

U4 HELPDESK ANSWER 2025: 16

Border corruption across the Western Balkans region

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The Western Balkans is a transit region for smuggling of migrants, trafficking in persons and illicit trade. These illicit activities often perpetrated by organised criminal groups lead to heightened risks of corruption among border officers and customs officials. Dedicated policy responses to border corruption are generally underdeveloped, but there are some emerging positive developments at the national level as well as increasing regional cooperation efforts.

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[Organised criminal groups' use of corruption and physical threats against customs officials \(2023\)](#)

[Western Balkans and Turkey: Overview of corruption and anti-corruption \(2019\)](#)

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Query

How does corruption enable illicit trade, trafficking in persons and smuggling of migrants across Albania, Bosnia and Herzegovina, Croatia, Kosovo¹, Montenegro, North Macedonia and Serbia?

Main points

- Border corruption occurs when border guard and customs authorities accept undue benefits from private actors to enable criminal activities, which may include trafficking in persons, smuggling of migrants and various forms of illicit trade, such as the smuggling of cigarettes and counterfeit commodities.
- Certain factors put the Western Balkans at risk for border corruption, including its status as a transit region for such activities, the presence of organised criminal groups and the under-resourced capacities of border authorities.
- The lack of comprehensive, comparative studies makes it difficult to determine the full scale of border corruption or the extent to which it enables these crimes in the region. Nevertheless, in most Western Balkan countries, there have been various reports and even arrests of border authorities for engaging in corruption in recent years.
- For example, in 2024, Croatian authorities uncovered a smuggling operation in which customs officials reportedly accepted bribes of up to €1,500 to allow the passage of vehicles carrying migrants into Italy. Similarly, in 2022, a joint operation led by Albania and Kosovo resulted in the arrest of 58 border police officers from both countries, suspected of taking bribes in return for enabling the illicit movement of various goods.
- As is generally the case beyond the region, there appears to be a lack of dedicated national frameworks for addressing border corruption in the Western Balkans. However, the existence of recent regional projects and other interventions indicate increased stakeholder willingness to address such risks.
- Furthermore, the European Commission has considered anti-corruption efforts regarding border guards and customs authorities in its enlargement reports on the accession process for Western Balkan countries, albeit not systematically.
- The broader literature recommends a holistic set of preventive and reactive measures to counter border corruption, including risk management, internal monitoring, investment in and training of border officials, reporting channels and sanctions. Evidence suggests some of these measures are being used across the region.

¹ This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

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Introduction: border corruption

This Helpdesk Answer explores to what extent border corruption acts as an enabler in the smuggling of migrants, trafficking in persons and illicit trade in the Western Balkans region,² and explores the policy responses and mitigation measures developed to counter it.

Jancsics (2019: 2-3) states that ‘border corruption occurs when border law enforcement officers, whose job is to collect revenue and ensure security, are bribed in order to not perform their duty and to act against their organization’s policy and the law’. They note that there is wide variation in how states organise their border management forces, and tasks such as controlling the movement of people and collecting customs duties may be carried out by one or multiple, separate bodies (Jancsics 2019: 2-3); furthermore, while border corruption can also involve employees of private companies working in airports or ports, the focus is usually on public authorities (Jancsics 2020: 216).

Similarly, Chêne (2018) describes how the term is largely used to describe forms of corruption occurring at border points that implicate customs administration and border guard forces. However, they note that while bribery is one of the most common forms, border corruption can also manifest differently, for example, as collusion with organised criminal groups and the exchange of sexual favours (Chêne 2018).³ Indeed, in some situations, border corruption can extend to higher, political levels, leading to the capture of public functions and decision-making processes related to border management policies (Broad and Lord 2018).

Broad and Lord (2018) describe how border corruption often takes the form of private actors, especially organised criminal groups, providing undue benefits such as bribes to border officials so that the officials either actively or passively enable their criminal activities. Such activities include – but are not limited to – trafficking in

² This paper follows the categorisation largely followed by the European Union which considers Albania, Bosnia and Herzegovina, Croatia, Kosovo, Montenegro, North Macedonia and Serbia as the countries comprising the Western Balkans (European Parliament n.d.).

³ For a more detailed overview of the different forms of corruption that border officials actors may engage in, see: Chêne 2018: 8-10.

persons, smuggling of migrants and forms of illicit trade, which are the focus areas for this Helpdesk Answer.

Corruption and trafficking in persons and smuggling of migrants

Trafficking in persons (TIP) and smuggling of migrants (SoM) both concern the movement and delivery of people from one location to another, frequently across an international border in violation of a country's laws (although TIP can also occur domestically without borders being crossed). As Chêne (2018: 20) notes, however, SoM often involves a consensual agreement between the smuggler and the migrant to bring the latter to a defined destination, whereas for TIP, the relationship between trafficker and victim is normally based on fraud, coercion or force for the exploitation of the victim (Chêne 2018: 20). Both crimes put people in positions of extreme vulnerability.

The role of corruption in enabling SoM and TIP at borders is often similar, especially when officials receive undue benefits to facilitate the transportation of migrants and trafficking victims, for example, by ignoring checks or even by providing identity papers, visas or permits (Chêne 2018: 20; UN Working Group on Trafficking in Persons 2023). Smugglers and traffickers may rely on corruption as a tactic especially where border controls are tight and there is a high likelihood of detection (Broad and Lord 2018).

However, research indicates that corruption can influence other stages of TIP and SoM, for example, by affecting the criminal justice response by hindering investigations, complicating prosecutions and intimidating witnesses (UN Working Group on Trafficking in Persons 2023). Furthermore, corruption enabling TIP and SoM may go unchallenged and even be normalised due to the lack of incentives for state employees to address it and the absence of protection for whistleblowers (Đorđević and Petrovic 2024: 7). According to some international organisations, SoM and TIP rarely occur on a large scale without corruption acting as an enabler (UN Working Group on Trafficking in Persons 2023; OECD 2016a). Nevertheless, the exact extent of corruption in the context of TIP and SoM can be difficult to determine, given the scarcity of data and hidden nature of the crimes.

Corruption and illicit trade

Unlike SoM and TIP, there is no widely accepted definition of illicit trade, and the term may be used to encompass activities ranging from illicit smuggling and trading

of counterfeit goods, medicines, excise goods such as cigarettes and alcohol, as well as wildlife products, narcotics, weapons and cash (OECD n.d.). While this Helpdesk Answer primarily focuses on counterfeit goods and excise goods, such as cigarettes, it is noted that other forms of illicit trade are widespread across the Western Balkans region, such as narcotics trafficking (Kurtic 2025) and cash smuggling (GI-TOC 2022a).

TRACIT (2024: 5-6) notes that corrupt border officials who enable one illicit activity (such as SoM or TIP) are likely to also enable other activities, such as the transit of counterfeit commodities. Indeed, there is a significant overlap in border corruption patterns across these. Costa and Kassa (2025) describe how organised criminal groups seeking to smuggle goods may use corruption to ensure border officials refrain from conducting controls, share confidential information regarding surveillance schedules or even directly support them by storing or moving illicit goods on their behalf. Additionally, even traders of licit goods may engage in corruption of officials to avoid declaring goods and paying taxes or to speed up border procedures (Costa and Kassa 2025). Furthermore, the TRACIT (2024: 7) emphasises that corruption can occur at virtually any stage in the supply chain of illicit trade, including the prevention of investigations against suspects. Cascone et al. (2025: 15) stress that border corruption enabling illicit trade incurs not only financial and tax losses but also wider negative impacts, such as on health, due to the circulation of potentially damaging counterfeit goods.

Risk factors for border corruption in the Western Balkans

In its analysis, the United Nations Office on Drugs and Crime (UNODC) (2020: 14) found that corruption and organised crime are matters of great concern to all Western Balkan countries, mainly because bribery at the borders is a critical enabler for many criminal activities. This section highlights some of the main risk factors which contribute to this enabler.

Status as a transit region

While serving, to a certain extent, as a destination for migrants, trafficking victims and illicit goods, the Western Balkans faces a high prevalence of these criminal activities largely on account of its status as a transit region.

In 2015, the Western Balkans were considered the primary transit route for irregular migration from the Eastern Mediterranean into the European Union, which fostered both SoM and TIP (Sterjoski and Bozinovska 2019). While steps were taken by the European Union and the Western Balkan governments to close the 'Balkans route', Kemp et al. (2021: 5) note relatively high migration flows persisted, including

through new smuggling channels and smuggling hotspots, especially via Bosnia and Herzegovina (see Figure 1).

Figure 1: SoM hotspots across the Western Balkans



(Source: Kemp et al. 2021:7)⁴

Furthermore, acute TIP risks persist, with women and unaccompanied minors, particularly Roma children, being especially vulnerable (Integral Human Development 2022: 4). According to the 2024 UNODC Global Report on Trafficking in Persons, in 2022, in Albania, Bosnia and Herzegovina, Montenegro, North Macedonia and Serbia, among other countries in Central and Southeastern Europe,

⁴ For a more detailed overview of the SoM hotspots at border points across the region, see: Kemp et al. 2021: 7-9.

nearly half of all detected victims were women (46%), while 28% of the children were girls, compared to 6% of boys and 20% of men (UNODC 2024a). Sexual exploitation accounted for nearly half of all detected cases, followed by forced begging (7%), mixed exploitation (7%) and forced criminality (3%).

The Western Balkans also serve as a transit region for forms of illicit trade. Jancsics (2020: 217) notes that regionally based organised crime groups cooperate and source illicit goods from other groups based across the Middle East and Latin America and transit them through Western Balkan countries by bribing border officials, with the aim of integrating them into the EU market. UNODC (2020: 54) analysed data of counterfeit goods seized by Western Balkan law enforcement agencies during the 2010s and found that seizures mainly ranged from ‘cigarettes, clothing, footwear, watches, sunglasses, handbags, toys, mobile phone accessories to industrial commodities and falsified medical products’, while noting that many of these originated from China, Turkey and the United Arab Emirates. Rutgers and Ierace (2019: 10) describe how many cigarette smugglers rely on Western Balkans countries to transport cigarettes to both the European and Turkish markets.

Presence of organised crime

Another risk factor is the presence of organised criminal groups in the region. Organised criminal groups’ use of corruption often presents unique challenges; notably, when it is combined with the threat of physical violence, enhanced responses to protect border officials may be required (Bergin 2023b). Furthermore, as Broad and Lord (2018) point out, organised criminal groups may be effective at gathering intelligence and local knowledge about routes and border controls, for example, identifying the officials who may be most vulnerable to corruption.

Stanković (2022: 7) describes how many groups first gained a powerful foothold in the region during the 1980s when there was a political power vacuum. Furthermore, socio-economic conditions and a lack of employment opportunities have driven some young people to become involved in organised crime (UNODC 2020: 14). Currently, many groups are able to carry out sophisticated operations, having developed international networks and with a membership spanning multiple countries in the region (Stanković 2022: 4). For example, GI-TOC points out that organised criminal groups involved in SoM networks benefit from pre-existing criminal connections, extensive knowledge of the local terrain and corruption within law enforcement agencies (GI-TOC 2025).

Border authorities

Border guard and customs authorities working on the frontline are often accorded broad discretionary powers over decisions on which people and goods can cross borders, giving rise to corruption risks (Jancsics 2020; TRACIT 2024: 11).

Furthermore, the working conditions such border authorities experience may also play a role in heightening their propensity to engage in corruption. Chêne (2018) describes how inadequate resources, understaffing and inadequate salary levels can all lead to unsatisfied personnel and drive border corruption. These can also decrease the likelihood that cases of border corruption are detected and sanctioned.

There is some evidence suggesting these dynamics are also at play in the Western Balkans. Analysing police forces more broadly, the Global Initiative Against Transnational Organized Crime (GI-TOC 2022b) found that salary levels were generally low, which gave rise to corruption vulnerabilities. In an older study focusing on the experiences of EU countries, including Croatia, the Centre for the Study of Democracy (2012: 13) found that wide salary disparities among border guard personnel acted as a driver for border corruption. The Economic Intelligence Unit (2018a: 17) ranked European countries' resilience to forms of illicit trade, including by assessing the 'customs environment' which 'measures how effectively an economy's customs service manages its dual mandate to facilitate licit trade while also preventing illicit trade'. Bosnia and Herzegovina, Croatia, Montenegro and Serbia all ranked in the bottom quadrant of the 34 European countries considered, while the remaining Western Balkan countries were not assessed.

While commending achievements reached in certain aspects, the European Commission has also highlighted some issues with border management authorities in its enlargement reports on Western Balkan countries as part of the accession process. For example, it flagged that the border police and customs authorities in Bosnia and Herzegovina were understaffed, which also undermined their investigative capacities (European Commission 2024a: 51; 80). Similarly, it found that in Serbia, significant investment was needed in human, financial and technical resources for border control and customs operations (European Commission 2024f: 51; 93). It also determined that in Montenegro, critical gaps existed in terms of border surveillance infrastructure and equipment (European Commission 2024d: 98). These capacity issues may also extend to authorities charged with investigating corruption more widely. For example, the European Commission (2024e: 32) found that the public prosecutor's office for prosecuting organised crime and corruption (OCCPPO) in North Macedonia faced insufficient budget and staffing levels.

Political and judicial interference

Some authors suggest that interference from political and judicial actors in the Western Balkans may undermine accountability for border corruption. Zvekić and Vlasis (2024) argue that there is a general perception across the Western Balkans that police forces maintain excessively close relationships with both certain political parties and organised criminal groups, making them particularly susceptible to outside influence. The GI-TOC (2019: 33-34) also describes similar dynamics within the region, stating that ‘in some cases, senior border, customs and police officials are appointed by a political party, creating a protection pyramid where the law enforcement officials do what their political masters tell them, and in return create conditions for the trafficking that enriches the corrupt politicians’.

Concerns have also repeatedly been raised about the effectiveness and potential politicisation of the judiciary in the Western Balkan countries, for example, in the European Commission’s enlargement reports as part of the accession process. This includes the politicised appointment of judges and prosecutors, and efforts to undermine the proper implementation of laws and rules (Zúñiga 2020). In this sense, there is a risk that criminal justice systems may not be sufficiently robust to address border corruption. Sterjoski and Bozinovska (2019: 35) note that in North Macedonia, despite the suspicion of involvement of some police officers in the crimes perpetrated by organised criminal groups engaged in the smuggling of migrants and trafficking in persons between 2016 and 2018, not a single police officer was convicted in the criminal proceedings.

In Albania, a former judge at the court of appeals in Korçë was found guilty of corruption after accepting a bribe of €6,000 to alter the detention status of a citizen who was arrested for smuggling migrants (Hallunaj 2024: 211). Nevertheless, as described in the following section, there has been a recent set of examples from across the region where border officials were charged or even convicted for engaging in corruption.

Extent of border corruption across the Western Balkans region

From a review of the available literature, it appears no comprehensive or comparative studies have been undertaken on the scale of border corruption across the Western Balkans region, including to what extent it acts as an enabler of SoM, TIP and illicit trade. Similarly, UNODC (2020: 12) holds that, while it is clear that corruption at the border is one of the enablers of all forms of transnational organised crime in the Western Balkans, there is not enough evidence to identify clear patterns and further research is needed (UNODC 2020: 12)⁵.

In some cases, border authorities concede their own internal challenges with corruption. This is the case with testimonies collected from policewomen for the report 2023 “Strengthening Border Police Capacities through Empowerment of Policewomen in the Western Balkans” (Golubova 2023). In particular, policewomen from Bosnia and Herzegovina, Serbia, Albania and Kosovo acknowledged challenges at border controls related to document fraud, false representation and corruption. However, in other cases, such concessions may not be forthcoming. For example, in one study, the Serbia Border Police Directorate (UGP) stated its belief there was no major risk of corruption among its staff, contrary to the assessment of another state body – the Internal Affairs Sector of the Police (SUKP) – which stated there was a high risk of corruption among border police officers (Đorđević 2020: 4).

There are isolated, but recurrent reports of border corruption across the region, including arrests and eventually convictions of officials. A selection of these is included below, but they should be treated as illustrative and cannot be necessarily considered as representative of the actual levels of border corruption across the individual Western Balkan countries.

⁵ The UNODC 2020 report provides some statistics on rates of public officials being prosecuted for corruption in Western Balkan countries in the 2010s, but this is not disaggregated to the level of border or customs officials.

Smuggling of migrants and trafficking in persons

In the past decade across the Western Balkans region, there have been various reports of border officials enabling SoM in return for bribes. Given that it is difficult to ascertain whether or not the relationship between the smuggler and migrant involved coercion, these cases may also have involved victims of TIP.

In 2025, Albania's Special Anti-Corruption Prosecutor's Office (SPAK) has charged 27 members of organised criminal groups that were suspected of smuggling 650 migrants into Europe via Albania. The authorities reported that officials from Albania's border police allegedly facilitated visa approvals in exchange for bribes (TEMA 2025). A performance assessment report of the Special Prosecution (SPAK) and special courts against corruption and organised crime 2020-2023 in Albania flagged the involvement of complicit officials in human trafficking and migrant smuggling at border crossings (Hallunaj 2024: 125). Furthermore, the report highlights the case of a human trafficking network that operated across multiple countries, including Albania, Greece and several other European nations, which benefitted from impunity granted by corrupt border officers (Hallunaj 2024: 232).

In 2024, the Croatian Office for the Suppression of Corruption and Organized Crime (USKOK) charged nine Croatian nationals in relation to a smuggling operation over the border with Italy. This included an unspecified number of customs officials who reportedly accepted bribes of up to €1,500 to allow the passage of vehicles carrying migrants (TVPWorld 2024). One key informant in a 2023 study alleged that Croatian police were increasingly taking bribes and turning a blind eye to SoM, often to compensate for their low salaries (Clewett et al. 2024: 14).

A 2022 report from the Balkan Investigative Reporting Network (BIRN) alleged that Serbian police and security authorities supported the operations of and protected a migrant smuggling group active around Serbia's northwest border with Croatia (Dragojlo 2022).

Kemp et al. (2021: 49) highlight reports that in the area of Gjirokastra, Albania, smuggling fees paid by migrants typically include a quota to bribe border officials. Similarly, in the Muriqan-Sokobin border crossing between Kosovo and Montenegro, bus drivers were reportedly expected to pay bribes to the police to pass the border without difficulty (Prishtina Insight 2019).

According to the Macedonian Young Lawyers Association, there is suspicion that some smuggling groups cooperate with certain police officers who provide them with up-to-date information about police patrols, controls and ambushes (Sterjoski and Bozinovska 2019). Similarly, Siljanovska and Cvetanovska (2022: 20) highlight reports that border officers have assisted organised criminal groups by giving them

intelligence and allowing them to smuggle migrants undetected at the border crossing in Bogorodica, North Macedonia.

Illicit trade

In 2022, a joint operation led by Albania and Kosovo resulted in the arrest of 58 border police officers from both countries working at the Vermice border, largely suspected of taking bribes (albeit from citizens rather than organised criminal groups) to facilitate the movement of various goods (Isufi and Sinoruka 2022; GI-TOC 2022c). In the same year, Kosovo police arrested 48 border police and two customs officials on allegations of accepting bribes at two other border crossings with Albania, namely Qafe e Prushit and Qafe Morine (Isufi and Sinoruka 2022). GI-TOC (2022c) noted that between these two cases, an estimated 5% of Kosovo's entire border police force was being investigated on corruption charges, but also commended the internal investigation and regional collaboration exhibited by Kosovo's law enforcement.

Separately, in 2023, 13 border police officers in Kosovo were convicted for having accepted bribes of up to €200 to facilitate the passage of contraband trucks carrying various goods such as livestock, derivatives, alcoholic beverages and food products (Prishtina Insight 2023); video evidence collected by BIRN was used in court. Similarly in 2023, in the Kakavija region of Albania, two border officers were arrested on suspicion of having taken bribes to allow trucks carrying goods to cross the border without checks and avoiding customs dues (Kote 2023).

In 2024, the investigative journalism outlet Valter alleged it had uncovered evidence showing that customs authorities in Banja Luka – a city in Republika Srpska, Bosnia and Herzegovina – were enriching themselves through a regular process of exacting bribes from drivers aiming to clear border processes quickly, and from illicit traders seeking to smuggle counterfeit goods sourced from China (SpinInfo 2024)

In 2022, a Bosnian court convicted three border police officers and at least six other individuals for multiple criminal offences, including bribery in relation to smuggling and illicit trade of goods. The officers working at the Trebinje border area with Serbia reportedly accepted payments, gifts and other benefits to refrain from conducting the inspections they were required to perform; the leader of the border patrol was given a prison sentence of one year, while the other two were given suspended sentences (Transparency International 2022). Between 2017 and 2018, 14 customs officers and 11 border police officers on the Serbian side of the Trebinje border area were arrested and charged for taking bribes (GI-TOC 2019: 33-34).

An investigation by BIRN suggested that the former director of Bosnia's border police from 2014 until 2023 was being investigated for taking bribes in relation to large-scale tobacco smuggling (Kurtic 2024). In a separate scandal, a high-ranking officer in the border police orchestrated a bribery scheme between 2020 and 2021, essentially selling positions in the agency to unqualified candidates (Transparency International 2024).

The GI-TOC (2019: 8-9) reported that the Rača crossing point between Bosnia and Herzegovina and Serbia was a hotspot for a range of illicit commodities, and local customs and border police were 'notoriously corrupt, and have been implicated in smuggling and accepting bribes'. It also flagged reports that in the Tuzla region of Bosnia and Herzegovina, a police commander was charged with leaking intelligence to criminal groups and forging official documents to support smuggling operations (GI-TOC 2019: 33-34). Furthermore, it describes how Jažince/Globočičë border crossing in North Macedonia serves as a hotspot for the trafficking of various goods, and border officials receive orders and rewards from local party officials for facilitating such activities (GI-TOC 2019: 11).

In a rather dated case from 2011, Croatia authorities arrested 23 customs and police officers on suspicion of more than 100 corruption related crimes, mostly concerning the taking of bribes to ignore the illicit import of commodities into Croatia (BalkanInsight 2011).

In addition to land border crossings, maritime ports often constitute hotspots for corruption related to illicit trade (Kemp and Scaturro 2022: 20). For example, in Bar, Montenegro, more than 43 million cigarettes were confiscated entering the port in 2018, largely linked to two organised criminal groups; in the same year, ten customs officials based in the town were charged in relation to facilitating the smuggling of cigarettes (GI-TOC 2019: 14). A later investigation by the watchdog organisation MANS found evidence that companies engaging in cigarette smuggling through Bar port availed of opaque and complex legal arrangements to hide their beneficial owners based in Panama and other jurisdictions (MANS 2025). Furthermore, Scaturro (2023: 12) notes that corruption is also an issue at airports across the region, where airport security personnel may take bribes to facilitate illicit activities.

Policy and institutional frameworks

Border corruption is an issue that touches on multiple criminal activities, which has hindered the development of a single, cohesive policy framework for countering it. Arguably, the Revised Arusha Declaration, which was adopted by member states of the World Customs Organisation (WCO) in 2003, serves as the closest example of an international standard.⁶ The declaration states that effective national customs integrity programmes must address ten core considerations.⁷

However, this standard does not apply to all aspects of border corruption, such as border guards and their enforcement actions against SoM and TIP. These are the subjects of two of the three so-called Palermo Protocols to the United Nations Convention against Transnational Organized Crime (UNTOC), which do not explicitly address links with corruption.⁸

The UNODC notes that the approach to addressing corruption in cases of TIP has primarily been reactive, dealing with each instance individually rather than implementing an inter-agency strategy to prevent and tackle both crimes holistically (UN Working Group on Trafficking in Persons 2023). In response to the insufficient international efforts to jointly tackle TIP and corruption, the OECD published Guiding Principles on Combatting Corruption related to Trafficking in Persons in 2016.⁹ Similarly, the International Bar Association's Presidential Task Force against Human Trafficking (2016) has recommended the development of joint anti-corruption and anti-human trafficking frameworks. Likewise, the TRACIT (2024:9-10) has called for enhanced cross-cutting approaches to curbing corruption as it occurs in illicit trade.

⁶ As of 2025, all seven Western Balkan countries are members of the WCO.

⁷ The ten key factors are: leadership and commitment; regulatory framework; transparency; automation; reform and modernisation; audit and investigation; code of conduct; human resource management; morale and organisational culture; relationship with the private sector.

⁸ Namely, the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children and the Protocol Against the Smuggling of Migrants by Land, Sea and Air.

⁹ These principles are: 1) international cooperation and agreements; 2) jointly addressing and investigating trafficking in persons and corruption with a particular focus on at-risk sectors; 3) transparency and an integrity framework for at risk public officials; 4) awareness-raising and prevention measures for public officials and the public; 5) improvement of data collection and systematic use of information; and 6) lifting immunity in corruption and trafficking cases.

In practice, coordination on curbing border corruption can also be challenging given the presence of many overlapping actors. This includes the various law enforcement units responsible for addressing SoM, TIP and illicit trade respectively and, as Cascone et al. (2025: 20) state, the effective management of border corruption due to the lack of systematic cooperation between border guards and customs agents.

This background helps explain the lack of dedicated policy and institutional responses to border corruption at national and regional levels across the Western Balkans, although there are emerging exceptions and positive developments.

National level

In terms of national frameworks, it appears that Western Balkan countries have rarely undertaken dedicated responses to border corruption; rather, the threat tends to be addressed only through general anti-corruption frameworks. For example, in a study on Serbia, Đorđević (2020: 10-11) found that the border police directorate had not adopted any anti-corruption plans or undertaken a corruption risk assessment, but corruption was addressed via the implementation of the 2013 national anti-corruption strategy. However, Đorđević (2020: 11) highlighted that the strategy did not contain any specific measures for border authorities and therefore expressed doubts about its effectiveness. Nevertheless, in some cases, anti-corruption frameworks may be more tailored. For example, in its 2024-2028 anti-corruption strategy, Montenegro identified police and customs administration as one of the vulnerable areas most to corruption (European Western Balkans 2024). Indeed, in other cases, agencies do have dedicated task forces on corruption; for example, the Albanian customs administration has an anti-corruption and ethics department, which processes complaints and cases, and cooperates with other national law enforcement agencies in this respect (European Commission 2024b: 81).

In many Western Balkan countries, issues such as corruption, TIP and SoM are addressed through different strategies. However, even if these are not addressed jointly at the policy level, there may be an overlap in practice. For example, in Bosnia and Herzegovina, a special department dealing with organised crime and corruption is located within the prosecutor's office. This department investigates and prosecutes acts of corruption and organised crime under the jurisdiction of the court of Bosnia and Herzegovina, and has a dedicated focus on SoM and TIP, among other issues (Zvekic and Vlassis 2024).

Regional level

At the regional level, different mechanisms exist to counter threats related to border corruption and to facilitate cooperation across law enforcement agencies. For example, a strategic and operational agreement on police cooperation was established to collaborate on trafficking in persons, weapons, drugs and criminal networks between Europol and Albania, Montenegro, North Macedonia and Serbia (European Parliament 2021). INTERPOL also facilitates cooperation by enabling data sharing through a secure network called I-24/7, which allows real-time access to databases and sensitive, urgent police information for law enforcement agencies globally (INTERPOL 2022). Another recent initiative is the establishment of the first-ever international operations room in the Western Balkans, situated within the police directorate in Montenegro. Its purpose is to function as a 24/7 hub for the coordination and exchange of information among institutions responsible for law enforcement and is supported through the EU Support to Strengthen the Fight Against Migrant Smuggling and Trafficking in Persons in the Western Balkans (EU4FAST 2025). In 2022, the World Customs Organization (WCO) organised Operation Balkan Gate 2 in which ten customs administrations from the wider Balkans region participated, which culminated in the seizure of 2.3 million counterfeit goods (WCO 2022).

Nevertheless, Zvekić and Vlassis (2024) state that ongoing political disputes among Western Balkan countries limit the full potential of law enforcement cooperation exemplified, for example, by Serbia's opposition to Kosovo joining INTERPOL.

Regional anti-corruption initiative (RAI)

The regional anti-corruption initiative (RAI) is an intergovernmental regional organisation covering the nine member states: Albania, Bosnia and Herzegovina, Bulgaria, Croatia, Moldova, Montenegro, North Macedonia, Romania and Serbia. It promotes mutual learning and capacity building on anti-corruption, including its links with security and organised crime. In 2021, the RAI members adopted the [regional roadmap on anticorruption and illicit finance flows](#), which includes aspirations to enhance cross-border criminal justice responses to corruption in the region (RAI n.d.)

Policy efforts to address organised crime – including human trafficking and the smuggling of migrants – and corruption in Western Balkan countries have also been shaped by these countries' aspirations to join the EU and the enlargement agenda set by the EU. Croatia became an EU member state in 2013 and the other countries were at different stages of the accession process as of 2024 (see Figure 2).

Figure 2: Accession status of Western Balkans countries as of 2024

Country	SAA: entry into force	Membership application	EU candidate status	Decision to open accession negotiation	Status of accession process, April 2024
Albania	2009	2009	2014	2020/2022	Initial phase
Bosnia and Herzegovina	2015	2016	2022	2024	Preparatory stage
Kosovo	2016	2022			
Montenegro	2010	2008	2010	2012	Advanced
North Macedonia	2004	2004	2005	2020/2022	Initial phase
Serbia	2013	2009	2012	2013	Partly advanced
Croatia	2005	2003	2004	2005	EU member since 1 July 2013

Source: Dabrowski and Léry Moffat 2024

The EU has treated action against both organised crime and corruption as key accession criteria; in particular, the European Commission's strategy titled Credible Enlargement Perspective for An Enhanced EU Engagement with the Western Balkans highlights links between corruption and organised crime, the existence of corruption at all levels of government, strong entanglement of public and private interests, impunity and extensive political interference (Zúñiga 2018).

In enlargement reports published as part of the accession process, the European Commission has often found efforts to address corruption in the Western Balkans have stagnated (SELDI 2022: 14-15). In these reports, the European Commission has considered and made reference to anti-corruption efforts regarding border guards and customs authorities, albeit not systematically or consistently.

Furthermore, the EU has supported several interventions which include targeted elements on border corruption in the region. This includes, for example, a programme implemented by UNODC (including its regional office for southeastern Europe and the human trafficking and migrant smuggling section) in partnership with the WCO on promoting rule of law and good governance through targeted border control measures at ports and airports in Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia (UNODC 2024b). The first phase of the project resulted in 520 significant seizures of illicit goods, while the second phase of the programme (from 2024 to 2027) focuses on fostering regional networks of the relevant authorities, supporting the integration of innovative technologies and developing proactive measures to address emerging threats (UNODC 2024b).

The European Union has also supported the Fight Against Large-scale Corruption and Organised Crime Networks (FALCON) project, which includes a focus on corruption at border crossings and its role in enabling smuggling, human trafficking

and illegal trade (Basel Institute on Governance 2025). It aims to counter this largely through the development and roll-out of different technology assisted tools, such as automated corruption risk assessment and visual recognition for border corruption. Some Western Balkan countries, such as Serbia, have reportedly benefitted from these tools (Basel Institute on Governance 2025).

Other regionally active bodies have also undertaken interventions on border corruption. For example, the Organization for Security and Co-operation in Europe (OSCE) implemented a project called [Comprehensive Capacity-Building Initiative to Prevent and Counter Corruption by Internal Security/Oversight Departments of Border and Law Enforcement Agencies](#), with participation from Western Balkan countries as well as Ukraine and Moldova. The project aimed to improve cooperation between border and law enforcement agencies through the establishment and support of a regional anti-corruption platform and to deliver interactive training courses to these agencies on preventing and countering corruption (OSCE n.d.).

Civil society organisations have also been active in this space. The Observatory of Illicit Economies in Southeastern Europe is a platform comprising civil society actors from Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia (GI-TOC n.d.). These actors identify, analyse and map criminal trends from across the region, and the regular risk bulletins the Observatory produces often flag border corruption risks.

Mitigation measures

In this section, select mitigation measures against border corruption are described, including some examples of how these have been implemented in the Western Balkans region. The inclusion of both mitigation measures and examples are again illustrative and should not be considered as exhaustive.

In its study of border corruption risks across the EU member states, the Center for the Study of Democracy (2012: 13) distinguishes between preventive and reactive measures that can be undertaken in response. Preventive measures are largely under the remit of the border authorities and include the adoption of normative frameworks, training opportunities and recruitment policies. Reactive measures may be undertaken by internal units of these agencies, but may also rely on the wider involvement of criminal justice actors. Similarly, Fjeldstad and Raballand (2020:132) argue that countering corruption in customs requires a whole-of-government approach with ‘the commitment of other external control authorities (such as the police, prosecutors and judicial power)’.

Indeed, the literature on border corruption generally recommends that mitigation measures should be implemented holistically (Center for the Study of Democracy 2012: 13; Bergin 2023b). Furthermore, Costa and Kassa (2025) stress mitigation measures should not be viewed as static but rather evolve and respond to the shifting nature of border corruption.

Preventive measures

As mentioned above, the Revised Arusha Declaration emphasises a set of integrity measures for customs administrations to help prevent corruption. However, these also go beyond the aim of negating corruption to actually developing a positive set of attitudes and values across the organisation (WCO 2021: 13). The WCO maintains a periodically revised integrity development guide, which acts as a ‘comprehensive tool that addresses all aspects of an integrity development initiative undertaken by customs administrations’. (WCO 2021: 10).

The OECD (2016b) has also emphasised the centrality of an integrity approach to customs agencies to prevent the facilitation of illicit trade and smuggling, highlighting the importance of codes of ethics. In this vein, UNODC (2021: 46) recommends ‘standard operating procedures and codes of conduct must adopt a zero-tolerance approach to corruption and any involvement in other unlawful activities, including smuggling of migrants and trafficking in persons’. Similarly, in terms of

illicit trade, TRACIT (2024: 10) calls for robust agency specific measures to uphold transparency, integrity and ethical conduct. To address corruption risks, Montenegro's customs service drafted a new code of ethics in 2013. This defines what amounts to unethical conduct for officers. The code is matched by a system of internal sanctions and a board, as well as nominated trustees, to monitor the application of the system. Furthermore, the service initiated a training campaign to familiarise frontline customs officers with the code (WCO 2019: 48-49).

Another widely endorsed preventive measure is a corruption risk assessment. For example, the WCO has developed a [Guide To Corruption Risk Mapping](#) that advises customs administrations on how to detect and close risks in their operations (WCO 2015). In the context of border corruption, an organised crime threat assessment can also provide important insights (Bergin 2023b). An assessment was undertaken by South Korea's Ministry of Economy and Finance of Bosnia and Herzegovina's customs administration, which praised the administration for having in place a comprehensive risk management process to identify corruption risks and recommended streamlining the process in various ways (Ministry of Economy and Finance, Republic of Korea 2023).

In a report focusing on border corruption across the Southeast Asia region, the UNODC (2021:46) recommended several human resources policies to mitigate risks, including transparent and fair systems for recruitment and the promotion of officials and fair levels of remuneration. TRACIT (2024: 10) similarly recommends establishing clear criteria for the selection, training and vetting of candidates applying to join public agencies vulnerable to corruption and illicit trade. In North Macedonia, a legal amendment was introduced to ensure integrity testing is part of the recruitment process for all law enforcement roles, including the border guard and customs administration (Transparency International Macedonia 2023: 124).

Such integrity checks and monitoring can continue during the career of border officers. For example, undercover integrity testing is a measure used by law enforcement and other public agencies in some jurisdictions to prevent corruption (Resimić 2023). With European Union funding, Albanian customs authorities installed cameras to enable 24-hour real-time monitoring of staff, which reportedly led to higher detection rates for smuggling, better protection levels for staff and reduced instances of corruption (European Commission 2016). In 2023, Albania introduced a further integrity verification process within all law enforcement agencies, in which they had to declare of any use of specific encrypted communication tools as a response to the criminal infiltration and corruption risks (European Commission 2024b). In Kosovo, customs officers are by law mandated to submit

regular asset declarations, which should be scrutinised by the country's anti-corruption agency for any irregularities (European Commission 2024c: 78).¹⁰

Rotating staff between departments and duty stations is an established practice used in the customs sector to prevent the formation of new relationships or disrupt existing ones that may lead to corruption (Bergin 2023a: 2). Similarly, the UN Working Group on Trafficking in Persons (2023) recommended this as measure which could reduce corruption that enables SoM and TIP. The European Commission (2020:8) recognised that staff rotation formed part of the measures adopted by Serbia's border police to prevent corruption.

TRACIT (2024: 10) stresses that border agencies should invest resources to enable the continuous, career-long training on ethical conduct for public officials. Evidence suggests that training on corruption risks, including innovative simulation-based formats, can be effective in customs administrations (Bergin 2023b: 19). In Bosnia and Herzegovina, the border police reportedly require its officers to attend regular training on anti-corruption (European Commission 2024a: 51). Similarly, in Albania, training sessions as well as confidential counselling on integrity related matters are provided to the local border and migration directorates (GRECO 2025: 14).

Automation, especially of customs procedures, is often recommended as a preventive measure against border corruption, given that it can reduce the high level of discretion officials are typically accorded to carry out their duties (Bergin 2023b: 20). In this vein, TRACIT (2018: 2-3) also recommended that Bosnia and Herzegovina, Serbia and Montenegro increase automation in customs procedures to reduce the risks of corruption enabling illicit trade. Some automation tools can also enhance detection; with the support of the European Union, an automated IT system called SEED was developed that enables the exchange of customs data between authorities in Western Balkans countries and can uncover irregularities (WCO 2024).

Reactive measures

Reactive measures can help detect cases of border corruption and ensure perpetrators are held accountable. TRACIT (2024: 10) recommends that border authorities establish a robust reporting system for ethical breaches and provide adequate protections for whistleblowers against all forms of retaliation, as well as

¹⁰ A study by Transparency International found that more broadly across the region, there were shortcomings in verification of asset declarations in most countries, often due to resource constraints or the lack of requirements for verification for different categories of officials (Büchner 2024: 31).

independent and resourced agency specific units to investigate and apply international sanctions (TRACIT 2024: 10).

These can include internal whistleblowing mechanisms and external channels. For example, in 2021, Kosovo customs launched two applications to enable citizens and businesses to report potential malpractice by customs officials (Telegrafi 2021). Similarly, the Croatia customs administrations provides a toll-free number for reporting, accompanied by a public information campaign on what amounts to corrupt behaviour among customs officials (Republic of Croatia: Customs Administration n.d.).

However, identified cases of border corruption may be serious enough to require more than internal responses, such as sanctions handed down by a judicial body. Effectively curbing border corruption may therefore require broader reforms that safeguard the criminal justice system from political or judicial interference. For example, Marmullakaj (2022) describes how a new case management system developed in Kosovo reduced the opportunities for corruption in its justice system.

However, as described above, there have been promising instances in the Western Balkans where perpetrators of border corruption have been held accountable, often with sanctions that may be considered dissuasive. For example, in 2021 a Bosnian court handed down a prison sentence of nine years to the former director of the customs administration and he surrendered real estate valued at US\$1.06 million, the amount he was estimated to have received in bribes in return for giving importers of textiles from Turkey, China and Hungary preferential treatment (Ljubas 2021). The lack of available data on border corruption cases in the region suggests that the collection of information on the number of related investigations and sanctions could be enhanced.

Human rights-based approach

As alluded to above, both SoM and TIP are criminal activities that put people in positions of extreme vulnerability and risk violating their human rights. Some studies flag corruption risks and the treatment of migrants, for example, within assisted return programmes (Paasche 2018). Other studies have documented malpractice in border management practices across the Western Balkans region, such as the inadequate screening for trafficking victims (Xhaho and Tandili 2019) and the arbitrary detention of irregular migrants being returned contrary to lawful procedures (Sterjoski and Bozinovska 2019).

UNODC (2021: 47-48) emphasises that the respective Palermo Protocols place obligations on states parties to protect smuggled migrants and victims of trafficking, and these obligations extend to anti-corruption measures to, for example, allow such people to testify in criminal proceedings in a way that ensures their safety (UNODC 2021: 47-48).

This speaks to the relevance of a human rights-based approach (HRBA) towards addressing border corruption. The inclusion of HRBA in policymaking implies the identification of ‘rights holders’, who are entitled to rights by virtue of being human, and ‘duty bearers’, who are legally bound to respect, protect and fulfil those entitlements. It also aims to identify inequalities and ensure compensation for discriminatory practices that leave vulnerable groups behind. Under this approach, migrants and victims of human trafficking are rights holders whose dignity must always be respected. Governments, as duty bearers, should fulfil the obligations they have committed to under human rights law (United Nations Network on Migration 2023).

Considering the transnational aspect of border corruption, SoM, TIP and illicit trade, the success of reactive measures may also hinge on regional collaboration between various national actors. UNODC (2021: 48) highlights several ways states can cooperate to counter corruption and its links with TIP and SoM, including by sharing intelligence on corrupt activities at hotspots for TIP and SoM and by cross-verifying the integrity of travel and other documents. It also notes that mutual legal assistance in the context of criminal investigations and prosecution may be required, including to facilitate the extradition of offenders and seizure of assets deriving from the corruption. The existence of regional law enforcement cooperation mechanisms in the Western Balkans described above provide a strong basis for such collaboration, but arguably with the potential to be expanded.

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