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ORGANIZATION OF AMERICAN STATES
Inter-American Drug Abuse Control Commission (CICAD)

Multilateral Evaluation Mechanism (MEM)
Governmental Expert Group (GEG)

THE BAHAMAS

(Commonwealth of)

EVALUATION OF PROGRESS IN DRUG CONTROL
2003-2004



INTRODUCTION

The Commonwealth of The Bahamas is an archipelago of 700 islands and has a total area of 13,940 km² with a coastline of 3,542 km. The country has a population of 314,000 (2003) with the following main ethnic groups: blacks and white and a literacy rate of 95.40% (2000). The Bahamas is a constitutional parliamentary democracy divided into 21 political constituencies. The country has a GDP per capita of US\$ \$16,007 and an inflation rate of 2.1% (2002). The Bahamas exports total US\$617 million annually (2002 est.) and relies on the principal exports of fish and crawfish, rum, salt, chemicals, fruit and vegetables.

I. INSTITUTIONAL BUILDING/NATIONAL ANTI-DRUG STRATEGY

A. National Antidrug Plan and National Commission

The Bahamas reports that it has a current National Anti-drug Plan (2004-2009), approved by the Cabinet. The Bahamian Plan covers the areas of demand and supply reduction, control measures, institutional framework, and program evaluation. In light of the nature of the country – an archipelago of 700 islands – decentralized policies have been adopted in the municipalities, with their respective antidrug strategies.

The National Anti-drug Plan of The Bahamas has a budget which comes from the central government, the international community, and contributions from civil society. Additionally, the agencies involved in combating drugs also contribute with their own budgets, although they are not predetermined. The budget to execute the National Anti-drug Plan resides in the specific appropriations for the implementing agencies: the Ministry of National Security (Police, Defense and Prison Services), Ministry of Health, the Ministry of Foreign Affairs and the Attorney General's Office. Additionally, the confiscated assets funds assist in defraying the cost of financing projects and activities being undertaken. The country is currently undertaking a study to determine the specific funds that are expended by the implementing agencies. This study is expected to be completed by May 2005. The country reports that it is concern whether adequate funds across the broad are available to execute the plan.

The National Anti-drug Secretariat (NADS) coordinates the areas of demand reduction, supply reduction, control measures, institutional framework and program evaluation. The institutions that make up the NADS central managing level are the Ministry of National Security, Ministry of Health and the Head of National Law Enforcement Agencies (HONLEA). The NADS is attached to the Ministry of National Security and is overseen by a ministerial cabinet committee. This agency has an overall budget of US\$70,000 for the year 2004; this, according to its own claims, is insufficient for performing all its tasks.

CICAD recognizes that the Bahamas has mechanisms to implement the various aspects of the anti-drug plan. However, CICAD notes with concern that the Bahamas does not yet have in place a system to measure the budget allocations to the implementing agencies.

B. International Conventions

The Bahamas has ratified the following international instruments:

- Inter-American Convention against the Illicit Manufacturing of and Trafficking in Firearms, Ammunition, Explosives, and Other Related Materials (CIFTA), 1997



- Inter-American Convention against Corruption, 1996
- United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, 1988
- United Nations Convention Against Psychotropic Substances of 1971;
- United Nations Single Convention on Drugs of 1961 as modified by the 1972 protocol.

It has not, however, ratified the Inter-American Convention on Mutual Assistance in Criminal Matters, 1992 nor the United Nations Convention Against Transnational Organized Crime, 2000 and its three Protocols.

The Bahamas states that it has a follow-up mechanism for the effective application of the mandates established in the international conventions, although details about this mechanism were not supplied by the country.

CICAD considers that the country is taking steps to implement the conventions that it has ratified. However, CICAD observes with great concern that The Bahamas has not yet ratified the Inter-American Convention on Mutual Assistance in Criminal Matters of 1992, as was recommended during the First Evaluation Round, 1999-2000.

CICAD also notes that The Bahamas has not ratified the United Nations Convention Against Transnational Organized Crime and its three Protocols, as was recommended during the Second Evaluation Round, 2001-2002.

RECOMMENDATIONS:

1. RATIFY THE INTER-AMERICAN CONVENTION ON MUTUAL ASSISTANCE IN CRIMINAL MATTERS, 1992, A RECOMMENDATION REITERATED FROM THE FIRST EVALUATION ROUND, 1999 – 2000.
2. RATIFY THE UNITED NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME AND ITS FOLLOWING PROTOCOLS, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001-2002:
 - A) THE PROTOCOL AGAINST THE SMUGGLING OF MIGRANTS BY LAND, SEA AND AIR
 - B) THE PROTOCOL TO PREVENT, SUPPRESS AND PUNISH TRAFFICKING IN PERSONS, ESPECIALLY WOMEN AND CHILDREN
 - C) THE PROTOCOL AGAINST ILLICIT MANUFACTURING OF AND TRAFFICKING IN FIREARMS, THEIR PARTS AND COMPONENTS AND AMMUNITION.

C. National Information System

The National Information Unit is responsible for disseminating drug-related information. Additionally, this agency, which is attached to the Ministry of Health and the Royal Bahamas Police, compiles and analyzes supply and demand reduction statistics. The Police Force gathers and analyses statistics on the supply side. The Bahamas is also a participant in the Inter-American Drug Use Data System (SIDUC) and Uniform Statistical System on Control of the Supply Area (CICDAT). The country reports drug-related statistics on regular basis to the International Narcotics Control Board (INCB) and to the United Nations Office on Drugs and Crime (UNODC).



The National Antidrug Plan includes the establishment of a National Drug Observatory by the year 2005, but is not yet implemented. Despite the absence of an observatory, the country reports that statistics are gathered, analyzed and disseminated by the implementing agencies.

The country carried out studies on drug use prevalence of high school students in 2003 and emergency room patients in 2004. Statistical work has been carried out by The Bahamas in the following areas: seizures by drug type, firearms, money laundering, cannabis cultivated areas, and arrests by type of offense. The National Anti-drug Plan provides for the evaluation of the country's drug collection capacity.

The Bahamas distributes publications and materials related to the drug problem through press / media, publications and reports by the NADS and other government agencies.

The Bahamas reports that it has a "Help Line" to provide the public with information about drugs.

CICAD notes the progress being made by The Bahamas to put in place mechanisms to compile and analyze drug-related supply and demand reduction statistics. However it encourages the country to continue with the implementation of the National Observatory on Drugs.

RECOMMENDATION:

3. IMPLEMENT THE NATIONAL DRUG OBSERVATORY TO GATHER AND ANALYZE STATISTICS AND OTHER RELATED DATA, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001 – 2002.

II. DEMAND REDUCTION

A. Prevention

A national system of drug abuse prevention programs targeting key populations is being implemented by The Bahamas. While the country reports that it currently offers programs for a range of target groups including school-based programs for primary and secondary students, community-based programs for adults, and programs for women, it does not provide details on the nature of the programs for students or the number of participants involved in any of the program areas identified. The country does not offer programs at the tertiary level, for working children, street and abandoned children, prisoners or in the workplace.

The country reports that it offers short-refresher courses and in-service professional specialized training in drug abuse prevention, treatment, and research. The Caribbean Regional Certificate Study Programme offers these short-refresher courses to health care and drug treatment workers, prison guards, police and defense forces. A total of seven professionals participated in the course in 2002 and no participants were registered during 2003 or 2004. The Bahamas does not offer technical courses or university level courses in this area, nor does it provide opportunities for regional and international training abroad programs. The country states that the Certificate Programme is sufficient to meet the demand for professional training and there are fourteen Bahamian students currently enrolled. However, the country notes that funding is a major challenge to sustain the programme.

The Bahamas indicates that it has not conducted any evaluations of drug abuse prevention programs in the past three years. However, the programmes are subjective to observational and feedback reviews in order to determine their effectiveness. The country also reports, that a



proposal has been developed for funding in order to conduct an evaluation of the Health and Family Life Education Program. The Bahamas reports that it has conducted complete scientific evaluations, however these evaluations are restricted to programmes with donor contributions.

CICAD recognizes that the country is implementing some prevention programmes in the area of demand reduction. However, CICAD is concerned that evaluations of prevention programmes is restricted to programmes with donor contributions.

RECOMMENDATION:

4. CONDUCT EVALUATIONS OF ALL DRUG ABUSE PREVENTION PROGRAMS, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001 – 2002.

B. Treatment

The Bahamas has not yet established guidelines or regulations on standards of care for drug abuse treatment, nor does the country keep a national registry of treatment services or programs. It does not possess instruments for accrediting such services and programs. The country attempted to establish a national registry. Given that The Bahamas does not have national standards of care, the country has not yet established a national mechanism to evaluate the quality of the services provided. However, the Ministry of Social Services has proposed legislation to establish standards for all care facilities in the country.

A number of drug treatment modalities are being offered, including one ambulatory, one residential and one clinic, all of which are publicly funded and offered to adults and minors of both genders. The country also has five private residential drug treatment programs for males only. The specific nature of the drug treatment services offered by the country include: network services for early detection, outreach and referral of cases both public and private. There is one public detoxification program; seven public and five private treatment and rehabilitation programs; two public social reintegration and aftercare services; and two public self-help groups. All of the services offered, whether public or private, are national in scope. The country also has one public treatment center which is geared specifically to women, while another is geared specifically for the treatment of adolescents.

In accordance with the Sandilands Rehabilitation Center, approximately 607 patients sought and received treatment in 2002, compared to 144 in 2003, and 178 in 2004. The country noted that all those who sought treatment received same. The Bahamas offers seven treatment programs, but reports that no studies have been undertaken to evaluate the various programs and modalities in order to determine their overall effectiveness. While the country recognizes that evaluation is needed, it notes that they are unable to undertake an evaluation without the necessary human and financial resources.

CICAD views with concern that The Bahamas has not established Minimum Standards of Care for persons affected by drug abuse, as was recommended during the Second Evaluation Round, 2001 – 2002.

RECOMMENDATIONS:

5. ESTABLISH MINIMUM STANDARDS OF CARE FOR DRUG ABUSE TREATMENT, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001 – 2002.
6. CONDUCT EVALUATIONS OF EXISTING TREATMENT PROGRAMMES.



C. Statistics on Consumption

A general population survey exploring the prevalence of substance use/abuse among the general population is yet to be undertaken by The Bahamas. Target population surveys on prevalence among high school students were undertaken in 2001 and 2003. The 2001 survey indicated that 84.9% of students between the ages of 10 and 19 years perceived drug use as being harmful to their health and well-being. The country stated that the research demonstrated a change in perceived risk over time, but provided no explanation of the nature and extent of the change. An analysis of the same data pointed to a correlation between perceptions of risk and prevalence with a greater percentage of students who perceived a drug as "quite" or "very harmful" reporting that they did not use that type of drug.

Prevalence in High School Students 2001

Type of drug	Lifetime (percentage)			Last 12 months (percentage)			Last 30 days (percentage)		
	M	F	Total	M	F	Total	M	F	Total
Alcohol	63.9	66.4	65.2	46.0	44.1	44.9	25.9	21.0	23.3
Tobacco	21.8	18.4	20.0	6.9	4.4	5.6	2.4	2.2	2.3
Solvents & Inhalants	6.7	6.2	6.2	2.9	2.0	2.4	1.5	0.8	1.1
Cannabis Type	20.9	9.4	14.9	12.7	4.9	8.6	7.8	2.1	4.9
Marijuana	20.9	9.4	14.9	12.7	4.9	8.6	7.8	2.1	4.9
Other Cannabis Type	0.7	0.8	0.8	0.3	0.2	0.2	0.3	0.1	0.2
Opioids	2.4	2.3	2.3	1.0	1.12	0.9	0.8	0.3	0.5
Heroin	1.5	0.6	1.0	0.8	0	0.4	0.6	0	0.3
Morphine	1.3	2.0	1.6	0.4	1.0	0.7	0.4	0.2	0.3
Opium	0.7	0.5	0.6	0.3	0.3	0.3	0.2	0.1	0.1
Cocaine Type	1.4	1.7	1.5	0.5	0.4	0.5	0.5	0.4	0.4
Cocaine HCL	1.0	1.1	1.1	0.5	0.3	0.4	0.5	0.2	0.3
Crack	1.1	1.0	1.1	0.3	0.3	0.3	0.3	0.2	0.2
Tranquilizers / Sedatives/ Depressants	3.2	3.0	3.2	1.0	1.4	1.3	0.4	0.5	0.4
Stimulants	1.7	2.0	1.9	0.3	0.8	0.5	0.3	0.6	0.4
MDMA (Ecstasy)	1.4	0.8	1.1	0.9	0.4	0.6	0.3	0.3	0.2
Methamphetamines	0.7	0.6	0.6	0.4	0.3	0.3	0.4	0.2	0.3
Other drugs	3.0	2.7	2.8	1.4	1.6	1.5	0.9	1.0	1.0
All illicit drugs	24.8	16.4	20.5	14.2	7.3	10.7	8.7	3.0	5.8

Average age of First use of any drug High School Students 2001

Type of drug	M	F	Average
Alcohol	11.2	11.9	11.5
Tobacco	11.2	11.7	11.4
Solvents & Inhalants	10.8	10.8	10.8
Cannabis Type	12.9	14.0	13.3
Marijuana	12.9	14.0	13.3
Hallucinogens	12.0	13.8	13.1
Opioids	10.1	14.0	11.0
Morphine*	9.0	13.6	12.0
Opium	7.8	10.3	8.9
Cocaine Type	11.7	12.3	12.0
Cocaine HCL	11.7	11.6	11.7
Crack	12.4	12.4	12.4
Tranquilizers / Sedatives/ Depressants	11.0	11.7	11.3
Stimulants	10.6	11.9	11.3
MDMA (Ecstasy)	13.4	13.4	13.4
Methamphetamines	8.4	11.0	9.6
Other drugs	11.8	13.0	12.4
All illicit drugs	12.6	12.9	12.7

*Non-prescribed/non-therapeutic use only



The country does not have an estimate of drug related morbidity among injecting drug users nor has it ever produce estimates of the association between drug use and Hepatitis B, Hepatitis C nor HIV. The country gathers data from emergency room reports, drug-related law enforcement reports and other sources in order to identify morbidity associated with drug abuse. The country informs that the use of ecstasy was first reported in The Bahamas in 2002.

CICAD recognizes the progress made to assess the prevalence of drug use among high school students. CICAD notes with concern that the country has not yet conducted a survey among the general population to estimate the impact of drug abuse.

RECOMMENDATION

7. CONDUCT A STUDY TO ESTIMATE THE PREVALENCE OF DRUG USE AMONG THE GENERAL POPULATION, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001-2002.

III. SUPPLY REDUCTION

A. Drug Production

The Royal Bahamas Police Force routinely eradicates the small amounts of cannabis, which are cultivated in the country. During 2002, 2003 and 2004, the country detected 0.4 hectares of cannabis cultivated.

B. Supply Reduction and Control of Pharmaceutical Products and Chemical Substances

The Bahamas reports that no illicit laboratories for organic or synthetic drugs have been found during 2002, 2003 and 2004.

Pharmaceutical Products

The Ministry of Health and the Bahamas National Drug Agency are the agencies responsible for the control of exportation, importation, license control, monitoring distribution, inspection, investigation, regulatory control, administrative sanctions, registry of licenses and transport control in the commercial sector. In the health sector, these agencies are responsible for license control, monitoring distribution, monitoring distribution, monitoring of prescribing, inspection, investigation, regulatory control, administrative sanctions and registry of licensees.

The country has in place a mechanism to monitor and regulate the use of pharmaceutical products and distribution by those health professionals authorized to do so. This mechanism includes the following elements: prescription requirement, special licenses or permits to prescribe certain drugs, distribution through pharmacies or other authorized outlets, monitoring distribution or purchases, monitoring of prescribing Inspection / investigation, administrative sanctions and registry of licensees.

There is also a formal system in place to evaluate the effectiveness of the mechanism that includes: number of licenses to practice issued, number of complaints received regarding unauthorized use, prescribing or distribution of pharmaceutical products, number of investigations initiated, number of administrative sanctions applied, number of inspections initiated, percentage of inspections resulting in investigations and percentage of health professionals in regulatory compliance.



However, the country reports lack of human resources and lack of regulations to effectively fulfill its responsibilities in controlling pharmaceutical products. From 2002 to 2004, there were no seizures of pharmaceutical products nor were any penal, civil or administrative sanctions applied.

CICAD notes with concern that the country has not approved the required legislation to effectively control pharmaceutical products listed in the United Nations Conventions of 1961 and 1971.

CICAD views with concern that The Bahamas has not developed a system to ensure effective compliance with the standards and regulations for preventing the diversion of controlled pharmaceutical products, as recommended during the Second Evaluation Round (2001 – 2002).

CICAD also notes the lack of information provided by the country in this area.

RECOMMENDATIONS:

8. APPROVE REQUIRED LEGISLATION IN ORDER TO ALLOW EFFECTIVE CONTROL OF PHARMACEUTICAL PRODUCTS.
9. DEVELOP A SYSTEM TO ENSURE EFFECTIVE COMPLIANCE WITH THE STANDARDS AND REGULATIONS FOR PREVENTING THE DIVERSION OF PHARMACEUTICAL PRODUCTS, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION, 2001 – 2002.

Controlled Chemical Substances

The Bahamas Customs Department is the national agency responsible for import / export control, license control, inspection, investigation, administrative sanctions and registry of licensees for controlled chemical substances. There is no mechanism to evaluate the effectiveness of this institution. During 2002 to 2004, there were no seizures of controlled chemical substances nor were any penal, civil or administrative sanctions applied. The Bahamas did not receive pre-export notifications for control chemical substances during the period 2002 to 2004. The country reports limited resources and lack of regulations to effectively fulfill its responsibilities.

CICAD notes with concern that the country has not approved the required legislation to effectively control chemical substances listed in the United Nations Convention of 1988.

CICAD notes with concern that The Bahamas has not developed a system to ensure effective compliance with the standards and regulations for preventing the diversion of controlled chemical substances, as recommended during the Second Evaluation Round (2001 – 2002).

CICAD also notes the lack of information provided by the country in this area.

RECOMMENDATIONS:

10. APPROVE REQUIRED LEGISLATION IN ORDER TO ALLOW EFFECTIVE CONTROL OF CHEMICAL SUBSTANCES.
11. DEVELOP A SYSTEM TO ENSURE EFFECTIVE COMPLIANCE WITH THE STANDARDS AND REGULATIONS FOR PREVENTING THE DIVERSION OF CONTROLLED CHEMICAL SUBSTANCES, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION, 2001 – 2002.



IV. CONTROL MEASURES

A. Illicit Drug Trafficking

The Drug Enforcement Unit (DEU) in conjunction with its OPBAT (Operation Bahamas, Turks and Caicos) partners and on its own initiative, conducted scores of operations during the years 2002 to 2004.

Quantity of Seized Drugs, 2002-2004

Year	2002	2003	2004
Type of drugs	Quantity Seized	Quantity Seized	Quantity Seized
Cannabis	25,197 lbs	13,356	4,093 lbs
Cannabis plants	110	14,112	1,552
Cannabis resin	-	5 lbs	-
Hashish Oil	-	1,151 lbs	-
Cocaine base	5,448 lbs	9,609 lbs	1,632 lbs
Heroin	-	0.6 lbs	-
Amphetamine/ methamphetamine	0.06 lbs	5 lbs	-

The country notes that seized illicit drugs are incinerated and any un-disposed of drug is used as evidence in court cases.

In 2002, there were 1,389 persons charged for illicit drug trafficking; this increased to 1,409 in 2003. In 2004, 1,606 persons were arrested and 1,412 charged for drug trafficking. The country has not provided any information for the number of persons convicted for illicit drug trafficking for the years 2002-2004.

The Bahamas reports that 1,409 persons were charged for illicit drug possession in 2003, however the country does not provide any data for the years 2002 and 2004. Alternative measures to criminal penalties are available in The Bahamas for a person who has been charged, prosecuted or found guilty of illicit possession for personal consumption. As appropriate, magistrates have issued sentences providing for treatment of offenders in lieu of imprisonment. The country further notes that a comprehensive Alternative Sentencing Bill is currently under review by stakeholders.

Interagency committee, joint forces/ operations, joint training and interagency information systems/networks are used to facilitate operational information exchange and collaboration among national authorities responsible for controlling illicit drug trafficking in The Bahamas.

The country indicates that the National Anti-drug Plan provides for a formal mechanism to evaluate the effectiveness of these collaboration systems, through the National Anti-drug Secretariat. However, The Bahamas does not provide any description of what this mechanism entails.

There were no extradition requests for illicit drug trafficking made to other countries for the period 2002-2004. The office of the Attorney General reports that during 2002, The Bahamas received 12 requests for extradition for illicit drug trafficking, none in 2003 and 16 in 2004. All of them were granted. The Bahamas reports that it allows extraditions of its nationals.

CICAD recognizes the efforts made by the country in combating illicit drug trafficking, together with the effective implementation of procedures for promptly responding the extradition request. The lack of information provided by the country limits a proper evaluation of this area of drug control.



B. Firearms and Ammunition

The Firearms Act 1969, Chapter 213, criminalizes the illicit possession, trafficking, and manufacture of firearms, ammunition, explosives, and other related materials. Such actions are punishable by up to seven-year prison terms. In 2003, the number of persons tried for illicit possession and trafficking in firearms and ammunition was 201, compared to 184 in 2002. In addition, from 2002-2004, there were 478 firearms and 4,900 rounds of ammunition confiscated. The Bahamas reports that the Firearms Act establishes administrative controls to prevent diversion of firearms and ammunition. Where explosives are concerned, there is an Explosive Act that establishes administrative controls for importation only. In these cases, the sanction is penal. There are no controls for exportation and in-transit movement of explosives.

**Quantity of firearms and ammunition confiscated
2002-2004**

	2002	2003	2004
Firearms	189	194	185
Ammunition	1,874	1,932	1,094

The Bahamas indicates that its law requires that firearms be marked when manufactured, imported, or used officially following their seizure and confiscation.

With reference to the number of firearms, ammunition, explosives, and other related materials confiscated in connection with arrests for illicit drug trafficking, the country reports the following data:

**Firearms and ammunition confiscated in relation to arrests for
illicit drug trafficking
2002-2004**

Year	Number of arrests	Quantity of confiscated firearms	Quantity of confiscated ammunition
2002	23	11	192
2003	26	12	182
2004	3	9	70

To keep confiscated firearms, ammunition, explosives, and other related materials from returning to the illicit market, they are either destroyed or donated to government agencies.

The Bahamas has a computer-based register that keeps records of the importation and in-transit movement of firearms, ammunition, explosives and other related materials. These data are kept for a period of 10 years. The country indicates that it does not manufacture nor export these items.

The country states that the Royal Police Force is the body responsible for the exchange of information and collaboration with agencies in other countries regarding the control of firearms, ammunition, explosives and other related materials.

CICAD recognizes that the country has adequate rules and regulations to control illicit trafficking in firearms, ammunition, explosives and other related materials. CICAD's ability to evaluate the efforts carried out by the agencies responsible for controlling movement of firearms, ammunition, explosives and other related materials and in preventing their diversion in The Bahamas was limited due to the lack of information provided.



C. Money Laundering

The Bahamas has enacted national laws that criminalizes money laundering and the sanctions for non-compliance: The Proceeds of Crime Act 2000, Financial Transaction Reporting Act 2000, and the Financial Intelligence Unit Act 2000. These laws criminalize money laundering as an autonomous crime. Predicate offenses include illicit drug trafficking, trafficking of firearms, traffic of human beings, prostitution, pornography, kidnapping, extortion, corruption, terrorism and its financing and fraud. However, the laws do not include organ trafficking as a predicate offense. Furthermore, these national laws authorize special investigations on money laundering cases as well as undercover investigations, electronic surveillance, use of informants and control deliveries.

The laws also establish administrative controls to prevent money laundering in respect of banks, "off-shore" banks, currency exchanges, insurance, casinos, real estate, lawyers, notaries, accountants and cross border movement of currencies as well as negotiable bearer instruments. There is no provision relating to stock exchanges. It is mandatory for financial institutions to report suspicious or unusual transactions to the competent authorities. It is also mandatory to have control measures in place that provide for the reporting of large transactions, client registry, verification of client identity, transaction registry, preservation of records, existence of enforcement officials and the existence of independent audits.

**Number of suspicious transactions reports
2002-2004**

Year	Number of Suspicious transactions reported	Number of investigations conducted
2002	160	59
2003	176	58
2004	145	37

During the years 2002 – 2004, no administrative or judicial sanctions were imposed for failure to comply or report money laundering. There are also provisions to provide bank documents and financial records in money laundering cases to facilitate financial intelligence and for indictment. In 2002, 160 requests were made for banks or other financial institutions documents and all were provided. In 2003, 176 requests were made and provided in 2003, and 91 requests were made and provided in 2004. These requests were answered within a two-week time frame.

The Bahamas reports on the value of property forfeited in cases related to money laundering. The country does not authorize sharing forfeited goods in cases involving more than one country.

**Value of property forfeited in money laundering cases
2003-2004**

Year	Value of property forfeited	Disposition of property forfeited
2003	US \$305,471.98	Deposited to the Confiscated Asset Fund Account
2004	US \$223,915.00	Deposited to the Confiscated Asset Fund Account

The country has an autonomous Financial Intelligence Unit (FIU) that receives requests, analyses and reports on transactions that may constitute money laundering. The Unit is under the authority of the Attorney General; it has a dedicated budget of US \$ 1M and is able to share information with other state agencies and foreign counterparts. The FIU is a member of the Egmont Group and has signed memoranda of understanding allowing for the exchange of information with counterparts in Australia, Belgium and Guatemala. The FIU has the capability to exchange information with counterparts in other countries without the signing of a memorandum of understanding.



The Bahamas did not make any requests for extradition in money laundering cases to other states, nor it received any requests from other states. The Office of the Attorney General is the central authority responsible for making and receiving requests for extradition to / from other countries and for making international cooperation requests to other states. The country reports that it did not make any requests to freeze assets or to lift bank secrecy in money laundering cases, however, The Bahamas did not provide any data in the number of requests received from other states.

The country did not provide any data in the number of officials trained to enforce laws and regulations to control and repress money laundering.

CICAD notes the progress made by the Bahamas to impose comprehensive legal and administrative controls to prevent money laundering. However, CICAD notes with concern that there are no provisions to control trafficking in organs, nor to exercise control over stock exchanges.

RECOMMENDATIONS:

12. AMEND LEGISLATIONS TO PROVIDE FOR ORGAN TRAFFICKING AS A PREDICATE OFFENSE OF MONEY LAUNDERING.
13. ESTABLISH ADMINISTRATIVE CONTROLS ON STOCK EXCHANGES TO PREVENT MONEY LAUNDERING.

D. Corruption

The Bahamas reports that 2 public officials were charged for offenses related to illicit drug trafficking in 2002 and two in 2004, all these cases are still pending.

CICAD's ability to evaluate the efforts carried out by The Bahamas in this section was constrained due to the lack of information provided.

E. Organized Crime

National laws combat Transnational Organized Crime, such as the Proceeds of Crime Act, the Dangerous Drugs Act, the Terrorism Act, and the Financial Intelligence Unit Act. These laws criminalize participation in an organized criminal group, money laundering, corruption, obstruction of justice, trafficking in persons, illicit trafficking of migrants, and illicit manufacture of firearms, their parts and components and ammunition.

The cooperation measures covered by the national laws include extradition, mutual joint legal assistance, seizure and confiscation, and interdiction operations, however they do not cover victim protection and assistance. National laws also include special investigation techniques, such as undercover operations, telephone line tapping, and controlled deliveries.

CICAD notes some progress made by The Bahamas by enacting legislation to criminalize transnational organized crime. However the lack of information provided by the country impedes a proper evaluation of its efforts.



V. CONCLUSIONS

CICAD notes that The Bahamas has made some progress in the area of drug abuse control. It has demonstrated effective mechanisms to implement the various components of its anti-drug plan. However, the country does not yet have in place a system to measure the diverse budget allocations destined to combat the drug phenomenon. The country has taken steps to implement international conventions. However CICAD notes that The Bahamas has not yet ratified the Inter-American Convention on Mutual Assistance in Criminal Matters nor the United Nations Convention Against Transnational Organized Crime and its three Protocols.

CICAD encourages the establishment of a National Drug Observatory that will enhance the country's demand and supply reduction efforts, especially in the area of data collection, analysis and dissemination. The country's efforts in drug prevention can be strengthened through continuous evaluation of all programmes. CICAD notes with concern that The Bahamas has not established minimum standards of care for drug treatment providers. Although progress has been made to assess the prevalence of drug use among high school students, the country has not yet conducted a survey among the general population.

CICAD observes that the required legislation to effectively control chemical substances and pharmaceutical products has not been established nor regulations. However, efforts have been made to combat illicit drug trafficking and to respond effectively to extradition requests. The country also has adequate rules and regulations to combat illicit trafficking in firearms, ammunition, explosives and other related materials.

The capacity to effectively control money laundering and transnational organized crime has been strengthened, though certain areas still require regulation and training of personnel. Attention is needed in the implementation of legislation in relation to corruption.

CICAD reiterates its concern that the country's failure to facilitate information distorts the assessment of its progress in dealing with the drug problem.

CICAD urges The Bahamas to renew its commitment to the MEM process, as the fight against the drug problem in all of its manifestations is a shared problem for all countries in this Hemisphere.



VI. SUMMARY OF RECOMMENDATIONS

The following recommendations are assigned to The Bahamas in order to assist the country in strengthening its policies to combat the problem of drugs and related activities and increase multilateral cooperation in the Hemisphere:

INSTITUTION BUILDING

1. RATIFY THE INTER-AMERICAN CONVENTION ON MUTUAL ASSISTANCE IN CRIMINAL MATTERS, 1992, A RECOMMENDATION REITERATED FROM THE FIRST EVALUATION ROUND, 1999 – 2000.
2. RATIFY THE UNITED NATIONS CONVENTION AGAINST TRANSNATIONAL ORGANIZED CRIME AND ITS FOLLOWING PROTOCOLS, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001-2002.
 - A) THE PROTOCOL AGAINST THE SMUGGLING OF MIGRANTS BY LAND, SEA AND AIR
 - B) THE PROTOCOL TO PREVENT, SUPPRESS AND PUNISH TRAFFICKING IN PERSONS, ESPECIALLY WOMEN AND CHILDREN
 - C) THE PROTOCOL AGAINST ILLICIT MANUFACTURING OF AND TRAFFICKING IN FIREARMS, THEIR PARTS AND COMPONENTS AND AMMUNITION.
3. IMPLEMENT THE NATIONAL DRUG OBSERVATORY TO GATHER AND ANALYZE STATISTICS AND OTHER RELATED DATA, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001 – 2002.

DEMAND REDUCTION

4. CONDUCT EVALUATIONS OF ALL DRUG ABUSE PREVENTION PROGRAMS, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001 – 2002.
5. ESTABLISH MINIMUM STANDARDS OF CARE FOR DRUG ABUSE TREATMENT, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001 – 2002.
6. CONDUCT EVALUATIONS OF EXISTING TREATMENT PROGRAMMES.
7. CONDUCT A STUDY TO ESTIMATE THE PREVALENCE OF DRUG USE AMONG THE GENERAL POPULATION, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION ROUND, 2001-2002.

SUPPLY REDUCTION

8. APPROVE REQUIRED LEGISLATION IN ORDER TO ALLOW EFFECTIVE CONTROL OF PHARMACEUTICAL PRODUCTS.
9. DEVELOP A SYSTEM TO ENSURE EFFECTIVE COMPLIANCE WITH THE STANDARDS AND REGULATIONS FOR PREVENTING THE DIVERSION OF PHARMACEUTICAL PRODUCTS, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION, 2001 – 2002.
10. APPROVE REQUIRED LEGISLATION IN ORDER TO ALLOW EFFECTIVE CONTROL OF CHEMICAL SUBSTANCES.
11. DEVELOP A SYSTEM TO ENSURE EFFECTIVE COMPLIANCE WITH THE STANDARDS AND REGULATIONS FOR PREVENTING THE DIVERSION OF CONTROLLED CHEMICAL SUBSTANCES, A RECOMMENDATION REITERATED FROM THE SECOND EVALUATION, 2001 – 2002.



CONTROL MEASURES

12. AMEND LEGISLATIONS TO PROVIDE FOR ORGAN TRAFFICKING AS A PREDICATE OFFENSE OF MONEY LAUNDERING.
13. ESTABLISH ADMINISTRATIVE CONTROLS ON STOCK EXCHANGES TO PREVENT MONEY LAUNDERING.