more vulnerable to fraudsters who try to find the weakest link. This patchwork approach is also expensive and inefficient. Businesses face between 1 and 2 billion EUR per year in compliance costs.

Third, in an era where data is the new infrastructure, Customs cannot fulfil its expanding role without modern digital tools. We need to fully digitalise our Customs procedures and integrate Customs data in a comprehensive way. The rise of digital tools and AI is a train that we cannot miss-the availability of these new tools could help us change our Customs in an innovative way. The good thing about being in a team is that we can learn from each other. Many EU Member States are already leading on digital systems and developing innovations that can be role models for EU-wide scaling.

The Customs Reform reshapes fundamentally how the EU Customs ecosystem works in order to make it smarter and stronger, more coordinated and more efficient.



## Learning from current Customs cooperation networks in Europe

Europe's Customs landscape is undergoing a significant transformation, driven by digitalisation and the need to future-proof trade. The Union Customs Code (UCC) digitalisation is setting the stage for a fully electronic, data-driven Customs environment.

In preparation of this reform, we have learned from the experience of existing European collaborative platforms like CELBET (Customs Eastern and Southern Eastern European Land Border Expert Team) and EUCABET (EU Customs Alliance for Borders Expert Team), who have laid critical operational foundations, strengthening enforcement and risk management. In the case of CELBET for instance, 11 Member States set up an expert team to build up and strengthen operational cooperation actions at the eastern and south-eastern land border, delivering tangible results from joint risk profiling to using new technologies, while also diagnosing weaknesses that hinder the effectiveness of joint action, such as varying Member State priorities and difficulties in data-sharing. These insights have informed the expansion of cooperation under EUCABET, which has enhanced operational coordination across all EU borders, particularly in combating drug trafficking and e-commerce risks.

Looking ahead, several initiatives, like the forthcoming Product Compliance and Safety Act will further tighten supply chain oversight, while the proposed Single Market and Customs Programme, backed by roughly 3 billion euros, for the customs priority, is expected to fund modernisation efforts, including the activities to be carried out by the new European Union Customs Authority (EUCA). These reforms need to be seen as pieces of the same puzzle- they represent an overall strategic shift in Europe toward a more integrated, resilient, and

tech-enabled Customs Union and towards more cooperation and coordination across countries.

## How a data-driven reform is reshaping the future of EU customs

The Customs Reform is a comprehensive modernisation of how the EU Customs ecosystem works and interoperates, introducing a data-driven, digital, centralised system to simplify procedures, enhance risk management, and launching concrete measures that tackle the challenges created by the growth of e-commerce. What is extraordinary about it is that this is a vision that 27 different countries have agreed to implement, a real testament to how the EU works at its best.

### An EU-level architecture: European Customs Authority (EUCA) and EU Customs Data Hub

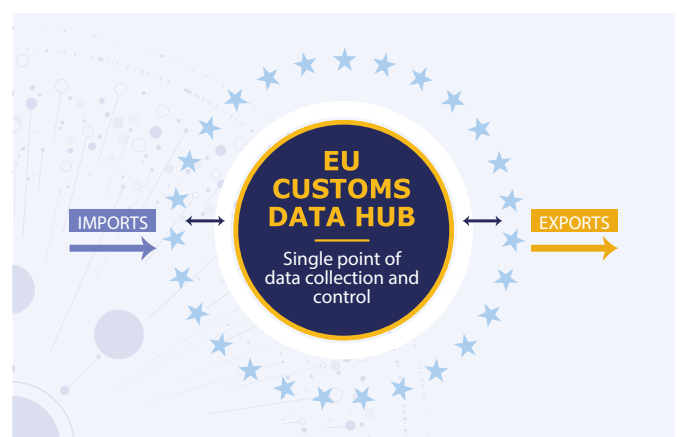
At the head of the reform stands the new EU Customs Authority (EUCA) in Lille, France, which was chosen for the seat, following a competition among nine EU cities. The core task of EUCA will be to manage the EU Customs Data Hub, a centralised platform that will collect, process, connect and store all relevant Customs data at EU-level in one central platform, instead of in the current 111 separated national systems in the 27 Member States.

Starting with e-commerce, the Data Hub will become the single digital interface for all Customs data submissions, offering a single, Customs experience no matter where goods cross the border. This means that businesses that want to bring goods into the EU will be able to enter all the necessary information on their products and supply chains in one place, instead of in different national systems and languages. Whether they plan to enter the EU in Hamburg, Antwerp or Algeciras, or use EU ports as transit points, they will deposit their data only once in the EUCA's data hub. All EU Member States will have access to the same real-time data according to their roles and rights in the Customs processes. Member States' Customs authorities will see all goods entering the EU and gain a true 360 degrees birds-eye view. With this information and the support of the EUCA, they will be able to carry out more targeted risk assessment and focus Customs checks where they are most needed.

The Data Hub's true power lies in this ability to transform Customs from a reactive to a predictive force. It will enable cross-referencing trade data with intelligence from OLAF (the EU's anti-fraud office), EPPO, and market surveillance authorities to help improve the flagging of high-risk shipments before they arrive at European borders. Analytical tools such as machine learning algorithms can help identify patterns, such as suspicious routing, undervaluation, or links to known fraudsters. The system will track "data events" rather than static declarations-recording when an order is placed, when a shipment is loaded, when goods are released-providing a dynamic, end-to-end view of trade flows instead of today's more fragmented situation where data is largely stored in

separate declaration-specific silos. This approach will be particularly transformative for e-commerce, where the current system is particularly overwhelmed.

Thanks to the EUCA, for the first time we will have a true EU-level risk analysis, which will ensure common priorities for controls and a common assessment of emerging risks and threats. Many of today's challenges are cross-border in nature and the EUCA will support Customs authorities in addressing them even more effectively. When high-risk shipments are identified, the EUCA will coordinate joint operations across member states, enabling them to act as one rather than 27 separate entities. This approach will be particularly valuable in combating cross-border threats like trafficking in illicit goods or other activities that exploit differences between national systems.



EUCA's creation marks a significant evolution in EU Customs governance as it will establish central coordinating capacity to support national Customs administrations. At its cruising speed, 300 staff members will work jointly to support the Member States in making EU Customs smarter, faster, safer, more uniform, and more capable of handling modern global trade flows. EUCA will not replace national Customs administrations. It is designed to act as an enabler and national

Customs authorities will retain operational autonomy and remain responsible for the implementation of the Customs legal provisions but benefiting from EU-level coordination and shared analysis. The new agency will empower the collective work of EU's Customs through shared experience, intelligence, coordinated operations, and advanced analytical tools deployed in the Data Hub. The governance and operational functioning of EUCA will rely on the Member States, who represent their countries in the EUCA Management Board. The agency will be headed by an executive director – yet to be selected.

### Next steps

The EUCA will be established in close cooperation with the Member States, with some activities commencing in 2027, and with the launch of the Data Hub's first focus on e-commerce in 2028. The full deployment of all aspects of the reform for all forms of trade will be done by 2031 at the latest. All traders will have the opportunity to operate under the full new UCC framework by that date if not earlier. This framework will become obligatory for all soon after. From that point on, trade will interact with Customs only through the hub. This will result in a very important simplification for businesses and Member States' Customs authorities. The estimated saving for them is more than 2 billion euros a year in IT development and maintenance costs. It will redefine the way information is provided, used and shared, drastically reducing compliance costs for all businesses. It will moreover allow new facilitations for trustworthy "Trust & Check" system, including the possibility to "self-release" goods on behalf of Customs.

### Shared priorities for the future of Customs: UCC reform and WCO modernisation

The EU's Union Customs Code (UCC) reform excels in reflecting the World Customs Organization's core objective of driving Customs performance through data-based Customs modernisation globally and including the WCO organisation itself. The UCC reform directly supports this and further WCO goals thriving towards digitalised, data-supported and simplified Customs processes, enhanced data-driven risk management and strengthened supply chain transparency. In doing so, the EU is aligned with the key pillars of the WCO's mission to ensure that global Customs remain fit for purpose in an era of rapid technological and economic change, further challenged by geo-political disruption.

The EU's ambition to advance Customs performance innovation and modernisation also globally is further very visibly reflected in its unwavering promotion of a substantial Harmonized System (HS) modernisation, that addresses gaps in classification, sustainability, and emerging technologies.

This will ensure that the HS remains a relevant tool for global trade, which helps simplify the tariff classification of goods and aligned with current global trade patterns. The EU is in this way not only aligning with the WCO's strategic direction but also providing a blueprint for Customs innovation, and in this example even a practical model for how Customs can support a more resilient, transparent, and trade-facilitating global HS. One thing is sure: global Customs collaboration will be essential for the EU Customs reform's long-term success.

### A global blueprint for Customs modernisation

While the EU's Customs Reform is tailored to its specific challenges, the underlying principles have global relevance. For the WCO's 187 members, the European experience offers valuable lessons about how to modernise Customs in the digital age, and even more so in the specific context of other regional Customs unions that are similar to that of the EU.

The EU's approach for a phased implementation could provide a model for other regions and similar Customs unions. By starting with e-commerce, the most pressing challenge, and gradually expanding to other sectors, the reform also minimises disruption while building momentum. This incremental strategy allows businesses and Customs authorities to adapt to the new system without overwhelming them.

Perhaps most importantly, the EU's experience demonstrates that Customs modernisation does not require sacrificing national sovereignty. The EUCA and the Data Hub are designed to enhance rather than replace national Customs administrations, reinforcing them and the EU Customs Union with tools, intelligence and capacities. This model of cooperation, balancing centralisation with individual autonomy could be particularly valuable for other regional blocs.

In today's high-speed multiplayer global trade arena, the Customs Reform redefines both the roles of the players and the rules of play - from Customs authorities and businesses to online platforms and consumers themselves. The objective is no longer simply to react, but to anticipate and adapt, as we continue shaping a Customs Union fit for the next level of challenges.

### More information

Commission welcomes historic agreement to reform EU Customs Union: [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_26\\_735](https://ec.europa.eu/commission/presscorner/detail/en/ip_26_735)

EU Customs Reform: [https://taxation-customs.ec.europa.eu/customs/eu-customs-reform\\_en](https://taxation-customs.ec.europa.eu/customs/eu-customs-reform_en)



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