

# The regulation of arms brokering in Southern Africa

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As brokers are a crucial link in the chain of arms transfers to militaries, policing agencies, militias and rebel groups, the development and implementation of controls on arms brokering activities has drawn considerable global attention, particularly within the United Nations (UN) system. A number of international, regional and subregional multilateral agreements that aim to eradicate the uncontrolled proliferation of arms include recommendations and commitments to control brokering activities. Their objectives are to regulate licit brokering, which typically relates to the facilitation of legal government-to-government arms, ammunition and military equipment transfers, and to distinguish this clearly from illicit brokering, which generally entails the diversion of legitimately sourced arms, ammunition and military equipment into criminal markets; the facilitation of arms transfers in violation of United Nations Security Council arms embargoes; or the facilitation of access to arms for transnational organized crime syndicates.

Multilateral agreements, however, are in themselves not enough. Effective control over arms brokers can only be achieved through creating and implementing national legislation: many regions are yet to achieve legally enforceable legislation (and accompanying punitive measures) at the subregional and regional levels. It is essential that a comprehensive network of states with national controls be constructed and effectively maintained, as unscrupulous brokers are adept at moving their operations and evading controls. Those countries without adequate brokering laws and regulations indirectly undermine international attempts to prevent illicit arms trafficking.

This article focuses on arms brokering activity and regulation in the Southern African Development Community (SADC), a region that was plagued by illicit arms brokering in the 1990s and early 2000s, and that in 2001 established a firearms and ammunition control protocol, a regional instrument to control the illicit flow of small arms and light weapons, which includes provisions on arms brokering.<sup>1</sup>

## *The evolution of arms brokering in Southern Africa*

Arms brokering in Southern Africa can be traced back to the eighteenth century, the initial period of colonial penetration of Southern Africa, when brokering was characterized by entrepreneurs and transport agents of European descent arranging the supply of firearms, ammunition and gunpowder to settlers (and later indigenous people) to be used for hunting, protection of lives and property, and to engage in armed conflict. Between 1977 and 1994, arms brokers collaborated closely with the South African government to smuggle arms into South Africa in violation of a mandatory UN Security

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Council arms embargo (resolution 418).<sup>2</sup> From the early 1970s until the late 1990s, arms brokers arranged for the delivery of weapons, ammunition and military supplies both to governments and non-state groups throughout the Southern African region.

International attention with respect to arms brokering activities in Southern Africa became more acute from the mid-1990s, as it became clear that arms brokers were involved in supplying arms to Rwandan forces and to the União Nacional Para a Independência Total de Angola (UNITA) rebel group in Angola, in violation of UN Security Council arms embargoes. In the case of arms transfers to UNITA, a Human Rights Watch report in 1994 indicated that:

...UNITA continues to receive support from private sources in South Africa, and has found a number of other governments willing to provide arms, or to facilitate UNITA's arms purchases through private sources, most notably Zaire [now the Democratic Republic of the Congo].<sup>3</sup>

Similar allegations were made by the UN Panel of Experts on Violations of Security Council Sanctions against UNITA in 2000, which highlighted the role of arms brokers:

...arms procurement by UNITA was not by means of direct contact between UNITA and arms producing countries. ...UNITA placed orders with arms brokers who then undertook to procure the required items. A small number of favoured brokers accounted for the bulk of UNITA's weapons imports, but in some cases UNITA also solicited bids from a wider range of brokers—particularly when there were special needs or requirements. As a general rule, the broker who supplied the arms was also responsible for arranging transport and delivery, any necessary training on the use of the system, maintenance and sometimes even spare parts.<sup>4</sup>

As regards Rwanda, reports suggested that a South African arms broker had, in collaboration with an official of the Rwandan Hutu government-in-exile, brokered the shipment of arms and ammunition held by the Seychelles government to Rwandan Hutu forces in what is now the Democratic Republic of the Congo (DRC) in June 1994.<sup>5</sup> The Seychelles authorities had confiscated the arms and ammunition in question in 1993, when they were destined for Somalia, which was under a UN Security Council arms embargo. The South African arms broker allegedly informed the Seychelles authorities that the recipient government for this new deal would be Zaire (now DRC).<sup>6</sup>

More recently (in 2006), a Belgian arms broker based in South Africa violated the UN Security Council arms embargo against Côte d'Ivoire.<sup>7</sup> The South African authorities, mainly due to bureaucratic inertia, have been unable to take timely legal action against this arms broker, who has now left South Africa.

Allegations of illicit arms brokering have been made against individuals and business entities located within Zimbabwe since 1997. It has been reported that individuals who were closely associated with Zimbabwe Defence Industries (ZDI) (which is a state-run, but private, enterprise) were involved in arranging illicit arms transfers to a rebel group in Sierra Leone and Charles Taylor's regime in Liberia.<sup>8</sup> In March 2004, a group of alleged mercenaries (predominantly South Africans), who were supposedly en route to stage a coup against the government of Equatorial Guinea, were arrested at Harare airport.<sup>9</sup> The group was accused of attempting to acquire weapons in Harare from ZDI. A prominent Zimbabwean businessman has also been implicated in facilitating arms supplies to Zimbabwe in violation of a European Union arms embargo, in addition to other suspicious international arms deals.<sup>10</sup>

Illicit arms brokering, carried out from both inside and outside the subregion, is still having serious consequences in some parts of Southern Africa, particularly eastern DRC. The UN Security

Council Group of Experts on the DRC reported in January 2008 that “regional smuggling networks are supplying weapons to illegal armed groups in the eastern part of the Democratic Republic of the Congo”.<sup>11</sup> Such activities were in violation of the UN Security Council arms embargo on all foreign and Congolese armed groups and militias operating in the territory of North and South Kivu and Ituri, and on groups not party to the Global and All-Inclusive Agreement on the Transition in the Democratic Republic of the Congo.<sup>12</sup>

### *Arms brokering regulation: selected Southern African cases*

The states of the Southern African region are making efforts to regulate arms brokering. The legally binding SADC Protocol on the Control of Firearms, Ammunition and Other Related Materials of 2001 commits its member states to implement legislation to control the activities of arms brokers in their territories. Section 5(3)(m) of the protocol stipulates that states parties should incorporate provisions that “regulate firearm brokering” in their national laws “as a matter of priority”.<sup>13</sup>

In June 2009 only two member states have specific legislative provisions to regulate brokering activities, namely Mauritius and South Africa.<sup>14</sup> The other SADC member states have not instituted specific brokering controls due to a combination of insufficient capacity and technical expertise, as well as a lack of political will. Some SADC member states have indirect and non-specific brokering controls: that is, some of the dimensions of arms brokering are regulated implicitly by national measures to control the import, export and transport of arms and ammunition; typically by a permit or licence system, where, in most cases, any individual or entity requires official documentation to transfer arms or ammunition across, into or out of the country.

Here we review brokering regulations and their effectiveness in SADC member states that have experienced significant levels of arms brokering activity and/or instituted brokering or brokering-related regulations and controls.

#### **SOUTH AFRICA**

South Africa has the most advanced arms industry in sub-Saharan Africa, established in the late 1930s.<sup>15</sup> As a result of the UN Security Council arms embargo, substantial government investment expanded South Africa’s arms industry significantly in the 1970s and 1980s, so that arms, ammunition and military equipment could be produced domestically.<sup>16</sup> In the late 1980s, following South Africa’s military withdrawal from Angola and Namibia, as well as a considerable reduction in the capital expenditure component of the defence budget, the defence industry began to prioritize exports, and made extensive use of arms brokers as a means of circumventing the arms embargo, which was lifted in May 1994.<sup>17</sup> As noted above, arms brokers based in South Africa, without the approval of the South African government, were also responsible for facilitating arms transfers to regions experiencing armed conflict and to groups and governments that were subject to UN Security Council arms embargoes.

In 1995, a year after the first all-race democratic elections, the South African cabinet penned a new arms export control policy, which was converted into legislation in 2002 (the National Conventional Arms Control Act). The new policy was principally motivated by the actions of a Lebanese arms broker, Eli Wazan, who in 1993 facilitated the export of South African arms to Yemen by means of fraudulent end-user certificates (which stated the end destination as Lebanon). South Africa was seeking to promote a new, more responsible, human rights-based foreign policy at the time, and Yemen was widely regarded as a country through which arms would be re-exported to conflict zones. The government established a Commission of Inquiry into the incident. Subsequent to

the commission's report, South Africa overhauled its arms export regulations by means of a cabinet memorandum.<sup>18</sup> The memorandum led to the creation of the National Conventional Arms Control Committee (NCACC), a permanent cabinet committee to oversee the reform of the arms export regime and the regulation of South African arms exports. A secretariat (currently known as the Directorate for Conventional Arms Control, or DCAC), as well as an interdepartmental Scrutiny Committee was also established to support the NCACC.

The National Conventional Arms Control Act incorporates most of the regulations from the cabinet memorandum. It includes relatively detailed arms brokering controls, whereby arms brokers are required to register with the DCAC as well as to apply for export licences prior to arranging arms-related transfers. All arms export licence applications must be authorized by the NCACC. The NCACC has the authority to monitor and investigate any arms transfer that it regards as being suspicious. In addition, an arms broker found guilty of contravening key provisions of this act may receive a maximum prison sentence of 25 years.

In 2008, the National Conventional Arms Control Act was amended; this effectively strengthened the arms brokering control regime in South Africa, as it expanded the regulation of brokering activities from conventional arms to "controlled items", a more comprehensive list of arms and arms-related materials that is set to be determined by the NCACC during 2009. Section 1 of the current act defines brokering services as:

- acting as an agent in negotiating or arranging a contract, purchase, sale or transfer of controlled items for a commission, advantage or cause, whether financially or otherwise;
- acting as an agent in negotiating or arranging a contract for the provision of services for a commission, advantage or cause, whether financially or otherwise;
- facilitating the transfer of documentation, payment, transportation or freight forwarding, or any combination of the aforementioned, in respect of any transaction relating to buying, selling or transfer of controlled items; and
- acting as intermediary between any manufacturer or provider of controlled items, and any buyer or recipient thereof.]

The National Conventional Arms Control Act (as amended) establishes the most comprehensive set of regulations in Southern Africa to control arms brokering activities. This legislation is applicable to any South African citizen, permanent resident or organization registered or incorporated in South Africa, irrespective of their physical location. The South African framework of regulations is widely regarded in the arms control community as being rigorous and robust. However, consistent implementation remains a challenge for the South African government, as over the past two years the NCACC has only met infrequently, and has not adhered to all the transparency provisions of the act. In addition, the DCAC does not have sufficient capacity to fully implement the responsibilities assigned to it.

## MAURITIUS

The Mauritian government is currently pursuing a relatively stringent approach to firearms control, and the Firearms Act 2006 prohibits arms brokering activities in Mauritius. Section 32 of the act states:

no person shall act on behalf of another, whether in return for a fee, commission or other consideration, or not, to negotiate any contract or other arrangement in connection with ... manufacturing, exporting, importing, financing, mediating, purchasing, selling, transferring, transporting, freight-forwarding, supplying and delivering firearms, their parts or components or ammunition or any other act performed by a person, that lies outside the scope of his regular business activities and that directly facilitates the brokering activities.<sup>19</sup>

In terms of acquiring firearms, ammunition and related equipment for the official security forces, the Mauritian government tends to import directly from foreign manufacturers, as Mauritius does not manufacture arms and ammunition. Such orders are typically small, but are put out for tender and administered by the Prime Minister's office. As brokering within Mauritius is prohibited, only foreign persons or entities are permitted to submit tender documents.<sup>20</sup>

Firearms and ammunition dealers source their stock directly from foreign manufacturers, predominantly in Europe (for example, enterprises in Austria, Czech Republic, Finland, Germany and Sweden).<sup>21</sup> One dealer stated that he used to import firearms and ammunition from a broker based in South Africa, but that the process of importing the items proved to be expensive and time-consuming (due to the scrutiny required by the South African arms export regulations). This underscores the necessity for—and effectiveness of—common and rigorous brokering regulations in all arms-producing states.<sup>22</sup>

## ANGOLA

Much of Angola's criminal procedure and firearms-related legislation is outdated. For example, Article 265 of the Angolan Penal Code (1954) specifies punitive measures of one to five years imprisonment for individuals found guilty of the illicit manufacture, import, transport, purchase, sale, concealment, caching, marketing or holding of war materials, firearms and their ammunition. Angolan legislation prohibits the private import, export and sale of military-style firearms.

It is not possible to purchase firearms legitimately in Angola for civilian use. Instead, anyone seeking to purchase a weapon would first have to obtain a firearm permit, and then an import permit. They would have to purchase the firearm in another country (most likely in Namibia or South Africa) and provide the Angolan border authorities with the necessary documentation when it was imported. However, this system is weakened by a lack of effective communication between the Angolan and the Namibian authorities, as noted in the section on Namibia.

Angola has yet to ratify the SADC Firearms Protocol, and it has not established robust arms brokering controls and regulations. This is of concern, given Angola's experience of illicit arms brokering, particularly with UNITA, as mentioned above.

## BOTSWANA

In Botswana, the Arms and Ammunition Act 1981 provides for the registration of arms dealers, as well as the regulation of the arms trade in Botswana. Article 13 of the act stipulates that no person shall trade, purchase, sell or transfer any arms or ammunition unless they are a registered arms dealer, and they are required to be a citizen or a resident of Botswana. A government permit is required for the legitimate import and export of arms and related material.

The Botswana government makes use of registered arms dealers to procure arms and ammunition for official use.<sup>23</sup> However, given the modest size of the Botswana security forces, the supply of arms and ammunition to government is not highly profitable. This, combined with the relatively small and highly regulated trade in firearms and ammunition for civilian use (which includes a raffle system of allocating firearm licences to individuals), has led to firearms dealers selling a range of other goods, such as camping and fishing equipment and accessories. No significant incidents of illicit arms brokering in Botswana have been reported, hence the lack of prioritization with regard to establishing specific brokering controls.

## MALAWI

In Malawi, the Firearms Act 14:01 (1967) governs the use, possession and trade in firearms and related materials. The Registrar of Firearms (with the Malawi police) is the central authority with respect to the acquisition of firearms. This authority regulates the issue of permits and licences for the exportation and importation of firearms. Firearms dealers are accountable to the Registrar for all the transactions they conduct, and are required to keep a register and to submit returns to the Registrar of Firearms.

There have been no reports of significant firearm trafficking associated with Malawi, hence it is not possible to ascertain the effectiveness of the controls currently in place.

## NAMIBIA

The Arms and Ammunition Act 1996 regulates the manufacture, trade, transfer, use and possession of small arms and light weapons in Namibia, but makes no specific provision for the regulation of arms brokering activities. However, individuals and organizations that seek to trade in arms and ammunition in Namibia must have a dealer's licence, which is issued by the Namibian Police Force (Nampol). Dealers are required to establish and maintain registers on all arms and ammunition acquired, disposed of, transferred and sold. Dealers are also obliged to submit monthly returns to the firearm registry. Only licensed arms and ammunition dealers and appropriate government agencies, such as the Namibia Defence Force, are permitted to import and export commercial consignments of arms and ammunition, and an import permit issued by Nampol is mandatory.<sup>24</sup>

According to the National Focal Point on Small Arms and Light Weapons, Nampol acquires the majority of its firearms and ammunition from dealers. All police arms and ammunition contracts are put out to tender and, in principle, only licensed dealers in Namibia are eligible to submit tender documents.<sup>25</sup> Thus, dealers that are successful in securing a police contract essentially act as brokers. The Ministry of Defence typically secures its arms, ammunition and military equipment directly from manufacturers, and does not make use of brokers.<sup>26</sup>

Namibia's current firearms control legislation allows for citizens of SADC states (who are not residents of Namibia) to purchase firearms in Namibia and then export them to their country of residence (subject to relevant national firearm controls). Angolan citizens reportedly make use of this provision most frequently. In order for such a transaction to take place legally, the non-citizen requires a letter of permission from the appropriate authority in their country of residence, as well as an official export permit from Nampol. However, there is typically no communication at all between Nampol and the authorities of the state to which the individual is purporting to export the firearm(s) and ammunition to ascertain whether the firearm(s) and ammunition physically left Namibian soil. This state of affairs has the potential to allow for individuals to stockpile and illegally trade in firearms and ammunition in Namibia. Nampol has taken legal action against Namibian-based businesspersons in the northern border regions with regard to firearm stockpiling.<sup>27</sup>

## TANZANIA

In Tanzania, the Armaments Control Act 1991 prohibits the import and export of armaments without official and documentary authorization by the National Armaments Control Advisory Board, an interdepartmental body appointed by the President of Tanzania. Any person who attempts to transfer arms and related material across Tanzanian soil without authorization will be subject to prosecution.

The authorities maintain strict control over the actions of firearms dealers in Tanzania. Detailed reports must be sent to the Firearm Registrar of the Tanzanian police on all firearm and ammunition

sales and purchases. All imports of firearms must first be authorized by the Firearm Registrar. Dealers are required to inform the police of the transportation of firearm stocks to their premises. The police will then provide protection during the transportation process. Given Tanzania's close proximity to eastern DRC, however, these controls are insufficient. DRC has experienced brisk arms embargo-busting activities in recent years, therefore Tanzania needs more specific legislation to effectively discourage and restrain illicit brokering.

## ZIMBABWE

Zimbabwe's key firearms control legislative document is the Firearms Act 1957, but it does not include an arms brokering component. Recently an amendment to this legislation was drafted, but it is yet to be approved by the state law adviser and approved by the legislature. There are, however, elements within this legislation that relate to the trade and transportation of firearms and ammunition. Currently, all firearms dealers require an official licence and must maintain registers of their stock and transactions. Any person who transports firearms and ammunition across Zimbabwean soil is required to carry an official licence or a permit. This system is rigorously enforced by the Zimbabwe Republic Police. However, it is suspected that larger-scale brokering activity, particularly with regard to ZDI, is not being regulated in the same way.

## OTHER SOUTHERN AFRICAN STATES

Despite the 2001 SADC Firearms Protocol committing member states to implement brokering legislation, there are no specific brokering controls within the remaining SADC member states. In Lesotho, Mozambique, Swaziland and Zambia, firearms exports and imports are administered by means of permit or licence systems similar to those in place in Botswana, Malawi and Namibia. In the DRC, the applicability of current firearms control legislation is a moot point: technically, there is a ban on civilian firearm possession. However, this ban has not been effectively enforced. In addition, despite its considerable experience of the activities of illicit arms brokers, the DRC has not yet instituted formal controls or regulations to govern arms brokers.

## Conclusion

Significant levels of arms brokering activity have taken place within the SADC region over the past decade, and such activities are likely to continue in the foreseeable future. Much appears to be legitimate, but certain individuals and business entities have engaged in unscrupulous arms dealings, which have included the violation of UN Security Council and European Union arms embargoes—although a broker has yet to be convicted of illicit arms trafficking in the SADC region. Current, indirect controls are clearly insufficient: it is essential that those SADC member states that have not already instituted specific brokering regulations prioritize the establishment of such regulations.

***A broker has yet to be convicted of illicit arms trafficking in the SADC region.***

In 2007, the Southern African Regional Police Chiefs Cooperation Organisation (SARPPCO), in partnership with the Institute for Security Studies (South Africa), devised standard operating procedures (SOPs) for the implementation of key elements of the SADC Firearms Protocol. The objective of such operating procedures was to provide policy makers, legislative officers and practitioners of firearms control with guidance on how to amend national legislation in order for it to conform to the SADC Firearms Protocol. A number of these operating procedures relate to the regulation of arms brokering activities.

The implementation of the SOPs is being facilitated by SARPCCO's Regional Coordinating Committee (RCC) on Small Arms and Light Weapons, which is comprised of the heads of firearms control in all SARPCCO member states.<sup>28</sup> The RCC meets twice a year, and the members assist each other with amendments to national legislation and controls in order to bring them into line with the SADC Firearms Protocol. For example, in 2009, Botswana and Namibia are in the process of amending their firearms control legislation, and are using the SOPs as a reference source. In addition, in 2009 SARPCCO initiated the purchase of firearm marking equipment for member states and developed a common firearm record-keeping database to apply to the SADC region. Both developments will further empower security forces in the SADC region to respond constructively to the problem of illicit brokering in arms and ammunition.

### Notes

1. This article summarizes the findings of Guy Lamb and Nicholas Marsh (eds), 2009, *Dangerous Dealings: Arms Brokering and Regulations in Southern Africa*, Institute for Security Studies and International Peace Research Institute, Oslo. Other contributors to this publication include Ben Coetzee, Noël Stott and Gugu Dube.
2. Signe Landgren, 1989, *Embargo Disimplemented: South Africa's Military Industry*, Oxford, Oxford University Press, pp. 237–238; Jose Vegar, 1997, "Stiffed Arms Merchant Sues", *Bulletin of the Atomic Scientists*, vol. 53, no. 6, November/December.
3. Human Rights Watch, 1994, *Arms Trade and Violations of the Laws of War Since the 1992 Elections*, New York, Human Rights Watch, p. 53. See also the follow-up report by Human Rights Watch, 1999, *Angola Unravels: The Rise and Fall of the Lusaka Peace Process*, New York, Human Rights Watch, pp. 112–123.
4. *Report of the Panel of Experts on Violations of Security Council Sanctions against UNITA*, reproduced in UN document S/2000/203, 10 March 2000, paragraph 15.
5. Brian Wood and Johan Peleman, 1999, *The Arms Fixers*, BASIC, NISAT and PRIO, chapter 3; this case is also taken up in the *Report of the International Commission of Inquiry (Rwanda)*, UN document S/1996/195, 14 March 1996, paragraphs 21–39.
6. Wood and Peleman, op. cit.
7. *Report of the Group of Experts* submitted pursuant to paragraph 2 of Security Council resolution 1708 (2006) concerning Côte d'Ivoire, UN document S/2006/964, 12 December 2006, pp. 7–8.
8. "Zim Running Guns for Africa", *City Press* (Johannesburg), 29 June 2008.
9. "SA 'Mercenaries' Plead Not Guilty", *BBC News*, 19 August 2004.
10. "Probe into BAE Arms Deals Widens", *BBC News*, 19 October 2006.
11. *Final Report of the Group of Experts on the Democratic Republic of the Congo*, reproduced in UN document S/2008/43, 13 February 2008, paragraph 56.
12. UN Security Council resolution 1493 (2003), UN document S/RES/1493(2003), 28 July 2003.
13. Southern African Development Community, Protocol on the Control of Firearms, Ammunition and Other Related Materials, signed at Blantyre, 14 August 2001.
14. The members of the SADC are: Angola, Botswana, DRC, Lesotho, Madagascar, Malawi, Mauritius, Mozambique, Namibia, Seychelles, South Africa, Swaziland, Tanzania, Zambia and Zimbabwe.
15. Gavin Cawthra, 1986, *Brutal Force: The Apartheid War Machine*, London, International Defence and Aid Fund, p. 49.
16. Peter Batchelor and Susan Willett, 1998, *Disarmament and Defence: Industrial Adjustment in South Africa*, Oxford, Oxford University Press, pp. 32–35.
17. Peter Batchelor, Paul Dunne and Guy Lamb, 2002, "The Demand for Military Spending in South Africa", *Journal of Peace Research*, vol. 39, no. 3, pp. 339–354.
18. The Commission of Inquiry into Alleged Arms Transactions between Armscor and One Eli Wazan and Other Related Matters, chaired by Mr Justice E. Cameron, was appointed in October 1994 and published its report on 15 June 1995.
19. Republic of Mauritius, Firearms Act 2006, paragraph 32.
20. Interview with Atmahdeo Baynath of the Central Firearm Index, Mauritian Police, Port Louis, 16 and 17 October 2007.
21. Interview with M.J.R.G. D'Hotman De Villiers, Managing Director, G.D.V. Co. Ltd, Port Louis, 16 October 2007; interview with C. Lagesse, Manager, Commercial Division, Robert Le Maire Limited, Port Louis, 16 October 2007.
22. Interview with Lagesse, 16 October 2007.
23. Interview with Superintendent G. Tlogelang, Gaborone, 19 September 2007.

24. Republic of Namibia, Arms and Ammunition Act 7 (1996).
25. Interview with I. Nangombe, Head of the Namibia Firearms Registry, Ministry of Safety and Security, Windhoek, 26 September 2007; interview with M. Shaama, Head of Namibia National Focal Point on Small Arms and Light Weapons Sub Division, Ministry of Safety and Security, Windhoek, 26 September 2007.
26. Interview with M. Shiweda, Managing Director, Windhoek Maschinenfabrik (pty) Ltd, Windhoek, 26 September 2007; interview with J. Auala, Chief Executive Officer, August 26 Holding Company (pty) Ltd, Windhoek, 27 September 2007.
27. Interview with Nangombe, 26 September 2007.
28. The member states of SARPCCO are: Angola, Botswana, Lesotho, Malawi, Mauritius, Mozambique, Namibia, South Africa, Swaziland, Tanzania, Zambia, Zimbabwe.

