

# Protecting Covid-19 vaccine in Kenya from organised crime adaptations



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## Abstract

This paper argues that the supply and distribution of the highly demanded Covid-19 vaccine presents a lucrative opportunity for Organized Criminal Groups (OCGs) in Kenya as the Corona virus pandemic intensifies, hence, the need for its fortification. The pandemic has drastically slowed down activities of OCGs worldwide and substantially

reduced their incomes thereby provoking adaptations and exploitation of new frontiers, among them Covid-19 vaccine and its environment. The modus operandi include exploitation of bureaucratic indemnities and legal loopholes, diversification into alternative illicit activities, exploitation of the cyber space, philanthropic initiatives, production

and distribution of counterfeit and substandard goods, diversification into legitimate trade, illicit diversion of shipments, and fraud. This paper recommends strict management of Covid-19 vaccine by government health agencies, with a strict criteria for involvement of the private sector, in order to safeguard infiltration by OCGs.



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## Introduction

Kenya confirmed its first case of Covid-19 on 13<sup>th</sup> March 2020. This necessitated the government to initiate a number of non-pharmacological interventions to control the spread internally. The measures included school closures, quarantines, night curfews, suspension of international flights, closure of international borders, partial lockdown of non-essential businesses and restriction of movement out of Nairobi, Mombasa, Kilifi, Kwale and Mandera counties. The efforts by the government of Kenya are part of those administered globally to contain the pandemic, which has killed more than 3 million people worldwide and has no cure yet. Consequently, pharmaceuticals are developing vaccines which are already being administered under emergency authorisation.

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## The context

The pandemic and its measures to control movement have displaced activities of OCGs not just in Kenya but across the world. These have been manifested in reduction in homicides, robberies and car theft in Bosnia; the arrest of a long-hunted mafia boss – Cesare Cordi of the Ndrangheta in Italy; reduction of Chinese exports to the rest of the world; a drop in production of methamphetamines and fentanyl by Mexican cartels due to difficulties in procuring imports of the precursor chemicals from China. Other manifestations are diminishing human smuggling activities in the Sahel region, particularly Libya, Egypt, Niger and Nigeria due to fear of the virus and blockage of smuggling routes; decreased purity and increasing price of heroin in Eastern and Southern Africa due to difficulties experienced in smuggling and a decrease in demand. Consequently, criminal enterprises have diversified into exploiting opportunities in the Covid-19 medical supplies industry, among them substandard Personal Protective Equipment (PPE) (Global Initiative Against Transnational Organized Crime, 2020). The adaptations have the potential to negatively affect the supply and distribution of the highly demanded Covid-19 vaccine worldwide.

At the core of vaccination programs of most countries is the diminishing supply of the vaccines amidst increasing demand. While vaccination strategies continue to prioritise frontline workers and at-risk groups as first beneficiaries, the high demand for the vaccine is prompting a potential vacuum being exploited by OCGs. Kenya has already received 1.02 million doses of AstraZeneca-Oxford Covid-19 vaccine and has established a Covid-19 Vaccine Task-Force to manage the vaccination process. So far, more than 900,000 vaccines have been administered.

Susceptibility of Covid-19 vaccine to OCGs in Kenya remains a key concern in this discourse due to the ongoing investigations into the procurement of Health Products and Technologies (HPTs) by the Kenya Medical Supplies Agency (KEMSA). The agency already lost more than Ksh. 2 billion (USD 18 Million) to OCGs in the process of procuring Covid-19 PPEs (Chelagat,



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## Organised crime adaptation mechanisms and implications on management of Covid-19 vaccine in Kenya

The following discussions highlight the various adaptations of OCGs in the wake of the Covid-19 pandemic and how they are likely to impact on the supply, distribution and administration of the vaccine in Kenya.

### Exploitation of bureaucratic indemnities and legal loopholes

Protections offered by governments on measures to manage the pandemic and the legal vacuums caused by the virus continue to be exploited by OCGs to energise the latter's criminal enterprises. Collusion with bureaucrats to exploit emergency measures imposed to manage the pandemic has been a major adaptation. This has been amplified by corruption, complicity and threats to public officers, particularly in Guinea-Bissau. Lockdown measures in the country have been used to silence whistleblowers and allow drug traffickers to move with increased impunity. Moreover, relaxation of maritime and airport cargo oversight measures have allowed cocaine to be shipped from Latin America for distribution both locally and transnationally to the north and west of Africa (Turshen, 2020).

Exploitation of legal loopholes occasioned by the pandemic, particularly in government procurement procedures has characterised the pandemic situation in Kenya. Gaps in the 2018 Executive Order issued by President Uhuru Kenyatta on procurement of public goods have emboldened the activities of the OCGs. The order exempts procurement arising from the declaration of a national emergency from publication and this creates opportunity for concealment (Nyabira & Olotch, 2020). Unlike other governments across the world, Kenya's new procurement procedures have only focused on

2020). The private sector has featured prominently in the alleged fraud. Among the companies under investigation are Kilig, Shop n' Buy, Regal Freighters and La Miguela, among others.

A parliamentary Report by the Departmental Committee on Health, Kenya, affirms possible fraud in the tender awarding process. It underscores the fact that majority of the companies that won the tenders to supply the HPTs were neither prequalified nor in the pharmaceutical business. The Report further found that KEMSA unprocedurally exceeded its allocated budget for the financial year by Ksh 3 Billion (USD 30 Million) allegedly funneled towards purchase of HPTs (Republic of Kenya, 2020). The existing evidence points to possible infiltration of government systems by OCGs. This paper, therefore, looks at the adaptation mechanisms of organised criminal enterprises in the wake of Covid-19 pandemic and implications on protecting Covid-19 vaccine in Kenya.

physical distancing and how to curb virus spread rather than tightening regulations on procuring Covid-19 goods. This has further bolstered the OCGs to continue abusing the existing procedural loopholes. The situation has become the basis of fraud and misconduct by contracting agencies, suppliers and service providers.

The implications of these occurrences on the distribution and supply of Covid-19 vaccine in Kenya include continued exploitation of the relaxed regulations on procurement by OCGs due to their ability to infiltrate government tendering systems. There is also continued abuse of single sourcing of the vaccine suppliers and its distributors since the President's Executive Order will still be used to cushion emergency procurements from public scrutiny. This will further affect import oversight procedures, including consignment inspections. This situation is likely to allow dumping of sub-standard vaccines into the country.



Photo Credit: Logistics Update Africa

## Diversification into alternative illicit activities

The disruptions caused by the pandemic have activated OCGs to diversify into alternative illicit activities. It is estimated that a total of USD 2.2 trillion was lost globally due to diversions of illicit trade funds in 2020 (Albamonte, 2020). Evidence points to escalation in transnational crimes, particularly trafficking in persons, smuggling of goods and counterfeiting in Argentina, Venezuela, Paraguay, Uganda and Colombia.

These occurrences are attributed to sanctions on movement imposed by the authorities to control the spread of Covid-19. The measures have affected transit of illegal products across the borders, hence the rise of alternative illicit means. Within this situation, the possibility of OCGs adapting to alternative ventures such as counterfeiting of vaccines to stay afloat remains high. Interpol has already warned of a potential surge in falsification of the vaccines. Moreover, the OCGs are likely to resort to using alternative means of transport exempt from government scrutiny such as ambulances to deliver illicit vaccines to their customers (Delgado, 2020). The closing of Colombia border with Venezuela, for instance, has encouraged the OCGs to switch to trafficking in persons trying to flee to Colombia (International Crisis Group, 2020).

A similar situation was witnessed in Kenya where smuggling of persons in and out of Nairobi City was at its peak when the government imposed restrictions on movement of people to control the spread of Covid-19. Similarly, in Honduras, human traffickers have hiked their trafficking prices to facilitate illegal movement of goods and people in and out of the country (Eligh, 2020b). Elsewhere, in Uganda, the OCGs have resorted to illegal wildlife trade as the demand for wildlife products such as pangolin scales and elephant penises continue to escalate in Asian countries (Maverick, 2021).



Photo Credit: International Monetary Fund

## Exploitation of the cyber space

OCGs have increased socially engineered attacks against organisations and individuals during the pandemic. They have taken advantage of the 'work from home' policies instituted by a majority of organisations to distribute malware and gain access to organisations' systems (Europol, 2020). As the pandemic progresses, illicit online markets are on the rise (Eligh, 2020a). The desperation to purchase the prophylactics such as face masks and sanitisers, compounded by the fear of leaving homes to purchase these products have enabled fake online sites to creep up and lure unsuspecting shoppers. In reality, these sites are often bait clicks used to access bank accounts of the customers while others peddle fake products.

Hospitals in developed nations have been victims of extortions, ransom hackings. The intention of the hackers, in particular, has been to steal confidential patient information and proceed to use this information to access personal accounts and sites (Ditcham, 2020).

Exploitation of Kenya's cyberspace is critical in this discussion due to Kenya's Internet penetration of 87.2% (Internet World Stats, 2020). Currently, 17% of Kenyans are actively engaged in the cyberspace making them potential targets of

OCGs. The pandemic period has seen incidents of phishing where messages promising every citizen Covid-19 relief funds have been targeting unsuspecting individuals for personal banking information.

These scams are bound to penetrate the supply and distribution of Covid-19 vaccine in Kenya. Already, online scammers in Europe are targeting individuals with false vaccination messages. The motive is to gain personal information such as bank details or spread a malicious malware when victims fall prey to their schemes. The FBI and Interpol have equally warned on the prospect of OCGs using the Internet to enter the Covid-19 vaccine market and cautioned people to be cautious when opening e-mails and texts from unidentified sources (Interpol, 2020).

The protection of Covid-19 vaccination data from online scammers remains a key concern in Kenya since the Ministry of Health has already unveiled a new digital immunisation records platform for its vaccination programme. The platform has the capability of registering those who have been vaccinated and notifying them on when they should take the next dose (Itimu, 2021).

## Exploitation of charity initiatives

Use of charity initiatives to win over the vulnerable population through delivery of aid is another adaptation. The OCGs have set up informal welfare schemes within communities experiencing economic crises occasioned by the pandemic but unable to get help from the authorities.

Donations of food and PPEs to communities by OCGs have been witnessed in Kenya, South Africa, Mexico, Japan and Italy. In other developments, the Government of Brazil encouraged local officials to work with OCGs to help stop the spread of the disease (Fajardo, 2020). The Hayat Tahrir al-Sham militia in Syria have distributed health information on the corona virus while the Taliban terror group have deployed health professionals to remote parts of Afghanistan. Similarly, the Al-Shabaab violent extremists have gone a step further to create Covid-19 treatment centers in Somalia (UNODC, 2020b).

These activities have allowed OCGs to gain further control of their territories, create conducive business environments and recruit with ease. The gestures have made them appear amenable to the community, solidify their posi-

tions and cast aspersions on the capabilities of existing authorities. The fake charities often solicit fraudulent donations and always pick a name that sounds close to a genuine and well-known charity.

Other scammers have pretended to offer fake home-test kits and miracle vaccines in an attempt to steal personal information. This adaptation is consistent with the FBI warning that unverified Covid-19 vaccine charity donations are likely to be scams. The scammers are destined to pose as patients of Covid-19 or will most likely solicit for donations on behalf of a friend or relative. Others may claim to be in distress in a far country and ask individuals to send them money urgently for vaccination before they travel. As the pandemic intensifies, philanthropic efforts of the OCGs have the potential of using the Kenyan population as 'guinea pigs' for trial vaccines and other medication still under development. The likelihood of other obsolete vaccines and medication getting into the Kenyan market under the guise of Covid-19 donations to third world countries remains large.



Photo Credit: Light for the World



Photo credit: Voice of America

### Distribution of counterfeit Covid-19 vaccines and related products

Lucrative opportunity for OCGs has been presented in the production and distribution of substandard Covid-19 Medical supplies and related products (UNODC, 2020a). The World Health Organisation (WHO) has already issued a warning on the proliferation of several unregulated online vendors selling substandard and counterfeit medical products.

The adaptation has witnessed seizures of false Covid-19 vaccines and other related illegal medicinal products in USA, Brazil, Italy, Spain and United Kingdom, Bosnia, Herzegovina, and Serbia, China and South Africa. (Interpol, 2021; Global Initiative Against Transnational Organized Crime, 2020; Reuters, 2020). These incidences have been linked to criminal syndicates

in the private sector which are politically connected (UNODC, 2020b).

The scenario in Kenya may not be different as the huge demand for HPTs and the fear of Covid-19 have limited the government's capacity to conduct sufficient quality checks on the products. As the pandemic intensifies, the situation may replicate itself in the distribution of fake Covid-19 vaccines in the country, since the genuine one is already in short supply. It is further expected that the OCGs will seek to obtain vaccines formula to be able to replicate them for black market distribution. The potential travel bans on non-vaccinated individuals will create a market for falsified vaccine certificates to enable international travel.

## Diversification into legitimate trade

The pandemic has opened opportunities for OCGs to acquire control of legitimate business organisations. This has been driven by the shortfalls many organisations experienced in liquidity and capital, rendering them unable to produce goods and services. Such struggling businesses are likely to seek support from OCGs in order to obtain liquidity, thereby creating an opening for entry of OCGs into legitimate markets.

The scheme is to rely on their ties with government officials, focusing on countries with high level corruption. In particular, OCGs such as the Sicilian Cosa Nostra, the Calabrian 'Ndrangheta', the Russian Mafia, the Triads in Hong Kong and Macau, and the Japanese Yakuza are conniving to swindle legal economies and exploit funds made available by governments (UNODC, 2020).

Due to reduced use of cash across the globe, a number of OCGs have resorted to using cryptocurrencies, like bitcoin, to stockpile their financial assets. The essential services industry has emerged as a major investment potential for OCGs. Over time, OCGs have ventured into sectors that have been in high demand during Covid-19, such as cleaning companies, food industry and funeral homes (Acosta, 2020).

They have also engaged in provision of health emergency services such as ambulances and selling of pharmaceutical and medical devices (Stephany et al., 2020). The logistics, e-commerce and pharmaceutical sectors have remained popular with OCGs because of increased demand for logistical support brought about by lockdown measures. This has made available new avenues for money laundering that could be applied in the vaccination programs.

In Kenya, the pandemic has decapitated a significant number of money laundering channels which in most cases relied on cash transactions. In particular, the shift to electronic cash transfers and other cashless transactions during the pandemic has reduced opportunities for placing illegal money into the financial system (Central Bank of Kenya, 2020).

These restrictions have occasioned OCGs to stockpile cash as they wait for the economy to fully reopen. The phenomenon underlies the rapid mushrooming of companies in Kenya for PPE distribution tenders and the flouting of public procurement rules to award tenders (Igunza, 2020)



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Photo Credit: The Official Microsoft Blog

## Fraud

Fraud schemes facilitated by OCGs during the pandemic have included supply and decontamination scams. Major targets have been Covid-19 prophylactics such as masks and sanitisers and people seeking to buy medical supplies off the Internet and afraid to leave their homes.

Popular scams have included phishing and stealing of money and delicate information. Extended scams where people receive messages telling them that they would be fined heavily for leaving their houses more than once have been noted in the United Kingdom. These schemes have vastly capitalised on anxieties and fears of the public (Limam, 2020). Other are impersonation of representatives of public authorities

and targeting of the vulnerable, commercial properties and medical facilities for organised burglaries (Europol, 2020).

Mismanagement of Covid-19 funds and donations have been evidenced in the fraud schemes in Kenya. For instance, part of the medical supply donations by Chinese Billionaire Jack Ma to assist in the management of Covid-19 could not be accounted for (Di Biasio, 2020). Other fraudulent schemes include the gross mismanagement of the Ksh. 1.3 billion (USD 11 Million) which had been donated by the World Bank to aid in the fight against the coronavirus pandemic (BBC, 2020). Majority of the companies involved in the fraud are in the private sector.



Photo Credit: DW News

This pattern foreshadows recurrence of fraud in the supply and distribution of Covid-19 vaccine, mostly in the area of identification fraud as individuals falsely receive vaccinations. The opportunity for OCGs lies in surreptitious activities for identify theft, exploiting legal loopholes in citizen registration and stealing of identification cards. This has already been experienced widely in the United Kingdom where individuals are using loopholes in the IT systems to bypass frontline workers for vaccination (Sleigh & Dunne, 2020). The country is fronting for vaccine passports targeting use of technology connected to its National Health Service (NHS). Similarly, the wider European Union is also contemplating the use of various methods of certification. Denmark and Sweden are working to develop a vaccination passport, while Germany and France are equally considering certifying Covid-19 status without discrimination. Beyond governments, private entities such as airlines, stadiums, schools, and locations prone to mass gatherings are bound to adapt these certification processes as a measure of safety for all those who interact within their brands (Balasubramanian, 2021).

The Ministry of Health, Kenya, is collaborating with African Union and Africa CDC on certified verification of a negative Covid-19 test for international travelers. This is in line with the Africa CDC Trusted Traveler (TT) initiative, an online system designed to authenticate and verify travelers' Covid-19 certificates. The directive puts a demand on all Kenyan laboratories to strictly issue Covid-19 certificates with Trusted Travel codes (Ministry of Health Kenya, 2021).

While the intention of the initiative is to prevent forgery of Covid-19 certificates by OCGs, the involvement of PanaBIOS Consortium and Econet Group, a bio-surveillance and bio-screening technology system as the authorised verification system, continues to raise a number of questions on the extent to which Kenya's Covid-19 data is protected from OCGs. Is Kenya safe sharing her Covid-19 data with PanaBIOS? What is the role of Kenya's National Data Centre in this? Who pays PanaBIOS for the verification? What makes it difficult for a verified vaccine certificate to be issued based on someone else's results? By virtue of being online-reliant in its operations, the PanaBIOS platform is not secure and may therefore be prone to hacks by cyber criminals for personal data. There remains clear loopholes for OCGs to exploit until the government issues clear procedures on the verification processes for incoming travelers.

Just as it happened to the PPEs, the OCGs will capitalise on prevailing panic and desperation across the world to acquire the vaccine. Their involvement is likely to cause interruption and delays in the distribution chain to increase anxiety and justify market for the vaccine counterfeits. The cost of human life will go up because of these delays as well as the use of counterfeit vaccines on unsuspecting victims. Given the indicated fragility of the vaccine, interrupting the distribution chain will reduce its effectiveness. Therefore, if reinfection or virus mutations occur, the vaccination process will be extended, and consequently, the crime too.

## Illegal diversion of shipments

Illicit diversion of legitimate vaccines to sell to other markets both locally and regionally presents a lucrative opportunity for OCGs in Kenya. Cases of COVID-19 vaccine being stolen have already been reported in Florida, New York and Pennsylvania (Jercich, 2021). There are fears among medical professionals that the closer the vaccine get to the patient, the easier it is to steal. Illegal diversion of COVID-19 vaccine shipments remains a possibility since one of Kenya's airports has previously featured in an investigation involving disappearance of around 6 million face masks destined for Germany.

With Eritrea and Burundi not keen on COVID-19 shots, the East African black market for the vaccine looms large. The situation is further catalysed by the existence of 'weak governance' structures in poorer countries to prevent diversion of vaccines by cartels (UNODC, 2020a). Theft and robberies of vaccines on transit as well

as distribution bases are imminent. The potential for shipments to be intercepted and vaccines counterfeited to increase sales in the black market looms large.

Corruption cartels in most of the world's public health systems remains a big problem, thereby raising concerns in the Covid-19 transport and distribution channels. Cartels in health authorities have created optimal opportunities for the OCGs to divert publicly owned and funded medical products in supply chains and hospitals to illicit markets (UNODC, 2020b). Given that the first world has had the privilege of first hand access to Covid-19 vaccine, there exists possibility of longer waits in poorer countries (Mueller & Stevis-Gridneff, 2021). This situation, therefore, presents opportunity for OCGs to divert vaccines produced in developed nations to the seemingly desperate situation in the developing nations, Kenya included.



Photo Credit: Logistics Update Africa

## Conclusion

The increasing demand for the vaccine is an avenue for adaptation of OCGs into more profitable ventures, both legal and illegal, in order to remain serviceable amidst the pandemic. Therefore, the potential of OCGs to infiltrate the Covid-19 vaccine supply, distribution and vaccination chain for profit exists. With the current world population in need of at least 15.6 billion doses of the vaccine, intellectual knowledge on vaccine production and brokerage of vaccine supply and distribution process will be prime products in the black market locally and globally. More specifically, channels already established in the trafficking of Covid-19 prophylactics and other related crimes will be put to full effect.

If the vaccine management chain is not properly secured, the aggregate socio-economic defects are enormous. These include huge loss of lives and livelihoods as the economy continues to melt down. It therefore calls for effective policies and their enforcement. This should incorporate intensified use of technology in the end to end supply chain databases of the vaccines.

## Recommendations

The following recommendations are offered in safeguarding the supply and distribution of Covid-19 vaccines in Kenya.

The government of Kenya should:

- a) Restrict the supply and distribution of Covid-19 vaccine to majorly government health agencies only and develop clear guidelines on involvement of the private sector to safeguard infiltration by OCGs.
- b) Tighten regulations governing the sourcing, distribution and administration of Covid-19 vaccine to ensure free and safe management of the vaccination process.
- c) Intensify surveillance and activate whistleblower channels for hoarding, counterfeiting and illegal vaccine administration channels.
- d) Build up strategic communication on vaccine distribution and administration to safeguard misinformation and disinformation by OCGs on the vaccination process.
- e) Escalate mapping of crime data and relaying information related to Covid-19 pandemic. These include geographical hotspots, transnational illegal shipment routes, corruption cartels, and online domains or websites with a reputation for various types of fraud related to covid-19.
- f) Strengthen security of shipping manifests and bills of lading to prevent the possible contamination and diversion of the vaccines.
- g) Amplify online monitoring of cyberspace and block websites that might be used to perpetrate fraud in the distribution chain.
- h) Upgrade security of vaccine stores at distribution and administration centers.
- i) Enhance use of technology to enable accurate distribution and administration of the vaccine. This could involve proper information dissemination and use of analytics and block-chain technology to track the vaccine processes including shipments, diversion and legal or illegal sales.

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