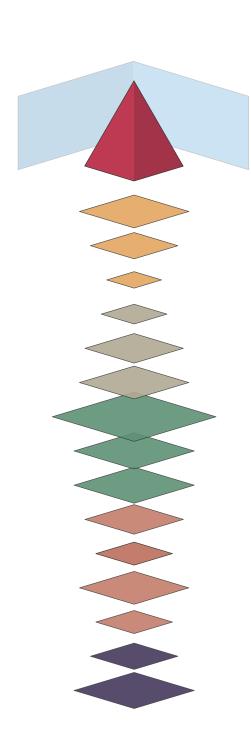




ZAMBIA







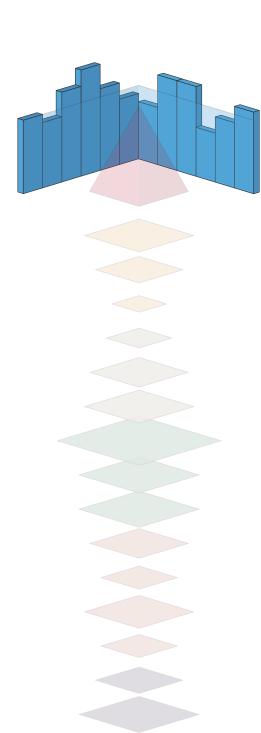


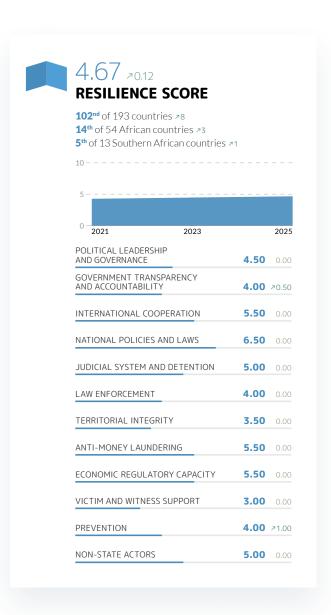






ZAMBIA











CRIMINALITY

CRIMINAL MARKETS

PEOPLE

Human trafficking is a notable issue in Zambia, primarily affecting individuals vulnerable to exploitation due to poverty. The country is a transit hub for traffickers moving victims to destinations such as South Africa and Namibia. Victims are often deceived with false promises of employment and better living conditions, only to be subjected to forced labour or commercial sexual exploitation. Criminal networks operating within and beyond Zambia's borders are involved in trafficking, often behind a labour recruitment agency facade. The social tolerance of forced labour, particularly in domestic servitude, complicates anti-trafficking efforts. Corruption among immigration officials facilitates the movement of trafficked individuals across borders. Human smuggling is also a concern in Zambia, where numerous migrants face hazardous journeys through the country, sometimes resulting in fatalities. Permeable borders and the involvement of corrupt officials sustain smuggling routes from the Horn of Africa to South Africa. Zambia is primarily a destination country but is increasingly a transit hub along the southern route, where smugglers exploit the same pathways used for human trafficking. The route through Mozambique is particularly active, facilitating the movement of individuals towards South Africa. Smuggled individuals are often at risk of becoming trafficking victims, as coercion and deception are common along these routes. Extortion and protection racketeering occur in Zambia but are relatively limited. Localized gangs also engage in small-scale extortion in urban centres such as Lusaka. There have been increased reports of extortion and kidnapping for ransom but these cases are sporadic and law enforcement responses often appear inadequate.

TRADE

Arms trafficking in Zambia is relatively minor compared to other criminal activities and does not significantly affect the criminal economy. The primary concern regarding illicit arms trade is its connection to instability in the Democratic Republic of Congo (DRC), where weapons occasionally cross into Zambia. Criminal networks, foreign actors and state-embedded officials are involved in arms trafficking but the market is relatively contained. There is little evidence to suggest strong domestic demand for illegal arms, and the market does not appear to be a significant driver of violence.

The trade in counterfeit goods is an issue in Zambia and illicit products are widely available despite regulatory measures. Counterfeit mobile phones have declined due

to stricter enforcement but counterfeit pharmaceuticals from India, electronics and apparel persist in the market. Foreign actors and criminal networks play a key role in manufacturing and distribution, and Chinese businesses are particularly involved in wholesale and retail. Counterfeit goods are also resold to traders and consumers from neighbouring Zimbabwe. Law enforcement agencies have increased efforts, conducting raids on production and distribution sites, yet counterfeit goods remain prevalent in informal markets and established retail outlets due to weak enforcement and corruption.

The illicit trade in excisable goods, including cigarettes, is expanding in Zambia, driven by economic factors and regulatory loopholes. Stricter controls on tobacco production and high excise duties have fuelled demand for cheaper, tax-evaded alternatives, increasing black market activity. Foreign actors, state-embedded officials and private sector entities are implicated in this trade, and cigarettes are primarily smuggled from China, India and Zimbabwe. The country has become an emerging hub for illicit cigarette distribution, exacerbating revenue losses and undermining public health efforts.

ENVIRONMENT

Flora crimes, particularly the illegal logging of protected African rosewood, are a significant issue in Zambia. The illicit trade is primarily driven by demand from China and traffickers take advantage of weak enforcement and regulatory loopholes to smuggle timber across borders. Criminal networks, foreign actors and corrupt state officials facilitate these activities, frequently mislabelling timber shipments to evade detection. Political elites have also been implicated in this trade, leveraging their positions to enable illegal logging and using international financial systems to launder profits.

Fauna crimes are a serious challenge in Zambia, which is a source and a transit hub for illegal wildlife products, including ivory, pangolin scales and bushmeat. Well-organized poaching networks operate across numerous southern African countries, smuggling wildlife through Zambia to Mozambique and the DRC on its way to Asian markets. Given its strategic location on southern Africa's trafficking routes, Zambia plays a crucial role in the regional illegal wildlife trade. The country is primarily a source and transit point rather than a major consumer market, but there is local demand for specific items, such as pangolin scales. Despite ongoing enforcement efforts, including seizures, most illicit wildlife trade goes undetected due to limited resources and corruption.



Non-renewable resource crimes, particularly involving copper, lithium and cobalt, have grown in prominence. The Copperbelt region is a focal point for smuggling, and illicit mineral exports significantly undermine legitimate mining operations and contribute to substantial tax revenue losses. The discovery of additional minerals, including gold, has intensified illegal extraction and trafficking. Foreign actors, state-embedded officials and criminal networks coordinate these activities, often bribing border officials to facilitate smuggling.

DRUGS

The heroin trade in Zambia is small, compared to its neighbours, but gradually expanding. The country is primarily a transit route for heroin trafficked from Mozambique, Afghanistan and Malawi to South Africa. Domestic consumption is limited but crime related to heroin trafficking has been observed in some urban areas.

Cocaine trafficking is an increasing concern in Zambia, with limited local consumption – particularly of crack cocaine – also reported. The trade is dominated by foreign actors and organized criminal networks. Brazil is identified as a key source country. Zambia functions as a transit hub and an emerging distribution centre, where foreign-controlled networks oversee operations and reap significant profits.

The cannabis market in Zambia is well established and the country is a major producer for local and regional demand. The government legalized medical cannabis under the 2021 Cannabis Act but implementation has been slow and illicit cultivation remains widespread. Cannabis is particularly popular among university students and domestic production ensures a steady supply. Zambia is also a key supplier to neighbouring countries. Enforcement efforts disproportionately target small-scale growers and consumers, while larger criminal networks involved in cultivation and trafficking operate with minimal interference.

Synthetic drug trafficking, though less prominent than other drug markets, is a concern in Zambia. Mandrax, primarily originating from India, has been trafficked into the country, making Zambia a transit and consumption site. The market is closely linked to South Africa, the primary source of other synthetic narcotics, particularly crystal meth (methamphetamine), which is increasingly consumed in Zambia. Limited regulatory capacity and enforcement gaps allow these substances to enter the market, sustaining demand and distribution networks.

CYBER-DEPENDENT CRIMES

Cyber-dependent crimes are an emerging challenge in Zambia, driven by the growing reliance on digital financial services and online platforms. Criminal networks and foreign actors engage in activities such as malware attacks and hacking, exploiting vulnerabilities in the cybersecurity

infrastructure. Law enforcement has made some arrests but the overall scale of cybercrime is difficult to assess due to underreporting and limited investigative capacity.

FINANCIAL CRIMES

Financial crimes are a concern in Zambia, where fraud, tax evasion, embezzlement and misuse of funds are frequently documented. Cyber-enabled financial fraud is becoming increasingly prevalent, fuelled by the widespread use of smartphones and digital financial transactions. Criminals exploit vulnerable individuals, coercing them into sharing personal information and conducting fraudulent transactions. Financial crimes such as embezzlement and misuse of funds are primarily committed by corrupt state-embedded actors, but cyber-enabled fraud is largely driven by foreign actors targeting digital payment systems and banking platforms.

CRIMINAL ACTORS

There is no significant evidence of mafia-style groups operating in Zambia. Lusaka-based street gangs, particularly the Chibolya gangs, have been the focus of police crackdowns for crimes such as aggravated robbery, abduction and assault. These efforts have reportedly led to a decline in gang-related offences in certain areas. The organized crime landscape is predominantly characterized by loosely affiliated criminal networks rather than rigid hierarchical structures. These networks are involved in a wide range of illicit activities, including human trafficking, human smuggling, drug trafficking, illicit trade of excisable and counterfeit goods, wildlife crimes and non-renewable resource crimes. Their operations are strategically positioned in key locations such as border points and the Copperbelt province, where cross-border transactions and resource exploitation are most viable. Despite their decentralized nature, these criminal networks wield significant influence, particularly through corruption. Many have targeted senior police officers with bribes to secure protection and avoid prosecution. There are reports that some criminal networks have contributed to political parties financially and secured access to well-placed politicians. However, while these groups have a strong economic presence, they do not appear to exert substantial influence over democratic processes. The transnational reach of these networks is notable, as they maintain links with regional and international criminal enterprises to facilitate the movement of illegal goods across borders. However, their primary mode of operation relies more on corruption and stealth than overt violence, which is relatively low.

State-embedded actors play a crucial role in the criminal economy, particularly at mid to low levels in government institutions. Corruption among immigration officers, especially at border posts, is a persistent issue. Low salaries and financial incentives have driven many officers to collude with criminal networks, facilitating illegal trade and human



smuggling while undermining regulatory enforcement. Zambia has a legacy of complicity among state actors in organized crime, and some individuals exploit their positions to extract state resources. This is especially evident in the evasion of taxes on illicit excisable goods, depriving the government of revenue. Recent corruption cases highlight vulnerabilities in the institutional framework, where corruption undermines efforts to combat organized crime.

Foreign criminal actors play a substantial role in the illicit economy, primarily operating in loose transnational networks. These actors are involved in high-value criminal enterprises, including human trafficking, arms trafficking, illicit trade in counterfeit and excisable goods, wildlife crimes, non-renewable resource crimes and drug trafficking. Some of these networks have also been linked to illicit activities in the pharmaceutical sector. Foreign actors strategically position themselves in major urban centres and border

towns, where they exploit geographic and regulatory weaknesses to facilitate cross-border trade. These actors maintain a strong economic presence but do not appear to exert political influence or engage in violent activities. Instead, they focus on leveraging Zambia's logistical and regulatory gaps to sustain their operations while avoiding confrontation with authorities.

Private sector actors, particularly professionals such as lawyers and accountants, have been increasingly implicated in Zambia's financial crimes. Reports indicate a rise in private sector involvement in money laundering and illicit financial flows. These professionals play an enabling role in high-value criminal enterprises, often exploiting weak compliance systems to facilitate money laundering schemes. Collusion between private sector actors and state-embedded officials is a feature of the financial crime landscape.

RESILIENCE

LEADERSHIP AND GOVERNANCE

Zambia's government has demonstrated a strong commitment to combating organized crime, particularly financial crimes, human trafficking and illicit trade. The country's leadership has taken steps to tighten border controls to address the trafficking of arms, humans and drugs, acknowledging Zambia's role as a key transit point for such activities. Opposition parties have not prioritized organized crime in their campaigns and there are no overt allegations linking the government to criminal actors. Organized crime networks exert influence in certain economic sectors, particularly through commodity smuggling. These groups often co-opt political elites to secure their influence, creating challenges for state institutions attempting to assert control over illicit markets. Public trust in the government is low, largely due to perceptions of corruption inherited from previous administrations. Zambia's democratic process is generally viewed as independent and resilient against criminal infiltration, but opposition parties face legal and practical barriers to fair competition. Restrictive laws also limit political space and online speech. During past election cycles, organized crime groups did not appear to exploit political conflicts, indicating a separation between criminal networks and the political landscape.

Zambia has taken steps to enhance government transparency and accountability, particularly through efforts to revitalize its Anti-Corruption Commission. The administration has encouraged whistle-blowers and pursued corruption cases, leading to numerous arrests. The government's commitment to transparency is underscored by the enactment of the Access to Information Act, which grants

citizens the right to request information from government institutions. The government also publishes its national budget, offering transparency in its public procurement processes. However, oversight by non-state actors and independent bodies is limited.

Zambia engages in international efforts to combat organized crime through various cooperation initiatives. The country is a signatory to many international agreements, including extradition treaties with international counterparts. Zambia's collaboration with INTERPOL and regional security organizations strengthens its capacity to address transnational criminal activities. Improvements in oversight mechanisms have enhanced accountability among agencies responsible for tackling cross-border crimes. Zambia's membership of regional frameworks, such as the Southern African Regional Police Chiefs Cooperation Organization and the Lusaka Agreement, bolsters its ability to coordinate with neighbouring states on transnational crime issues. However, the country faces significant challenges in its capacity to cooperate with international jurisdictions due to limited financial and institutional resources, gaps in regulatory oversight, and difficulties in effectively managing illicit financial flows in its economy.

Zambia has established a relatively comprehensive legal framework to combat organized crime, covering areas such as human trafficking, drug trafficking, wildlife crimes and cyber-related offences. Penalties are aligned with international standards. However, gaps remain in coverage and enforcement. Legislative attention to human smuggling and the illicit trade of excisable goods has been limited,



though efforts are under way to update laws on human smuggling and decriminalize consent-based smuggling to better protect victims. Despite tangible policy advancements, including the enactment of the 2021 Narcotic Drugs and Psychotropic Substances Act and the Cyber Security Act and Cyber Crimes Act in 2025, implementation is hindered by inadequate funding, affecting the overall effectiveness of these measures.

CRIMINAL JUSTICE AND SECURITY

Zambia's judicial system has taken steps to address organized crime, including the establishment of a specialized court for economic and financial crimes. However, systemic challenges persist, such as case backlogs, limited resources and inefficiencies in judicial processes. Many cases of organized crime, particularly human trafficking cases, depend on international support for prosecution. The judiciary also faces political pressures, and the absence of a witness protection programme complicates efforts to secure convictions of organized crime figures. Prison conditions are poor due to overcrowding and slow legal proceedings, and limited evidence suggests organized criminal control in detention facilities. Law enforcement efforts to combat organized crime are hindered by corruption, inadequate funding and low salaries. Some police officers reportedly engage in organized crime for financial gain, contributing to public mistrust. Budgetary constraints affect police operations and officers sometimes require citizens to cover the costs of investigations, disproportionately affecting lower-income communities. Zambia's extensive porous borders exacerbate these challenges, making the country particularly vulnerable to human trafficking, illicit commodity smuggling and cross-border crimes. Despite these difficulties, Zambia's specialized unit for combating human trafficking has demonstrated effectiveness in victim identification, supported by international training initiatives. However, overall intelligence gathering and response capabilities are limited.

Maintaining territorial integrity is a significant challenge for Zambia, given its lengthy and loosely regulated borders shared with eight countries. Corruption in law enforcement and border control agencies facilitates smuggling activities, including illicit commodities and human trafficking. The country's position along a major trafficking route between the Horn of Africa and southern Africa complicates enforcement efforts. Zambia has deployed additional border guards to high-risk areas, such as the DRC border, but corruption and a lack of technological resources undermine border security operations.

ECONOMIC AND FINANCIAL ENVIRONMENT

Zambia has made significant strides in anti-money laundering initiatives, aligning with international financial oversight standards. However, it has yet to implement a national strategy specifically targeting illicit financial flows, though efforts are

under way to adopt a comprehensive anti-money laundering and counter-terrorism financing policy. The establishment of a transfer-pricing unit in the Zambia Revenue Authority represents a proactive measure to prevent corporate tax evasion and transfer mispricing, but resource constraints limit its effectiveness. Zambia is not on any international financial blacklist and there is no evidence of emerging platforms such as crowdfunding or online gambling being exploited for money laundering purposes.

The economic regulatory environment presents strengths and vulnerabilities. The Business Regulatory Review Agency oversees regulatory frameworks but weaknesses in tax administration and lax supervision of financial activities contribute to the country's susceptibility to illicit financial flows. Corruption is a concern in public-private partnerships, and non-competitive sourcing of contracts creates opportunities for misconduct. Zambia's economic recovery has been slow and GDP growth has fallen short of government targets. Structural issues, such as energy shortages and reliance on copper exports, affect financial stability. Efforts to enhance financial transparency include amendments to the Companies Act to improve beneficial ownership disclosure, but enforcement challenges persist.

CIVIL SOCIETY AND SOCIAL PROTECTION

Victim and witness support mechanisms in Zambia are underdeveloped, particularly for victims of human trafficking. Shelter facilities outside major urban centres face limitations in space, staff training and integration services. Despite that, the Ministry of Community Development and Social Services opened a new shelter for victims of trafficking and gender-based violence, raising the total number of available shelters to six. Legal provisions intended to protect victims sometimes fail in practice, as trafficked individuals may still face penalties for unlawful acts committed under duress. Drug rehabilitation services are similarly inaccessible to much of the population due to cost barriers, despite ongoing efforts to expand treatment facilities. The Public Interest Disclosure (Protection of Whistle-blowers) Act aims to safeguard individuals reporting corruption and crime, but retaliatory actions against whistle-blowers are a significant issue.

Crime prevention efforts focus on human trafficking and wildlife crime, and government oversight is provided by an interministerial committee. Labour inspections are conducted to regulate recruitment agencies and prevent fraudulent job offers that could lead to exploitation. Wildlife conservation initiatives are supported by NGOs working with national parks authorities to combat poaching and illicit trade. However, prevention measures in urban areas remain limited, particularly regarding organized crime activities involving unemployed youth. There is little evidence of consumer awareness programmes aimed at reducing public participation in illicit markets.



Non-state actors play a mixed role in Zambia's resilience to organized crime. Civil society organizations are active in supporting victims and training law enforcement, but their capacity to directly combat organized crime is limited. Media freedom is constrained and journalists face government restrictions, harassment and legal action. Media conditions have improved under the current administration but economic challenges and weak legislative protections limit investigative journalism. Social media is increasingly being used as a tool for exposing corruption and criminal activities, but concerns remain about its potential misuse. Despite these constraints, civil society engagement in crime-related issues has grown, signalling incremental progress in fostering public accountability.

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