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Illicit financial flows in North Africa

Sources, channels and counter-measures in Algeria, Egypt, Libya, Morocco and Tunisia

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Illicit financial flows from corruption and illegal markets drain public resources across North Africa. Embezzlement, undervalued sale of state assets and front-company schemes commonly appear in Algeria, Egypt, Morocco and Tunisia, while the diversion and cross-border smuggling of subsidised fuel feature in Libya's conflict economy. Case evidence shows that proceeds move through proxies and offshore vehicles and are held in companies, accounts and real estate, including in the EU, Switzerland, the UK and the UAE.

Legal frameworks largely meet international standards, but implementation lags. Corruption rarely features in suspicious transaction reports; estate agents and lawyers seldom report suspicious activity; prosecutions are often selective; and asset recovery from abroad has been slow. Crypto-assets appear to be an emerging risk.

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[Bergin, J. Illicit financial flows and development in Southeast Asia \(2025\)](#)

[Jenkins, M. Illicit financial flows, fragility and conflict \(2024\)](#)

[Castro Orduna, M. C. and Fraiha Granjo, A. The uses and impact of beneficial ownership information \(2023\)](#)

Caveat

The evidence base is uneven. Although the paper reviews literature from 2021–2026, many documented cases date from the 2000s and 2010s. The latest MENAFATF mutual evaluations date from 2016 (Tunisia), 2019 (Morocco), 2021 (Egypt) and 2023 (Algeria), and Libya has none. Case material draws mainly on Transparency International's sample of court records and media reports, and on NGO and UN reporting for Libya. The paper distinguishes between documented cases, estimates and allegations. IFFs are by definition cross-border, but the line between them and illicit funds that stay in-country is not always clear, especially when discussing sources. The paper therefore focuses on cross-border flows where possible, and on corruption and illegal markets rather than tax evasion or avoidance (summarised briefly in Box 1).

Query

Please provide a literature review of illicit financial flows in North Africa over the last five years, covering Algeria, Egypt, Libya, Morocco and Tunisia.

Main points

- North Africa recorded the highest financial crimes score of any African region in the 2025 Africa Organised Crime Index (7.83 out of 10), and its average criminality score rose from 4.73 in 2019 to 5.29 in 2025. The region now also scores highest in Africa for human smuggling and the cannabis trade.
- Corruption is a source of IFFs, an enabler of other crimes and a facilitator of cross-border transfers. Documented cases involve embezzlement, undervalued sales of state land and resources, inflated contracts, falsified invoices and the undue allocation of state privileges, often through front companies and family proxies.
- Illegal markets generate significant revenue for organised crime groups and complicit officials, part of which crosses borders. An estimated US\$20 billion of fuel was diverted in Libya in 2022–2024; Morocco remains a leading source of cannabis resin and a growing cocaine transit point; and gold smuggled from Sudan moves through Egypt and Libya to the UAE.
- Proceeds move through domestic banks and proxies, informal exchange and, in the largest cases, offshore companies and accounts in Europe and the UAE. Real estate at home and abroad is where most illicit wealth is stored. Recovery of assets from abroad has been slow.
- Laws largely meet FATF standards, but implementation lags significantly. Corruption features in only 5% of the suspicious transaction reports linked to a predicate offence in Algeria and in 3% of reports in Egypt.
- Regulation and supervision of non-financial businesses and professionals (DNFBPs) is an important gap. While case evidence demonstrates that real estate and property remains a high-risk asset class for criminals to hide and grow illicit wealth, real estate agents file almost no suspicious transaction reports in the countries for which data are available (Algeria, Egypt and Tunisia).
- Legal professions are a further weak link. Lawyers and notaries file almost no reports, supervision of them is weak or absent, and Morocco has not clarified when professional secrecy exempts lawyers from reporting suspicious transactions. Tunisian lawyers filed no reports in 2024.
- Institutional shortcomings hamper enforcement. Prosecutors control case initiation in Egypt and Tunisia, anti-corruption agencies in Algeria and Egypt cannot freeze assets, and prosecutions have been selective in four of the five countries, where civic space is also repressed or closed.
- Algeria, Morocco and Tunisia have central beneficial ownership registers; Egypt's register is accessible only to the registrar, and Libya has none. Registers alone are not enough: ownership data must be accurate, up to date and usable by investigators. Restricted access to property data and

weak cooperation with destination jurisdictions also hamper investigations.

- The evidence on crypto-assets as a channel for IFFs is thin. Morocco and Egypt rank among Africa's larger crypto markets, and Libya hosts illegal bitcoin mining on subsidised electricity, but no documented corruption related laundering case was found. Tunisia's financial intelligence unit has identified possible crypto payments to foreign illegal betting platforms. The paper treats crypto as an emerging risk to monitor.
- The evidence supports: prioritising action by destination jurisdictions; transparency and supervision of real estate and the legal professions; better use of financial intelligence; usable, verified ownership data; and measures targeting Libyan fuel and regional gold.

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Background

Defining illicit financial flows

There is no single agreed definition of illicit financial flows (IFFs). The UNODC–UNCTAD Conceptual Framework for the Statistical Measurement of Illicit Financial Flows defines them as financial flows that are illicit in origin, transfer or use, that reflect an exchange of value and that cross country borders (UNODC and UNCTAD 2020). The African Union/UN Economic Commission for Africa High Level Panel on Illicit Financial Flows from Africa (the Mbeki Panel) similarly describes them as money illegally earned, transferred or utilised that crosses borders (AU/ECA 2015).

The UNODC–UNCTAD framework, developed for Sustainable Development Goal indicator 16.4.1, groups IFFs into four categories by the activity that generates them: tax and illicit commercial practices; illegal markets; corruption; and exploitation type activities and terrorism financing, described in UNCTAD’s 2020 report as theft type activities (UNCTAD 2020: 19; UNODC 2023). Each category raises its own measurement problems. Flows are hidden by design, official data are incomplete, and the most cited estimates, such as trade value gaps, capture mainly commercial and tax related flows rather than proceeds of corruption or crime (UNCTAD 2020; GFI 2026).

Reuter (2017) argues that aggregate estimates obscure more than they reveal, and that responses must be matched to the specific source and channel of each flow. He identifies five interventions explicitly aimed at reducing IFFs: anti-money laundering laws and programmes, stolen asset recovery procedures, the automatic exchange of tax information between countries, country-by-country reporting of corporate profits and beneficial ownership registers. He frames IFFs as a governance problem as the same political settlements that generate illicit wealth also shape whether reforms are implemented. This paper follows that approach by disaggregating IFFs by source (corruption and illegal markets) and by channel (banks, legal entities, real estate, trade and informal finance).

Scope of this paper

The paper reviews literature published between 2021 and 2026 on IFFs from Algeria, Egypt, Libya, Morocco and Tunisia. It focuses on flows arising from corruption and illegal markets, and on anti-money laundering (AML), beneficial ownership and asset recovery responses. It therefore covers two of the four types of activity that generate IFFs in the UNODC–UNCTAD framework and three of the five policy responses

identified by Reuter (2017). Corruption is treated as a source of IFFs, as an enabler of other predicate crimes (for example, where officials “tax” smuggling or customs officers collude with traffickers) and as a facilitator of cross-border transfers (where officials accept falsified documents or fraudulent letters of credit that allow funds to leave the country).

Tax related flows, including trade misinvoicing by commercial actors, fall outside the main scope. They are summarised in Box 1 because estimates of trade misinvoicing dominate the IFF literature on the region. The two tax focused interventions identified by Reuter are mentioned only where they relate to corruption.

Scale of the problem

Capital flight from Africa, which captures trade misinvoicing and other balance-of-payment transactions, was estimated at US\$88.6 billion a year on average from 2013 to 2015, around 3.7% of the continent’s GDP (UNCTAD 2020: 181). Region specific estimates for North Africa are dominated by trade data. No North African country has yet produced official estimates of crime related IFFs under SDG indicator 16.4.1. UNODC has provided technical assistance in selected African countries, but its published pilot estimates cover countries in Latin America and the Asia-Pacific region (UNODC 2023). Global Financial Integrity estimates cumulative trade value gaps¹ for 2013–2022 of around US\$164 billion for Morocco, US\$131 billion for Egypt and US\$68 billion for Tunisia (GFI 2026). GFI’s data for Algeria cover only 2013–2017 (about US\$52 billion) and for Libya only 2016–2019 (about US\$9 billion), so they are not comparable (GFI 2026: 4).

In addition, North Africa recorded the highest financial crimes score of any African region in the 2025 Africa Organised Crime Index (7.83 out of 10), making financial crime the region’s highest scoring criminal market, ahead of human smuggling (7.75) and the cannabis trade (7.42). The region’s average criminality score rose from 4.73 in 2019 to 5.29 in 2025 (ENACT 2025a: 38).² The index does not attribute the rise to a single cause, but North Africa overtook East Africa in 2025 as the highest scoring region for human smuggling (7.75), has had the highest score for the cannabis trade in every edition, and had the second-highest regional score for the cocaine trade (4.83) (ENACT 2025a: 31, 42, 49).

¹ A trade value gap is the difference between the value of goods a country reports exporting to (or importing from) a partner and the value the partner reports for the same trade. Large gaps can indicate misinvoicing but could also arise for legitimate reasons.

² The Africa Organised Crime Index, produced by the ENACT programme, scores criminal markets and criminal actors from 1 (non-existent or little influence) to 10 (severe influence), and resilience from 1 (non-existent) to 10 (extremely effective).

In a sample of corruption cases from the Middle East and North Africa (MENA) compiled by Transparency International, stolen assets range from about US\$80,000 to nearly US\$13 billion (Transparency International 2026). A MENAFATF typologies study found that embezzlement by public officials accounted for 40% of corruption linked money laundering cases in MENA, abuse of function for 16% and bribery of national officials for 10% (MENAFATF 2019a). The study aggregates data across the region and does not separate North African countries from the Middle East.

Box 1. Trade misinvoicing and tax related IFFs

Trade misinvoicing occurs when importers or exporters misstate the price, quantity or quality of goods to move money across borders, evade customs duties or taxes, or circumvent capital controls. Global Financial Integrity's 2026 study of MENA uses mirror-trade analysis, which compares what countries report exporting or importing with what their trading partners report for the same trade, to estimate the resulting value gaps for 2013–2022. Morocco, Egypt and Tunisia are among the ten economies that together account for roughly 90% of the region's gaps (GFI 2026: 5). For Morocco and Egypt, these large absolute figures largely reflect large trade volumes; Tunisia's gaps remain high as a share of its trade, at about 22% (GFI 2026: 6).³

Trade-gap estimates mainly capture commercial and tax related flows, not the proceeds of corruption or crime that are the focus of this paper. Trade-based money laundering, in which criminal proceeds are disguised through over or under-invoiced trade, is discussed in the section on channels.

Regional dynamics

Three regional dynamics shape IFFs in North Africa. First, political transitions exposed the wealth accumulated by previous regimes. The fall of Zine El Abidine Ben Ali in Tunisia, Hosni Mubarak in Egypt and Muammar Gaddafi in Libya in 2011, and

³ GFI treats the value gaps, following the World Customs Organization, as "risk indicators rather than precise measurements of illicit activity" (GFI 2026: 2). It also notes that free trade zones and re-export trade make trade documents harder to follow and trade harder to attribute to the right partner (GFI 2026: 5). Economists have criticised mirror-trade estimates for producing inflated figures because they do not account for legitimate causes of discrepancies such as entrepôt trade (goods temporarily imported into one country and re-exported to another) and shipping costs (Carbonnier and Mehrotra 2024: 38). These estimates nonetheless remain the most common basis for modelling the economic effects of IFFs (Bak and Jenkins 2025).

the 2019 Hirak⁴ protests that ended Abdelaziz Bouteflika's presidency in Algeria, all triggered asset freezes abroad and domestic prosecutions. Fifteen years on, recoveries from abroad remain small (see country profiles).

Second, conflict in Libya and Sudan has created a war economy that spans borders. Fuel, gold, weapons and migrants move along shared routes, and the revenue finances armed groups (The Sentry 2025; Soliman and Baldo 2025). Some of this value demonstrably crosses borders, such as when diverted fuel is sold abroad or smuggled gold is exported to the UAE, and UNODC reports that much of the profit from drug trafficking in Libya is laundered and invested abroad (UNODC 2026: 31). However, evidence on how much of these proceeds leaves the region, rather than being spent locally or in neighbouring countries, is largely limited to individual cases and investigative reporting.

Third, Mediterranean migration corridors connect North Africa to Europe. Migrant smuggling and trafficking generated an estimated US\$978 million in revenue in Libya at the 2016 peak (Eaton and Yousef 2025: 6), and in Tunisia migrant smuggling accounted for over 61% of the suspicious transaction reports processed in 2024 (CTAF 2025). Some payments are made through informal channels: friends or family of detained migrants reportedly transfer ransoms to armed groups through black-market channels, but these flows are not quantified (Eaton and Yousef 2025: 49). Much of the revenue appears to be spent and reinvested locally, as in Sebha, where smuggling linked neighbourhoods have seen a boom in commerce and real estate construction (Eaton and Yousef 2025: 33–34). Morocco, for its part, received 322 requests for judicial assistance in 2024, 110 of them from France, with money laundering the most common subject (Présidence du Ministère Public 2025b).

⁴ The Hirak (Arabic for “movement”) was a mass, largely peaceful protest movement in Algeria that began on 22 February 2019. It was set off by President Abdelaziz Bouteflika's bid for a fifth term.

Regional overview: main IFF challenges

This section sets out the patterns common to the five countries. Country specific evidence and examples are presented in the country profiles.

Main sources of IFFs

Proceeds of corruption

Transparency International's review of detection and investigation in MENA identifies five recurring typologies in the North African cases (Transparency International 2026):

- direct embezzlement and bribery, documented in all five countries, from discretionary ministry budgets in Egypt to a long-running scheme at Morocco's national social security fund
- undue allocation of state privileges, such as customs and tax exemptions, subsidised loans and public land, most pronounced in Algeria, where the scale of the cases suggests systemic capture of institutions
- undervalued sales of state resources and inflated project costs in Algeria, Egypt and Morocco, which exploit information asymmetries about market value; examples include state land sold below market value in Egypt and Morocco and gas exported below market prices in Egypt
- falsified invoices, certificates and financial records in Algeria, Egypt and Libya, including letters of credit for fictitious imports
- state capture at regime level: firms connected to the Ben Ali family captured over 20% of private sector profits in Tunisia (Rijkers, Freund and Nucifora 2014), and the head of Libya's Gaddafi-era ODAC misappropriated an estimated US\$6–7 billion through inflated contracts and advance payments (Transparency International 2026)

Illegal markets

The principal illegal markets that generate IFFs in the region are:

- Fuel diversion and smuggling in Libya: an estimated US\$20 billion of fuel was allegedly diverted from the Libyan market in 2022–2024 through opaque crude-for-fuel swaps, mainly by networks linked to the Libyan Arab Armed Forces with the tacit acceptance of senior officials, and smuggled abroad by sea and land, including US\$6.7 billion in 2024 alone (The Sentry 2025).
- Drug trafficking: Morocco remains the main source of cannabis resin seized in North Africa (UNODC 2026: 21), and its cocaine market has grown, with large seizures at the port of Tanger Med in January 2024 (ENACT 2025a: 50). Libya has become “an emerging node for the onward trafficking of cocaine to multiple markets”, with shipments arriving directly from Ecuador, Colombia and Brazil, and also serves as a node for cannabis resin and a transit country for tramadol and pregabalin (UNODC 2026: 6, 26–27).
- Migrant smuggling and human trafficking along the central Mediterranean routes through Libya, Tunisia and Algeria. In Libya, armed groups and municipal authorities levy “taxes” on illicit economies and issue papers that allow smugglers to move (Herbert, Horsley and Badi 2023: 5); in Tunisia, migrant smuggling accounted for over 61% of the suspicious transaction reports processed by the financial intelligence unit in 2024 (CTAF 2025).
- Gold smuggling from Sudan and the Sahel through Egypt and Libya, with the UAE as the main destination. Unofficial exports to Egypt are estimated to account for about 60% of gold production in three Sudanese states, more than 60 tonnes in 2023 and 2024 (Soliman and Baldo 2025; Swissaid 2024).

Extortion and protection racketeering is not a region-wide issue in North Africa. The Africa Organised Crime Index scores it at 3.0 in Algeria and 3.5 in Egypt and Tunisia, against 5.5 in Morocco and 9.0 in Libya, where armed groups tax smuggling and control checkpoints (ENACT 2025b–f). The paper therefore addresses extortion only in the Libya profile.

Channels and enablers

Corruption as an enabler

Eriksson (2017) identifies five intersections between corruption and IFFs. All five are documented in North Africa:

- Corruption facilitates the crimes that generate illicit funds: officials and armed groups tax or protect fuel and migrant smuggling in Libya (The Sentry 2025; Eaton and Yousef 2025; Herbert, Horsley and Badi 2023: 4–5).

- Corruption is itself a source of illicit funds: embezzlement, bribery and undervalued sales of state assets are documented in all five countries (Transparency International 2026).
- Corruption facilitates illegal transfers by inducing oversight officials to look the other way: falsified documents and fraudulent letters of credit have moved funds out of Algeria, Egypt and Libya (Transparency International 2026; ENACT 2025d).
- Corruption hollows out the institutions that should detect IFFs: state-embedded actors in Libya use official tools to manage criminal markets, and anti-corruption bodies in Algeria, Egypt and Tunisia lack powers or independence (Herbert, Horsley and Badi 2023: 6; ENACT 2025d; Transparency International 2026).
- Corruption can facilitate the use of funds once they have crossed borders: in documented cases, proceeds were held in property, companies and accounts in EU member states, Switzerland, the UK and the UAE (Transparency International 2026).

Banks, proxies and informal finance

Domestic banks are usually the first stop for illicit funds, before any transfer abroad, typically through accounts held by spouses, children or other proxies (Transparency International 2026). Informal channels sit alongside them. Egypt's informal savings pools (*gameyas*) have been used to move illicit funds (Transparency International 2026). Unofficial currency exchanges operate openly in Algeria and in Tunisia's border regions (ENACT 2025b; ENACT 2025f), and *hawala*⁵ networks serve migrants and smugglers. Large cash economies compound the problem; for example, in December 2025, Algeria's central bank banned cash deposits into commercial bank accounts, citing money laundering risks (TSA 2025).

Legal entities and beneficial ownership

Front companies with family members of officials and politically connected individuals as shareholders recur across the reviewed country cases (Transparency International 2026). Beneficial ownership transparency remains weak (Transparency International 2025):

- Algeria, Morocco and Tunisia have live central registers, but only Morocco's and Tunisia's are open to the public, for a fee; Algeria has yet to adopt the ministerial

⁵ *Hawala* is an informal way of moving money that relies on trust between brokers (*hawaladars*) rather than on money physically crossing a border. The word comes from Arabic and roughly means "transfer".

decision needed for public access (Transparency International 2025: 5); Libya has none, and Egypt's register, introduced in 2020, is accessible only to the registrar (Open Ownership n.d.).

- Only Algeria and Morocco require the register authority to verify the information.
- Algeria, Morocco and Tunisia require legal entities to report any change to their beneficial owners, shareholders or directors to the register within 30 days (Transparency International 2025: 17).
- Libya does not require legal entities to hold or provide information on their own beneficial owners (Transparency International 2025: 17).
- Bearer shares remain permitted without meaningful safeguards in Algeria and Libya, and outside the capital market in Morocco.
- Nominee arrangements are largely unregulated in Algeria, Egypt, Libya and Morocco; Tunisia prohibits them.

MENAFATF's 2025 typologies report on legal persons and arrangements confirms the pattern across the region. Of the ten member countries evaluated in the second round, 60% "still require substantial improvements" in preventing the misuse of legal persons and arrangements. In the cases analysed, shell or inactive companies were the most common laundering technique (about 30% of cases), followed by complex, multilayered ownership structures (23%) (MENAFATF 2025b: 4, 40).

Experience elsewhere shows that having a register is not enough. Available evidence indicates that effective use of beneficial ownership information depends on how easily authorities and other users can access it, the functions a register offers and the quality of the data (Castro Orduna and Fraiha Granjo 2023: 15). Fees and prior registration requirements, as in Morocco and Tunisia, can delay access, while linking registers to tax, land and vehicle registers allows declared ownership to be cross-checked automatically, as in Austria, Belgium, the Czech Republic and Denmark (Castro Orduna and Fraiha Granjo 2023: 16–17). No North African country yet links its beneficial ownership data to other registers in this way (Transparency International 2026).

Real estate and luxury goods

Real estate and luxury goods registered to family members are used to store illicit wealth in all five countries, both at home and abroad, as the 4,213 properties seized in Algeria and the hotels in Scotland bought in the ODAC case illustrate (Transparency International 2026; Le360 2022). Property registers often do not offer comprehensive coverage and are accessible only case by case, and no country in the region has a real-time searchable property database or links company, ownership, property and asset declaration data (Transparency International 2026).

Offshore vehicles and destination jurisdictions

The largest and most politically connected cases rely on offshore companies, foreign bank accounts and foreign property. Common destinations include France, Germany, Italy, Luxembourg, Malta, Panama, Spain, Switzerland, the UAE and the United Kingdom (Transparency International 2026). The ODAC case in Libya alone involved more than 100 shell companies, including 65 in the UK, 22 in Malta, 16 in the British Virgin Islands and seven in Cyprus (Transparency International 2026).

The documented North African cases point to Europe as the main destination for corrupt proceeds, alongside the UAE (Transparency International 2026). This conclusion rests on case evidence, some of it dated, as suspicious transaction reports and financial intelligence data do not show systematically where illicit funds from the region go. Beyond the region, Dubai appears to play a key role as a destination for illicit gold from West Africa, and its real estate market has come under scrutiny for absorbing the proceeds of corruption and crime (Jenkins 2024: 24). The UAE is also a destination for gold smuggled from Sudan through Egypt and Libya (Soliman and Baldo 2025). For sub-Saharan Africa, trade-based estimates show Asia and the Middle East becoming major destinations, with China the largest single destination in 1980–2018 (Signé, Sow and Madden 2020: 2, 9).

Offshore leaks provide further, if dated, indications. The Panama Papers (2016) named Algeria's then minister of industry, Abdeslam Bouchouareb, as owner of a Panamanian company linked to a Swiss bank account; a British Virgin Islands company of Alaa Mubarak, son of Egypt's former president; and a British Virgin Islands company used by the private secretary of Morocco's king to buy a yacht (ICIJ 2016; Al-Bab 2016). The Pandora Papers (2021) named Morocco's Princess Lalla Hasna and a royal adviser (Bladi 2021). Appearing in these leaks does not in itself indicate wrongdoing.

Gatekeepers and professional enablers

Professional service providers, often referred to as gatekeepers,⁶ such as bankers, trust and company formation agents, lawyers, notaries, accountants and real estate agents, can facilitate and obfuscate corruption schemes and illicit financial flows, whether knowingly or negligently. While banks and other financial institutions have long been subject to anti-money laundering requirements, professionals in the non-financial sector have traditionally escaped the same degree of scrutiny. Dealers in

⁶ Gatekeepers are professionals, such as lawyers, notaries, accountants, and trust and company service providers whose services can give criminals access to the financial system and help them set up the legal structures used to hide assets.

precious metals and stones are also particularly relevant given the volume of gold smuggled through the region. In MENAFATF's case data, the most common laundering methods were offshore transfers (24% of cases), front companies (14%), real estate (12%), third-party accounts (9%), securities (9%) and luxury goods bought through proxies (5%) (MENAFATF 2019a). Reporting by professionals in these sectors is minimal, and coverage of the legal professions has gaps (see below).

Trade-based money laundering and free zones

Over and under-invoicing of trade and the use of free trade zones allow criminal proceeds to be disguised as commercial payments (GFI 2026: 5, 10), and fraudulent letters of credit serve the same purpose. In Libya, letters of credit have been used to obtain foreign currency for fictitious imports (Transparency International 2026; ENACT 2025d).

Crypto-assets

Legal status: all five countries restrict crypto-assets, but in different ways. Algeria criminalised the issuance, possession, purchase, sale, mining and promotion of crypto-assets under law 25-10 of July 2025, which amends the 2005 anti-money laundering law (law 05-01), with prison sentences of two months to one year (Journal Officiel 2025; Unlock Blockchain 2025). Egypt's central bank law of 2020 prohibits trading or promoting crypto-assets without a licence from the central bank (Andersen 2025). Libya's central bank banned crypto transactions in 2018, but mining is not explicitly criminalised (The New Arab 2025). Tunisia has no dedicated legal framework for crypto-asset service providers; a bill for a new foreign exchange code that would also cover virtual currencies was before parliament in 2026 (La Presse de Tunisie 2026). Morocco, which prohibits crypto transactions under its foreign exchange rules, published draft law 42.25 in late 2025 to licence crypto-asset service providers under the capital markets authority (AMMC), with anti-money laundering supervision by the financial intelligence unit (ANRF) (Morocco World News 2025a). As of July 2026, the bill was still under review and had not been submitted to parliament (Morocco World News 2026).

Market size: restrictions have not prevented use. Morocco ranked 24th in the 2025 Chainalysis Global Crypto Adoption Index, ahead of Egypt (Morocco World News 2025b). Earlier Chainalysis analysis linked Egyptian adoption to currency depreciation and remittances (Forkast 2022). Adoption indices measure overall use, most of it legitimate, not illicit flows.

Evidence of illicit use: the literature reviewed contains only indicative evidence:

- The Africa Organised Crime Index reports that trafficking networks in Morocco use crypto-assets and encrypted communications to evade detection and lists under-regulated crypto-assets as an emerging risk in Algeria (ENACT 2025b; ENACT 2025e).
- Morocco's financial intelligence unit lists crypto-related offences among emerging categories in suspicious transaction reports, without giving figures (Hespress 2025).
- A 2026 Tunisian study identifies crypto-assets as a laundering risk, but cites no Tunisian cases (Zawya 2026).
- Tunisia's financial intelligence unit devoted one of its two strategic studies in 2024 to crypto-asset use. It also identified recurring crypto-asset purchases by individuals linked to illegal online betting and concluded that payments to foreign betting platforms may have been made in crypto (CTAF 2025: 25–26). This is one of the few official references to crypto-related laundering in the region, and it concerns illegal betting, not corruption.
- In Libya, illegal bitcoin mining converts subsidised electricity, priced as low as US\$0.004 per kilowatt hour, into a foreign currency asset outside the banking system. Libya accounted for about 0.6% of the global bitcoin hashrate⁷ in 2021, and mining is estimated to consume about 2% of national electricity output. Raids seized around 100,000 devices in 2023, and nine people were sentenced to three years in prison in Zliten in November 2025 (The New Arab 2025). This is a misuse of a public subsidy, but no source quantifies the resulting outflows.

Where capital controls are strict, as in Algeria and Libya, and in Egypt until the March 2024 currency float, peer-to-peer stablecoin markets offer an obvious route for moving value abroad, but this paper found no systematic study documenting it.

On the available evidence, crypto-assets are a secondary and emerging channel, not a main enabler of corruption related IFFs (ENACT 2025b; ENACT 2025e; Transparency International 2026; CTAF 2025). Blanket bans may reduce visibility by pushing activity to peer-to-peer platforms and offshore exchanges that national authorities cannot supervise. The IMF concludes that strict bans are “not the first-best option”, are costly to enforce and increase incentives for circumvention, given that customers can easily use providers not authorised in their country (IMF 2023).

⁷ The hashrate is the estimated total computing power used to process transactions and mine new blocks on a blockchain.

The FATF notes that peer-to-peer transactions fall outside obliged entities and that jurisdictions struggle to mitigate the risks of offshore providers; it also reports that most illicit on-chain activity now involves stablecoins (FATF 2021; FATF 2025).

According to FATF (2021), the proportionate response is to include virtual assets in national risk assessments (NRA), which FATF guidance requires even of countries that prohibit them, and to build basic blockchain analytics capacity in financial intelligence units. Tunisia’s unit has begun preliminary analysis using a crypto-analytics platform (CTAF 2025: 31).

In Morocco, efforts could focus on ensuring that the 2025 draft law 42.25 applies FATF standards from the outset (Morocco World News 2025a). Morocco’s rating on Recommendation 15, which covers virtual assets, rose only to partially compliant in 2024 (MENAFATF 2024b).

Cross-cutting institutional weaknesses

Legal frameworks across the region largely meet FATF standards on investigative powers, but implementation lags (Transparency International 2026). Table 1 summarises the main features of each country’s framework.

Table 1. Selected features of AML and beneficial ownership frameworks

	Algeria	Egypt	Libya	Morocco	Tunisia
FATF grey list	Listed October 2024; removed June 2026	Not listed	Not listed	Removed February 2023	Removed October 2019
Latest mutual evaluation	2023	2021	None in second round	2019	2016; new evaluation 2025–2026
Central beneficial ownership register	Yes, verified ⁸	Registrar access only (since 2020)	No	Yes, verified, public for a fee	Yes, public for a fee, not verified
Bearer shares	Permitted	Abolished	Permitted	Permitted outside capital market	Abolished

⁸ Here, “verified” means the law requires the register authority to check the beneficial ownership information it receives. Without verification, the register records whatever the company declares.

	Algeria	Egypt	Libya	Morocco	Tunisia
Mutual evaluation body	MENAFATF	MENAFATF	MENAFATF	MENAFATF	MENAFATF
Egmont Group member⁹	Yes	Yes	No	Yes	Yes
Crypto-assets	Criminalised (2025)	Prohibited without licence	Banned (2018); mining not explicitly criminalised	Banned (2017); draft law 42.25 (2025)	Not authorised

Sources: FATF 2026; MENAFATF 2024a; Transparency International 2025; Transparency International 2026; country sources cited in text.

Weak reporting: suspicious transaction reports rarely concern corruption; corruption features in only 5% of the reports linked to a predicate offence in Algeria (about 1.4% of all reports) and in 3% of reports in Egypt (MENAFATF 2023: 47–48; MENAFATF 2021: 54). Reporting from high-risk non-financial sectors is minimal. Algeria's financial intelligence unit received no reports from real estate agents or dealers in precious metals and stones, although its national strategy ranks these among the highest risk sectors, and Egypt received five reports from real estate brokers from 2017 to 2019 (MENAFATF 2023: 37, 46; MENAFATF 2021: 51–52). In Tunisia, accountants filed three of 1,236 reports in 2024 and lawyers none (CTAF 2025). Defensive filing¹⁰ by Algerian banks further dilutes quality. Overwhelmed by 200–800 automated alerts a day and short of staff to review them, many banks report transactions such as foreign trade operations or large cash deposits without any confirmed suspicion, which inflates volumes without adding intelligence value (MENAFATF 2023: 47–49, 121–122). Morocco is a partial exception, with reports from the non-financial sector doubling between 2023 and 2024 (Transparency International 2026).

Gaps in coverage of the legal professions: mutual evaluations and follow-up reports show that lawyers and notaries, who set up companies and property transactions, are the least supervised gatekeepers:

⁹ The Egmont Group of Financial Intelligence Units is an international organisation that facilitates cooperation and intelligence sharing between national financial intelligence units to investigate and prevent money laundering and terrorist financing.

¹⁰ Defensive filing is the practice of submitting suspicious transaction reports mainly to avoid sanctions for failing to report, rather than on the basis of an analysed suspicion.

- Algeria: notaries, rated high risk, were the only non-financial profession filing meaningful numbers of reports; lawyers were treated as low risk; and no non-financial business or profession was supervised for AML compliance (MENAFATF 2023).
- Egypt: lawyers are supervised by the bar association, which, at the time of the 2021 mutual evaluation, had not assessed the sector's risks. The evaluation listed 300 lawyers and 397 accountants as reporting entities at the end of 2019 and does not address notaries (MENAFATF 2021: paras 26, 64, 86).
- Libya: no mutual evaluation is available.
- Morocco: the 2019 evaluation found that the Ministry of Justice had issued no detailed AML measures for lawyers, notaries and authenticators (*adouls*) and had carried out no supervision. It also found that the law did not make clear when professional secrecy exempts lawyers from reporting (MENAFATF 2019b). Law 12-18 of 2021 lists these professions as reporting entities, and the related ratings rose to largely compliant in 2022, but the follow-up report did not resolve the professional secrecy question (MENAFATF 2022).
- Tunisia: the 2016 evaluation recorded two reports from lawyers and one from accountants, and none from notaries or real estate agents (MENAFATF 2016). Amendments in 2019 extended due diligence duties to lawyers and notaries, but lawyers remain outside binding supervisory instructions (MENAFATF 2020). Lawyers filed one report in 2023 and none in 2024 (CTAF 2025).

Prosecutorial bottlenecks: prosecutors hold exclusive or near-exclusive authority to open cases in Egypt and Tunisia, relegating anti-corruption bodies to detection and referral (Transparency International 2026). Anti-corruption agencies in Algeria and Egypt cannot freeze or seize assets, and financial intelligence units depend on prosecutors or courts to maintain freezes, which in Tunisia can initially last only three to five working days (Transparency International 2026). In 2025, Morocco restricted the right of associations to file complaints in public funds cases (Le Matin 2025).

Under-used financial investigation: parallel financial investigations¹¹ are rarely or ineffectively used in Algeria and Egypt (MENAFATF 2023: 38; MENAFATF 2021: 63). Morocco has moved to make them mandatory in financial criminal cases, a reform that contributed to its removal from the FATF grey list in February 2023 (MENAFATF 2022: 15; Transparency International 2026).

Unverified and siloed data: company registers are often outdated; asset declarations by public officials are filed but not verified, published or cross-checked; and none of

¹¹ A parallel financial investigation is a financial inquiry conducted alongside a criminal investigation into a predicate offence, to identify the proceeds of crime, trace assets and uncover associated money laundering.

the five countries links company, ownership, property and declaration data (Transparency International 2026).

Limited use of international cooperation: mutual legal assistance (MLA) frameworks exist but are rarely used at scale in corruption cases. Algeria and Egypt are exceptions, both for the volume and quality of their outgoing requests and for their use of informal pre-request consultation to speed up cooperation. Some countries submitted zero or very few MLA requests, even for major scandals (Transparency International 2026). Libya is the only country in the region that does not use Egmont Group channels. However, even where countries belong to the Egmont Group, cooperation between financial intelligence units is largely passive, responding to incoming requests rather than proactively seeking to preserve assets (Transparency International 2026).

Limited political will: prosecutions in Algeria, Egypt, Libya and Tunisia have been selectively pursued against political opponents and members of former regimes, while cases involving connected individuals are dropped, delayed or resolved leniently (Transparency International 2026). In Tunisia, experts report that money laundering charges have been politicised (ENACT 2025f). Judges and prosecutors face pressure, most visibly in Tunisia, and Algeria stopped accepting anonymous letters as a basis for investigations in 2021 (Transparency International 2026).

Closing civic space: CIVICUS rates civic space as repressed or closed in Algeria, Egypt, Libya and Tunisia, and as obstructed in Morocco (Transparency International 2026). North Africa scores 2.75 out of 10 for the role of media and civil society in countering organised crime, the lowest regional score in the world (ENACT 2025a: 25). These restrictions underline the role that journalists and civil society organisations can play in detecting corruption cases.

Implications for human development

IFFs undermine human development in North Africa, above all by diverting public resources from services. African countries with high levels of IFFs spend about 25% less per capita on health and 58% less on education than those with low levels, although UNCTAD notes that these estimates do not imply causality (UNCTAD 2020: 152, 156). Studies of the economic effects of IFFs find that illicit outflows reduce public revenue and domestic investment, that these effects accumulate over time, and that the damage is smaller where institutions are stronger (Bak and Jenkins 2025). Embezzlement from social security, subsidy and public investment budgets is documented across the region, and the sums can be large; for example, the value of fuel diverted in Libya from 2022 to 2024 exceeded three times the country's combined spending on health and education (Transparency International 2026; The Sentry 2025).

The OECD (2018: 24–25) proposes assessing the harm caused by illicit economies and their associated financial flows across five dimensions: governance, societal, economic, environmental and physical.

In North Africa, the evidence maps onto these dimensions unevenly. Governance: the capture of state resources by connected elites and selective anti-corruption campaigns have eroded public trust, elites who move their wealth abroad have less stake in upholding the rule of law at home, and restrictions on civil society and the media weaken the detection of IFFs (Reuter 2017; Transparency International 2026; ENACT 2025a). Societal: elite capture has entrenched inequality and fuelled the grievances behind the 2011 uprisings and the 2019 Hirak (Rijkers, Freund and Nucifora 2014; Transparency International 2026). Economic: as set out above, illicit outflows divert public resources from services and reduce revenue and investment (Bak and Jenkins 2025). Physical: smuggling revenues sustain armed groups and the abuse of migrants along routes controlled by those who profit from them (The Sentry 2025; Eaton and Yousef 2025). Environmental: the literature reviewed contains little evidence on the environmental effects of IFFs in the region.

Country profiles

Each profile sets out the major IFF risks documented in the literature and the system's strengths and weaknesses, and then the counter-measures. The assessment reflects two questions: how well the literature documents the problem a measure addresses, and whether there is evidence, from the country or from comparable settings, that the measure works. Each table rates the evidence as strong (documented by mutual evaluations, court records or multiple independent sources), moderate (documented by a single robust source or by comparable settings) or limited (plausible but undocumented). Rows marked "gap" flag measures for which the evidence is missing.

Algeria

Major risks

Grand corruption and state capture. The trials that followed the 2019 Hirak exposed how the Bouteflika-era elite allocated state privileges (such as customs and tax exemptions, subsidised loans and public land) to connected business owners. Two former prime ministers received sentences of 12 and 15 years in the car assembly case, and a former chief executive of the state hydrocarbons company Sonatrach received 15 years in 2024 over the Augusta refinery purchase (Transparency International 2026). A former member of parliament created more than 80 interlinked companies between 2011 and 2018 to conceal revenues and obtain fraudulent credit, with family members as shareholders; and officials at the youth employment agency colluded with suppliers to obtain state subsidy cheques through fake invoices (Transparency International 2026).

Laundering channels. Embezzlement, misuse of public funds and illicit enrichment are linked mainly to corrupt officials rather than organised crime groups. Proceeds are laundered through shell companies, real estate and cash-intensive sectors such as construction and hospitality, and unofficial currency exchanges operate openly, reportedly protected by state actors (ENACT 2025b). The scale of the cash economy prompted the central bank to ban cash deposits into commercial accounts from December 2025 (TSA 2025).

Assets abroad. By December 2022, President Abdelmadjid Tebboune said that assets worth US\$20 billion had been seized domestically, including 4,213 properties and more than 6,500 bank accounts, while the justice minister acknowledged that large sums remained in more than 30 countries (Le360 2022). Recovery from abroad has

been slow. By April 2026, Switzerland had accepted 20 of 33 Algerian requests and was returning more than US\$110 million; France had not responded to 61 requests (RSI 2026). The Panama Papers named Abdeslam Bouchouareb, then minister of industry, as owner of a Panamanian company, Royal Arrival Corp, linked to a Swiss bank account (ICIJ 2016).

Institutional weaknesses. Corruption features in only 5% of the suspicious transaction reports linked to a predicate offence, the financial intelligence unit archives many reports for lack of information, and real estate agents and dealers in precious metals and stones file none (MENAFATF 2023: 37, 46–48; Transparency International 2026). Parallel financial investigations are rarely used (MENAFATF 2023: 38). Anti-corruption agencies cannot freeze or seize assets, and since 2021 anonymous letters can no longer trigger investigations (Transparency International 2026). The central beneficial ownership register is verified and gives competent authorities free online access, while an executive decree of November 2023 provides for public access pending a ministerial decision; bearer shares and nominee arrangements, however, remain unregulated (Transparency International 2025).

Recent reforms. Algeria was placed on the FATF grey list in October 2024, following strategic deficiencies identified in its 2023 mutual evaluation, and added to the EU's list of high-risk third countries in 2025 (European Commission 2025). It was removed from the grey list in June 2026 after completing its FATF action plan, which included improving suspicious transaction reporting, establishing a legal framework for targeted financial sanctions related to terrorist financing and tightening supervision of high-risk sectors (FATF 2026; Ecofin Agency 2026). The 2025 finance act banned cash payments for real estate, luxury goods and insurance premiums (Talbot 2026). Law 25-10 of July 2025 criminalised crypto-assets (Journal Officiel 2025; Unlock Blockchain 2025). With IMF support, the Bank of Algeria completed a sectoral money laundering risk assessment, applied new risk-based inspection procedures to selected banks in late 2024 and adopted an interim AML/CFT supervision strategy for 2025, while the National Center of the Commercial Register evaluated the collection, verification and access to beneficial ownership information (IMF METAC 2025: 16).

Strengths. Algeria uses joint investigation teams for complex cases and makes heavy use of mutual legal assistance. It is also the only country in the region whose law specifies that authorities can access beneficial ownership information without delay (Transparency International 2026).

Counter-measures

Algeria's delisting shows that technical compliance can improve quickly. The evidence therefore points to the application of the framework to corruption cases and

to the sectors where proceeds are stored, while guarding against the selective use of prosecutions.

Table 2. Potential counter-measures for Algeria

Counter-measure	Evidence base
Bring real estate agents and precious metals dealers into reporting, with active supervision	Strong: no reports from either sector despite both being ranked highest risk (MENAFATF 2023)
Give anti-corruption bodies powers to initiate cases and request freezes; restore anonymous complaints	Moderate: prosecutorial and freezing bottlenecks; 2021 restriction on anonymous letters (Transparency International 2026)
Regulate bearer shares and nominees; implement public access to the beneficial ownership register	Moderate: gaps scored 0% (Transparency International 2025)
Pursue asset recovery through due process guarantees that address destination states' concerns	Moderate: 61 requests unanswered by France; returns from Switzerland (RSI 2026); concerns about judicial impartiality (Le360 2022)
Effects of the cash deposit ban and the crypto ban	Gap: no evaluation available; both may push activity into informal channels

Egypt

Major risks

Embezzlement and undervaluation. Egyptian cases document embezzlement through discretionary budget lines, bribery in procurement and the sale of state resources below market value. Former interior minister Habib El-Adly was charged with embezzling more than US\$110 million from the ministry budget; former president Hosni Mubarak and his sons were sentenced to three years for diverting public maintenance funds to private palaces; a former oil minister and a businessman received 15-year sentences for supplying gas to Israel below market prices; and a housing minister received five years for selling state land below its value (Transparency International 2026). In 2016, the head of procurement at the state council was arrested for allegedly accepting a bribe from a furniture supplier (Transparency International 2026).

A cash heavy economy. Egypt's economy remains cash heavy, state linked actors are often implicated in illicit financial activity, and the military plays a dominant role in public spending and infrastructure with little oversight (ENACT 2025c). Informal

savings pools (*gameyas*) have been used to channel illicit funds (Transparency International 2026).

Gold. Gold smuggling networks link Egypt's eastern mining regions to informal sales in Cairo and abroad (ENACT 2025c). Since the war in Sudan began in 2023, an estimated 60% of gold production from three Sudanese states, more than 100 kilograms a day, has been smuggled or exported unofficially to Egypt, where higher prices give traders margins of 60–80% (Soliman and Baldo 2025). Much of this gold is then sold on to the UAE (Soliman and Baldo 2025).

Asset recovery. Switzerland froze assets linked to the Mubarak family in 2011. In 2022, Swiss prosecutors closed their money laundering investigation and released about CHF400 million, stating that the information provided by Egyptian authorities was insufficient to show that the funds were of illegal origin (Arab News 2022). The Panama Papers revealed Alaa Mubarak had a British Virgin Islands company managed through Credit Suisse (Al-Bab 2016).

Institutional weaknesses. Corruption related reports account for 3% of suspicious transaction reports, and real estate brokers filed five reports from 2017 to 2019 (MENAFATF 2021: 51–54). Prosecutors hold near-exclusive authority to open cases, the administrative control authority must ask prosecutors to freeze assets, and prosecutors make insufficient use of financial investigation evidence (Transparency International 2026). Since 2020, companies registered with the commercial registry must keep a register of their beneficial owners and notify changes to the registry (Soliman, Hashish & Partners 2020). Open Ownership classifies this as a live, economy-wide register held by the commercial register authority but accessible only to the registrar ([Open Ownership n.d.](#)). The decree does not define beneficial ownership or control (Soliman, Hashish & Partners 2020), and the register is neither verified nor accessible to competent authorities. Bearer shares have been abolished, nominees are largely unregulated, data protection and banking secrecy impede information sharing, and AML requirements cover foreign but not domestic politically exposed persons (Transparency International 2025). Egypt's last national risk assessment, conducted by its national AML/CFT¹² coordinating committee and covering 2018–2019, has never been published and is known only through the 2021 mutual evaluation, which criticised its limited sample of cases (MENAFATF 2021). Lawyers are supervised by the bar association, which, at the time of the 2021 mutual evaluation, had not assessed the sector's risks (MENAFATF 2021: para 26).

Strengths. The quality of suspicious transaction reports has improved since 2018 thanks to a new IT system. Egypt makes heavy use of mutual legal assistance, and it is developing operational frameworks for joint investigations (Transparency

¹² AML/CFT stands for anti-money laundering and countering the financing of terrorism.

International 2026). According to MENAFATF's latest follow-up report, Egypt's legal framework is now rated compliant on the reporting obligations of non-financial businesses and professions, but only partially compliant on their regulation and supervision (MENAFATF 2025a).

Counter-measures

Table 3. Potential counter-measures for Egypt

Counter-measure	Evidence base
Make the 2020 beneficial ownership register verified and directly accessible to the financial intelligence unit, the administrative control and tax authorities	Moderate: register held by the registrar only, with beneficial ownership undefined in the decree; reliance on unverified bank and tax data (Transparency International 2025; Soliman, Hashish & Partners 2020; Open Ownership n.d.)
Extend enhanced due diligence to domestic politically exposed persons and supervise real estate brokers and lawyers	Moderate: domestic PEP coverage unclear (Transparency International 2025); five broker reports in three years; bar association has not assessed sector risks (MENAFATF 2021)
Require parallel financial investigations and give the Administrative Control Authority freezing powers	Moderate: insufficient use of financial evidence; dependence on prosecutors (Transparency International 2026)
Tighten customs and trade controls on gold imports, and engage UAE and Swiss refiners on due diligence	Moderate: large unofficial flows from Sudan (Soliman and Baldo 2025)
Update the national risk assessment and publish data on prosecutions and confiscations	Gap: NRA outdated; no recent evaluation data

Libya

Major risks

A conflict economy. Libya's rival governments and armed groups have turned public revenues into private income. Libya ranks fifth of 54 African countries for criminality (7.05) and 53rd for resilience (1.88), with scores of 9.0 or higher for financial crimes, extortion, human smuggling, arms trafficking and crimes involving oil and fuel (ENACT 2025d). Criminal figures with ties to militias hold senior government roles and use official tools to manage criminal markets and influence public finances (ENACT 2025d). Rather than profit directly from smuggling, many of these actors profit from their ability to govern criminal markets through state institutions and to

“shape or control state budgets, payrolls and procurement contracts”, building systems that “resemble a kleptocracy” (Herbert, Horsley and Badi 2023: 6).

Fuel. Since 2021, the national oil corporation has paid for fuel imports by swapping crude oil with foreign traders instead of using central bank funds, which removed the imports from public accounting. Imports doubled from 20.4 million litres a day in early 2021 to more than 41 million litres in late 2024, and an estimated US\$20 billion of fuel was diverted in the period 2022–2024 (The Sentry 2025). The Sentry identifies Saddam Haftar’s Libyan Arab Armed Forces as the dominant actor, with the tacit acceptance of Prime Minister Abdelhamid Dbeibah and networks in Misrata and Zawiya. Box 2 traces the flow from source to destination. The Africa Organised Crime Index estimates that as much as 40% of imported fuel is smuggled or re-exported (ENACT 2025d).

Box 2. Libya’s crude-for-fuel swaps: from source to destination

- Source: since 2021, the national oil corporation has paid for imported fuel by swapping crude oil with foreign traders, outside central bank funding and public accounting. Imports doubled, and an estimated US\$20 billion of fuel was diverted in 2022–2024, including US\$6.7 billion in 2024 (The Sentry 2025).
- Corruption as enabler: armed groups control ports, checkpoints and storage, and senior officials tolerate or direct the trade (The Sentry 2025; ENACT 2025d).
- Channels: small tankers and mislabelled cargoes carry fuel by sea; trucks carry it by land to Sudan, Chad and Niger (The Sentry 2025; ENACT 2025d).
- Destinations: Malta, Italy, Albania and Turkey by sea; Sudan’s Rapid Support Forces, Chad and Niger by land (The Sentry 2025).
- Impact: the diverted value exceeds by three times Libya’s combined spending on health and education, and residents of peripheral areas pay up to 40 times the official price for fuel (The Sentry 2025).
- Responses proposed: an audit of the 2021–2024 swaps, replacement of fuel subsidies with cash transfers, chemical markers in fuel, maritime interdiction and targeted sanctions (The Sentry 2025).

Letters of credit and banking. Fraudulent letters of credit have been used to obtain foreign currency at the official rate for fictitious imports (ENACT 2025d; Transparency International 2026). A 2024 investigation found that tens of millions of euros of compromised state funds from Benghazi had been laundered abroad

(ENACT 2025d). In 2015, the Central Bank of Libya referred 30 companies to prosecutors for suspected money laundering using false documents, involving about US\$2.2 billion (UNICRI 2021a: 18).

Illicit inflows. Illicit money and resources also flow into Libya and sustain the conflict. In 2020, Malta seized around US\$1.1 billion in Libyan dinars printed by the Russian state-owned company Goznak for the eastern authorities' parallel central bank (ADF 2020; bne IntelliNews 2020). A UN panel of experts found the arms embargo "totally ineffective", with extensive violations by states supporting both sides, including the UAE, Egypt, Jordan and Russia on one side and Turkey and Qatar on the other (UN Security Council 2021; ENACT 2025d).

Legacy cases. The head of the Gaddafi-era ODAC misappropriated an estimated US\$6–7 billion through inflated contracts, advance payments for projects that were never built and a 20% skim on contracts. He used more than 100 shell companies in the UK, Malta, the British Virgin Islands and Cyprus, cash smuggled in suitcases and luxury property abroad, including hotels in Scotland. An Interpol red notice was issued and then lifted, and the suspect reportedly lived in Libya in 2021 (Transparency International 2026). More broadly, Libya's asset recovery and management office, with UNICRI's assistance, has traced some US\$54 billion in Libyan assets abroad. Many remain unliquidated, partly because officials fear that returned assets would be lost to corruption, and many have not yet been frozen (UNICRI 2021a: 26).

Smuggling and extortion. In parts of southern Libya, armed groups and municipal authorities levy "taxes" on smuggling; one such scheme in Kufra reportedly raised about US\$200,000 a month from fuel alone (Herbert, Horsley and Badi 2023: 5). Libya is also a transit hub for cannabis resin, cocaine and synthetic drugs (UNODC 2026), and gold from the Libya–Sudan–Egypt border area is flown through Libyan airports to Istanbul and Dubai (Soliman and Baldo 2025). Libya is the only country in the region where extortion and protection racketeering reaches a severe level (9.0), reflecting armed groups' control of checkpoints, ports and storage facilities (ENACT 2025d; The Sentry 2025). Much of the profit from drug trafficking is "laundered and invested abroad", while proceeds that stay in Libya are invested mainly in real estate, where prices are reportedly rising (UNODC 2026: 31). In the east and south, elements of the Libyan Arab Armed Forces reportedly channel illicit profits into the local economy "both to launder the money and to secure social support" (Herbert, Horsley and Badi 2023: 5).

Crypto mining. Cheap, subsidised electricity has made Libya a hub for illegal bitcoin mining (see the crypto subsection above).

Institutional weaknesses. Libya has no central beneficial ownership register, does not require companies to hold ownership information, permits bearer shares and has published no national risk assessment (Transparency International 2025). Its financial intelligence unit shares intelligence only through formal written requests and does not use Egmont channels, and mandates overlap (Transparency International 2026). Libya has not undergone a second round MENAFATF evaluation; MENAFATF reviewed a self-report in November 2024 (MENAFATF 2024a). In April 2024, the government of national unity created a new agency for combating financial crimes, money laundering and terrorism financing (Lawsociety.ly 2024), adding to the number of bodies with overlapping roles.

Strengths. Libya's legal definition of beneficial ownership is comprehensive, and its law places no restrictions on domestic information sharing (Transparency International 2025). The constraint is implementation by fragmented institutions, not the letter of the law.

Counter-measures

In Libya, domestic enforcement is constrained by the involvement of state-embedded actors in the flows themselves. The evidence therefore points to measures that change the incentives around the largest revenue streams and to action by the jurisdictions where fuel, gold and money arrive.

Table 4. Potential counter-measures for Libya

Counter-measure	Evidence base
Audit the 2021–2024 crude-for-fuel swaps, restore central bank funded imports and replace fuel subsidies with targeted cash transfers	Moderate: swaps bypassed public accounting; US\$20 billion diverted (The Sentry 2025)
Enforcement by destination states: interdiction of smuggled fuel in Malta and Italy, scrutiny of Libyan linked companies in the UK and Malta, and targeted UN sanctions on facilitators	Moderate: documented maritime routes and offshore networks (The Sentry 2025; Transparency International 2026)
Join the Egmont Group and clarify the mandates of the financial intelligence unit and the new financial crimes agency	Moderate: isolation from Egmont; overlapping mandates (Transparency International 2026)
Tighten central bank controls on letters of credit	Moderate: documented LC fraud (ENACT 2025d)

Counter-measure	Evidence base
Beneficial ownership register and full mutual evaluation	Gap: no register, no national risk assessment and no evaluation; with authorities politically fragmented and mandates overlapping, a register established by one administration is unlikely to cover all companies or be used nationwide (Transparency International 2026)

Morocco

Major risks

Drug proceeds. Morocco’s cannabis trade scores 9.0 and its cocaine trade 6.5 on the Africa Organised Crime Index (ENACT 2025e). Morocco is a leading source of cannabis resin and an increasingly important entry point for South American cocaine bound for Europe, notably through Tanger Med (ENACT 2025a: 50; ENACT 2025e; UNODC 2026). Trafficking networks use crypto-assets and encrypted communications to evade detection (ENACT 2025e).

Corruption cases. Documented cases include long-running embezzlement at the national social security fund, for which Transparency International cites losses of around US\$12.5 billion over 30 years; the sale of the Saadi casino land in Marrakesh at US\$60 per square metre against an official value of US\$2,000, for which the main defendant received five years; and a former urban agency director sentenced to ten years for demanding US\$52,550 in bribes (Transparency International 2026). The Saadi case shows how slowly such cases move. The court of cassation upheld the convictions for embezzlement of public funds, forgery and bribery only in December 2024, four years after the Marrakech court of appeal ruled in November 2020. Transparency Maroc, a civil party throughout, warned of “the lack of deterrence against corruption due to delays in justice” and noted that Marrakech city council never joined the case as a civil party, despite significant financial losses (Transparency Maroc 2024).

Laundering channels and inflows. Proceeds are laundered through real estate, front companies, offshore accounts and luxury goods (ENACT 2025e). Morocco is also the subject of growing European money laundering investigations: in 2024 it received 322 requests for judicial assistance, 110 of them from France, and money laundering accounted for 26% of requests, ahead of drug trafficking; Morocco executed 44% of requests (Présidence du Ministère Public 2025b). Members of the royal entourage appear in the Panama and Pandora Papers (Al-Bab 2016; Bladi 2021).

Institutional framework. Morocco left the FATF grey list in February 2023 (Transparency International 2026). Its beneficial ownership register is public for a fee and verified, and companies must hold their own ownership information, but bearer shares outside the capital market and nominee arrangements remain unregulated (Transparency International 2025). Suspicious transaction reports rose by 41% to 8,076 in 2024, and the financial intelligence unit referred 84 files to prosecutors, up from 71 in 2023. The most common predicate offences in those files were receiving the proceeds of crime (27%), fraud (23%) and document forgery (20%) (Telquel 2025; Hespress 2025). Courts issued a record 134 money laundering judgements in 2023, up from 85 in 2022, and prosecutors handled 821 money laundering cases that year (Présidence du Ministère Public 2025a). A 2022 agreement between the financial intelligence unit and the chief prosecutor sets a 60-minute target for responding to information requests (Transparency International 2026). Gaps remain: law enforcement cannot use covert digital techniques in money laundering cases, and Morocco makes little use of mutual legal assistance in corruption cases (Transparency International 2026). The question of when professional secrecy exempts lawyers from reporting, raised in the 2019 MENAFATF evaluation, remained unresolved in the 2022 follow-up report (MENAFATF 2019b; MENAFATF 2022). The same evaluation found that suspicious transaction reports related to corruption were limited despite the high risk, and that the anti-corruption authority lacked powers to investigate the complaints it received (MENAFATF 2019b: 52, 83).

Shrinking space for complaints. Article 3 of the new criminal procedure code (law 03.23), published in September 2025, reserves the initiation of prosecutions for corruption and financial crimes to the public prosecutor on referral from official bodies, substantially restricting the ability of civil society to trigger cases (Le Matin 2025). CIVICUS rates Morocco’s civic space as obstructed (Transparency International 2026).

Counter-measures

Table 5. Potential counter-measures for Morocco

Counter-measure	Evidence base
Restore the right of associations to file complaints in public funds cases	Moderate: civil society and media detect many cases; Article 3 of law 03.23 substantially restricts this route (Le Matin 2025; Transparency International 2026)
Turn rising reporting into corruption convictions and confiscations: mandatory parallel financial investigations, covert digital techniques and published data on outcomes by predicate offence	Moderate: 8,076 reports in 2024, but 84 files referred to prosecutors, while corruption is not among the three main predicate offences (Telquel 2025; Hespress 2025)

Counter-measure	Evidence base
Link the beneficial ownership register to property and asset declaration data, and regulate bearer shares and nominees	Strong: real estate is the main laundering channel; data are siloed (ENACT 2025e; Transparency International 2025, 2026)
Speed up execution of European requests involving real estate and bank assets	Moderate: 44% execution rate on 322 requests (Présidence du Ministère Public 2025b)
Clarify in law when professional secrecy exempts lawyers from reporting, and supervise lawyers, notaries and <i>adouls</i>	Strong: deficiency identified in 2019 and unresolved in 2022 (MENAFATF 2019b; MENAFATF 2022)
Crypto-asset regulation under draft law 42.25	Gap: indicative evidence of use by traffickers only (ENACT 2025e)

Tunisia

Major risks

Legacy of state capture. Under Ben Ali, connected firms captured over 20% of private sector profits through regulatory changes and privileged access (Rijkers, Freund and Nucifora 2014). Switzerland froze assets linked to Ben Ali and his associates in January 2011; the campaign group Public Eye estimates that the family transferred US\$320 million to Swiss banks in the 2000s (The New Arab 2021). The ten-year Swiss freeze expired in January 2021, and most assets remain blocked under mutual legal assistance proceedings because Tunisia has not supplied the documentation Swiss courts require (The New Arab 2021). Some funds have nonetheless returned. Switzerland returned US\$60.5 million in 2016 (I Watch 2019: 2) and announced the return of a further TND3.5 million (about US\$1.27 million) in March 2021 (UNICRI 2021b: 14). France has held €14.2 million in seized funds since 2014 under an investigation that remains open (StAR 2025). At home, the national confiscation committee ordered the confiscation of 2,335 assets from the Ben Ali family, recovering about US\$450 million (UNICRI 2021b: 14). Recovery has been hampered by the dispersion of assets across jurisdictions and unclear beneficial ownership (Transparency International 2026). Foreign bribery is also documented, as the UK arm of Alstom was convicted of paying around US\$3 million through an intermediary to win a Tunis metro contract (Transparency International 2026).

Penal conciliation. A 2022 decree law offered prosecuted business owners settlements in exchange for payments or investment in marginalised regions. Results fell short of

expectations, and the framework was revised by law no. 3 of 2024 (Tuniscope 2026). The literature reviewed provides no reliable figures on amounts recovered.

Migrant smuggling and informal finance. Migrant smuggling now dominates financial intelligence. The financial intelligence unit received 1,236 suspicious transaction reports in 2024, up 45% on 2023, with payment institutions filing 119 compared with four the year before (CTAF 2025). Over 61% of the reports processed concerned migrant smuggling. The unit issued 22 freezing orders, but no funds were frozen in 2024 (CTAF 2025). Illegal currency exchange operates in border regions, tax evasion by wealthy individuals is significant, and financial investigations often lack judicial follow-through (ENACT 2025f).

Institutional weaknesses. Since 2021, President Kais Saied has dissolved parliament, suspended the national anti-corruption authority and issued a new constitution; prosecutors and judges have been intimidated, removed and prosecuted (Transparency International 2026). Experts report that money laundering charges are increasingly politicised (ENACT 2025f). Prosecutors hold exclusive authority to open cases, and the financial intelligence unit can suspend transactions for only three to five working days (Transparency International 2026). Tunisia’s beneficial ownership register is not verified, and the last national risk assessment, conducted by the financial intelligence unit (CTAF) with the interior and defence ministries, dates from 2017 and covered only associations and international trade companies among legal persons (Transparency International 2025). Tunisia’s last mutual evaluation dates from 2016, and a new MENAFATF evaluation is under way in 2025–2026 (Tunisie Numérique 2025). Lawyers remain outside binding supervisory instructions (MENAFATF 2020) and filed no suspicious transaction reports in 2024 (CTAF 2025).

Strengths. Tunisia’s framework is the strongest in the region on bearer shares, which are abolished, and nominees, which are prohibited (Transparency International 2025). Its financial intelligence unit produced 280 parallel investigation reports in 2024, and reporting by payment institutions rose from four reports to 119 in a year (CTAF 2025).

Counter-measures

Table 6. Potential counter-measures for Tunisia

Counter-measure	Evidence base
Restore an independent anti-corruption authority and protect judges and prosecutors from interference	Strong: suspension of the authority; removal and prosecution of judges; politicised charges (Transparency International 2026; ENACT 2025f)

Counter-measure	Evidence base
Use the 2025–2026 mutual evaluation to update the national risk assessment and verify the register	Moderate: NRA from 2017; unverified register (Transparency International 2025)
Convert migrant smuggling intelligence into freezes and prosecutions, including longer suspension periods	Strong: 22 freezing orders but no funds frozen; three to five-day suspension limit (CTAF 2025; Transparency International 2026)
Rebuild the documentation for Swiss asset recovery cases and publish penal conciliation settlements	Moderate: assets blocked for lack of documentation (The New Arab 2021); opaque conciliation results (Tuniscscope 2026)
Bring lawyers under binding supervisory instructions and require reporting by notaries and real estate agents	Strong: no reports from lawyers and three from accountants in 2024; lawyers not subject to supervisory instructions (CTAF 2025; MENAFATF 2020)

Potential region-wide counter-measures

Each measure below is assessed on two questions: how well documented the problem is across the five countries and whether there is evidence, from the region or elsewhere, that the measure works. No counter-measure has been rigorously evaluated in North Africa, so evidence on effectiveness comes mainly from other countries or from changes observed after reforms. The first five measures address problems documented in official sources across several countries; the last two address real gaps but rest on weaker evidence.

Action by destination jurisdictions. The largest documented assets sit abroad, in the EU, Switzerland, the UK and the UAE. By April 2026, France had not responded to 61 Algerian requests for legal assistance, and Swiss prosecutors closed the Mubarak case in 2022, citing insufficient information from Egypt (RSI 2026; Arab News 2022). Dubai appears to play a key role as a destination for illicit gold, and its property market has come under scrutiny for absorbing the proceeds of corruption and crime (Jenkins 2024: 24). Destination states face fewer of the political constraints that limit domestic enforcement. Where they act, results follow: Switzerland accepted 20 of 33 Algerian requests and is returning more than US\$110 million (RSI 2026), and in the UK, requiring offshore companies that own property to name their real owners on a public register was followed by a sharp fall in anonymous purchases (Collin, Hollenbach and Szakonyi 2023: 1, 25). Faster responses to legal assistance requests, freezing and confiscation of proceeds and due diligence by gold refiners offer good potential leverage. Returns carry their own risks. In Libya, many traced assets remain unliquidated partly because of fears that returned funds would be lost to corruption (UNICRI 2021a: 26). Experience elsewhere points to safeguards such as returning funds in tranches earmarked for social programmes, with civil society monitoring their use, as with the Abacha funds Switzerland returned to Nigeria, although monitoring there also uncovered shortcomings, including ghost projects; or channelling funds through an independent foundation, as with the BOTA Foundation in Kazakhstan (Bak 2026). The problem is well documented, and there is direct evidence from destination countries that action produces results.

Transparency and supervision of real estate and the legal professions. Real estate is a leading laundering channel in all five countries, yet reporting by estate agents is near zero wherever data exist, and lawyers and notaries file almost no reports and face weak supervision (MENAFATF 2021, 2023; Transparency International 2026; CTAF 2025). Reporting obligations for agents and notaries, binding supervision of the legal professions, clear limits on professional secrecy, disclosure of the real

owners of property and searchable property registers would target the channel where much illicit wealth is stored. The problem is documented in official evaluations across the region. Evidence that the remedy works comes from the UK, where property ownership disclosure deterred anonymous investment, although the authors describe their findings as preliminary (Collin, Hollenbach and Szakonyi 2023: 22, 25).

Better use of financial intelligence. Reports reach financial intelligence units but rarely become cases. Prosecutors hold exclusive or near-exclusive authority to open cases in Egypt and Tunisia, anti-corruption bodies in Algeria and Egypt cannot freeze assets, and freezes in Tunisia can initially last only three to five working days (Transparency International 2026). Morocco shows that reform is possible: making parallel financial investigations mandatory contributed to its removal from the FATF grey list (MENAFATF 2022). Mandatory parallel financial investigations, more pathways to open cases, longer freezing periods and freezing powers for anti-corruption bodies could address these bottlenecks. The bottlenecks are well documented; evidence on effect is limited to Morocco's experience, where reform coincided with delisting and a rise in money laundering judgements, without a direct causal link being shown.

Usable beneficial ownership data. Beneficial ownership registers can help curb IFFs, but only where a functioning wider ecosystem allows the data to be verified, accessed and used. On the available evidence, a central register in every country would therefore not, on its own, be the most effective region-wide measure. Algeria, Morocco and Tunisia already have live registers, but only Algeria and Morocco require the information to be verified. Anonymous bearer shares and undisclosed nominees (people listed as owners on behalf of someone else) remain largely unregulated, and no country links ownership data to property or asset declaration records (Transparency International 2025, 2026). Experience elsewhere shows that registers are used effectively only where users have timely access, the data are of good quality and registers can be cross-checked against other records (Castro Orduna and Fraiha Granjo 2023: 15–17). The interventions therefore differ by country: verification and access for competent authorities in Egypt; verification, an end to anonymous bearer shares, disclosure by nominees and data links in Algeria, Morocco and Tunisia; and basic foundations first in Libya, which does not yet require companies to hold ownership information (Transparency International 2025). The gaps are well documented; evidence on what makes registers effective comes from reviews of practice outside the region rather than from impact evaluations.

Measures targeting the largest illegal markets. According to The Sentry, an estimated US\$20 billion of fuel was diverted in Libya from 2022 to 2024 through crude-for-fuel swaps, and gold from Sudan and the Sahel moves through Egypt and Libya to the UAE (The Sentry 2025; Soliman and Baldo 2025). Ending the swap arrangements, reforming fuel subsidies and tightening controls on gold imports could

cut the revenues behind the largest flows, but each depends on political settlements and on destination states. The scale of these markets is well documented by investigative research; there is no evidence yet on which remedies would work.

Civic space and whistleblowers. North Africa scores lowest in the world for the role of the media and civil society in countering organised crime (ENACT 2025a: 25), and Algeria, Morocco and Tunisia have restricted complaints, associations or whistleblowing (Transparency International 2026). Journalists and civil society organisations can help detect many corruption cases, so protecting them strengthens detection. The restrictions are well documented; the link to fewer illicit flows is indirect.

Monitoring crypto-assets. Evidence of crypto-assets being used to launder corruption proceeds is so far indicative only (see the crypto subsection). Including virtual assets in national risk assessments and building basic analytical capacity could let authorities detect any shift without diverting resources from the counter-measures above.

Table 7. Region-wide counter-measures

Counter-measure	Rationale and evidence
<i>Action by destination jurisdictions:</i> faster responses to mutual legal assistance, freezing and confiscation of proceeds in the EU, Switzerland, the UK and the UAE, and due diligence by gold refiners	The largest assets sit abroad; France has not answered 61 Algerian requests; Swiss cases closed for lack of evidence (RSI 2026; Arab News 2022; Transparency International 2026). Destination states face fewer of the political constraints that limit domestic enforcement
<i>Transparency and supervision of real estate and the legal professions:</i> report obligations for agents and notaries, binding supervision of lawyers and notaries, clear limits on professional secrecy, beneficial ownership of property and searchable property registers	Real estate is a leading laundering channel in all five countries, and reporting by the sector is near zero where data exist; lawyers file almost no reports and are weakly supervised (MENAFATF 2021, 2023; Transparency International 2026; CTAF 2025)
<i>Make better use of financial intelligence:</i> mandatory parallel financial investigations, more pathways to open cases, longer freezing periods and freezing powers for anti-corruption bodies	Prosecutorial and freezing bottlenecks in Algeria, Egypt and Tunisia; Morocco's reforms contributed to its delisting from FATF grey list (Transparency International 2026; MENAFATF 2022)
<i>Usable beneficial ownership data:</i> verification and access in Egypt; verification, bearer share and nominee reform, and links to property and declaration data in Algeria, Morocco and Tunisia; foundations first in Libya	Registers exist in three countries but have gaps in verification, bearer shares and nominees (Transparency International 2025); effective use depends on access, functionality and data quality, not on the existence of a register alone (Castro Orduna and Fraiha Granjo 2023: 15)

Counter-measure	Rationale and evidence
<i>Sector-specific measures for the largest illegal markets: Libyan fuel swaps and subsidies, and Sudanese and Sahelian gold transiting Egypt and Libya</i>	Scale documented (The Sentry 2025; Soliman and Baldo 2025); remedies depend on political settlements and destination states
<i>Protect civic space and whistleblowers, and restore complaint rights for associations</i>	Lowest global score for non-state actors (ENACT 2025a); restrictions in Algeria, Morocco and Tunisia (Transparency International 2026)
<i>Monitor crypto-assets: include virtual assets in national risk assessments and build basic analytics capacity</i>	Indicative evidence only: use by trafficking networks in Morocco and emerging risk in Algeria (ENACT 2025b; ENACT 2025e); possible crypto payments to illegal betting platforms in Tunisia (CTAF 2025: 25–26); FATF guidance requires virtual assets in national risk assessments (FATF 2021)

Sources: Arab News 2022; Castro Orduna and Fraiha Granjo 2023; CTAF 2025; ENACT 2025a, 2025b, 2025e; FATF 2021; MENAFATF 2021, 2022, 2023; RSI 2026; Soliman and Baldo 2025; The Sentry 2025; Transparency International 2025, 2026.

Two cautions apply. First, stronger enforcement powers can be misused. Prosecutions in Algeria, Egypt, Libya and Tunisia have been selective (Transparency International 2026), and Tunisian experts report that money laundering charges have been politicised (ENACT 2025f). In Libya, armed groups have used law enforcement roles to secure state funding and immunity, launder their reputations and target rivals. The west coast branch of the Stability Support Apparatus, created by the government in 2021, gave its member groups access to state resources and a role in migrant interception while they remained involved in fuel smuggling. A coast guard commander sanctioned by the UN for human smuggling has rebuilt his reputation through counter-migration operations. In 2023, a nominal arrest order against a tribal leader in Zawiya was reportedly driven by local rivalries (Herbert, Horsley and Badi 2023: 7–8).

Measures that widen investigative or freezing powers should be paired with judicial independence, due process and transparency about case outcomes. The economic evidence underscores this point; IFFs do less damage where institutions are strong (Bak and Jenkins 2025), so measures that strengthen independent oversight have value beyond the cases they uncover.

Second, cooperation from destination states depends on trust in the requesting country's courts. Swiss and French reluctance reflects concerns about evidence and impartiality as much as capacity (Arab News 2022; Le360 2022). Concerns about

how assets would be managed, and whether they might be misappropriated again, can also slow returns (UNICRI 2021a; Bak 2026).

Several existing platforms offer entry points. The MENAFATF evaluation cycle, including Tunisia's 2025–2026 evaluation, creates deadlines that governments take seriously. The MENA Asset Recovery Inter-Agency Network, launched in 2025 with Egypt and Morocco on its steering committee, can support informal cooperation on tracing and freezing (Morocco World News 2025c). The IMF's Middle East Regional Technical Assistance Center (METAC), whose 14 members include all five countries, supports revenue and customs administration, banking supervision and fiscal transparency and co-hosts an AML/CFT workstream. In 2024 and 2025 it helped Algeria develop risk-based AML/CFT supervision, while customs authorities in Morocco and Tunisia worked on detecting fraudulent transactions, which is relevant to trade-based money laundering. A governance and anti-corruption workstream was due to start in 2025–2026 (IMF METAC 2025: vii, 9, 16, 22–23).

Relevant regional bodies and initiatives

The tables below provide an initial scoping of the main actors and projects working on IFFs in the region.

Table 8. Regional actors

Actor	Objective	Countries
MENAFATF	FATF-style regional body: mutual evaluations, follow-up and typologies	All five are members; none is a member of FATF
MENA Asset Recovery Inter-Agency Network (MENA-ARIN), launched 2025	Informal cooperation on identifying, tracing, freezing and recovering illicit assets	Regional; Egypt and Morocco on the steering committee
League of Arab States	Regional standard setting; Arab Convention against Corruption; Riyadh Arab Agreement on Judicial Cooperation	All five
Egmont Group	Information exchange between financial intelligence units	Algeria, Egypt, Morocco, Tunisia (Libya does not use Egmont channels)
African Union: Common African Position on Asset Recovery (2020)	Continental framework for detecting, recovering and returning assets	All five
IMF Middle East Regional Technical Assistance Center (METAC)	Capacity development on revenue and customs administration, banking supervision and fiscal transparency; co-hosted AML/CFT workstream; governance and anti-corruption workstream planned for FY2026	All five, among 14 members

Table 9. Selected projects

Project	Timeline	Objective	Countries	Category
Transparency Now (EU; Transparency International and UNICRI)	2023–2027	Anti-corruption safeguards, whistleblowing, financial disclosure and asset recovery research	Morocco, Tunisia (plus Jordan, Lebanon and Palestine)	AML; asset recovery; beneficial ownership
UNODC Middle East and North Africa programme	Ongoing; no dates published for the Libya anti-corruption and Egypt border projects	Anti-corruption support in Libya; illicit trafficking through Egyptian borders; AML	Libya, Egypt	AML; asset recovery
EU Global Facility on AML/CFT	September 2017–May 2026	Technical assistance on AML/CFT	Regional	AML
EU–Council of Europe South Programme	Phase VI: November 2025–December 2028	Exchange on asset recovery, confiscation and management of seized assets	Southern Mediterranean partners	Asset recovery
MENA–OECD Governance Programme	Ongoing (launched 2005)	Public integrity and anti-corruption reform	Egypt, Morocco, Tunisia and others	Integrity
StAR Asset Recovery Watch	Ongoing; database relaunched c. 2023	Database of asset recovery cases	Tunisia, Egypt, Libya	Asset recovery
EU–UNODC–UNICRI Libya project (2020, €2.5 million)	2020–c. 2023	Capacity for corruption and financial crime investigation, asset tracing and recovery	Libya	Asset recovery

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