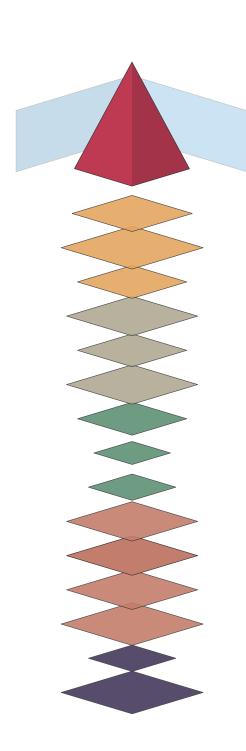




BOSNIA AND HERZEGOVINA







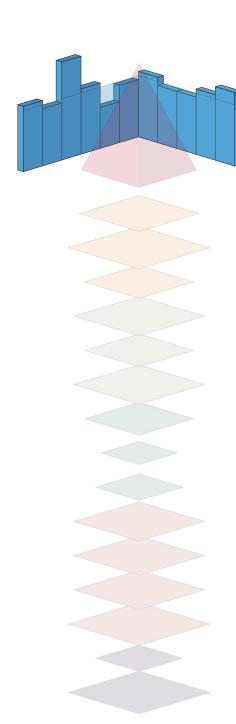








BOSNIA AND HERZEGOVINA



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GOVERNMENT TRANSPARENCY AND ACCOUNTABILITY		3.50	0.0
INTERNATIONAL COOPERATION		6.00	0.0
NATIONAL POLICIES AND LAWS		4.00	0.0
JUDICIAL SYSTEM AND DETENTION		2.50	⊅0.5i
LAW ENFORCEMENT		3.50	0.0
TERRITORIAL INTEGRITY		4.00	0.0
ANTI-MONEY LAUNDERING		3.50	0.0
ECONOMIC REGULATORY CAPACITY		3.50	0.0
VICTIM AND WITH	NESS SUPPORT	4.00	0.0
PREVENTION		4.50	0.0
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CRIMINALITY

CRIMINAL MARKETS

PEOPLE

Human trafficking in Bosnia and Herzegovina remains a persistent issue, with the country functioning as a source, transit point and destination for trafficking victims. Women and girls from Bosnia and Herzegovina are trafficked for sexual exploitation both domestically and internationally, while Roma children are often subjected to forced begging, sex trafficking and domestic servitude. Criminal networks exploit corruption within state institutions, where officials have been implicated in providing fraudulent documents to facilitate trafficking. Although the government has increased prosecutions and allocated funding for NGO-run shelters, victim identification remains inadequate, and trafficking victims continue to be penalized for crimes they were coerced into committing. Migrants and refugees, particularly unaccompanied minors from Afghanistan, Pakistan and Syria, face heightened risks of exploitation, with many falling victim to human trafficking.

The human smuggling market is deeply entrenched, with Bosnia and Herzegovina serving as a critical transit point along the Balkan migration route. This market is closely linked to arms trafficking, with reports indicating that criminal organizations are selling weapons to migrants involved in smuggling networks. Most migrants depend on smugglers to cross the Bosnia and Herzegovina-Serbia border, with some being recruited as scouts or guides. Corruption among border police exacerbates the problem, allowing smugglers to operate with impunity. These smuggling networks are transnational, facilitating illegal crossings into Croatia and Slovenia, often utilizing encrypted communication platforms. Law enforcement operations, including significant Europol-led actions in 2024, have dismantled parts of these networks; however, the criminal market remains highly lucrative. Recent police operations have uncovered a growing trend of collaboration between migrant smugglers from various countries and their accomplices, who are typically based in the Balkan region.

Extortion and protection racketeering are pervasive, primarily targeting the hospitality sector, small businesses and loan-sharking operations. Organized crime groups, including networks associated with regional criminal clans, are heavily involved. Loan sharks impose exorbitant interest rates, coercing victims into cycles of debt that often involve law enforcement officers as both debtors and facilitators. In major cities such as Sarajevo and Banja Luka, extortion-related violence is common; however, many cases remain unreported due to victims' fear of retaliation.

TRADE

The arms trafficking market is well established, with Bosnia and Herzegovina serving as both a source and transit country for illicit weapons. Smuggling methods include disassembling firearms for shipment through mail and utilizing informal networks to circumvent export bans. The conflict in Ukraine has resulted in heightened arms trafficking activities, with weapons from Bosnia and Herzegovina reportedly making their way to conflict zones despite regulatory restrictions. Although authorities have initiated public security campaigns and destruction programs to mitigate the presence of illegal firearms, the market remains resilient, with illicit weapons frequently trafficked to Western Europe.

The trade in counterfeit goods is extensive, primarily sourcing products from Türkiye and China, which are then transported through Croatia. Counterfeit clothing, footwear and pharmaceuticals dominate this market, with online sales on the rise. State-embedded actors, including corrupt customs officials, facilitate these smuggling operations. Seizures of counterfeit goods remain low compared to neighbouring countries, highlighting significant enforcement disparities. Although the government has initiated anticounterfeiting measures, the market continues to be a crucial component of Bosnia and Herzegovina's broader illicit economy.

The illicit trade of excise goods, particularly tobacco, remains a significant challenge. Bosnia and Herzegovina serves as both a source and transit country for smuggled cigarettes, with criminal networks exploiting weak border controls and corruption within enforcement agencies. The country loses substantial revenue each year due to illegal tobacco sales. Recent investigations have revealed high-level police involvement in smuggling operations, with some activities linked to political figures. Law enforcement has initiated multiple operations aimed at dismantling these networks; however, the trade continues due to ongoing demand and deep-rooted corruption.

ENVIRONMENT

Illegal logging is pervasive, driven by criminal networks and state-embedded actors. Political elites and local officials are frequently implicated, exploiting loopholes in forestry regulations to issue illegal concessions. Instances of mayors and municipal officials profiting from unauthorized deforestation are common. In areas such as Herzegovina–Neretva Canton, the lack of effective logging regulations allows such exploitation to persist unchecked. Additionally, logging is associated with money laundering activities within the construction sector, where illegally harvested timber is used in real estate developments.



Fauna crimes, including illegal hunting and poaching, are significantly underreported; however, Bosnia and Herzegovina serves as a source country for the illegal wildlife trade. Although domestic demand is low, foreign actors, particularly Italian organized crime groups, are involved in smuggling protected species. Italian hunters often pose as tourists in Bosnia and Herzegovina to illegally hunt tens of thousands of quail, taking advantage of the weak enforcement of hunting regulations. This criminal activity not only endangers biodiversity but also highlights broader issues of corruption, inadequate oversight and the country's vulnerability to cross-border environmental exploitation. Additionally, online sales of illegal wildlife products persist, with enforcement measures remaining insufficient.

The illegal exploitation of non-renewable resources, particularly coal and gravel, is driven by private companies and corrupt officials. Unauthorized coal excavation and fuel smuggling are prevalent, with these illicit operations often linked to political figures. Illegal gravel mining along the Drina River has persisted for decades, frequently involving local government officials. Despite numerous protests and environmental concerns, enforcement measures remain ineffective, as regulatory loopholes continue to allow the market to thrive.

DRUGS

The heroin trade in Bosnia and Herzegovina is relatively consolidated, involving both local and foreign criminal networks. Heroin is primarily trafficked through Türkiye, with major transit points in Bijeljina and Cazin. Although demand has declined, criminal organizations continue to traffic heroin alongside other illicit drugs. Law enforcement agencies have participated in significant international operations targeting heroin networks; however, the trade remains a prominent aspect of organized crime in Bosnia and Herzegovina.

Mafia-style groups and high-level criminal networks dominate the cocaine trade. Bosnia and Herzegovina acts as a transit hub for cocaine destined for Western Europe, with shipments arriving from South America through ports in the neighbouring countries. Large-scale law enforcement operations conducted in 2023 and 2024 have dismantled parts of these networks; however, key figures continue to operate. Violence associated with cocaine trafficking has intensified, with conflicts between rival clans resulting in targeted assassinations, including those of law enforcement personnel.

Cannabis trafficking is well established in the country, which serves as both a transit hub and a source market. Cannabis is primarily imported from Albania and Montenegro; however, domestic cultivation is on the rise, particularly in remote areas near interethnic borders and along the border with Croatia. Large cannabis plantations have been dismantled, and recent seizures underscore the scale of local production.

The market remains resilient, with traffickers utilizing real estate investments to launder their proceeds.

The synthetic drug trade is expanding, with locally produced amphetamines dominating the market. Seizures of synthetic drugs, including MDMA and methamphetamine, have increased, as networks traffic these substances across the Western Balkans. Production is primarily domestic, with criminal groups utilizing Bosnia and Herzegovina as a base for regional distribution. Although law enforcement operations have disrupted key suppliers, both demand and supply continue to grow.

CYBER-DEPENDENT CRIMES

Cybercrime in Bosnia and Herzegovina is an escalating threat, involving both domestic and foreign actors. Cyber-attacks predominantly originate from countries such as Brazil, the Netherlands, the US, Russia, Germany and China, with Bosnia and Herzegovina primarily serving as a destination country. Bosnia and Herzegovina faces a significant cyber threat, with millions of cyber-attacks occurring monthly, including a substantial number of DDoS attacks. The absence of a comprehensive cybersecurity strategy has rendered the country vulnerable to cybercrimes, while limited public awareness further exacerbates the issue. Although law enforcement has arrested some suspects in recent years, cybercrime remains a pervasive criminal market.

FINANCIAL CRIMES

Financial crimes are pervasive, involving state-embedded actors, private-sector enablers and organized crime groups. Several high-ranking officials have been implicated in procurement fraud, tax evasion and embezzlement. Law enforcement agencies have initiated multiple operations targeting financial crime networks; however, systemic corruption continues to undermine anti-fraud efforts. Despite a few high-profile convictions, enforcement remains selective, with politically connected individuals frequently evading prosecution. Trade is commonly exploited for under- or over-invoicing, and the misuse of funds remains widespread in Bosnia and Herzegovina.

CRIMINAL ACTORS

Mafia-style groups in Bosnia and Herzegovina are not widespread, but they play a critical role in the country's organized crime landscape. The most significant group fitting this description is the Tito and Dino Cartel, one of the world's largest drug trafficking organizations. This cartel operates in both Bosnia and Herzegovina and the Netherlands, maintaining direct ties to Latin American drug suppliers. While these groups do not control specific territories or criminal enclaves, they maintain influence through corruption, extortion, racketeering and large-scale drug trafficking. They exploit corruption within law



enforcement and government institutions, leveraging their financial power to secure protection. Although law enforcement agencies have conducted high-profile arrests and asset seizures, these groups continue to operate, taking advantage of the country's weak institutional framework and political protection.

Criminal networks in Bosnia and Herzegovina are highly adaptable, engaging in various illicit markets, including drug trafficking, financial crimes and smuggling. These loosely connected groups operate throughout the country, particularly in Republika Srpska and key cities such as Sarajevo, Banja Luka and Mostar. Some networks specialize in extortion and usury, as evidenced by recent high-profile arrests linked to loan-sharking operations. Many of these groups are affiliated with regional and international criminal organizations, particularly those from Serbia, Montenegro, Albania and South America. The recent decryption of encrypted messaging platforms has unveiled extensive communications between criminal actors based in Bosnia and Herzegovina and their international suppliers, further exposing their involvement in global trafficking routes. Despite law enforcement operations aimed at dismantling these networks, corruption and inefficiencies within the judicial system impede long-term suppression efforts.

State-embedded actors play a crucial role in facilitating organized crime in Bosnia and Herzegovina. Corruption is pervasive at all levels of government, with high-ranking officials implicated in drug trafficking, financial crimes and the illicit exploitation of natural resources. Some law enforcement officers have been arrested for their direct involvement in trafficking operations, while political figures have leveraged their influence to protect criminal enterprises. Additionally, officials within the Ministry of Internal Affairs of Republika Srpska have been linked to drug trafficking networks. Illicit coal mining and timber exploitation are also facilitated by political figures who issue fraudulent permits in exchange for financial kickbacks. International sanctions have been imposed on key political figures due to their roles in perpetuating corruption and undermining state institutions. Despite periodic crackdowns, political interference continues to obstruct investigations, allowing state-embedded actors to maintain their influence over illicit markets.

Foreign actors exert significant influence over organized crime in Bosnia and Herzegovina, capitalizing on the country's weak border controls and divided political landscape. Regional criminal organizations from Serbia, Montenegro, Croatia and Albania maintain a strong presence, collaborating with local actors to facilitate drug and arms trafficking. The country also functions as a transit hub for Latin American cocaine destined for Western Europe. Additionally, Turkish, Saudi and Western Asian actors are involved in illicit financing schemes, while Russian-backed groups exploit Republika Srpska's political alignment with Russia to conduct influence operations. Reports indicate that operatives from these Russian-backed groups have trained individuals in Bosnia and Herzegovina for destabilization activities. Additionally, Bosnia and Herzegovina has become a haven for criminals from other European countries, including Slovenian and Croatian fugitives who have been apprehended in recent years. Although foreign actors do not completely control specific criminal markets, their collaboration with local groups has significantly strengthened transnational crime networks operating in the region.

The private sector in Bosnia and Herzegovina is deeply intertwined with organized crime, with many businesses serving as facilitators for money laundering and financial crimes. Common methods used to conceal illicit funds include the use of cash-based transactions, exploitation of currency exchange offices and the recruitment of money mules to transfer funds across borders, often taking advantage of gaps in oversight and financial regulation. The construction and real estate industries are particularly vulnerable, with illicit funds frequently funnelled into largescale developments. Business entities owned by politically connected individuals benefit from preferential treatment in public procurement processes, often securing contracts through fraudulent bidding mechanisms. Companies linked to the President of Republika Srpska and his associates have been implicated in sanctions evasion and corruption, frequently restructuring ownership to evade detection. Financial institutions also contribute to enabling illicit financial flows, as weak regulatory oversight permits money laundering through offshore accounts. While law enforcement has targeted some high-profile cases, regulatory gaps and political interference continue to hinder efforts to curb private-sector complicity in organized crime.

RESILIENCE

LEADERSHIP AND GOVERNANCE

Bosnia and Herzegovina faces ongoing challenges in political leadership and governance, particularly in combating organized crime and corruption. Although initiatives such as the 2023–2026 Strategy for Countering Organized

Crime and a national strategy for systematic asset recovery have been introduced, their implementation remains weak due to political interference and fragmented governance structures. The country's divided political landscape, especially the secessionist policies of Republika Srpska and



its defiance of state-level institutions, further complicates governance. Ethnic divisions among leaders hinder decision-making and create opportunities for criminal exploitation. Additionally, the lack of independent investigative and prosecutorial authority hampers efforts to combat high-level corruption and criminal infiltration.

Government transparency and accountability remain insufficient, with systemic corruption undermining public trust. Despite some advancements in administrative transparency, judicial independence has declined. Corruption remains a serious problem in Bosnia and Herzegovina, with political interference in the judiciary and selective enforcement of anti-corruption measures enabling significant scandals to go unaddressed. The government's lack of oversight in procurement processes and public spending further facilitates corruption. Legislation concerning whistle-blower protection, public procurement and conflicts of interest is enforced inconsistently, while newly introduced laws in Republika Srpska limit civil society and media oversight, further exacerbating the situation.

International cooperation is active but hindered by political divisions. Bosnia and Herzegovina engages in joint investigations and collaborates with Europol, INTERPOL and neighbouring countries to combat organized crime, human trafficking and illicit financial flows. However, inconsistent foreign policy and delays in aligning with the EU acquis have impeded deeper cooperation with Eurojust and the European Public Prosecutor's Office. Although the country has signed agreements to strengthen judicial cooperation, gaps persist in extradition processes and the enforcement of international legal obligations.

Bosnia and Herzegovina's national policies and legal frameworks lack harmonization, which contributes to weak enforcement against organized crime. The country has taken measures to combat human trafficking, drug trafficking and environmental offences, but the inconsistent application of laws across regions limits their effectiveness. Proposed legislation in Republika Srpska that grants immunity to public officials further undermines legal accountability. Additionally, cybersecurity laws are underdeveloped, leaving Bosnia and Herzegovina vulnerable to cyber-dependent crimes.

CRIMINAL JUSTICE AND SECURITY

The judicial system in Bosnia and Herzegovina is plagued by inefficiency, political interference and inconsistent enforcement. A lack of judicial independence hinders the effective prosecution of organized crime and corruption. Despite legislative reforms, asset declaration systems and financial transparency measures remain inadequate, facilitating judicial corruption. Court rulings are often inconsistent across different entities, further complicating the legal landscape. Although high-profile arrests have occurred, political connections usually shield key figures from prosecution. Allegations of ill treatment of detainees,

ineffective investigations and inadequate healthcare provision in detention facilities persist. There is no national prison strategy, and existing legislation is not aligned with European and international standards. A significant issue to highlight is the practice of buying off prison sentences of up to one year. This loophole undermines the justice system, allowing individuals, particularly those involved in organized crime, to avoid serving time for their offences by paying fines. This practice weakens the deterrent effect of the legal system and perpetuates a culture of impunity.

Law enforcement agencies encounter structural and operational challenges stemming from fragmented governance and corruption. While Bosnia and Herzegovina has established specialized units to combat drug trafficking, human trafficking and financial crimes, resource limitations and a lack of coordination impede their effectiveness. Criminal networks have infiltrated border police and cantonal law enforcement agencies, with reports indicating that police officers are facilitating illegal activities. While training programs have been introduced to enhance investigative capabilities, the practical application of these skills remains inconsistent. Efforts to combat arms trafficking, counterfeit goods and excise smuggling have yielded mixed results; although seizures have increased, prosecution rates remain low.

Territorial integrity is compromised by weak border security and the presence of transnational criminal networks. Bosnia and Herzegovina's border management strategy partially aligns with EU standards, but staff shortages and inadequate infrastructure hinder effective enforcement. Cooperation with international agencies has resulted in enhancements to border control measures; however, corruption within customs and border patrol units undermines these efforts. Criminal groups exploit gaps in territorial oversight, using Bosnia and Herzegovina as a transit hub for smuggling illicit goods, narcotics and victims of human trafficking into the EU. Furthermore, calls from representatives of Republika Srpska to secede from Bosnia and Herzegovina and unify with Serbia continue to pose a significant threat to the country's internal stability and territorial integrity. Regarding the country's capacity to combat cybercrime, it remains limited, with cybersecurity institutions operational only in certain regions and lacking comprehensive solutions.

ECONOMIC AND FINANCIAL ENVIRONMENT

Bosnia and Herzegovina faces persistent challenges related to money laundering and illicit financial flows, driven in large part by entrenched corruption and inadequate financial oversight. Financial investigations are seldom conducted, and asset recovery mechanisms remain weak and underutilized. The absence of a regulatory framework for cryptocurrency transactions further heightens the risk of money laundering. To align with the Financial Action Task Force recommendations and avoid blacklisting, the country recently adopted the Law on Preventing Money Laundering and Terrorist Financing, bringing its legal and



regulatory framework closer to EU standards. However, the effectiveness of these reforms will depend on their implementation, which remains uncertain. The economic regulatory environment remains fragmented, with high levels of corruption hindering business operations. Regulatory inefficiencies, weak enforcement of property rights and a sluggish judicial process deter foreign investment. Bosnia and Herzegovina's economy is hindered by excessive bureaucratic hurdles and an extensive informal economy contributing to financial instability. Efforts to enhance regulatory quality and harmonize taxation policies with EU standards have progressed slowly. While trade agreements and economic partnerships exist, political divisions impede advancements in regulatory reforms and transparency initiatives.

CIVIL SOCIETY AND SOCIAL PROTECTION

Victim and witness support mechanisms in Bosnia and Herzegovina remain insufficient. Although the country has implemented measures to assist victims of human trafficking and organized crime, resource limitations and weak institutional support hinder their effectiveness. While shelters and legal aid services are available, they suffer from inadequate funding. Victims of trafficking, particularly from marginalized communities such as the Roma population, often encounter insufficient protections and are at risk of revictimization. Additionally, witness protection programs are underdeveloped and judicial proceedings frequently fail to ensure the safety of individuals who cooperate in criminal cases.

Prevention efforts in Bosnia and Herzegovina have experienced limited success due to inconsistent policy implementation and a lack of proactive crime prevention strategies. Although anti-corruption agencies exist, they are understaffed and lack the necessary enforcement authority. The Strategy for Countering Organized Crime (2023–2026) aims to address these systemic weaknesses, but tangible results have yet to materialize. Despite initiatives such as the Anti-Drug Abuse Strategy in Sarajevo Canton, which seeks to prevent drug abuse, reduce drug-related harm and enhance treatment and rehabilitation services, some drug prevention and rehabilitation programs in the country remain inadequately funded. While human trafficking prevention strategies are established, they suffer from inconsistent implementation at the regional level. Furthermore, efforts to combat cybercrime are impeded by outdated legal frameworks. Awareness campaigns targeting the illicit trade in excise goods have been launched; however, enforcement remains weak due to corruption and a lack of resources.

Non-state actors, including civil society organisations and independent media outlets, are facing increasing restrictions. Although Bosnia and Herzegovina has a vibrant NGO sector, particularly in the areas of human rights advocacy and anti-corruption initiatives, government interference and restrictive legislation in Republika Srpska hinder their

operational capacity. Journalists investigating organized crime and corruption often face threats and intimidation, with limited institutional protection available to them. The media landscape is becoming increasingly polarized, with public broadcasters subject to political influence and independent outlets struggling to maintain financial viability. Press freedom has deteriorated, and legal protections for journalists remain inadequate, further impeding investigative reporting on criminal activities and governance issues.

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