



Haweeney ganacsata ah oo joogta suuq kamid ah suuqyada Hargeysa islamarkaana gadeysa Koob dhaay caana geel ah. Ganacsatada yar yare ee haweenka ah waxey badanaa ku tiirsan yihiin xawaaladda si ay ganacsiga ugu billowdaan dabakaaydahooda (sandaqado). Sawir Oxfam/Petterik Weggers.

DUN BEY SURAN TAHAY

Dhibaataada Joogtada Ah ee Lagu Hayo Jiritaanka Lacagaha Loo Diro (Xawilaad) Soomaaliya

Sannad walba, Soomaaliya¹ waxaa soo gaara ku dhowaad \$1.3bn oo lacag xawaalad (lacag lasoo diray) ah. Lacagta oo ay u soo direen qurba joogta soomalida eheladooda ku nool wadankii hooyo. Taasoo u dhiganta inta u dhexeysa 25 iyo 45 boqolkiiba dhaqaalaha wadanka, waxeyna ka badan tahay marka la isu geeyo lacagaha uu wadanku ku helo magaca gargaarka biniaadamnimo, gargaar horumarineed iyo maalgelinta tooska ah ee ay sameeyaan dadka ajnabiga ah² iyadoo ay qoysaska Soomaaliyeed luminayaan khadka keliya ee tooska ahaa ama muuqday oo ay ku heli jireen lacagaha loo soo diro. Soomaaliya waxey u baahan tahay caawimaad waqti dheer socota si ay u dhistaan hey'ado maaliyadeed oo degan iyo sidaasoo kale kaalmo deg deg si ay u sii socoto nidaamka ay waqtigaan lacagaha ku diraan.

1 HORUDHAC

Sida ay qoysaska soomaliyeed u booqdaan marwalba xafiisyada shirkadaha lacagaha dira (Xawaalad) si ay u soo qaataan lacagihii ay u soo direen qaraabadooda kala jooga Minneapolis, Toronto, London, Melbourne, Nairobi, Copenhagen iyo meela kaleba, waxey rajeynayaan in bishan aysan noqon bishii ay ku hungoobi lahaayeen iney helaan lacagihii loo soo diray.

Dadka ama shirkadaha ka shaqeyaya diritaanka lacagaha waxey qiyaasaan in, in kabadan boqolkiiba 80 lacagaha ay ku billaabaan ganacsataa yar yar howlahooda ganacsi iney soo diraan qurbajoogta soomaaliyeed³. Sidaasoo kale, lacagaha laga helay dibadda waxaa loo isticmaalaa nolol maalmeedka aasaasiga ah sida cunto, biyo, hooy iyo waxbarasho. Waxaa intaa dheer, badanaa dadka lacagaha loo soo diro waxey sii caawiyaan qaraabadooda saboolka ah.⁴

DHIBKA JIRA

Somaaliya ma aha oo keliya mid kamid ah wadamada caalamka ee ku tiirsan xawaaladda, ee waxey si gaar ah u wajahdaa dhibaatooyin badan oo u gaar ah si ay u joogteyso diritaanka lacagaha la diro. Si aan lamid aheyn shirkadaha xawaaladaha ee wadama badan, habka diritaanka lacagaha soomaaliya waa mid la awoodi karo isla markaana u fudud macaamiisha iney helaan.⁵ Soomaaliya ma lahan nidaam ganacsi bangiyadeed oo shaqeynaya: Sidaasoo kale, wada shaqeynta Bangiga dhexe ee Somaaliya uu la leeyahay bangiyada caalamka aad ayey u xaddidan tahay, adeegyada bangiyada ganacsiga ma jirin ama aad ayey u yar yihiin, iyo awooda howlgelineed iyo maamuleed ee qeybahan bangiyada aad bey u liidataa. Asal ahaan, Soomaaliya lagama helo Bangiyada ajnabiga ama heyadaha gudbiya lacagaha.⁶

Sannad walba, Somaaliya⁷ waxaa soo gaara ku dhowaad \$1.3bn oo lacag xawaalad (lacag lasoo diray) ah. Lacagta oo ay u soo direen qurba joogta soomalida eheladooda ku nool wadankii hooyo. Tasoo u dhiganta inta u dhexeysa 25 iyo 45 boqolkiiba dhaqaalaha wadanka, waxeyna ka badan tahay marka la isu geeyo lacagaha uu wadanku ku helo magaca gargaarka biniaadamnimo, gargaar horumarineed iyo maalgelinta tooska ah ee ay sameeyaan dadka ajnabiga ah².



'Annagu Soomaali ahaan waan iska warqabnaa. Hadduu mid naga mid ah xanuunsan yahay waan caawinnaa. Hadduu guursanayo waan caawinnaa sidaasoo kale. Tani waxey na siisaa xorriyad si aan u caawinno kuwa kale. Waxeyna saameyn weyn ku leedahay tayeynta nolosheenna.'

Kadija Hassan Mohamoud,
Badhan, Somalia

Kadija Hasan Mohamed iyo wiilkeeda iyo gabadheeda oo jooga Badhan, Somalia. Sawirka: Adeso

Taasi waxey fursad siisay heyadaha lacagaha dira ee Soomaalida: Waa koox shirkado ah kuwaasoo ka abuurmay shabakado aan rasmi aheyn oo loo yaqaan xawaalad⁷ iney noqdaan habka keliya ee nidaamsan, shaqeynaya, isla markaasna hey'ado si rasmi ah loo sharciyeeyay

kuwaasoo lacaguhu ay sii maraan Soomaaliya. Si ay u shqeeyaan, xawaaldaha Soomaalida waxey u baahan yahii in ay ku leeyihiin xisaabaad bangiyada wadammada ay lacagta ka dirayaan.⁸ Nasiib darro se, sannadihii la soo dhaafay, Shirkadaha xawaaladaha Soomaaliyeed waxaa si aad ah uga horimaanayay dhibaaatooyin ka horistaagayay iney helaan adeegyada bangiyada ku yaal Mareykanka, Ingiriiska, Australiya iyo wadama kaleba. Bangiyada wadamadaasi waxey ka saarayaan nidaamkooda qeybaha loo arko iney ka imaan karto halis, kuwaasina waxaa ku jira qeybaha lacag diridda, waxeyna Soomaaliya ku calaamadiyeen iney tahay mid lacag dirideedu ay halis tahay sababtuna ay tahay liidashada sharciyada lagu maamulo lacagaha iyo joogitaanka kooxaha ku jira liiska argagixisada.

Halista ka imaan karta dhaqdhaqaaqa lacagaha sharciyeysan aad baa loo xakameeyay, xaaladaha qaarkoodna si dhameystiran ayaa loo jaray taasoo ku keeni karta argagax iyo quusasho rajooyinkii la lahaa. Maadaama, shirkadaha xawaaladaha soomalidu ay lumiyeen howlihii bangiyada, lacagaha loo xawilo Soomaaliya wey sii yaraan karaan xagga tirada, taasoo keeni karta iney gebi ahaanba hoos galaan. Tanina waxey guuldarro ku noqoneysaa ujeedooyinkii jiritaanka sharciyada AML/CFT waxeyna abuurii kartaa nidaam aysan sharci dejiyaasha iyo dadka maamula dhaqan gelinta qaanuunka awood u laheyn iney u dusaan, taasoo kordhin kartaa ku xadgudubka xorriyadda shakhsiga. Leyman ganacsi oo aan rasmi aheyn oo gacan ka helaya kuwa wax gudbiya kuwaasoo qaadaya boqollaal kun oo dollar ayaa waxey u badan tahay iney bedelaan nidaamka caadiga ah ee hadda jira kuwaasoo ay la xisaabtami karaan nidaam dejiyayasha iyo bulshada ay u adeegaanba. Qoysaska ku tiirsan lacagaha lagu diro nidaamka xawaaladaha waxey la kulmayaan cirriiri iyo dhibaato nololeed halka khadadka dambiilayaasha doonaya iney ka faaideystaan nidaamkan ay gaarayaan dantey lahaayeen

Laga soo billaabo bishii July 2013 di, dowladaha, shirkadaha xawaaladaha iyo bangiyada ku yaal Ingiriiska iyo Mareykanka gaar ahaan waxey qaadeen tallaabbooyin lagu gaari karo xal. Siyaasiyiinta dowladaha Mareykanka iyo Ingiriiska waxey mudnaanta koowaad siiyeen sidii ay u socon laheyd xawilaadda lacagaha loo diro Soomaaliya. Iyadoo dowlada Soomaaliyana ay qaaday tallaabooyin muhiim ah oo lagu maamulayo diritaanka lacagaha, sidaasoo kalena isticmaalka farsamada lacagaha lagu diro telefoonnada gacantana si wanaagsan ayey ugu sii fideysaaa Somaaliya oo dhan. Horumarkan intiisa badan wuxuu ku yimid dareen ka dhashay culeysyada siyaasadeed iyo ololaha dadweynaha.

Xogwarrankan kooban wuxuu dib u eegid ku sameynayaa dadaallada caalamiga ah ee socday ilaa iyo bishii July 2013 dii kuna saabsanaa sidii loo fududeyn lahaa lacagaha loo diro Soomaaliya iyadoo la tilmaamayo guulaha la gaaray iyo weliba waxyaabaha muhiimka ah ee maqan una baahan in la qabto. Waxey warbixintu si kooban u abbaareysaa waddammada Mareykanka iyo Ingiriiska oo ah wadammada ay degan yihiin qurbajoogta soomalida ah ee ugu tirada badan halkaasoo dhibaataada lagu hayo diritaanka lacagaha ay aad u sarreyso. Waxey sidaasoo kale warbixintu daboolleysaa dhacdooyinkii ugu dambeeyay ee ka dhacay Australiya, halkaasoo jiritaanka mustaqbalka ee xawilaadaha

Soomaalidu uu u egyahay mid shaki sii galaya iyadoo dowladda Australiyana ay billowday la shaqeynta shirkadaha xawaaladaha iyo bangiyada si looga hortago caqabadaha jira.

Talooyinkeenu waa kuwa ka hirgeli kara caalamka oo dhan, maadaama ay gaar ahaan la xiriiraan doorka wadamada G20 ga si ay uga soo baxaan ballanqaadyadooda ku aadan ilaalinta arrimaha dhaqaalaha.

Box 1: Xaaladda Biniadamnimo ee Soomaaliya

Sicir bararka cuntada, roob yaraan, barakac, dagaallo, ganacsigii oo go'go'aya, iyo heerkii kaalmada bini aadamnimo oo yaraatay oo isu tagay ayaa waxey abuureen xaaladda helitaanka cuntada oo yaraatay taasoo ay dadka qaar la mid dhigeen xaaladdii jirtay xilligii macluusha ee 2011kii. Dad ka badan 730,000 oo ruux ayaa ku tiirsan kaalmada biniadamnimo si ay u noolaadaan. Waqtigan lagu guda jiro qoraalka, in lagu qiyaasay 202,600 oo carruur ah da'dooduna ka yar tahay 5 jir ayaa run ahaantii nafaqa darreysan, kuwaasoo ay ku jiraan 38, 200 oo aad u nafaqa daran kuna dhow xaalad dhimasho.⁹ Tani waa natiijo ka dhalatay saboolnimo daba dheeraatay iyo adeeg la'aan, iyadoo Soomaaliya mid ka mid ah shanti carruur ahba uu dhimanayo inta uusan gaarin shan sano jir. Boqolkiiba 30 kamid ah dadka Soomaaliyeed ayaa awood u leh iney helaan biya nadiif ah oo ay cabbaan, waxana jira in ka badan 1.1 milyan oo ah dad ku bara kacay gudaha dalka iyo 1 miyan oo qaxooti ah.⁹

'Lacagtan waxaa loo isticmaalaa in lagu daboolo dhamaan baahideenna aasaasiga ah sida cuntada, biyaha, biilalka iskuulka ee carruurteyda. Waxaan boqolkiiba boqol ku tiirsannahay lacagtaas. La' aanteedana ma noolaan karno. Waxaad u baahan tahay lacag si aad u hesho wax walba oo aad dooneyso. Xataa haddii aan lahaan lahaa xirfad waxaan u baahnaan lahaa lacag si ay ii caawiso (arrinkan waa muhim ee si wanaagsan u muuji)'

Suhair Farah Ismail, Hooyo shan carruur ah dhashay kuna nool Badhan, Soomaaliya

Saddexdii qof ee soomaaliyeed ba qof kamid ah wuxuu sheegayaa ineysan awood u heleyn iney iibsadaan cunto, waxbarasho ama caafimaadka aasaasiga ahba¹⁰ haddii aysan jirin lacagaha loo soo diro. Dhibaata kale ee dheeraadka ah ee ka imaan karta waxa weeye in qoysas badan noloshoodu ay gasho xaalad adag isla markaana ay hoos u dhigto dadaalada lagu doonayo degganaanshaha iyo nabad kusoo dabaalidda Soomaaliya. Xaqiiqdu waxey tahay, in lacagtan oo ay ku heli karaan dadka loo soo diro sida ugu dhakhsiiyaha badan si ay ugu iibsadaan waxyaabaha ay islamarkiiba aad ugu baahan yihiin, ama ay ku maalgeshtaan fursadaha ugu muhiimsan ee u muuqda, waxey ka dhigeysaa in khadkan uu yahay mid aad muhiim ugu ah dib usoo noolaanshaha jiritaanka Soomaaliya.

KHADKA NOLOSHA SOOMAALIDA WAA INUU FURNAADAA

Maxaa dhici lahaa haddii qoyska iyo saaxiibbada kunool dibadaha aysan dib dambe u awoodin iney u diraan lacag eheladooda ku nool Soomaaliya?

\$1.3 BILYAN

Tirada lacagta ah ee Soomaalida ku nool dibadaha ay u diraan qiyaas ahaan sannad walba qoysaska iyo saaxiibbada ku nool Soomaaliya si ay ugu caawiyaan ma ku filan tahay in ay helaan waxyaabaha aasaasiga ah ee uuu baahan yahay qoyska, in ay ku furtaan ganacsi yar, carruurtooduna ugu diraan Iskuullo, Iyo in ay maal geshtaan bulshadooda?

Maanta khadkii nolasha wuxuu ku sugan yahay khatar sharciyada bangiyada ka jira Mareykanka, Ingiriiska iyo Meela kale awgood, malaayiin naf ahna waxey suran yihiin miisaanka (waxey ku dhow yihiin dhimasho)

Lacagta laga helaa qoysaska iyo saaxiibbada ku nool dibadaha waxey u tahay nolo soomaali aad u badan iyadoo u suurtagelineysa iney helaan baahidooda dhaqsida ah sida:



LACAGTA GAAR AHAAN LOO SOO DIRO HAWEENKA WAXAA KA DHASHA MAALGELIN LAGU SAMEEYO

- Waxbarashada
- Caafimaadka
- Nafaqada



IN KA BADAN 40%

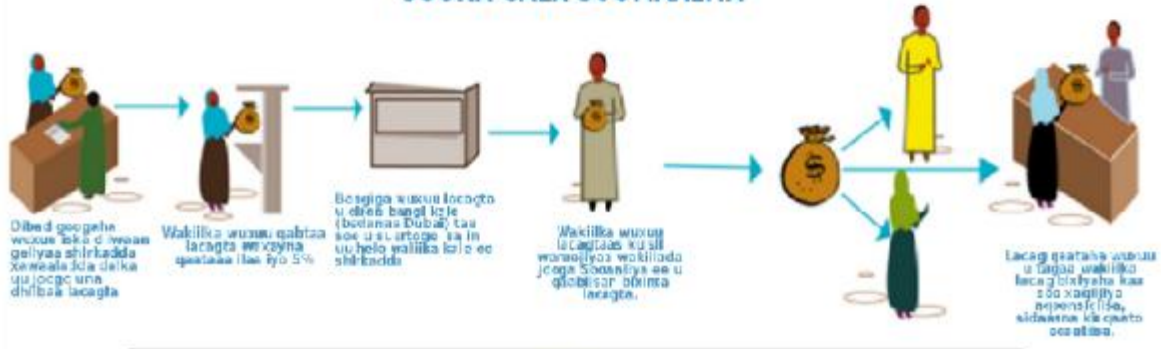
Soomaalida waxey ku tilmaan yihiin lacagta ay soo diraan qeraabada iyo saaxiibbada ku nool dibadaha si ay u helaan baahidooda aasaasiga ah

Lacagta ay soo diraan qoysaska iyo saaxiibbada dibadaha ku nool waxey ka dhigantaa qeyb weyn oo kamid ah dakhliga sannadeedka waddanka



XAWAALADDU WAXAY U DHIGANTAA **25-45% GDP** WAX SOO SAARKA GUUD EE SOOMAALIYA

MEEQA DHAQDHAQAAQ AYAA KA YIMAADA DIBADAHA SOONA GALA SOOMAALIYA



Sources: Helping The Lifetime Open Remittance and Partners In Somalia 2011 Family Ties Remittance and Livelihood Support in Puntland and Somaliland 2011 The Wall Street Journal 2014



Hawa Abdullahi Warsame, Hooyo shan carruur ah dhashay kuna nool Badhan, Soomaaliya Photo: Adeso

Caqabadaha dhaqaale ee soo wajahaya dadweynaha Soomaaliyeed, oo ay ku jirto baahida ay u qabaan hab maamul dhaqaale oo deggan waxey u baahan tahay in la helo xalal joogta ah. Si kastaba ha ahaatee, taasi waa ineysan hoos u dhigin sida deg degga ah ee loogu baahan yahay in la xoojiyo habka lacag diridda xawaaladaha Soomaalida. Dowladda Soomaaliyeed waa iney hoggaamisaa, laakiin dowladaha Mareykanka, Ingiriiska, iyo Australiya, kooxda G20 iyo dowladaha xubnaha ka ah, kooxda lagu magacaabo Financial Action Task Force, iyo bangiga adduunkaba waa iney sida ugu dhaqsiiyaha badan ugu howlgalaan sidii ay u ilaalin lahaayeen jiritaanka halbowlaha lacageed ee u dhexeeya Soomaaliya iyo dadkeeda qurbajoogta ah.

Raadka ay ku yeelan karto haweenka Soomaaliyeed maadaama ay yihiin kuwa u qaabilsan qoysaskooda xagga daryeelka guriga waa mid si gaar ahaaneed u weyn. Inkastoo ay adag tahay in la helaa tirakoob rasmi ah, haddana waxey u muuqataa in, in ka badan kala bar haweenka Soomaaliyeed ay helaan lacagaha la soo diro.¹¹ Badanaa lacagaha la soo diro waa lacagaha keliya ee qofka dumarka ah ee reerka u qaabilsan xagga daryeelka guriga ay awood u leedahay iney u maamusho sidey doonto, taasoo haweenka Soomaaliyeed u ah qalab ama adeeg muhiim u ah xagga kobcinta dhaqaalaha dumarka, kaasoo markiisa kor u qaadaya awoodda ay dumarku u leeyihiin iney u doodaan helitaanka xuquuqdooda bulsho iyo siyaasadeed.¹² Baaritaanno la sameeyay waxey sheegayaan in markey dumarku helaan ayna maamulaan lacagaha lasoo diro, iney ubadan tahay in ay ku maal geliyaan horumarinta iyo kor u qaadidda nolosha qoyska iyagoo kordhinaya kharashaadka ay ku bixiyaan caafimaadka, waxbarashada iyo nafaqada carruurta.¹³ Si kastaba ha ahaatee, maamulida lacagaha la soo diro ma aha mid bilaash loo siiyay dumarka helaa. Arrinkaan aad ayuu muhiim ugu yahay gaar ahaan dumarka noloshoodu ku tiirsan tahay lacagaha la soo diro oo keliya si ay u badbaadiyaan nolosha qoyska.

'Nolosha dadka idilkeed waxey ku tiirsan tahay lacagaha la soo diro, waxaana dhab ah inta ay Soomaaiya ka awoodeyso in ay daryeesho dadkeeda, in ay jireyso ku tiirsanaanta lacagahaa.

Tani ma aha lacag dheeraad ah un, ee waa lacag aan ugu baahanahay nolol maalmeedkeeyda si aan u badbaado. Ma aha keliya inaan ku tiirsanahay lacagtaa ee in kabadan toban qaraabadeyda ah iyo ehelkeyga oo dhan ayaa sidaasoo kale ku tiirsan. Waxaan leeyahay qaraabo xanuunsan kuwaasoo u baahan daweyn, iyo carruur aan isku dayayo inaan u helo waxbarasho. Lacagtanna waxey muhiim u tahay arrinkaa. Haddii aanan helin lacagtan, awood uma heleyno in aan badbaadinno nolosheenna waxaanna ka baqanayaa inaan xataa ka fekerro waxa dhici kara la' aanteed.'

Hawa Abdullahi Warsame, Badhan, Somalia

Tan iyo billowgi dagaalkii sokeeye dumarku waxey qeyb weyn ka qaateen iney noqdeen kuwa wax kusoo kordhiya nolosha qoysaskooda, sida ayagoo billaabay ganacsiiyo yar yar (Kaasoo maalgelinta ka timaada qurbajoogta ay laf dhabar u tahay), isla markaana siinaya daryeelka aasaasiga ah ee carruurtooda. Qaar kamid ah haweenka hela lacagahaa la soo diro waxey doortaan iney ka gudbaan maamulidda maalinlaha ah ee lacagaha iyagoo qeyb ka mid ah hantida ay heystaan ku maal geliya dhaqdhaqaaqyo ilo dhaqaale abuurid ah si ay u xaddidaan ama u yareeyaan dhibaatada uga imaan karta go' go'idda iyo hubaal la'aanta dhaqaalahaan soo galaa. Haddii ay ku timaado carqalad helitaanka lacagahan lasoo diro, haweenka iyo qoysaskooda ayey ka muuqaneysaa naxdinta inteeda badan.

Box 2: Dumarka iyo dhaqaalaha Soomaaliya

'Saboolnimo, nabadgelyo xumo, war is gaarsiin la'aan, adeeg la'aan ka jirta miyaga, iyo horumar la'aanta hey'adaha maaliyadda ayaa ah caqabadaha ugu muhiimsan ee hortaagan iney ka qeyb galaan ragga iyo dumarka Soomaaliyeed dhaqdhaqaaqyada arrimaha dhaqaalaha eek a socda wadanka. Si kastaba ha ahaatee, haweenka Soomaaliyeed waxey wajahaan mar walba dhibaatooyin intaas kasii dheer si ay uga qeyb galaan nidaamka maaliyadeed ee wadanka. Tira badan oo haweenka kamid ah malahan wax keyd lacageed ah, kumana laha xisaabaad bangiyada shirkadaha lacagaha dira. Shirkadaha lacagaha dira iyo bangiyadaba waxey iska ilaaliyeen iney siiyaan deymaan ganacsatada yar yar ee haweenka kuwaasoo damaanad la'aan ama keyd iyagu ay leeyihiin la'aantiis loo arko deynta la siiyo mid ka khatar badan tan la siiyaa ragga. Sidaasoo kalena, nabadgelya xumidu waxey u sii keentay dumarku xaalad aan ku habooneyn iyaga, howlhooda ganasi iyo dhaqdhaqaaqoodaba. Khadka lacag diriddu (xawaalad) waxuu caawiyay sidii loo wajihi lahaa xeyn daabyadaan. Xawaaladuhu waxey saameyn la laablaabay u leedahay dadka loo soo diro iyo qoysaskooda iyo bulshadaba. Waxeyna marhoreba ka qeyb qaateen kobcinta dhaqaale ee haweenka Soomaliyeed. Waxaa muhiim ah in, khadka lacag diriddu uu sii socdo si uu uga qeyb qaato arrinkan. Iyadoo farsama kasta ee cusub ama nidaamka gaarsiinta lacagaha la diraba ay tahay iney tixgeliyaan baahida khaaska ah iyo aragtiyada haweenka.'

Dr. Shukria Dini, Founder, Somali Women's Study Centre

2 LACAGAHA LOO DIRO SOOMAALIYA EE LAGA SOO DIRO MAREYKANKA IYO WAXA AY KA QABTO DOWLADDA MAREYKANKA

Wixii ka dambeeyay weeraradii argagaxisada ee 11 kii September 2001 dii, qaar kamid ah bangiyada waaweyn ee Mareykanka waxey uga jawaabeen dhaqan gelinta sharciyada lagula dirirayo lunsashada/dhaqidda lacagaha iney xiraan xisaabaadkii shirkadaha xawaaladaha. Dadka maamula shirkadaha Soomaalida ee lacagaha diraa waxey ka digeen bilowgii sannadihii 2000 oo dhan khatarta kusoo fool leh khadka lacag diridda ee Mareykanka iyo Soomaaliya. Hasayeeshee, Kama horreyn markii ay abaartii ka dhacday geeska Afrika 2010 kii ilaa 2011 kii ay gaartay heerkii ugu xumaa, oo uu bangiga lagu magacaabo Sunrise Community Bank uu shaaciyay inuu xirayo xisaabihii shirkadaha Soomaalida ee lacagaha dira. Kuwaasoo hey'adaha gargaarka iyo bulshada Soomaaliyeedba ay si baaxad leh u wada dhaqaajiyeen. Ilaah baa mahad leh, shirkadaha lacagaha diraa wey badbaadeen kadib markii ay heleen bangiyo yar yar iyo kuwa dhexdhexaad ah oo ay ku tiirin karaan sii wadidda ganacsigooda. Hasayeeshee, dhacdadaan waxey soo bandhigtay aragti la'aanta dowladda Mareykanka ee ku saabsan mustaqbalka lacagaha loo diro Soomaaliya, taasoo ka horimaaneysa qiritaanka shacabka oo sheegeysa xiritaanka xisaabaadka shirkadaha lacagaha diraa waxey musiibo ku noqoneysaa danaha Mareykanka iyo Soomaliya.¹⁴

'Miyaysan xanuun badneen hadduu ilamahaaga ama ilmahooda aysan heysan waxey cunaan adiguna aad cunta cuneysid? Aad bey u culus tahay markaad cunta haysatid, ilmahaadana uusan heli Karin. Waxaan jeclaan laheyn inaan u sheegno dowladda iney tahay dhibaato aad u weyn. Waxaan jeclaan lahaa inaan u sheego dowladda Mareykanka iney sii waddo kaalmadeeda iyadoo oggolaaneyso sii socoshada khadka lacag diridda.'

Qabil Said, Minneapolis, MN
USA

Box 3: Nidaam dejiyayaasha bangiyada Dowladda Mareykanka: Waxey ka heesayaan isla warqadii heesta: Micnaheedu waa isku wada ra'yi?

Waxyaabaha laga rabo dadweynaha ee ay sameeyeen sharci dejiyayaasha wasaaradda khasnadda dowladda Mareykanka sannadkii 2014 tii si ay u caawiyaan shirkadaha lacagaha dira waa yididiilo fiican, laakiin kuwa badan oo wanwanaagsan kana mid ah dowladda waxey u baahan yihiin iney xisadahooda ka iibsadaan farriinta khasnadda hadii la doonayo in is beddel lagu sameeyo howlaha bangiyada.

Xafiiska ka shaqeeya dambiyada ku saabsan xagga dhaqaalaha ee loo yaqaan Financial Crimes Enforcement Network (FinCEN) iyo xafiiska maamula hantida dibadaha (OFAC) waa labada qeybood ee ka tirsan wasaaradda khasnadda dowladda una qaabilsan dejinta nidaamyadooda. FinCEN waxaa intaa u dheer iney siiso ama bixiso data da ama warbixinnada laga ururiyay baaritaannada dambiyada, sidaasoo kale OFAC waxey fulisaa dhaqdhaqaaqyada lagu xoojinayo fadqalallada iyo xeerarkooda. Hey'adaha kormeera bangiyada isla markaasna ceymiya bangiyada-Xafiiska muraaqabeeya lacagaha ee loo yaqaan Office of the Comptroller of the Currency (OCC), shirkada ceyminta hantida federaalka ee loo yaqaan Federal Deposit Insurance Corporation (FDIC), Golaha keydka federaalka (Federal Reserve Board) – iyo sidaasoo kale maamulka midowga amaanada qaranka (the National Credit Union Administration) waxey ku taagan yihiin iney xor ka noqdaan xeer dejiyayaasha khasnadda dowladda (oo ay ku jirto OCC) taasoo ka howlgasha isla goobta khasnadda dowladda. Mid walba oo ayaga kamid ah wuxuu xiriir toos ah la leeyahay

hey'adaha maaliyadda iyo sidaasoo kale, Iyagoo u maraya baaritaannadooda iyo howlaha xoojinta xeerarka taasoo u jeedadiisu tahay si loo damaanad qaado jiritaanka nidaamka dhaqaale, waxey xaddidaan halista ka imaan karta musuqmaasuqa lacagaha lacagaha lagu sameeyo. Ugu dambeyn, xeer ilaaliyayaasha qaabilsan dambiyada waxey noqdeen kuwa aad muhiim u ah sannadihii lasoo dhaafay. Wasaaradda caddaaladda ee Mareykanka iyadoo ka faaideysaneysa howlgalka lagu magacaabo Operation Choke Point waxey si xoog leh u abbaartay bangiyada xiriirka la leh macaamiisha ay u arkaan iney halis xoog leh ka imaan karto.¹⁶ Qareennada Mareykanka ee u qaabilsan dacwooyinka dambiyada laga galo federaalka si toos ah ayey ula shaqeeyaan xeer ilaaliyayaasha gobollada ka tirsan federaalka, kuwaasoo si madax bannaan uga masuul ah joogteynta iyo jiritaanka xeerarka heer gobol isla markaana saameynta ay ku leeyihiin qaar kamid ah heyadaha caddaaladda sida New York oo kamid ah meelaha ay bangiyada caalamiga ah ay ka sameeyaan ganacsi aad u ballaaran, aad bey muhiim u tahay.

Qeybaha kala gedisan ee ka tirsan dowladda waxey leeyihiin ujeedooyin kala gedisan marka laga hadlayo la shaqeyntooda bangiyada. Halka qaar ayaga kamid ah ay la shaqeeyaan xeer dejiyayaasha wasaaradda khasnadda (lacagta), midkoodna mas'uul kama aha ama ma lagula xisaabtami karo wax ku saabsan siyaasadda dibadda ee Mareykanka, inkastoo saameyn aad u weyn ay ku leeyihiin qeybta saree e hogganka. Kala fogaanshaha ka dhexjira khadadka siyaasadeed iyo nidaamyada bangiyada waxey aad usii adkeeyay dadaallada ay wadaan dowladda Soomaaliya, iyo mid ku dhow kaas oo ay waddo dowladda ingiriiska, taasoo soo bandhigtay kiis aad u xoog badan oo ah haddii la joojiyo xisaabaadka shirkadaha lacagaha dira ay ku leeyihiin bangiyada iney wiiqeyso danaha siyaasadeed ee ay labada wadan wadaagaan.

Saddexdii sano ee lasoo dhaafay, dowladda Mareykanku waxey qaaday talaabooyin fudud balse aad muhiim u ah si ay u caawiso iney Soomaaliya ay xagga dhaqaalaha ku istaagto cagaheeda. Qaabka uu u sameysan yahay golaha lagu magacaabo National Security Council-led interagency working group, una qaabilsan lacagaha loo diro Soomaaliya wuxuu caddeynayaa in dowladdu ay soo dhoweyneyso waxyaabaha ka dhashay kala go'a khadka lacag diridda. Wasaaradda khasnadda lacagta dowladda Mareykanka iyo hey'adda USAID waxey si wadajir ah ula shaqeeyeen bangiga dhexe ee Soomaaliya si ay uga caawiyaan inuu wanaajiyo nidaamka bangiga ee maamulidda lacagaha dadweynaha uuna u jid xaaro abuuridda nidaamka bangiyada Soomaaliya isla markaana iskaga filnaada xagga maaliyadda. Wasaaradda khasnadda waxey ka caawineysaa bangiga dhexe ee Soomaaliya inuu dhiso qeybtiisa kormeerka iyo lasocoshada howlaha bangiga taasoo ah awood uu wadan kasta u baahan yahay. Tani waxey ujeeddadeedu tahay in bangiga lagu xiro khadadka caalamiga ah ee lacagaha. Madaxweyne Obama wuxuu sidoo kale saxiixay sharciga shirkadaha lacagaha xawila.



Xisbiga Jamhuuriga ee Mareykanka Keith Ellison (D-MN), Wakiilka wasaaradda khasnadda lacagta: Kristin Toretta, Sarkaal u qaabilsan xagga hehiisyada shirkadda Kaah: Aden Hassan, iyo Filim Jilaaga Soomaaliyeed: Barkhad Abdi waxey ka wada hadlayaan caqabadaha haysta lacag u diridda Soomaaliya iyadoo jooga shir ay isugu yimaadeen Adeso/Oxfam magaalada Minneapolis, MN. Sawir: Adeso

'Miyeysan xanuun badneen hadduu ilamahaaga ama ilmahooda aysan heysan waxey cunaan adiguna aad cunta cuneysid? Aad bey u culus tahay markaad cunta haysatid, ilmahaadana uusan heli Karin. Waxaan jeclaan laheyn inaan u sheegno dowladda iney tahay dhibaato aad u weyn. Waxaan jeclaan lahaa inaan u sheego dowladda Mareykanka iney sii waddo kaalmadeeda iyadoo oggolaaneyso sii socoshada khadka lacag diridda.'

Sadiq Yusuf Mohamud,
Minneapolis, MN, USA

Sharciga wanaajinta, waa cabbiraad dareenka guud kaasoo qeexayo la socoshada howlaha xawilaadda lacagaha waxaana laga yaaba iney soo saarto koror yar oo u oggolaanayo in shirkadaha lacagaha diraa ay helaan adeegyada bangiyada. Waxaa dhici karta arrinta ugu wanaagsan in ay tahay in wasaaradda khasnadda lacagaha ballan qaadkeedii bishii September 2014 kii ay ballan qaaday in ay caddeyn dheeraad ka bixiso, caddeyntaas oo ku saabsan rajooyinka bangiyada iney la shaqeeyaan shirkadaha lacagaha diraa ee halistoodu sarreyso, ballan ka tarjumeysa waajibaadyada siyaasadeed ee dhabta ah iyadoo la wajahayo tacaddiyada jiraa lana abbarayo waxa ugu dhibka badan oo ah adeegga meelaha ay maraan lacagaha la diraa Money Transfer Corridors.¹⁷ Warbixintii November 2014 kii ee ay soo saartay hey'adda ku shaqada leh dambiyada lacagaha ee loo yaqaan Treasury's Financial Crimes-Enforcement Network, kuna saabsaneed bangiyada kuwooda ku shaqada leh ganacsiga ku saabsan adeegyada lacagaha oo ay ku jiraan shirkadaha lacagaha xawila waxey diiradda saartay in bangiyada aan laga fileyn iney xakameeyaan adeegyada lacag diridda ama ay ogaadaan qof kasta oo lacag diraya.¹⁵

Weli, nidaamka fududeynaya diritaanka lacagaha ee Mareykanka iyo Soomaaliya wuxuu ku jiraa xaalad aad u liidata, dowladda Mareykankuna uma diyaarsana iney wax ka qabato ama ay si wanaagsan u maamusho cawaaqibta xooggan ee ka imaan karta arrinkan. Shirkadaha Soomaaliyeed ee lacagaha xawilaa badankood kuma laha xisaabo bangiyadeed meelaha/xarumaha ay u badan yihiin dadka ay u adeegaan. Ilaa goor dhow, tani waxey ku qasabtay iney gacanta ku hayaan tira aad u badan oo lacag kaash ah kuna rara gawaari ka gudbeysa xuduudaha gobollada iyadoo lagu ilaalinayo baabuurta gaashaaman. Maamulayaasha shirkadaha xawaaladuhu waxey

sheegayaan in arrinkaan ka hor istaagay iney ballaariyaan adeegyadooda ayna kusoo koobmeen iney u adeegaan tira yar oo kamid ah bulshada isla markaana waxey adkeysay iney ilaaliyaan jiritaankooda iyo qiimaha adeegyada ay bixiyaanba. Xilligan lagu guda jiro qoraalka warbixintanna, xaaladdu weyba ka sii liidataa sidii hore: Bangiga Ganacsatada California (Merchants Bank of California), oo ah bangi laf dhabar u ah fududeeynta diritaanka lacagaha loo dirayo Soomaaliya wuxuu shaaciyay inuu xiri doono xisaabaadka shirkadaha lacagaha xawila ee Soomaalida 6 da bisha Feberuary ee sannadkan 2015ta. Isla waqtigan uu socdo qoraalka warbixintan, shirkadaha dira lacagaha waxey xirayaan meelihii ay ku lahaayeen faracyada, taasoo keeneysa in dad badan oo kamid ah muhaajiriinta Soomaaliyeed ee ku nool gobollada kala gedisan ee Mareykanka aysan haysan wadda sharciyeysan oo ay ku caawin karaan eheladooda ku nool wadankii hooyo. Haddii aan la helin faragelin ka timaada xagga dowladda Mareykanka, ama aan la helin ka qeyb qaadasho ka timaada New bank, Soomaaliya iyo dhamaan wadamada Geeska Africa waxa dhici karta iney soo foodsaarto macluul iyo dhaqaalaha oo aad hoos ugu dhaca iyo weliba dhibaatooyin biniaadamnimo oo aad u daran. Illaa hadda, dowladda Mareykanka ma aysan bixin wax damaanad ah oo loo diyaariyay in la qaadayo tallabooyin lagama maarmaan u ah sidii loo heli lahaa wada sharci ah islamarkaana muuqata oo ay kusii socon karto diritaanka lacagaha ee loo dirayo dadka u baahan ee jooga Soomaaliya.

Box 4: Qaabka uu Bangiga Ganacsatada (Merchants Bank) uu u wajahayo maamulidda halista ka imaan karta diridda lacagaha: Taasoo Beddel u noqon kara nidaamka golaha lagu magacaabo golaha khatar ka cararka (De-Risking)

Sida ay sheegayaan shirkada lacagaha xawila, Merchants Bank of California wuxuu diray (gudbiyay) sannadihii lasoo dhaafay 60-80 boqolkiiba tirada guud ee lacagaha laga diro Mareykanka ee loo diro Soomaaliya. 19 Bishii May dhexdeeda, sannadkii lasoo dhaafay ee 2014ta, bangigu wuxuu ogeysiis ku bixiyay in uu doonayo inuu xiro xisaabaadka shirkadaha dira lacagaha ee Soomaalida si uu u yareeyo halista ku imaan karta faaidadiisa.

Go'aaminta xiritaanka xisaabaadka shirkadaha lacagaha dira, bangiyadu waxey si is dabajoog ah usoo saarayaan waraaqo ay ku ogeysiinayaan dadka ama shirkadaha lacagaha dira in aysan u suurtagaleyn in ay sii wadaan xiriirkii ganacsi ee ka dhexeeyay iyaga iyo bangiyada. Nasiib darro se, waraaqaha guud ahaan ma xuseynin wax sabab ah oo ka dambeeysay go'aanka ay bangiyadu gaareen, bangiyaduna guud ahaan waxey iska ilaaliyaan ama diidaan in ay wax wadahal ah ka galaan sidii ay shirkadaha lacagaha dira u qaadi lahaayeen talaabooyin u suurtagelin kara iney noqdaan kuwa soo jiidan kara macaamiil badan.

Arrima aad muhiim ah oo ka horimaanaya tusaalooyinkan kor ku xusan, Merchants Bank wuxuu la yeeshay la tashiiyo ballaaran shirkadaha Soomaaliyeed ee lacagaha dira, mujtamaca madaniga ah iyo wakiilka Mareykanka Keith Ellison si loo qeexo bal iney suurtagaleyso sii jiritaanka xisaabaadkooda ay ku leeyihiin bangiga. Kadib dib u dhigid lagu sameeyay xiritaanka xisaabaadka, madaxa bangiga Merchants Bank Daniel Roberts wuxuu booqasho ku tagay waddanka Imaaraadka Carabta iyo Jabuuti si uu wareysi ula soo yeesho saraakill kamid ah hoggaanka shirkadaha Soomaalida ee lacagaha dira iyo inuu wax badan kasoo ogaado hababka

ay ula dhqmaan una tixgeliyaan macaamiishooda. Kadib markii ay soo bandhigeen wixii ay lasoo kulmeen ee ku saabsanaa sida dib u habeeyn loogu sameyn karo nidaamyada ay ku shaqeyso shirkad kasta aoo kamid ah shirkadaha lacagaha dira, Bangiga Merchants dib ayuu ula noqday go'aamadiisii wuxuuna isku dayay inuu oggolaado iney sii furnaadaan ilaa muddo xisaabaha shirkada soomaaliyeed ee lacagaha dira.

Inkastoo, Bangigga Merchants uu horay u shaaciyay bishii January ee sannadkan 2015 ta in uu xirayo dhammaan xisaabaadka Shirkadaha lacagaha dira ee Soomaalida Mareykanka, waxaa cad in uusan Bangigu intaa ku ekaan ee uu ka gudbay waajibaadkiisii oo uu sharcigu u saamaxayay si uu u hagaajiyo awoodiisa wax xakameynta isla markaana uu u caawiyo halbowlha nolosha dadweynaha Soomaaliyeed.

3 LACAGAHA LOO DIRO SOOMAALIYA LAGANA DIRO INGIRIISKA IYO WAXEY KA QABTO DOWLADDA INGIRIISKA



Dad ka mid ah Soomaalida Ingiriiska oo ololaynaya iyagoo ka cabanaya go'aanka bangiga Barclays oo uu ku xirayo xisaababka shirkadaha xawaladaha Soomaalida. Sawir qaade: Oxfam

Maqaalka cinwaankiisu yahay ku dadaalidda sii jiritaanka/sii socoshada khadka nolosha (Keeping the lifeline open) waxaa la daabacay 31 dii bishii July 2013 dii iyadoo la filayo suurtagalnimada joojinta lacagaha laga diro Mareykanka ee loo diro Soomaaliya.¹⁶ Si kastaba ha ahaatee, waxyar kahor daabacaadii maqaalka afarta xawaaldood ee shirkadaha xawaaladaha Soomaalida oo ku lahaa xisaab bangiyeed dalka Ingiriiska ayaa waxaa uu ku wargeliyay banikiga Barclays, bangigii ugu danbeeyay ee ay xiriirka la lahaayeen, in xisaabatkooda, iyo 254 shirkado xawaalade kale la xirayo. Inkastoo Soomaaliya ay ka mid tahay wadamadama mudnaanta leh marka la fiiriyo siyaasadda arimaha dibadda ee dowladda Ingiriiska, hadana dowladda ingiriiska wey ka gaabisay in ay degdeg uga jaawaabto arrinkan.¹⁷

Box 5: Waxyaabaha ugu yare ee lala xiriiriyo xawaaladaha Soomalida Ingiriiska

Marka loo eego sharciyada Ingiriiska, shirkadaha xawaaladaha guud ahaan waxaa loo kala saaraa sida Hey'adaha loo oggolaaday lacag bixinta (Authorized Payment Institutions), kuwaasi oo diri kara lacag aan xadidneeyn iyagoo sii marinayo xisaabaadkooda bankiyada ee u furan. Waxaa jira kuwa kale oo aan laheyn xisaab bangiyeed kuwaas oo loo yaqaan Hey'adaha bixiya lacagaha yar yar; Small Payment Institutions (SPIs) kuwaas oo diri kara ilaa €3m bishiiba, iyagoo sii marinaayo shirkadaha xawaaladaha leh xisaabadka bangiyada kuwaas lacagaha ku diri kara si jumla ah. Sidaas darteed, shirkadaha lacagaha dira ee Soomalida weli waxaay awood u leeyihiin iney diri karaan lacag iyagoo aan xiriir toos ah la laheyn bangiyada. Si kastaba ha ahaatee, qaababkan waa kuwa aad ugu nugul iney bankiyada ka baxaan xiriirkii ay la lahaayeen shirkadaha loo oggol yahay iney diraan lacagaha jumlada ah ama iney culeeys ku saaraan shirkadahaas xawaaladaha jumlada si ay u joojiyaan xiriirka ay la leeyihiin xawaaladaha Soomaalida, iyadoo aysan sii jiri doonin qaab kale oo si toos ah lacaga loogu diro Soomaaliya. Qeyba kamid ah qurba joogta Soomaalida ayaa isu arko ineynan heli Karin waddo ay si toos ah ugu caawin Karaan eheladooda ku sugan waddankii hooyo.

Si kastaba ha ahaatee, olole xoogan oo aay sameeyeen, qurbajoogta Soomaalida, kooxaha bulshada rayidka ah iyo siyaasiyiin ayaa ku dhalisay bankiga Barclays inuu dib u dhigo xeritaanka xisaabadka muddo afar jeer ah,¹⁸ sidaasoo kalena dowladda Ingiriiska iney xooga saarto dadaalada lagu xoojinaayo nidaamka xawaaladaha dalka Ingiriiska. Dowladda ingiriiska waxey aasaastay koox waxqabad (Action group) oo qaabilsan lacagaha dibadaha loo diro oo ay kuu jiraan wakiilo ka socda shirkadaha xawaaladaha, dowladda, bangiyada, iyo bulshada rayidka ah. Kooxdan waxqabadka waxeey isha ku haynayaan guud ahaan xawaaladaha 'si ay u xaqiijiyaan in xawaaladuhu ilaalinayaan shuruucda dalka ayna yihiin kuwa bad qabo, si lacagaha loogu diro wadamada soo koraya iyo in lacagahaasi loo isticmaalo in lagu maalgeliyo mashaariic sharci ah kuwaasoo gacan ka geeyanayo hormarinta xasilloonida iyo kubuca wadamadaasi. Kooxda ujeedkeedu wuxuu yahay iney xaqiijiyaan in adeegyada xawaaladaha ay yihiin kuwo 'wax ku ool ah ayna isticmaalaan wadiiqooyinka tooska ah ee lacag bixinta meelaha suura galka ah iyo in aay ku tala galaan waxa laga doonayo oo ku aadan ilaalinta shuruucda.¹⁹ Tariikhdu markey aheyd 28kii August 2014, hey'adaha maaliyadda Ingiriiska sida kuwa khasnadda iyo canshuur celinta (The UK Treasury iyo Her Majesty's Revenue and Customs) ayaa si wada jir ah u soo wada saaray tilmaamooyin ay ku badbaadayaan bangiyada marka ay la xaajoonayaan shirkadaha xawaaladaha. Tani waxey ka dhigantahay in bangiyada loogu hanjabay iney yihiin eedeysanaayl ku xadgudbay sharciga laga baabi'inayo dacwadaha qaladadkooda hadii aay aqbalaan qawaaniinta iyo in ay u hogaansamaan tilmaamaha/awaamirta la siiyay.²⁰ Hammiga bangiyada ay dib u furayaan xisaabaadka shirkadaha xawaaladaha ayaa ugu dabeyn go'aamineysa waxqabadka dib u habeynta lasameeyay. Inkastoo dadaallada wanaagsan ee Ingiriiska ay waddo ay si xoog leh ugu xiran

yihiin dowladda Mareeykanka, sababtoo ah dhammaan lacagaha dibadaha loo diro ee laga dhigo Doollar, waa in ay waafaqsan yihiin qawaaniinta iyo sharciyada dowladda Mareeykanka.

Talaabooyinka dowladda Ingiriiska waxaa kale oo kamid ah in si gaar ah diiradda loo saaro Soomaaliya sababtoo ah Soomaaliya malahan nidaam bangiyeed iyo sidaasoo kale xaaladaha adag ee aay ku shaqeeyaan xawaaladaha Soomaalida. Si kastaba ha ahaatee waxaa la aasaasay waxa loo yaqaan A public-private UK-Somalia 'Safer Corridor' Pilot oo loogu tala galay in lagu maamulo sidii xiriirka ganacsi ee ka dhexeeya Ingiriiska iyo Soomaaliya uu u ahaan lahaa mid bad qaba iyadoo kor loo qaadayo kalsoonida bangiyada ay ku qabaan shirkadaha xawaaladaha Soomaalida islamarkaana la xoojinayo sharciyada shirkadaha xawaaladaha si loo waafajiyo shuruucda aqoonsiga/garashada macamilka (KYC). Si loo billaabo barnaamijkan tijaabada ah ee Safer Corridor wuxuu u baahday latashiya badan in lala sameeyo qeybaha shirkadaha xawaaladaha, bangiyada, dowladda Soomaaliya iyo Soomaalida daegan wadankan Ingiriiska iyo Soomaaliyaba. Dadaallada dowladda Ingiriiska ee ahaa in bulshadu kamid noqoto ka qeyb qaadashada wada hadallada kuu saabsan arrinkani waxey aheyd mid si weyn loo amaanay. Dowladda Ingiriiska waxaa xitaa kaalin hormuud ah ay ka qaadatay in ay kadhadhiciso wadamada kale ee xubnaha ka ah wadamada loo yaqaan G20 in ay mudnaan siiyaan, talaabana aay u qaadaan fududeeynta habsami u socodka xawaaladaha ama lacagaha la diro. Waa arin laba geesood ah marka loo eego saameeynta qawaaniinta Mareeykanka ay ku yeelanayaan Ingiriiska iyo hey'adaha kale ee caddaaladdaba in la xusaa ay mudan tahay.

Inkastoo isku day wanaagsan ee uu qaaday The UK's Safer Corridor initiative haddana weli waa mid jilicsan. Iyadoo ujeedooyinka laga lahaa ay ahaayeen kuwa in kalsooni iyo dhiirigelin lagu geliyo bangiyada sidii ay ugu fidin lahaayeen adeegyadooda shirkadaha xawaaladaha ayaa hadana dadaalada dowladda ee ku aadan qeybaha bangiyada ay yihiin kuwa laga ma maarmaan ah. Iyadoo laga duulayo howlaha koonban ee wajiga hore, ballaarinta mashruuca waa wax loo baahan yahay si loo hubiyo in nidaamayada cusub ay si wanaagsan ula shaqeeyaan mashaariicda socota. Waxaa intaas dheer, qaabka shaqo ee Safer Corridor ma xusayo baahia deg degga ah ee shirkadaha xawaaladaha si ay u helaan xisaabaad bangiyeed taasoo ka dhigeysa shirkadaha xawilaadaha kuwa u nugul joojin ku timaada mustaqbalka dhaw. Halka dowladda Ingiriisku ay ka war qabto marnaanshahan, haddana illaa hada ma jiro qorshe muuqda oo looga kaban karo. Balanqaadyo iyo dabacsanaan ka imanaya dhamaan qeybaha ku lugta leh barnaamijkan loo bixiyay Safer Corridor waxaa looga baahan yahay in ay gaaraan guushiisa.

4 LACAGAHA LOO DIRO SOOMAALIYA EE KA YIMADO AUSTRALIA IYO MOWQIFKA DOWLADDA AUSTRALIYA

Baaqyada ka yimid qeybaha bangiyada Mareeykanka iyo Ingiriiska waxey horay u billaabeen in ay saameyn ku yeesheen suuqyada caalamka. Tusaale ahaan, dalka Australia, walaaca Bangiyada sida in lagu soo oogo dacwado, cunaqabateyn iyo xaddidaadyo lagu soo rogo, iyo sumcad xumi ayaa waxey sabab u noqdeen in ay si tartiib tartiib ah ay u xeraan sannada kadib xisaabaadka shirkadaha xawaaladaha ay ku leeyihiin bangiyada. Bartamihii sannadkii 2014ka, hal bangi oo ka mid ah bangiyada waaweyn ee Australiya loona yaqaan Westpac Bank, ayaa sii wado adeegyada uu siin jiray shirkadaha xawaaladaha ka diiwan gashan wadanka.

Bishii August 2014 kii, ku dhawaaqitaankii bangiga Westpac ee ahaa inuu xirayo xisaabaadka shirkadaha xawaaladaha bxiya dhamaadka bisha October ee isla sannadkaa ma saameyn mutaqbalka shirkadaha xawaaladaha Soomaalida oo keliya, ee wexeey kaloo caqabad ku noqotay guud ahaan shirkadihii xawaaladaha Australiyaan ka ahaa ee diiwaangashanaa. Dalka Australiya waxaa ka jira in ka badan 5,500 shirkado xawaaladeed oo diiwaan gashan kuwaas oo fududeeya is dhaafsiga in ka badan A\$30bn gudaha iyo dibadda Australiya. Shirkadahan xawaaladaha waxaa kamid ah 25 shirkado xawaaladeed oo Soomali leeyihiin kuwaasoo sida la sheegay Soomaaliya u dira in kabadan A\$33.5m sannad kasta ayagoo wakiilka ah qiyaas ahaan 7,500 oo Soomaalida lacagaha dira ah.²¹

Iyadoo laraacayo hadalkii ka soo baxay Bangiga Westpac ee ahaa inuu xirayo xisaabaadka shirkadaha xawaaladaha, xiriirka xawaaladeedyda Soomaaliyeed (SMRA) oo la aasaasay bishii March 2013kii, si uu ufududeeya si wadajir ah shuruucda dhexdooda ah isla markaan ka shaqeeya u hogaansanaanta shuruucda ee xawaaladaha Soomaalida, ayaa si deg deg ah u aasaasay koox waxqabad oo kadhinacshaqeeyso wakiillada bulshada Soomaaliyeed eek u nool Australiya si ay ugu bandhigaan arintan dowladda Australia, xubnaha baarlamaanka iyo in looga hadlo saxaafadda.

Bulshada Soomaalida waxey kaloo awood uyeelatay in ay is baheysi ballaran kahelaan shirkadaha xawaaladaha kale iyadoo ay xigtay in ay ku midoobaan xiriirka shirkadaha xawaaladeedyda Australiya iyo ururka lacag bixiyayaasha (ARCPA) bishii October 2014kii, taasoo loo aasaasay iney noqdaan urur yeesha hal cod oo aay ku mideysanyihiin dhaman shirkadaha xawaaladaha dalka Australiya.

Dowladda Australiya waxey si firfircooni ku jirto uga jawaabtay cabashooyinkii shirkadaha xawaaladaha iyo bulshada ee la xiriiray xiritaanka xisaabaadka shirkadaha xawaaladaha, waxeyna kuu guuleysteen in ay dowladdu sameeysay guddi waxqabad (inter-agency task force) oo soo uruuriyo, xeerarka, siyaasadaha arimaha dibadda, shuruucda iyo qawaniinta xadideeysa shirkadaha xawaaladaha is aay uga qeyb qaataan dadka arrintu saameysay iyo qeybaha bangiyada.

Marka laga soo tago kulamada ay la qaadatay Soomaalida iyo wakiillada shirkadaha lacagaha dira, dowladda Australia dowladda Australiya wexeey la xiriirtay waaxda dalka Ingiriiska u qaabilsan hormarinta caalamiga ah (DFID) si ay uga ogaato dadaalada ka socda Ingiriiska iyo wixii ku saabsan Safer Corridor Pilot iyo sida ay tani uga qeyb qaadan karto hanaanka Australiya aay ku wajaheeyso Xawaaladaha.

Gudiiga waxqabadka waxaa kale oo kaalin dhexdhexaadineed oo muhiim ah uu ka qaatay fududeeynta wadhadalla dheeraad ah oo aay yeeshaan shirkadaha xawaaladaha iyo Bangiyada. Horraantii December 2014kii, dowladda Australia wexeey martigelisay kulan ay kasoo qeyb galeen dhamaan hey'adaha aay quseyso arimaha xawaladaha una dhexeeyay xiriirka bangiyada Australia, wakiilada afarta bangi ee ugu weeyn dalka Australia, shirkadaha xawaaladaha, wakiilada bulshada, iyo waaxyaha dowladda ee muhiimka u ah arrintan. Kulan kaasi waxaa diiradda lagu saaray sidii loo gaari lahaa xal lagu abuurayo kalsooni ka dhex dhalata qeybaha lacagaha dira iyo Bangiyada. Xiriirka shirkadaha xawaaladleeyda iyo kuwa lacag bixinta (ARCPA), iyo xawaaladaha Soomaalida waxeey la yimaadeen soo jeedin in kor loo qaado ku dhaqanka sharciyada shirkadaha xawaaladaha iyo shuruucda ayaga ugaarka ah si loogu dhaqmo sharciyada ka hor tagga lacag lunsashada/dhaqidda iyo la dagaallanka maalgelinta argagixisada (AML/CFT).



Qaar kamid ah xawaladleyda Somaalida Australia oo kulan kula le wasiirka maaliyadda ee mucaaradka magaalada Canberra, November 2014 kii. Sawir qaade: Hussein Haraco/Golaha deeganka Soomaalida Australiya ee Victoria

Hindisayaashan waxaa kamid ahaa hindisaha xiriirka shirkadaha xawaaladleeyda iyo lacag bixinta (ARCPA) ee lagu abuurayo xeerarka waxqabadka iyo tilmaamaha sida ugu wanaagsan oo loo raacayo shuruucda xawaaladaha iyadoo lala tashanaayo dowladda Australiya, shirkadaha xawaaladaha iyo bangiyada taasoo ay bangiyadu ay u isticmaali karaan si kalsooni ku jirto si loo qiimeeyo shirkadaha xawaaladaha ku haboon iney helaan xisaabaadka bangiyada. Si lamid ah, bulshada Soomaalida waxey soo jeediyeen talaabooyin cad cad oo ay keeni kara xayiraaado ay soo rogaan bangiyada caalamiga ee la shaqeeya, sidoo kalana kor loogu qaadi lahaa nidaamyada lagu xaqiijinayo qofka lacagta helaya taasoo loo yaqaan wajiga gudbinta (Delivery phase) ama tallaabadii ugu dambaysay (Last mile) ee waddada lacag diridda.

Iyadoo wadahadalladan aysan weli mira dhal noqon, ayaa waxaa lagu hishiyay in la aasaaso koox ka kooban qeybaha badan ee daneeya (multi-stakeholder working group) arimaha xawaaladaha, bankiyada iyo dowladda si loo fahmo arimaha shirkadaha xawaaladaha iyo in leysula meel dhigo hannaan dhaqan wanaagsan oo ay shirkadaha lacagaha diraa fulin karaan si ganacsigoodu uu unoqon karo mid la jaan qaadi kara heerka la aqbali karo halista ku imaan karta bangiyada. Iyadoo diiradda si gaar ah loo saaraya arimaha soo wajahaya hantida xawaaladaha yar yar iyo kuwa dhexe, kooxdu waxey si joogta ah uga kulmi doontaa arimahan si looga gaaro xal joogta ah oo waara kuna aadan halista soo wajahi karta oo ay bangiyadu ka walaacsanyihiin islamarkaana oggolaaneysa sii socoshada shaqada shirkadaha xawaaladaha. Xiriirka shirkadaha xawaaladleeyda iyo lacag bixinta (ARCPA) waxey sidoo kale la xiriireen waaxda arimaha dibadda iyo ganacsiga Australiya (DFAT) si loo abuuro loona horumariyo tilmaamooyinka ku haboon ee lagu hagi lahaa ayna u hoggaansami lahaayeen shirkadaha xawaaladaha.

In kastoo lagaaray horumarradan wanaagsan iyo rajooyinka mustaqbaleed ee ku saabsan xawilaadaha Soomaalida iyo guud ahaan shirkadaha lacagaha dira ee Australiya, ayaa haddana waxaan weli cadeeyn sida uu noqonayo mustaqbalka dhow ee xawaaladahaas. Waxa mahadleh, dadaallada ay sameeyeen shirkadaha xawaaladaha Soomalida iyo ururrada kale ee lacagaha dira oo taageera buuxda ka helay Oxfam, bangiga Westpac wuxuu go'aansaday in uu sameeyo hal bil oo uu dib u dhigayo xiritaanka xisaabaadka ilaa dhammaadka bisha November 2014 ka, laakiin aysan ballanqaadeyn inay dib dambe u sameeyaan dib u dhigid kale oo dheeraad ah.

Bishii November 2014kii tiro kamid ah Shirkadaha xawaaladaha laakiin aysan shaqa ku laheyn ururrada SMRA ama ARCPA, ayaa waxey dacwad ka gudbiyeen Westpac ayagoo ku eedeeyay dhaqan xumo aan la aqbali karin. Bishii December 24, 2014, 24 kii shirkadood ee ugu dambeeyay ee dawcada ka gudbisay Westpac ayaa waxey heleen xal ay isla gaareen iyaga iyo Westpac maxakamaduna ay ansixisay, kuwaas oo isku raacay in xawaaladaha waqti kordhin ay kusii wadan karaan adeegyada bangiyada lasiiyo ilaa 31 ka March ee sannadka 2015 ta.²⁷ Halka uu xalkani si cad waqti kordhin u siinayo waqti kordhin xisaabadkii lagu xusay dacwadda kooxdan Class action, dabayaaqada bisha January 2015, haddana waxey u muuqataa in waqti kordhintani ay sidoo kale fursad siineeeyso ugu yaraan xawaalada kale oo xisaabaadkooda aan la xirin dhamaadkii sannadkii 2014, kuwaasi oo aay kamid yihiin shirkadaha xawaaladaha Soomaalida.²²

Waxaan shaki ku jirin, in horumarradii ugu danbeeyeyay ay Soomaalida Australiya ku abuureen farxad iyagoo ka caawiyay diritaanka lacagihii ay u diri jireen eheladooda liidata kuna sugan Soomaaliya iyo meela kalaba inkastoo ay ku meel gaar tahay. Su'aasha weli taagan ayaa ah in dib u dhigistan u dambeysay ee ku saabsan xiritaanka xisaabaadka ay siineeeyso waqti ku filan wadahadallada u dhaxeeya shirkadaha xawaaladaha, bangiyada iyo dowladda si loo gaaro xal waara amaba la raadiyo xal kale oo deg deg ah oo ay kujiraan shirkadihii xawaaladaha ee xisaabaadkoodii la xiray dabayaaqadii 2014 kii welina aan dib loo furin.

5 TALLAABOYINKA AY QAADEEN SHIRKADAHA LACAGAHA XAWILA

Laga soo billabbo dhacitaankii Dawladdii Siyaad Barre 1991kii, xawilaaduhu waxay ku tallaabsadeen dhisitaanka dhaqaale kutiirsan xalaalnimo iyo aaminaad iyadoo meesha kamaqan tahay dawlad dejisa nidaam xakameeya hawlagalladooda. Xawaaladuhu waxay ku yareeyeen khataraha ay la kulmi karaan iyagoo kutiirsan shabakado²³ kudhisan is-aamin iyo is-dabagal joogta ah oo aad looga taxadaray kaasoo xoojinayaa helitaanka nidaam laysku raacsan yahay. Laakiin sida shirkadaha cusub, dhimista khataruhu ama halista kuma salaysna keyd dhaqaale ay leeyihin, iyo iney si fiican uga warqabaan macaamiisha ay la fal gelayaan, caymis ay kujiraan ama diffaac habeysan oo ay leeyihiin. Sannadahaan dambe, maadaama adeegyada bankiyadu dhib noqdeen, xawaaladaha Soomaalidu waxay ku dadaaleen inay diiwaan geliyaan kuna tarjumaanna habka ay adeegsadaan qaab ay fahmi karaan shirkadaha ama dawladaha adduunku, kuwa dejiya nidaamyada lacagaha iyo kuwa bangiyada lehba.²⁴ Waqtigan, waxay ruqsado ka haystaan dhammaan qeybaha caddaallada ee goobaha ay kahawlgalaan (bixiyana ruqsadaha), waxayna ballan qaadeen in ay fuliyaan dhammaan tallaabooyinka kucad sharciga looga baahan yahay goob kasta. Waxay cod dheer ku caddeeyeen inay hirgelinayaan qaab shaqo ee waafaqsan habka AML/CFT. Hirgelinta tallaabooyinkaasi waxey hoos u-dhigeen faa'idooyinka la helayo iyo adeegyada loo qabanayo bulshada Soomaaliyeed.



Dawladda Somaliland waxey ku dadaashay inay garab kahesho bulshada caalamka iyo tan rayidkaba. Mudane Abdirahmaan Cabdullaahi Ismaaciil "Saylici", Madaxweye-ku-xigeenka Somaliland wuxuu khudbad ka jeediyey shir waddankiisu qabtay oo looga hadlayey xawilaadaha iyo dembiyada lacagaha kayimaada. Sawirka: Adeso.

Waxaa jiray tusaalooyin aad u wanaagsan oo ay sameeyeen bulsho aad u habeysan oo ay hoggaminayaan dad diyaar u ah dood iyo wadahalad iyo xirrir intaba sida kooxda xawaaladleyda soomaaliyeed (The Somali Remittances Ad Hoc Group) ee Australiya, iyo SOMSA oo Ingiriiska ka howlgasha.

Xawilaaduhu, inkastoo ay hirgeliyeen tallaabayinkaan wanaagsan, haddana weli inta badan bangyada reer galbeedku shaki weyn bey kaqabaan. Waxaa intaas dheer, in ay xawilaaduhu ka gaabiyeen inay wada shaqeeyaan si ay dadweynaha wax ugu sheegaan iyo inay si wadajir arrimahooda ugu bandhigaan dawladdaha. Inkastoo xawilaadaha soomalidu ku dhaqaaqeen in ay ku midoobeen ururro ka dhisan Mareykanka, Ingiriiska, Australiya, Imaaraadka carabta iyo Somaliland, haddana ururradaasi weli kuma guulaysan inay u midoobaan si fiican iyo in ay si mug leh u maal geliyaan siday bulshada ku gaari lahaayeen, wargelinta bulshada iyo xirriirrada dawladda. Arrinkaasi ay ka gaabiyeen xawaaladuhu, waxey keentay inay dawladdu heliwaayaan warbixin waafi ah waqtiga loo baahan yahay in go'aan laga gaaro arrimaha ku saabsan habka lacaguhu ugu qulqulaan Soomaaliya. Waxay kaloo hoos u dhigtay hufnaanta wacyigelinta ay samaynayaan hogaamiyaasha bulshada, hay'adaha taakulaynta bini'aadamka, iyo xawilaaduhuba.

6 DADAALLADA CAALAMKA IYO XAWILAADAHABA

Kooxda G20 waxay ku qanacsan tahay in xawilaaduhu yarayn karaan ku tiirsanaanta bulshada ee caawimada, horumarna gaarsiin karto shaqsiyaadka iyo bulshooyinkaba.³¹ Xawilaaduhu waxay waddamaada siiyaan hanti ay ku gaaraan horumar, waxay xoojiyaan isku xirka bulshada, waxay gaarsiin karaan lacag dadka aad saboolka u ah. Kolka xawilaaduhu xirmaan, waxaa soo baxa habab aan sax ahayn oo lacagaha leys kugu diro kaasoo keeni kara in sare u kacdo habka loo yaqaan lacag lunsashasho/dhaqid ama musuqmaasuq lacageed “money laundering” iyo dembiyada dhaqaalaha, sidoo kalena dhici karto inay hoos-udhacdo adeegsiga habka sharciyeysan ee lacagtu ku gaari gaarto dadka.

Hubinta in si sharciyeysan lacagaha loo xawilo waxay kooxda G20 diiradda saartay shirkoodii dabayaaqadii 2014ka ee loo yaqaan ka qeyb qaadashada caalamiga ah ee arrimaha maaliyadda (Global Partnership for Financial Inclusion (GPI)) oo ay ku cusboonaysiinayeen qorshayaasha hawlgallada laxiriira lacagaha si ay ugu daraan ballanqaadyo ku saabsan 'kor u qaadidda wacyigelinta, ogaanshaha sidii loo heli lahaa xal kuhaboon ee ku aadan sababaha keenay in la xiro xisaabaha bangiyada ee ay lahaayeen shirkadaha xawilaadaha.²⁵

Shirkii 2014 G20 ay kuyeesheen Brisbane, Australia waxaa kaloo kasoo baxay qorshe cusub oo kusaabsan sidii loo fududeyn lahaa adeegga xawilaadaha, iyadoo la muujiyey sida kooxda G20 uga go'an tahay inay xal u hesho arrimaha ka hor imaan kara habsami u socodka xawilaadaha iyo arrimaha lacagahaba.²⁶

Guddiga loo yaqaan The Financial Action Task Force (FATF²⁷) waxey si habboon iskula soo qaadeen arrinta la xiriirta nidaamyada lacagta ee meesha ka saaraya dadka saboolka ah iyo tan ku saabsan arrinta khatar-kacararka bangiyada (bank de-risking). Ereyga khatar-kacararka (de-risking) waxaa lagu qeexay “ xaaladda ay adeegsadaan hay'adha

maamula lacagaha inay ku joojyaan ama ku ciriiriyaan xiriirrada ay la leeyihiin macaamiisha ama qaybo kamid ah macaamishooda iyagoo diidaya, intii ay maareyn lahaayeen, khatarta ka imaan karta awaamiirta ama tilmaamaha guddiga FAFT ee ku saabsan khataraha ama halisyada (FAFT's risk approach).²⁸ Labadaan mawduuc si aad ah ayey iskugu xiran yihiin: in laga saaro xawilaadaha adeegyada bangiyada waa mid kamid ah calaamadaha khatar ka cararka taasoo saameyn xad dhaaf ah oon dheelli tirnayn ku leh bulshooyinka aad u nugul. Haddaba, Guddiga loo yaqaan FATF waxay ballan qaadeen inay kala shaqaynayaan qaybta kamida kooda G20 ee loo yaqaan Global Partnership for Financial Inclusion (GFPI) iyo hay'adaha kaleba sidii loo tirakoobi lahaa saamaynta khatar kacararka (de-risking), iyo haddii loo baahdo, in tallaabo wax ku ool ah laga qaado marka layskugu yimaado shirka wadatashiga ee bisha Febraayo 2015ka. Waa arrin aad muhiim u ah in ajendaha AML/CFT kaasoo ay FAFT si sax ah u ogaatay inay tahay mid kamid ah sababaha badan ee khatar ka cararka iyo katakoodidda hababka lacagaha inuusan noqon mid ka joojiya shaqsiyaadka iyo bulshooyinka xaqa ku taagan gaar ahaan kuwa saboolka ah iyo kuwa aadka u liita in ay ka qaybgalaan nidaamka la yaqaan ee lacagaha lagu maamulo.

Bangiga Adduunku wuxuu qeyb libaax ka qaataa sidii loo fududeyn lahaa lacag diridda. Bangiga Adduunka wuxuu si caalami ah u taageeray cilmi baarisyo muhiim ah wuxuuna qabtay shirar caalami ah oo lagu abuuray kooxo shaqo oo ku saleysan habka loo yaqaan wada shaqynta hay'adaha dowladda-iyo kuwa gaarka loo leeyahay (Public-Private Partnership) oo ujeeddada laga leeyahay tahay sidii hoos loogu dhigi lahaa qiimaha ku kaca lacag dirista, si aan mugdi ku jirinna oo cad loola socon lahaa shaqooyinkooda iyo hababka iyo nidaamyada ay adeegsadaan. Arrinka ku saabsan Soomaaliya, Bangiga Adduunku wuxuu kaaloo kudhaqaaqay sidii uu hormuud uga noqon lahaa fulinta mashruuca loo yaqaan UK's Safer Corridor iyo siduu ula talin lahaa Maamullada Soomaalida inay abuuraan Hab dawlad wanaag ku dhisan oo lagu maamulo lacagaha. Marka loo fiiriyo awooddaan dambe ee bangigu ku dhaqaaqay waxaa muhiim ah in bangigu taageero habka ujeedadiisu tahay dhisidda hab leysku raacsan yahay ah ee hirgala waqtiga dheer, isla markaana uu dhiirri geliyo sidii loo heli lahaa tallaabooyin lagu yaraynayo khatarta ganacsiga loo yaqaan lacag-dhaqidda/lunsashada ama musuqmaasuqa lacagaha (money laundering). Tallaabadaasi waa inay noqotaa mid muujinaysaa hoos u dhaca khataraha soo gaari kara bangiyada iyo xawilaadaha damacsan inay ganacsi suubiyaan ama inay lacagaha u diraan Soomaaliya.

7 HIIGSIGA MUSTAQBALKA

Sannadihii la soo dhaafay, dadaallada lagu taageerayey xawilaadaha lacagaha iyo hababka loo adeegsaday maamulidda lacagaha waxay iskugu jireen xilliyo lagu mashquulay sidii loo maarayn lahaa dhibaatooyinka dhacay iyo xilliyo dhaadheer oo lala qabsaday xaaladda iyadoo la moog yahay khataraha ka imaan kara. Markii lagu dhawaaqay in la xirayo xisaabaadka bangiyada ayaa waxaa soo baraarugay maamullada Soomaalida, ururrada rayidka iyo dawladaha reer galbeedka si ay uga hortagaan cabsida laga qabo halista sare ee ka imaan karta

marka si degdeg ah loo gooyo xisaabaadkaas. Intaan halista xiritaanka xisaabaadku jirin dawladdu waxay ku mashquulsanaayeen arrimo kale iyagoo si khalad ah iska dhaadhiciyey in habka xawilaaduhu aamin yahay.

Si loo kordhiyo xasilloonida lacagta ee Soomaaliya, dawladda iyo saaxiibadeedu waa inay si joogta ah diiradda ugu hayaan una soo jeestaan wax ka qabashadeeda xataa haddaanay muuqan halista in xisaabaadka la xirayo. Ajendaha bulshada caalamka waa inay ku jirtaa qorshaha wax looga qaban karo xiritaanka xisaabaha xawilaadaha, arrintaasoo ilaa hadda aanay jirin dawlad kudhaqaaqday, sidoo kale waa in iyana la adkeeyo hay'adaha maamula adeegga lacagaha ee dalka. Sidoo kale waa in iyana loo soo jeesto sidii wax looga qaban lahaa welwelka la xiriira halista ka imaan karta khatar kacararka iyo saamaynta ay ku leedahay waddammada soo koraya.

Qaar kamid ah talooyinka la soo jeediyey si loo xalliyo arrimaha dhici kara waqtiga dheer waa cad yihiin waana laysku raacsan yahay, sida in la dhiso kartida kormeerka hay'adaha lacagta ee soomaaliya iyo in la aburo xaalado keeni kara in la helo bangi ganacsi oo si hufan uga hawlgala waddanka soomaaliya. Dhanka kale waxaa iyana jira arrimo aan looga maarmiin helitaanka hab waara oo lagu maamuli karo xawilaadaha Soomaaliya iyo lacagaha adduunka kuwaasoo aan weli si fiican loo fahmin una baahan in si hufan loo lafa guro. Tusaale ahaan, dhanka caalamka, arrimaha loo yaqaan khatar kacararka bangiyada waa leysku wada raacsan yahay, laakiin sababta keentay laykuma raacsana iyaduna saamaynta ay keeni karto (hadii laga reebo halista ay ku hayso xawaaladaha Soomaaliya) si guud looma diiwaangelin. Aad bey u fiicnaan laheyd in gudaha Soomaaliya laga sameeyo daraasad lagu baarayo saamaynta ay leedahay kutiirsanaanta sii kordhaysa ee lacagaha telefoonada gacanta layskugu gudbiyo oo kharashaadka maalin laha ah lagu bixiyo iyo tan xawilaadaha adduunka, khaas ahaan saamaynta ay ku leeyihiin ayna dareemi karaan haweenka, bulshada aad u liidata iyo waayelkaba. Waxaa sidaasoo kale, waxa haboon in fiiro gaar ah loo yeesho helitaanka hindisiyaal casri ah oo kor loogu qaadi karo dabagallada caddaymaha (transparency) maamulka xawilaadaha, wax kala gadashada tafaariiqda ku saleysan, iyo shabakadaha ganacsiga lacagaha, tusaale ahaan, dhisidda ama abuuridda aqal lagu mideysan yahay oo maamula xawilaadaha Soomaalida oo dhan iyo shirkado qaabilsan lacag bixinta iyo caddaymahooda.

8 TALO BIXIN (RECOMMENDATIONS)

Dawladda Federaalka Soomaaliya iyo Maamullada kale waa in ay:

Hagaajiyaan maaraynta lacagaha iyo caddaymahooda. Tiro badan oo ah Bangiyada kajira caalamku waxay sameeyaan baaritaan ay ku ogaanayaan halista ay la kulmi karaan inta aanay lacago u dirin ama laama ka furan waddamo badan. Baaritaannadaas waxay diirrada kusaaraan arrimo badan ay kamid yihiin heerka ay gaarsiisan yihiin dembiyada la xiriira lacagaha iyo argagaxisnimada, hufnaanta hawlaha la xiriira nidaamka lacagaha iyo heerka helitaanka caddaaladda gaarsiisan tahay marka laga hadlayo kormeerada bangiyada lagu sameeyo, iyo waddamada la geynayo lacagaha, tusaale ahaan hay'adaha maamula lacagaha dawladda heerka ay ka warqabka maamulka lacagta iyo musuqmaasuqu gaarsiisan yihiin. Maammullada Soomaalidu ma xakamayn karaan arrimahaas oo dhan, laakiin waxay hagaajin karaan caddaymaha iyo kawarqabka iyagoo:

- abuuraya guddii la-talin caalami ah kaasoo kormeeraya heshiiyada Bangiga Dhexe;
- la-dagaallamaya xididdadana u siibaya musuqmaasuqa hay'adaha dawladda.
- ansixinaya hirgelinayana sharciyada bangiyadu kudhaqmaan iyo kuwa xakamaynayaa lacag-dhaqidda (money laundering);
- fulinaya baaritaannada xawilaadaha, si wadajir ahna ugu dhaqaaqaya baaritaanno lagu ogaanayo halista sare ee lacag-dhaqidda/maalgelinta argagaxisnimada (ML/TH), suubinayana qorshe-hawleed wax looga qabanayo arrimahaas; iyo
- diyaarinaya habka loo diiwaan gelinkaro loona kormeerikaro nidaamka dibedda loogu xawilo lacagaha.

In Lagu daro bangiyada iyo howlahooda heshiisyada hiigsiga cusub (The new deal). Hiigsiga cusub wuxuu qorsheynayaaa marxaladp loogu tala galay Soomaaliya laguna xooginayo hab maamulka lacagaha dowladda iyadoo lagu suurtagelinayo taasi abuuritaanka xisaabaad ku shaqeynaya Nidaamyada leysla yaqaanno iyo khasnad ku leh hal xisaab oo keliya bangiga dhexe ee Soomaaliya.²⁹ Gaaritaanka ujeeddadan waxey hagaajineysaa awoodda uu bangigu u leeyahay inuu ballaariyo xirirrada uu la leeyahay bangiyada dibadda isla markaana waxey kor u qaadeysaa heerka dabagalka lacagaha iyadoo yareyneysa khataraha ka imaan kara lacahaga loo diro Soomaaliya.

Shirkadaha lacagaha xawila ee Soomaaliyee waa in ay:

- **Hagaajiyaan wada shaqeynta dhexdooda ah ee suuqyada muhiimka ah iyagoo maalgelinaya hagaajinta ku dhaqmidda sharciyada iyo farsamooyinkoodaba.** Waxaa soo galaya xoojinta nidaamyada looga shaqeeyo qeybaha xawilaadaha ee leysku raacay, hagaajinta nidaamyada si loo garto loogana gudbiyo warbixin dhaqdhaqaaqyada laga shakiyo, in la abuurto hey'ado tababarro iyo kormeerid, sare u qaadid qaabka loo gurbiyo warbixinnada, ilaalinta keydka iyo diiwaan gelin, iyo xoojinta howlaha ka warqabka iyo

dabagalka.

- **In ay ka qeyb galaan baaritaannada khataraha ku imaan kara qeybha kala gedisan si loo caddeeyo meelaha ay khatarta lacag dhaqiddo sarreyso iyo dambiyaduna (ML/TF) ku badan yihiin qorshe shaqona loo sameeyo sidii loo yareyn lahaa ama looga hortagi lahaa.**
- **Si buuxda u maalgeliyaan urur ganacsi ee caalami ah kasso leh tilmaamaha looga baahan yahay nidaamka kor lagu soo sheegay ee baro macaamilkaaga (KYC) si loo helo xubinnimo joogta ah, khabiirnimo iyo howl wadeenno leh aqoon shaqo oo ugu yaraan kala jooga wadamada Soomaaliya, Imaaraadka Carabta, Mareykanka, iyo Ingiriiska.** Shirkadaha xawilaadaha waxey ka sameeyeen wadamma dhowr ah, ururro ganacsi laakiin weli sidii laga rabay ma aha oo wey tabar daran yihiin, dhaqaale xumo heysata, iyo ayagoo ay mar walba wiiqayaan kambaniyada/shirkadaha ka tirsan ururradaas. Si loo ilaaliyo doorka ay ururradaasi ku leeyihiin jiritaanka dadweynaha Soomaaliyeed, heyadaha Soomaaliyeed ee lacagaha xawilaa waa iney si wadajir ah oo dhab u wada shaqeeyaan si ay u yeeshaan hal cod oo keliya isla markaasna ay u kordhiyaan saameynta ay leedahay matalaadooda.

Dowladda Mareykanka waa in ay:

- **Qaaddaa tallaabooyin deg deg si loo hubiyo in muhaajiriinta Soomaalida ee ku nool Mareykanka ay u suurtagaleyso iney si madax bannaan isla markaana sharciga waafaqsan usii wadi karaan diridda lacagaha ay u dirayaan walaalahooda jooga Soomaaliya.** Waxaan ugu yeernay dowladda Mareykanka iney u diyaar garowdo suurtagalnimada in Xawilaadaha Soomaalida lagu qasbo iney xiraan meelaha ay faracyada ku leeyihiin ayna yareeyaan qulqulka lacagaha sababtuna ay tahay iyadoo aysan jirin fursada badan oo Nidaam bangiyeed ka howl gala Soomaaliya. Waqtigii aanu saadaalineynay wuu yimid. Waxaa jira qaabab badan oo sharciyesan oo ay dowladda Mareykanka kusoo wadi karto qulqulka lacagaha loo diro Soomaaliya sida:
 - in ay diyaariso talis/hoggaan u qaabilsan sharciyeynta khaaska ah, sida in bangiyada loo oggolaado in ay la sameyn karaan ganacsi xawilaadaha haysta ruqsadaha islamarkaana sharciyeysan ee ay leeyihiin Soomaalida Mareykanka
 - in ay dowladda Mareykanku diyaariso heshiis dhexmara iyada iyo hey'adaha dowladda ee qaabilsan maaliyadda/lacagaha sida New York Federal Reserve si loo fududeeyo lacagaha loo diro Soomaaliya.
- **In La abuurto barnaamij ballaaran si loo barto isla markaana loo caddeeyo siyaasadda dadka baniyada baara iyadoo xoogga la saarayo muhimmaadda nidaamyada bangiyada ay u leeyihiin shiradaha lacagaha xawila.** Baarayaasha Bangiyada waxey wajahaan cawaaqibo xun xun hadii ay ka dhacdo lacag dhaqid bangiyada ay kormeeraan. Iyagu waxba ka faa-idi maayaan sii haynta xisaabaha shirkadaha ay u arkaan kuwa halis ah, xataa haddii

ay ku dhaqmaan sharciyada Mareykanka. Baarayaashu niyad uma hayaan iney ilaaliyaan in ay shirkadaha ama ururrada ka shaqeeya kobcinta dhaqaalaha ay helaan adeegayada bangiyada Si xal loogu helo dhibaatan waa in hey'adaha OCC, FDIC, iyo The Federal Reserve strategies intuba ay ku kordhiyaan is beddello tababarrada iyo buugaagta ay isticmaalaan baarayaasha bangiyada.

- **In la caddeeyo waxyaabaha laga filanayo wada shaqeynta bangiyada iyo shirkadaha lacagaha xawilaa.** Bishii October 8 di, kalkaaliyaha xoghayaha khasnadda Mareykanka Daniel Glazer, wuxuu baloggiisa ku qoray in uu oggolaaday ama waafaqay in wasaaradda khasnadda Mareykanka ay la shaqeyn doonto hey'adaha bangiyada federaalka si dib u habeyn loogu sameeyo awaamnirta/tilmaamaha bangiyada la shaqeeya shirkadaha lacagaha xawila iyo in ay awaamirtaasi xoogga saari doonto arrinkaas. Iyadoo adeegsanaya hab kormeerid iyo awood ku filan, bangiyadu waxey si hubaal ah u maamuli doonaan dadka lacagaha dira ee ay halistoodu sarreyso.
- **Si cad in loo gudbiyo ujeedooyinka dowladda Mareykanku ay ka leedahay dalabaadka wadanka dibadiisa ee ku saabsan lacagaha lalunsado ama loo yaqaano lacaga dhaqidida iyo dambiyada la xiriira lacagaha oo dhan (US AML/CFT laws).** Qaab dhaqameedka ad adag ee dowladda Mareykanka oo ay kaga hortageyso lacag dhaqidida waxaa ka mid ah iney kusoo rogto ganaaxyo aad u culculus bangiyada ajnabiga ah ee ku ganacsada Doolarka Mareykanka. Tani waxey ku qancisay bangiya badan kuwaasoo haysta xisaabo ay ugu tala galeen ganacsiga la xiriira lacagaha, gaar ahaan shirkadaha yar yar ee ka howl gala meelaha halistoodu sarreyso, ineysan istaahilin in khatar loo gala. Si loo siiyo damaanad bangiyada, in ganacsi la sameynta shirkadaha lacagaha diraa ay tahay mid badbaadsan ama la oggol yahay, waa in ay dowladda Mareykanku shaacisaa damaceeda, iney xoojineyso oo keliya ka hortagga dhaqdhaqaaqyada ugu xun ee ay sameeyaan bangiyada ajaanibta Taasoo ah waxa guud ahaan horayba loo sameeyay.

Dowladda Ingiriiska waa in ay:

- **Sii waddaa dadaalladeeda ay ugu abuureyso Soomaaliya jid badbaadsan (Safer Corridor) oo xooggan waqtiga iyo sida ugu habboon iyo in ay la wadaagto wadammada iyo hey'adaha kaleba khibradaha laga kororsaday tallaabooyinkii horay loo qaaday.** Dadaallada dowladda Ingiriiska waxey caddeyn u yihiin go'aannada dhabta ah ee muuqda, laakiin waxaa jira weli suurtagalnimada xiritaanka xisaabaha inta uusan nidaamkan Safer Corridor shaqa gelinba. Dowladda ingiriisku waa in ay la timaadaa dadaalkeeda ugu sarreeya si loo suurtageliyo inuu nidaamka Safer Corridor uu noqdo mid shaqeeya isla markaana lagu lifaaqo oo uu la shaqeeyo barnaamijyada kale ee jira. Waa in ay sii waddaa dowlada ingiriiska ineyla shaqeyso dhammaan qeybaha ku lugta leh howlahaan diridda lacagaha si loo ilaaliyo habsami u socoshada kalsoonida qeybaha maamulka lacagaha.

- **Dowladda Ingiriiska waa in ay waafaqdaa tallaabooyinka deg degga ah si loo wajaho hadii ay soo dersaan carqalado ku yimaada socoshada lacagaha la diro, sida fursadaha kor ku xusan ee lagula taliyay dowladda Mareykanka.**
- **Waa in ay la shaqeysaa dowladda Mareykanka iyo dowladaha kale ee G20 si loo hubiyo in bixinta lacagaha loo diro Soomaaliya loo maamulay sida arrin deg deg aad ah loo qabo.**

Dowladda Australiya waa in ay:

- **Sii wadaa fududeynta wadhadallada dhinacyada badan ee u socda bangiyada, ganacsiga xawilaadaha, dowladda iyo bulshada saameyntu gaartay, iyadoo ujeedaduna tahay in si dhakhsi ah loo gaaro xalal qiima leh, waqti dheerna soconaya, kuwaasoo u oogolaanaya bangiyada Australiya in ay sii wadaan la shaqeynta shirkadaha lacagaha xawila.**
- **Si deg deg ah u oggolaataa taallaabooyin deg deg ah si loo wajaho carqaladaha ku imaan kara socoshada lacaga la xawilo, sida ah fursadaha kor ku xusan ee loogu tala bixiyay dowladda Mareykanka iyo Ingiriiska, iyadoo la og yahay xiritaankii lagu sameeyay qaar kamid ah xisaabaadka shirkadaha lacagta xawila dhammaadkii sannadkii 2014 ka iyo in ay kuwa harayna sugayaan in la xiro bisha March ee sannadkan 2015 ka.**
- **Sii waddaa la shaqeynta dowladaha Ingiriiska, Mareykanka iyo dowladaha kale ee arrinkan muhiimka u ah si xeel dheer leysu dhaafsado khibradahii laga faaiday waddammada kale iyo hey'adaha ay horay usoo martay arrintaan. Tani waa in ay ku jirtaa kormeerid joogta ah oo lagu sameeyo nidaamka UK's Safer Corridor iyo isticmaalidiisa lagu isticmaalayo xaaladda Australiya.**
- **La shaqeeyso shirkadaha xawaaladaha Soomaalida iyo Xawilaadaha Australiya si loo caawiyo dadalladooda ay ku xoojinayaan xeerar dhaqameedyo dhexdooda ah iyo iney horumariyaan sida ugu wanaagsan ee loo dabbiqi karo awaamirta loogu tala galay Hey'adaha lacagaha xawila ee Australiya.**
- **Sii waddo in ay riixdo waxqabad deg deg ah o ay sameeyaan waddammada G20 oo ay la shaqeynayaan waddama kale oo arrimahan daneynaay si loo wajaho arrimaha ku saabsan hakad gelinta socodka xawaaladaha and maamulka lacagahaba.**

Bangiyadu waa in ay:

- **Si hoos ahaaned u qaabeeyaan/dejiyaan siyaasado iyo qaabraacyo lagu qiimeeyo khatarta. Bangiyada waaweyn ee caalamiga ah waxey gaaraan go'aanno ku saabsan in ay ku shaqeeyaan diritaanka lacagaha ama in ay furaan laamo ay ku qiimeynta khatarta ee ay horay u dejisteen. Qaababkan qiimeynta khatarta waxey tixgelin siinayaan arrima dhowr ah, oo ay kamid yihiin baahsanaanta dambiyada lacagaha iyo argagixisnimada, jiritaanka sharciyada lagu maamulo lacagaha, Sharciyada ku saabsan**

kormeerka bangiyada, awoodda canshuur celinta inta ay la eg tahay, iyo heerka uu gaarsiisan yahay musuqmaasuqa iyo mugdi la'aanta/daahfurnaanta ka jirta hey'adaha maamula lacagaha dadweynaha.yeeshaan waddama kala gedisan iyagoo ku saleynaya siyaasadooda.

Xaaldaha ay macaamiishu la kulmaan khatar aad u sarreysa sida hey'adaha maaliyadda Soomaaliyeed, bangiyada ganacsiga caalamiga waa in ay:

- **Hubiyaan/xaqijiyaa in ilo dhaqaale oo ku filan hoos ahaan loogu qoondeeyay s ay si ku filan isla markaana sugan u qiimeyaan una yareeyaan saameynta khatarta**
- **Abuuraan qaab guud oo lagu fahmi karo waxa micnihiisu yahay habka ku saleynta khatarta iyo sida loo iisticmaalay**
- **Soo saaraan tilmaamooyin hoose isla markaana bixiyaan tababarro khaas ahaaneed oo loogu tala galay shaqaalaha bangiyada ee aqoontoodu sarreyso iyo kuwa kalsoonida buuxda lagu qabo si ay u maamulaan macaamiisha la filayo in khatartoodu aad u sarreyso**
- **Dib u eegis ku sameeyaan tilmaamaha khaaska ah ee ay horay u diyaarisay hey'adda FATF kuna saabsan qaabka la macaamilka xisaabaha khatartoodu sarreyso, iyagoo isla markaana ku daraya tilmaamaha dheeriga ah ee soo kordhay**
- **Soo saaraan tilmaamooyin ku saleysan xaaladaha iyo hababka khatarta lacagaha:**
 - **Tixgeliyaan dib u eegisata xaaladaha gaar ahaaneed, sida Soomaaliya, kalana saaraan sharciyada hoose kuwaasoo laga yaabo iney bixyaan damaanado; iyo**
 - **Isku dayaan xajinta xisaabaha shirkadaha fududeeya diritaanka lacagaha loo dirayo Soomaaliya.** Ugu yaraan, bangiyadu waa ineysan u xirin xisaabaha si kala soocid la'aan ah ama iyadoo lagu saleynayo aragtiyo ama dareen aan jooqta aheyn kuna saabsan xaaladaha Soomaaliya ka jira. Mar Alla markey suurtagal tahay, bangiyadu waa in ay la shaqeeyaan shirkadaha lacagaha dira iyagoo isticmaalya awood aan caadi aheyn/aad u sarreysa iyagoo isku dayaya in ay fahmaan macaamiishooda iyadoo la raacayo habab ku saleysan dadaal si ay u siiyaan adeegyada ay u baahan yihiin.
- **Qaabeeyaan qorsha howleed lagu yareynayo khatarta ka imaan karta lacagaha:**
 - **Abuuraan guddiyo hoosaadyo ka shaqeeya in si wanaagsan loo fahmo islamarkaana ku sameeya qiimeeyn khatarta dhabta ah ee jirta marka loo eego tan la filayo iney dhacdo**
 - **Sameeyaan dib u sixid lagu sameynayo qaababka raacidda tilmaama hoosaadyada bangiyada ee looguu tala**

galay yareynta khatarta iyadoo aan la joojineeyn (lasii wadayo) adeegyada la siinayo macaamiisha; iyo

- **Dib u eegis jooga ah ku sameeyaan waxyaabaha kusoo kordhay hababka qiimeynta khatarta qaranka (National risk assessments) si, si joogta ah loogu sameeyo kormeer iyo dabagal meelaha ugu muhiimsan ee ay ka imaan karto khatarta iyo meelaha nugeylku ka jiro iyadoo si dhab ah loo caddeynayo xaaladaha uu heerkooda dhibaato is beddelay**

Dowladaha ay degan yihiin Soomaalida qurba joogta ah waa in ay:

- **Taagero ka geystaan horumarinta bangiyoyada tayo leh oo laga hirgeliyo dhulalka Soomaalida iyagoo siinaya taageero farsamo iyo dhisidda shaqaalaha bangiyada iyo kordhinta tayadoodaba iyo guud ahaan qorsha dejinta iyo hab maamulka lacagaha**
- **Isku duwaan dadaallada ka socda qeybaha sharciyada si looga fududeeyo shirkadaha yar yare e leh laamaha badan culeysyada haysta La shaqeyaan dowladda Ingiriiska si loo kordhiyo khibradaha ay u leeyihiin abuuridda waddooyin aamin u ah lacagaha loo diro Soomaaliya.**
- **Siiyaan dhiirrigelin nooc kasta ah bangiyada u oggolaada shirkadaha lacagaha dira sii isticmaalidda xisaabahooda.**
Arrinkan, waxaa laga sameyn karaa Mareykanka, tusaale ahaan iyadoo la kordhinayo waxa loo yaqaan Community Reinvestment act oo loo sameynayo bangiyada siiya adeegyada shirkadaha lacagaha dira.
- **Sida laga soo xignayo dadka aqoonta u leh arrimahan, waxey sheegayaan in bangiyada qiimaha jaban ku bixiya adeegyada lacag diridda ayba helayaan dhiirrigelinta noocan ah.**
- **Sameeyaan xiriirin iyo tixgelin/qadarin waxyaabaha (fikaradha iyo talooyinka) ka yimaada bulshooyinka qurbajoogta ah, shirkadaha lacagaha dira iyo bangiyadaba.** Xalal siyaasadeed oo aan tixgelin siineyn aragtiyadooda, danahooda iyo degaannada lagu shaqeynayaba waxey u badan taay ineysan guuleysan
- **Iyagoo isticmaalaya deeqaha loogu tala galay hal abuuridda iyo kaalmada farsamo ee la siiyo maamullada Soomaalida, waa in ay taageero ka geystaan sidii loo ballaarin lahaa isla markaana loo caalamiyeyn lahaa habka lacagaha leysugu gudbiyo telefoonnada gacanta iyo in la baro bulshada sidii ay u isticmaali laheyd.** Lacagaha lagu diro telefoonnada gacanta waxaa laga isticmaalaa meelaha qaar ee kamid ah Soomaaliya, laakiin waxaa aad u yar in loo isticmaalo si caalami ah, iney isticmaalaan dadka ku nool meelaha magaalooyinka ka baxsan iyo dadka waayeellada ahba. Iyadoo aysan aheyn mid ku habboon in isticmaalka diritaanka lacagaha lagu diro telefoonnada uu noqdo mid si dhaqsa ah u beddela habkii hore ee diritaanka lacagaha, haddana habkan iyo qaababka kale ee ku saleysan farsamooyinka casriga ah waxey noqon karaan qeyb kamid ah xalalka mustaqbalka fog ee diritaanka lacagaha iyo guud ahaan maamullada maaliyadeed ee Soomaaliya. Si kastaba ha

ahaatee, deeq bixiyeyaashu waa in ay si taxadar leh u darsaan saameynta ay yeelan karto kordhinta ku tiirsanaanta isticmaalka lacagta telefoonnada iyo qaababka kale ee ku saleysan farsamooyinka casriga ah kuwaasoo kaalin ka geysan kara sidii haweenka, dadka la liido iyo waayeelladuba ay awood ugu heli lahaayeen iney helaan adeegyada dhaqaale.

- **Qiimeyn ku sameeyaan suurtagalnimada iyo saameynta ay yeelan karto in shirkadaha xawaaladaha Soomaaliyeed ay yeeshaan qaab lacag bixineed oo wadajir ah.** Tani waxey kor u qaadi kartaa in dadka sharciyada qaabilsan iyo bangiyadaba ay si aan mugdi ku jirin usoo ururiyaan isuguna keenaan lacagihii maray xisaabaha waddanka Imaaraadka Carabta (UAE) waqtiga clearance ka, halkaasoo deymaha dhexmara xawilaadaha dhexdooda, wakiilladooda caalamka kala jooga iyo ganacsatada (kuwaasoo dib usoo buuxiya lacagihii wakiilada shirkadaha xawaaladaha ee jooga Soomaaliya) lagu xalliyo..

Dowladaha ku bahoohay ururka G20 iyo kooxda loo yaqaan the Financial Action task Force waa in ay:

- **Muujiyaan rabitaanka siyaasadeed ee lagama maarmaanka ah si loo ilaaliyo sii socoshada hababka diritaanka lacagaha ee nugul/tabarta daran iyadoo tixraac lagu sameynayo waxyaabihii kasoo baxay shirkii Brisbane.** Arrimahaasi oo ay kamid ahaayeen in lasoo saaro tilmaan cad oo ku saabsan sidii loo abuuri lahaa waddooyin amaan ah (safer corridors) oo lacagaha la dirayo la marsiiyo gaar ahaan markii dowladaha ay lacuguhu u socdaan laga filayo in ay ka jirto khatar argagixisnimo oo sarreysa iyo lacag dhaqid/lunsasho, sidaasoo kalena ay ka jiraan tallabooyin dowladeed oo waqti gaaban soconaya sida dekedo nabad ah muddo gaaban ama dadweyna daneynaya howlaha bangiyada, si loo xaqiijiyo in waddooyinka khatarta ay furan yihiin ama sii jirayaan. Dhaqdhaqaaqyada daba socoshada go'aamadii horay loo gaaray, waa in ay si gaar ahaaneed u abbaaraan Soomaliya ka wadan ahaan halkaasoo diritaanka lacaguhu ay soo food saartay dhibaato ama halis iyadoo dadka Soomaaliyeed ay ku tiirsan yihiin lacagaha la soo diro si ay u helaan waxyaabaha ay u baahan yihiin.
- **Hubiyaan xoojinta laba geesoodka ah ee ah in mudnaanta la siiyo sidii looga hortagi lahaa dhaqidida lacagaha iyo maalgelinta argagixisada taasoo dhinac ah iyo xoojinta fududeynta sidii loo maareyn lahaa dhaqaalaha iyo awood u helidda isticmaalka qaab bangiyeedyada shirkadaha lacagaha dira oo iyaduna dhinac kala ah.** Tani waa in la fahmaa iyadoo loo tarjumayo tilmaamooyin cad cad oo la siiyo bangiyada heer waddan, kaasoo dhiirri gelinaya qeybaha bangiyada oo dhan.
- **Taageeraan horumarinta hab maamul bangiyadeed kaasoo ay suuratgal tahay iney ka wada faa-ideystaan Soomaalida oo dhan isla markaana u hoggansamaya qawaaniinta/sharciyada caalamiga ah ee bangiyada,** iyadoo ka bar bar sameynaya maalgelin hey'adaha caalamiga ah ee lacagaha, taasoo loola dan leeyahay in hoggaamin cad oo wax tar leh la helo, khubaro farsama

ahaan loo hubiyay iyo sidaasoo kale taagero. Iyadoo la hubinayo in haweenku ay aqood u leeyihiin in ay helaan adeegyada bangiyada.

Bangiga Adduunku waa in uu:

- **Ula shaqeeyaa si aad u dhow qeybaha ay shaqa wadaagga yihiin.** Iyadoo laga ambaqaadayo kartida ay aqoonta xirfadeed ee uu bangigu u leeyahay maamulka lacagaha, bangigu wuxuu kaalinta koowaad kaga jiraa siduu iskugu duwi lahaa dadaallada wada shaqeynta ah ee socda kuwaasoo ay ayideen dowladaha, ururrada aan dowliga aheyn, bangiyada, shirkadaha xawila lacagaha, iyo bulshada Soomaaliyeed ee ku kala nool Soomaaliya iyo caalamka intiisa kaleba. Si kastaba ha ahaatee, fikirkaan si uu u noqdo mid shaqeeya, bangiyadu waxey u baahan yihiin in ay xogta la wadaagaan isla markaana ka dhageystaan wixii talooyin ah ee ku saabsan qorshayaasha iyo fulinta howlaha khuseeyaba dadka arrinkan daneynaya iyo kuwa ay dan wadaagga yihiin intaba.
- **Aqoonsadaa deg degta dhibaata ku soo fool leh socoshada/qulqulka diritaanka lacagaha iyo inuu taageeraa hababka aan mugdiga laheyn (transparent) kuwaasoo taageero u ah sameynta hoggaannada qeybaha u qaabilsan Sharciyada ka hor tagga lacag lunsashada iyo la dagaallanka maalgelinta argagixisada (AML/CFT) ee awoodda u leh in ay sameeyaan horumar deg deg ah iyo kor u kac dhaqaale.** Illaa hadda, bangiga adduunku wuxuu ku tala galay inuu taageero u fidiyo qaabab waqti dheer soconaya oo loogu tala galay maamulidda lacagaha. Wuxuu leeyahay habab dib u hagaajineed oo ay ka muuqato niyad jab kuwaasoo ujeeddadoodu tahay in la helo isla markiiba horumar, haddii uusan dhameystirneyn xataa horumarinaya hey'adaha AML/CFT ee Dhulalka Soomaalida. Bangigu waa inuu xaqiijiyaa in hababka muhiimka ah ee lagu dajinayo aas aas xoog leh ee soconaya waqti dheer kaasoo loogu tala galay in lagu maamulo lacagaha in uusan baabi'inin qaababka kale ee waqtiyada gaaban soconaya kuwaasoo ayaguna muhiim u ah sidii loo heli lahaa iney si dhaqso ah u horumarto hey'adda AML/CFT, si loo dhiirri geliyo bangiyada adduunku in ay ku soo biiraan howlgalka.
- **Soo jeediyaa qaabab dib u habeyn loogu sameynayo qeybaha lacag diridda ee waddanka Imaaraadka carabta (UAE) iyagoo la shaqeynaya bangiga dhexe ee wadankaas.** Bangiga adduunku wuxuuba la shaqeeyaa maamullada wadanka UAE si dib u habeyn loogu sameeyo qeybta lacagta si loo kordhiyo raacidda sharciyada hey'adda AML/CFT. Tani waa halka ugu muhiisan ee uu ka liito habka lacagaha loogu diro Soomaaliya waqtiga hadda lajoogo, iyadoo lacagahaasi intooda badan ay soo maraan Dubai. Maadaama Bangiga adduunku uu yahay daneeye muhiim u ah arrinkan diritaanka lacagaha, isagoo la shaqeynaya bangiga dhexe wuxuu qeyb libaax ka ciyaari karaa in uu u xaqiijiyo bangiyada caalamiga ah iyo dowladahaba in habka lacag dirista Dubai uu yahay hab aan laab laab laheyn isla markaana dhaxal gal ah.

NOTES

- 1 M. Orozco and J. Yansura. Keeping the Lifeline Open: Remittances and Markets in Somalia. 2013. Available at <http://www.oxfam.org/en/research/keeping-lifeline-open> Accessed December 18, 2014.
- 2 M. Orozco and J. Yansura. Keeping the Lifeline Open: Remittances and Markets in Somalia. 2013. Available at <http://www.oxfam.org/en/research/keeping-lifeline-open> Accessed December 18, 2014.
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- 5 Due largely to an insistence by international money transfer companies on exclusive agent agreements, most Africans must pay 12 percent to send \$200, almost double the global average. See K. Watkins and M. Quattri. Lost in Intermediation: How Excessive Charges Undermine the Benefits of Remittances for Africa. Overseas Development Institute, 2014. Somali-Americans must pay a 5 percent commission for similar transactions. See M. Orozco and J. Yansura, 14 [note 2]. The charges are the same for other Somali diaspora communities.
- 6 As of the time of writing, the only such MTO office is the Western Union office in Hargeisa.
- 7 The term *hawala* comes from the Arabic word for 'transfer'. Historically, it developed as an informal system to facilitate trade between distant regions where conventional banking institutions were not available, were weak, or were unsafe. Originally wholly reliant on trust networks, the *hawala* system in Somalia has professionalized and pledged to abide by international standards since it began in the early 1970s.
- 8 Somali MTOs wire money to Dubai, where, through contracts with regional traders, they are able to replenish the cash reserves of local MTO agents in Somalia.
- 9 Adeso, Oxfam et al. Risk of Relapse: Somalia Crisis Alert. Available at <http://www.oxfam.org/en/research/risk-relapse> Accessed December 18, 2014.
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- 11 Sending Money Home to Africa. IFAD. 2009. Available at www.ifad.org/remittances/pub/money_africa.pdf Accessed January 5, 2015. T
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- 15 FinCEN Statement on Providing Banking Services to Money Service Businesses. November 10, 2014. Available at http://www.fincen.gov/news_room/nr/pdf/20141110.pdf Accessed December 18, 2014.
- 16 M. Orozco and J. Yansura [note 2].
- 17 At present, two companies whose access to banking services do not appear threatened are Western Union, which operates a single branch in Hargeisa, and World Remit, a mobile money transmitter which is available only to users of Telesom's ZAAD service in Somaliland.
- 18 At the time of its decision, Barclays facilitated an estimated 70 percent of all remittances from the UK. It made the decision to close money service business accounts ostensibly to reduce its exposure to prosecution and enforcement under US and UK anti-money laundering regulations, but it should be noted that it continued to bank some money service businesses that generate at least £100,000 annually to Barclays. It appears that Barclays, like other US and UK banks that have exited Somali MTOs and other small MTOs before, may have balanced regulatory and reputational risk on one hand against revenue on the other. See [Dahabshiil Transfer](#)

Services Limited v. Barclays Bank PLC [2013] EWHC 3379 (Ch) (05 November 2013).

- 19 Terms of Reference for the Action Group on Cross Border Remittances. Available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/295344/TOR-OVERVIEW.pdf Accessed December 18, 2014.
- 20 See Statement of The Rt. Hon. Economic Secretary to the Treasury Andrea Leadsom, UK Parliamentary Debate, September 9, 2014. Available at <http://www.publications.parliament.uk/pa/cm201415/cmhansrd/cm140909/halltext/140909h0002.htm> Accessed January 5, 2015.
- 21 Figures provided by the Somali Money Remitters Association (SMRA) on 29 December 2014.
- 22 The Somali Money Remitters Association received official correspondence from Westpac Banking Corporation in January 2015 advising that their MTO accounts would be closed on 31 March 2015. However, ARCPA have advised that at least some MTO accounts closed by Westpac prior to the court ordered settlement in December 2014 have not been re-opened.
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