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**Bureau for International Narcotics and Law
Enforcement Affairs**

International Narcotics Control Strategy Report

Volume I

**Drug and Chemical
Control**

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Common Abbreviations

APEC	Asia-Pacific Economic Cooperation
AFRICOM	U.S. Military Command for Africa
ASEAN	Association of Southeast Asian Nations
ATS	Amphetamine-Type Stimulants
CARICC	Central Asia Regional Information Coordination Center
CARSI	Central America Regional Security Initiative
CBP	U.S. Customs and Border Protection
CBSI	Caribbean Basin Security Initiative
DARE	Drug Abuse Resistance Education
DEA	U.S. Drug Enforcement Administration
DHS	U.S. Department of Homeland Security
DOJ	U.S. Department of Justice
DTO	Drug Trafficking Organization
ECOWAS	Economic Community of West African States
EU	European Union
FBI	Federal Bureau of Investigation
FIU	Financial Intelligence Unit
ICE	U.S. Immigration and Customs Enforcement
ILEA	International Law Enforcement Academy
INCB	International Narcotics Control Board
INCSR	International Narcotics Control Strategy Report
INL	U.S. Department of State's Bureau of International Narcotics and Law Enforcement Affairs
JIATF-S	Joint Interagency Task Force South
JIATF-W	Joint Interagency Task Force West
MAOC-N	Maritime Analysis and Operations Centre-Narcotics
MLAT	Mutual Legal Assistance Treaty
MOU	Memorandum of Understanding
NIDA	National Institute of Drug Abuse
OAS	Organization of American States
OAS/CICAD	Inter-American Drug Abuse Control Commission
ONDCP	Office of National Drug Control Policy
NPS	New Psychoactive Substances
SELEC	Southeast European Law Enforcement Center
SIU	Special Investigative Unit
SOUTHCOM	U.S. Military Command for the Caribbean, Central and South America
TOC	Transnational Organized Crime
UNODC	United Nations Office on Drugs and Crime
UNCAC	United Nations Convention against Corruption
UNTOC	United Nations Convention against Transnational Organized Crime
USAID	U.S. Agency for International Development

USCG	U.S. Coast Guard
UTC	Universal Treatment Curriculum for Substance Use Disorders
WACSI	West Africa Cooperative Security Initiative
Ha	Hectare
HCL	Hydrochloride (cocaine)
Kg	Kilogram
MT	Metric Ton

International Agreements

1988 UN Drug Convention – United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (1988)

UN Single Drug Convention – United Nations Single Convention on Narcotic Drugs (1961 as amended by the 1972 Protocol)

UN Psychotropic Substances Convention – United Nations Convention on Psychotropic Substances (1971)

UNCAC – UN Convention against Corruption (2003)

UNTOC – UN Convention against Transnational Organized Crime (2000) and its supplementing protocols:

Trafficking in Persons Protocol – Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime

Migrant Smuggling Protocol – Protocol against the Smuggling of Migrants by Land, Air and Sea, supplementing the United Nations Convention against Transnational Organized Crime

Firearms Protocol – Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition, supplementing the United Nations Convention against Transnational Organized Crime

INTRODUCTION

Legislative Basis for the INCSR

The Department of State's International Narcotics Control Strategy Report (INCSR) has been prepared in accordance with section 489 of the Foreign Assistance Act of 1961, as amended (the "FAA," 22 U.S.C. § 2291). The 2019 INCSR, published in March 2019, covers the year January 1 to December 31, 2018 and is published in two volumes, the second of which covers money laundering and financial crimes. In addition to addressing the reporting requirements of section 489 of the FAA (as well as sections 481(d)(2) and 484(c) of the FAA and section 804 of the Narcotics Control Trade Act of 1974, as amended), the INCSR provides the factual basis for the designations contained in the President's report to Congress on the major drug-transit or major illicit drug producing countries initially set forth in section 591 of the Kenneth M. Ludden Foreign Operations, Export Financing, and Related Programs Appropriations Act, 2002 (P.L. 107-115) (the "FOAA"), and now made permanent pursuant to section 706 of the Foreign Relations Authorization Act, Fiscal Year 2003 (P.L. 107-228) (the "FRAA").

Section 706 of the FRAA requires that the President submit an annual report no later than September 15 identifying each country determined by the President to be a major drug-transit country or major illicit drug producing country. The President is also required in that report to identify any country on the majors list that has "failed demonstrably . . . to make substantial efforts" during the previous 12 months to adhere to international counternarcotics agreements and to take certain counternarcotics measures set forth in U.S. law. U.S. assistance under the current foreign operations appropriations act may not be provided to any country designated as having "failed demonstrably" unless the President determines that the provision of such assistance is vital to U.S. national interests or that the country, at any time after the President's initial report to Congress, has made "substantial efforts" to comply with the counternarcotics conditions in the legislation. This prohibition does not affect humanitarian, counternarcotics, and certain other types of assistance that are authorized to be provided notwithstanding any other provision of law.

The FAA requires a report on the extent to which each country or entity that received assistance under chapter 8 of Part I of the Foreign Assistance Act in the past two fiscal years has "met the goals and objectives of the United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances (the "1988 UN Drug Convention")."

Beginning in 2007, pursuant to The Combat Methamphetamine Enforcement Act (CMEA) (The USA Patriot Improvement and Reauthorization Act 2005, Title VII, P.L. 109-177), amending sections 489 and 490 of the Foreign Assistance Act (22 USC 2291h and 2291) section 722, the INCSR was expanded to include reporting on the five countries that export the largest amounts of methamphetamine precursor chemicals, as well as the five countries importing the largest amounts of these chemicals and which have the highest rate of diversion of the chemicals for methamphetamine production. This expanded reporting also includes additional information on efforts to control methamphetamine precursor chemicals, as well as estimates of legitimate demand for these methamphetamine precursors, prepared by most parties to the 1988 UN Drug Convention and submitted to the International Narcotics Control Board. The CMEA also requires a Presidential determination by March 1 of each year on whether the five countries that legally exported and the five countries that legally imported the largest amount of precursor

chemicals (under FAA section 490) have cooperated with the United States to prevent these substances from being used to produce methamphetamine or have taken adequate steps on their own to achieve full compliance with the 1988 UN Drug Control Convention. This determination may be exercised by the Secretary of State pursuant to Executive Order 12163 and by the Deputy Secretary of State pursuant to State Department Delegation of Authority 245-2.

Although the Convention does not contain a list of goals and objectives, it does set forth a number of obligations that the parties agree to undertake. Generally speaking, it requires the parties to take legal measures to outlaw and punish all forms of illicit drug production, trafficking, and drug money laundering; to control chemicals that can be used to process illicit drugs; and to cooperate in international efforts to these ends. The statute lists actions by foreign countries on the following issues as relevant to evaluating performance under the 1988 UN Drug Convention: illicit cultivation, production, distribution, sale, transport and financing, and money laundering, asset seizure, extradition, mutual legal assistance, law enforcement and transit cooperation, precursor chemical control, and demand reduction.

In attempting to evaluate whether countries and certain entities are meeting the goals and objectives of the 1988 UN Drug Convention, the Department has used the best information it has available. The 2019 INCSR covers countries that range from major drug producing and drug-transit countries, where drug control is a critical element of national policy, to small countries or entities where drug issues or the capacity to deal with them are minimal. The reports vary in the extent of their coverage. For key drug-control countries, where considerable information is available, comprehensive reports are provided. For some smaller countries or entities where only limited information is available, reports include whatever data the responsible U.S. diplomatic mission could provide.

The country chapters report upon actions taken – including plans, programs, and, where applicable, timetables – toward fulfillment of Convention obligations. Because the 1988 UN Drug Convention’s subject matter is so broad and availability of information on elements related to performance under the Convention varies widely within and among countries, the Department’s views on the extent to which a given country or entity is meeting the goals and objectives of the Convention are based on the overall response of the country or entity to those goals and objectives. Reports will often include discussion of foreign legal and regulatory structures. Although the Department strives to provide accurate information, this report should not be used as the basis for determining legal rights or obligations under U.S. or foreign law.

Some countries and other entities are not yet parties to the 1988 UN Drug Convention; some do not have status in the United Nations and cannot become parties. For such countries or entities, we have nonetheless considered actions taken by those countries or entities in areas covered by the Convention as well as plans (if any) for becoming parties and for bringing their legislation into conformity with the Convention’s requirements. Other countries have taken reservations, declarations, or understandings to the 1988 UN Drug Convention or other relevant treaties; such reservations, declarations, or understandings are generally not detailed in this report. For some of the smallest countries or entities that have not been designated by the President as major illicit drug producing or major drug-transit countries, the Department has insufficient information to make a judgment as to whether the goals and objectives of the Convention are being met.

Unless otherwise noted in the relevant country chapters, the Department's Bureau of International Narcotics and Law Enforcement Affairs (INL) considers all countries and other entities with which the United States has bilateral narcotics agreements to be meeting the goals and objectives of those agreements.

Information concerning counternarcotics assistance is provided, pursuant to section 489(b) of the FAA, in section entitled "U.S. Government Assistance."

Major Illicit Drug Producing, Drug-Transit, Significant Source, Precursor Chemical, and Money Laundering Countries

Section 489(a)(3) of the FAA requires the INCSR to identify:

- (A) major illicit drug producing and major drug-transit countries;
- (B) major sources of precursor chemicals used in the production of illicit narcotics; or
- (C) major money laundering countries.

These countries are identified below.

Major Illicit Drug Producing and Major Drug-Transit Countries

A major illicit drug producing country is one in which:

- (A) 1,000 hectares or more of illicit opium poppy is cultivated or harvested during a year;
- (B) 1,000 hectares or more of illicit coca is cultivated or harvested during a year; or
- (C) 5,000 hectares or more of illicit cannabis is cultivated or harvested during a year, unless the President determines that such illicit cannabis production does not significantly affect the United States. [FAA § 481(e)(2)]

A major drug-transit country is one:

- (A) that is a significant direct source of illicit narcotic or psychotropic drugs or other controlled substances significantly affecting the United States; or
- (B) through which are transported such drugs or substances. [FAA § 481(e)(5)]

The following major illicit drug producing and/or drug-transit countries were identified and notified to Congress by the President on September 11, 2018, consistent with section 706(1) of the Foreign Relations Authorization Act, Fiscal Year 2003 (Public Law 107-228):

Afghanistan, The Bahamas, Belize, Bolivia, Burma, Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Haiti, Honduras, India, Jamaica, Laos, Mexico, Nicaragua, Pakistan, Panama, Peru, and Venezuela.

Of these 22 countries, **Bolivia and Venezuela** were designated by the President as having “failed demonstrably” during the previous 12 months to adhere to their obligations under international counternarcotics agreements and take the measures set forth in section 489(a)(1) of the FAA. The President determined, however, in accordance with provisions of Section 706(3)(A) of the FRAA, that continued support for bilateral programs to aid the people of Venezuela is vital to the national interests of the United States.

Major Precursor Chemical Source Countries

The following countries and jurisdictions have been identified to be major sources of precursor or essential chemicals used in the production of illicit narcotics:

Afghanistan, Argentina, Bangladesh, Bolivia, Brazil, Burma, Canada, Chile, China, Colombia, Costa Rica, Dominican Republic, Ecuador, Egypt, El Salvador, Germany, Guatemala, Honduras, Hong Kong, India, Indonesia, Japan, Mexico, the Netherlands,

Nigeria, Pakistan, Peru, Poland, Republic of Korea, Singapore, South Africa, Switzerland, Taiwan, Thailand, the United Kingdom, and Venezuela.

Information is provided pursuant to section 489 of the FAA in the section entitled "Chemical Controls."

Major Money Laundering Countries

A major money laundering country is defined by statute as one "whose financial institutions engage in currency transactions involving significant amounts of proceeds from international narcotics trafficking" [FAA § 481(e)(7)]. More information on the methodology is set forth in Volume II of the INCSR in the section entitled "Legislative Basis and Methodology for the INCSR." The following countries/jurisdictions have been identified this year in this category:

Afghanistan, Albania, Algeria, Antigua and Barbuda, Argentina, Armenia, Aruba, Azerbaijan, Bahamas, Barbados, Belgium, Belize, Benin, Bolivia, Bosnia and Herzegovina, Brazil, British Virgin Islands, Burma, Cabo Verde, Canada, Cayman Islands, China, Colombia, Costa Rica, Cuba, Curaçao, Cyprus, Dominica, Dominican Republic, Ecuador, El Salvador, Georgia, Ghana, Guatemala, Guyana, Haiti, Honduras, Hong Kong, India, Indonesia, Iran, Italy, Jamaica, Kazakhstan, Kenya, Laos, Liberia, Macau, Malaysia, Mexico, Morocco, Mozambique, Netherlands, Nicaragua, Nigeria, Pakistan, Panama, Paraguay, Peru, Philippines, Russia, Senegal, Serbia, St. Kitts and Nevis, St. Lucia, St. Vincent and the Grenadines, Sint Maarten Spain, Suriname, Tajikistan, Tanzania, Thailand, Trinidad and Tobago, Turkey, Ukraine, United Arab Emirates, United Kingdom, United States of America, Uzbekistan, Venezuela, and Vietnam.

Further information on these countries/jurisdictions and United States money laundering policies, as required by section 489 of the FAA, is set forth in Volume II of the INCSR in the section entitled "Money Laundering and Financial Crimes."

Presidential Determination

THE WHITE HOUSE

WASHINGTON

September 11, 2018

Presidential Determination No. 2018-21806

MEMORANDUM FOR THE SECRETARY OF STATE

SUBJECT: Presidential Determination on Major Drug Transit or Major Illicit Drug Producing Countries for Fiscal Year 2019

By the authority vested to me as President by the Constitution and the laws of the United States, including Section 706(1) of the Foreign Relations Authorization Act, Fiscal Year 2003 (P.L. 107-228) (FRAA), I hereby identify the following countries as major drug transit or major illicit drug producing countries: Afghanistan, The Bahamas, Belize, Bolivia, Burma, Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Guatemala, Haiti, Honduras, India, Jamaica, Laos, Mexico, Nicaragua, Pakistan, Panama, Peru, and Venezuela.

A country's presence on the foregoing Majors List is not necessarily a reflection of its government's counternarcotics efforts or level of cooperation with the United States. Consistent with the statutory definition of a major drug transit or drug producing country set forth in section 481(e) (2) and (5) of the Foreign Assistance Act of 1961, as amended (FAA), the reason major drug transit or illicit drug producing countries are placed on the list is the combination of geographic, commercial, and economic factors that allow drugs to transit or be produced, even if a government has engaged in robust and diligent narcotics control law enforcement measures.

Pursuant to Section 706(2)(A) of the FRAA, I hereby designate Bolivia and Venezuela as countries that have failed demonstrably during the previous 12 months to adhere to their obligations under international counternarcotics agreements and take the measures set forth in section 489(a)(1) of the FAA. Included with this determination are justifications for the designations of Bolivia and Venezuela, as required by Section 706(2)(B) of the FRAA. I have also determined, in accordance with provisions of Section 706(3)(A) of the FRAA, that support for programs to aid the promotion of democracy in Venezuela are vital to the national interests of the United States.

Combating the ongoing United States opioid epidemic is one of my Administration's most urgent priorities. The Consolidated Appropriations Act of 2018, which I signed into law this spring, dedicated nearly \$4 billion in additional funding to confront this national crisis. My Administration is committed to addressing all factors fueling this drug crisis, which is devastating communities across America, including steps to curb over-prescription, expand access to treatment and recovery programs, improve public education programs to prevent illicit drug use before it begins, and to strengthening domestic drug enforcement at our borders and throughout our Nation. Alongside these massive and historic United States efforts, I expect the

governments of countries where illicit drugs originate and through which they transit to similarly strengthen their commitments to reduce dangerous drug production and trafficking.

In this respect, I am deeply concerned that illicit drug crops have expanded over successive years in Colombia, Mexico, and Afghanistan, and are now at record levels. Drug production and trafficking in these three countries directly affect United States national interests and the health and safety of American citizens. Heroin originating in Mexico and cocaine from Colombia are claiming thousands of lives annually in the United States. Afghanistan's illicit opium economy promotes corruption, funds the Taliban, and undermines the country's security, which thousands of United States service men and women help defend. Despite the efforts of law enforcement and security forces, these countries are falling behind in the fight to eradicate illicit crops and reduce drug production and trafficking. These governments must redouble their efforts to rise to the challenge posed by the criminal organizations producing and trafficking these drugs, and achieve greater progress over the coming year in stopping and reversing illicit drug production and trafficking. The United States will continue its strong support for international efforts against drug production and trafficking, as well as to strengthen prevention and treatment efforts in the United States. The urgency of our national drug epidemic requires significant and measurable results immediately, in the coming year and in the future.

You are authorized and directed to submit this designation, with the Bolivia and Venezuela memoranda of justification, under Section 706 of the FRAA, to the Congress, and publish it in the *Federal Register*.

/S/

Donald J. Trump

MEMORANDUM OF JUSTIFICATION FOR MAJOR ILLICIT DRUG TRANSIT OR ILLICIT DRUG PRODUCING COUNTRIES FOR FY 2019

Bolivia

During the past 12 months, the Bolivian government has failed demonstrably to make sufficient efforts to meet its obligations under the international counternarcotics agreements or to uphold the counternarcotics measures set forth in Section 489 (a)(1) of the Foreign Assistance Act (FAA) of 1961, as amended (FAA).

According to coca cultivation estimates from the United States government, the Government of Bolivia, and the UN Office on Drugs and Crime (UNODC), Bolivia remains the third largest producer of cocaine in the world. It is also a major transit zone for Peruvian cocaine. Cocaine cultivation in Bolivia continues to increase; the United States government estimated coca cultivation increased by three percent to 37,500 hectares (ha) in 2016 from 36,500 in 2015. Per United States government estimates, potential pure cocaine production has more than doubled in Bolivia over the past decade, and increased eight percent to 275 metric tons from 2015 to 2016.

In addition to excessive production levels, Bolivia's inadequate controls over its legal markets are of concern. Until 2017, Bolivian law permitted 12,000 hectares of licit coca production per year. In March 2017, President Evo Morales signed into law a bill that replaces Bolivia's former counternarcotics law and nearly doubles those limits; the area available for licit coca production will increase from 12,000 to 22,000 hectares. This exceeds the amount of coca needed for traditional purposes by 38 percent, according to a European Union (EU) estimate. UNODC officials have estimated that 90 percent of the Chapare region's coca cultivation is destined for illicit cocaine production and not traditional consumption.

In 2013, Bolivia re-acceded to the 1961 U.N. Single Convention on Narcotic Drugs with a reservation permitting coca to be used only within Bolivia for traditional, cultural, and medicinal purposes. Despite these stated conditions, Bolivia continues to promote the use of coca in other countries and discuss potential export opportunities for coca products. These actions undermine Bolivia's commitments to its international drug control obligations.

As a matter of official policy, the Government of Bolivia does not encourage or facilitate illegal activity associated with drug trafficking. President Morales and other senior officials have acknowledged serious corruption problems in the judiciary and police. Approximately 60 police officers were investigated for corruption associated with drug trafficking in 2015, the most recent year for which data is available. Corruption, interference by other branches of government, and insufficient judicial resources undermine due process and create delays in the administration of justice.

Increased Bolivian counternarcotics cooperation with other countries and in international fora would be welcome. Bolivia receives most of its foreign counternarcotic financial support from the European Union (EU). The EU is currently implementing a three-year (2016-2018)

assistance program budgeted at \$50 million, and also provides an additional \$10 million to support UNODC drug control programs and technical assistance through a contractor. The United States has not had a counternarcotics presence in Bolivia, but U.S. officials consult with international organizations and third-country governments involved in supporting Bolivian drug control goals and efforts to strengthen the rule of law. A customs mutual assistance agreement between the Government of Bolivia and United States to foster improved information sharing was signed in July 2017, which permits information exchanges and collaboration to prevent illegal shipments and related criminal activities, including drug trafficking.

Bolivia participated in the semi-annual Multilateral Maritime Counter Drug Summit held in November 2017, which attracted 125 maritime counterdrug professionals from nearly 25 countries and over 65 international agencies spanning North, Central and South America, and Europe. The United States and Bolivia are parties to a 1995 extradition treaty that permits the extradition of nationals for the most serious offenses, including drug trafficking. Bolivia and the United States do not have a mutual legal assistance treaty, but both countries can request assistance through various multilateral conventions to which both are parties.

In accordance with United States legislation, the determination that Bolivia has failed demonstrably to make substantial efforts to adhere to its obligations under international counternarcotics agreements and to take counternarcotics measures set forth in the FAA results in the withholding of certain kinds of U.S. assistance, with exceptions for humanitarian and counternarcotics assistance under the FAA. United States assistance to and relations with Bolivia are extremely limited. It is not in the vital interest of the United States to grant a national interest waiver to Bolivia, given that any assistance necessitating such a waiver is neither contemplated by the United States, nor actively pursued by the Government of Bolivia.

MEMORANDUM OF JUSTIFICATION FOR MAJOR DRUG TRANSIT OR ILLICIT DRUG PRODUCING COUNTRIES FOR FY 2019

Venezuela

During the past 12 months, the Venezuelan government failed demonstrably to make sufficient efforts to meet its obligations under the international counternarcotics agreements or to uphold the counternarcotics measures set forth in section 489 (a)(1) of the Foreign Assistance Act of 1961, as amended (FAA). A national interest waiver for Fiscal Year 2019 for Venezuela permits support for United States government-funded bilateral assistance programs vital to the national interest of the United States, such as democracy building and human rights advocacy.

Venezuela remained a major drug-transit country in 2018. Venezuela is one of the preferred trafficking routes for illegal drugs, predominately cocaine, from South America to the Caribbean region, Central America, the United States, Western Africa, and Europe, due to its porous western border with Colombia, weak judicial system, sporadic international counternarcotics cooperation, and permissive and corrupt environment.

Public corruption, including among senior government officials, is a major problem in Venezuela, making it easier for drug-trafficking organizations to smuggle illegal drugs. The Venezuelan government, as a matter of policy, does not encourage or facilitate illicit drug production or distribution, nor does it condone laundering the proceeds of the sale of illicit drugs; however, the Maduro regime knowingly maintains a United States designated Narcotics Kingpin in its Cabinet.

On February 13, 2017, the United States designated Venezuelan Executive Vice President Tareck El Aissami pursuant to the Foreign Narcotics Kingpin Designation Act for his involvement in international narcotics trafficking activities. El Aissami facilitated, coordinated, and protected other narcotics traffickers operating in Venezuela. Specifically, El Aissami received payment for the facilitation of drug shipments belonging to Venezuelan drug kingpin Walid Makled Garcia. El Aissami also is linked to coordinating drug shipments to Los Zetas, a violent Mexican drug cartel, as well as providing protection to Colombian drug lord Daniel Barrera Barrera and Venezuelan drug trafficker Hermagoras Gonzalez Polanco.

In November 2016, nephews of Venezuelan first lady Cilia Flores, Efrain Campo Flores and Francisco Flores de Freitas, were convicted by a federal court in New York of conspiracy to traffic 800 kg of cocaine to the United States. In 2017, the nephews were unsuccessful in overturning their convictions on appeal. In August 2016, the United States unsealed indictments against General Nester Luis Reverol Torres, the former director of ONA and former commander of the National Guard, and Edylberto Jose Molina Molina, former sub-director of ONA, for participating in an international cocaine trafficking conspiracy. Immediately following the U.S. indictments, President Nicolas Maduro appointed Reverol as Minister of Interior, Justice, and Peace, in which he is responsible for overseeing both ONA and the National Guard.

In September 2015, the United States unsealed indictments against former Bolivarian Intelligence Service (SEBIN) chief of finance Pedro Luis Martin Olivares and former anti-drug official in the Scientific, Penal, and Criminal Investigative Corps (CICPC) Jesus Alfredo Itriago for alleged involvement in drug trafficking activities affecting the United States. In 2013, the U.S. Department of the Treasury added Vassily Kotosky Villarroel-Ramirez, a former captain in the Venezuelan National Guard, to the “Specially Designated National and Blocked Persons (SDN)” list under the Foreign Narcotics Kingpin Designation Act (Kingpin Act). The Venezuelan National Guard reported the arrest of Villarroel-Ramirez in July of 2015.

In 2008, the Treasury designated former Minister of Defense and current Trujillo state Governor, Henry Rangel Silva and Guárico state Governor Ramón Emilio Rodríguez Chacín as “Specially Designated Narcotics Traffickers” pursuant to the Foreign Narcotics Kingpin Designation Act for assisting the *Fuerzas Armadas Revolucionarias de Colombia* (FARC) in trafficking narcotics.

The Venezuelan government has yet to take action against these or other government and military officials with known links to the FARC or Mexican drug cartels.

In 2018, the Venezuelan government engaged in minimal bilateral law enforcement cooperation with the United States. Venezuelan authorities do not effectively prosecute drug traffickers, in part due to political corruption. Additionally, Venezuelan law enforcement officers lack the equipment, training, and resources required to significantly impede the operations of major drug trafficking organizations. The Venezuelan government occasionally reports drug seizures, arrests, and destruction of drugs and airstrips to the public, but did not share evidence about the destruction of illicit drug with U.S. officials.

Drug control cooperation between Venezuela and the United States has been limited and inconsistent since 2005, when Venezuela refused to sign a negotiated amendment to the U.S.-Venezuela bilateral Letter of Agreement on drug control cooperation. The United States and Venezuela have a bilateral agreement for counter drug operations. The agreement enables both countries to stop, board, and search vessels flying the other’s flag. Furthermore, this agreement enables direct case information sharing, and expedited vessel registry checks. In 2016, the Venezuelan government cooperated with the United States Coast Guard in six documented maritime drug interdiction cases, compared to 10 cases in 2015. Venezuela did not attend the 2017 International Drug Enforcement Conference for the first time in four years.

To advance cooperation with the United States, the Venezuelan government could increase the exchange of narcotics-related information to lead to more drug-related arrests, help dismantle criminal networks, aid in the prosecution of criminals engaged in narcotics trafficking, and stem the flow of illicit drugs transiting Venezuela.

The United States and Venezuela are parties to an extradition treaty that entered into force in 1923. Although the 1999 Venezuelan constitution bars the extradition of Venezuelan nationals, Venezuela periodically extradites or deports non-Venezuelan nationals to the United States for prosecution.

Pursuant to Section 706 of the Foreign Relations Authorization Act of Fiscal Year 2003, FRAA, though Venezuela has failed demonstrably, a national interest waiver under the FRAA allows the continuation of certain United States bilateral assistance programs to Venezuela; humanitarian and counternarcotics assistance can be provided to Venezuela without a national interest waiver.

POLICY AND PROGRAM DEVELOPMENTS

Overview

Volume 1 of the 2019 International Narcotics Control Strategy Report provides an overview of actions taken during the previous year by the governments of nearly 70 countries to reduce illicit drug production, trafficking, and use. This global challenge bears more direct impact on the health and safety of Americans than at any time in our history. According to data from the Centers for Disease Control and Prevention, more than 70,000 people died in the United States from drug overdoses in 2017, making drug overdoses the leading cause of premature deaths in the country. The vast majority of the illicit drugs responsible for these deaths originate outside the United States, placing drug supply and demand reduction among the most urgent U.S. foreign policy priorities.

Opioids continue to fuel the majority of U.S. overdose deaths. What began as a prescription drug problem and morphed into a heroin epidemic has shifted to misuse of highly potent synthetic opioids, particularly fentanyl and its analogues. Synthetic opioids are frequently laced into heroin and other drugs, or pressed into counterfeit pills and sold to often unsuspecting users, adding to the risk of overdose. These shifts have resulted in a staggering loss of American lives in recent years. Deaths from synthetic opioids, primarily fentanyl, soared to nearly 30,000 in 2017, up more than 45 percent from 2016.

Trafficking in these drugs offers numerous advantages to criminals. Synthetic drugs can be manufactured virtually anywhere, and production costs are low. The extreme potency of synthetic opioids lets traffickers reap high profits from small volumes. Criminals exploit the tools of global e-commerce to sell these drugs online directly to consumers and, due to their potency, small quantities of drugs can be delivered through the mail and express consignment services at minimal risk of detection. Virtually any community with a postal address and internet connectivity is at risk, and what began in North America has metastasized into what the United Nations now calls “a global opioid epidemic.”

Trafficking and abuse of synthetic opioids has become a top concern of governments across Africa, South Asia, and the Middle East, particularly involving counterfeit or illicitly manufactured tramadol. Within the European Union, over three dozen new synthetic opioids have been detected since 2009, with 13 reported in 2017, including 10 fentanyl analogues. This expansion is likely to continue, as traffickers adapt to outmaneuver regulatory controls and law enforcement efforts as they seek new markets.

These are considerable challenges that will test the capacities, resourcefulness, and political will of the international community. On September 24, 2018, President Trump launched the Global Call to Action on the World Drug Problem at the United Nations in New York City, where 130 countries committed to take further action to address and counter the world drug problem, including the emerging threat of synthetic drugs. Policies and legal frameworks developed to meet the drug control challenges of the previous century may require adjustments for the 21st century. The United States and many countries, for example, have enacted legal reforms to control new psychoactive substances (NPS) based on their psychoactive effects or chemical similarity to controlled drugs, rather than precise chemical structures. In December 2018, China

committed to control fentanyl compounds as a class. Once implemented, this move should help thwart illicit chemists and manufacturers who quickly change their illicit formulations to non-regulated analogues to evade law enforcement.

Effective global responses will need to target all vulnerabilities in the supply chain exploited by criminals, including online trafficking facilitated by virtual currencies and other emerging technologies. Further steps must also be taken to safeguard the integrity of international mail and express consignment services from criminal misuse, including the collection and sharing of advance electronic data to help identify suspicious parcels. The United States is committed to deploying the full range of its diplomatic, law enforcement, and foreign assistance tools to facilitate global action in these areas and, by doing so, to increase the cost, risk, and difficulties associated with trafficking and misusing synthetic opioids and other NPS.

While we adjust our posture to address these emerging 21st century threats, the United States will remain deeply engaged in working with partners to address traditional drug threats, particularly cocaine, heroin, and methamphetamine, which continue to inflict a heavy toll in the United States and many countries around the world. Experts from the United Nations and other organizations have warned that surging production, trafficking, and use of methamphetamine in some South East Asian countries has reached crisis proportions. Coca cultivation and cocaine production remains at historically high levels in Colombia, fueling rising use and overdose deaths in the United States and threatening Colombia's efforts to establish enduring peace and security throughout its territory. Opium poppy cultivation and heroin production remain rampant in Afghanistan, undermining stability and economic development and fueling the Taliban insurgency and corruption. In Mexico, powerful transnational criminal organizations continue to reap billions of dollars in profits from controlling trafficking routes for methamphetamine, heroin, fentanyl, and cocaine into the United States, increasing corruption and violence.

These are daunting challenges, and like-minded governments will need to continue working together in the years to come to reverse the tide. Progress will also require further steps to reduce demand for illicit drugs, including through expanding access to evidence-based treatment and recovery programs, and improving programs to prevent illicit drug use before it begins. The United States is committed to working through regional bodies, multilateral channels, and bilaterally with like-minded governments to promote coordinated international responses to address these challenges.

Demand Reduction

Drug demand reduction is a key foreign policy tool for addressing the interconnected threats of drugs, crime, and violence. The goal of demand reduction strategies calls for a comprehensive, balanced approach to the drug problem that targets prevention, treatment, recovery, research, and international cooperation.

Recognizing that substance use is a major public health threat, and that drug use is a preventable and treatable disease, many countries are requesting INL-sponsored technical assistance to improve and develop effective policies aimed at reducing use. INL works closely with international partners to coordinate and execute capacity building and training activities for service providers in drug prevention, treatment, and recovery. INL also promotes the sharing of critical information and evidence-based studies to preserve the stability of societies threatened by the drug trade.

The drug demand reduction program has four pillars: (1) develop the drug demand reduction workforce, (2) professionalize drug treatment, prevention, and recovery services, (3) build global networks and community coalitions, and (4) address populations with special clinical needs. In achieving these objectives, INL supports the following:

- Capacity building, training, mentoring, and credentialing aimed to educate governments, public organizations, and practitioners in the field on evidence-based practices in drug prevention, treatment and recovery;
- Development of drug-free community coalitions internationally, involving law enforcement and public/private social institutions aimed at preventing drug use and its consequences;
- Research, development, and outcome based evaluation efforts to determine the effectiveness of drug prevention and treatment programs; and
- Development of innovative tools to increase knowledge of and decrease deaths caused by toxic adulterants found in illicit substances.

Recognizing that there are populations with special clinical needs in the development and pattern of substance use disorders, INL supports technical assistance to address their unique treatment needs associated with substance use and related violence.

Significant completed and ongoing INL-funded demand reduction projects for 2018 include:

Universal Prevention Curriculum: INL's Universal Prevention Curriculum (UPC) consists of two series, one for coordinators/managers of prevention programs and one for prevention implementers/prevention workers. This training program is based on the United Nations Office on Drugs and Crime (UNODC) Standards for Drug Use Prevention, offering innovative evidence-based approaches to drug prevention in a variety of settings such as family, school, workplace, media, and the community. The development of examinations and an International Certified Prevention Specialist credential is in the process of being developed. The effectiveness of the school-based program is currently being evaluated with INL support in collaboration with the Cayetano Heredia University in Lima, Peru.

Regional Treatment Training: INL supports the work of the Colombo Plan, UNODC, and the Organization of American States to strengthen the workforce providing drug prevention, treatment and recovery services through intensive trainings and credentialing examinations at the national level. These trainings improve the quality of services, helping prevent the initiation of drug use and improving treatment outcomes, lowering relapse rates, and generating overall greater confidence in the treatment system. Through 2018, the curriculum has been disseminated in 56 countries – Afghanistan, Bahamas, Bangladesh, Benin, Bhutan, Botswana, Cambodia, Cameroon, Cote d’Ivoire, Egypt, Estonia, Ethiopia, Fiji, Gambia, Georgia, Ghana, Guatemala, India, Indonesia, Iraq, Japan, Kazakhstan, Kenya, Kyrgyzstan, Laos, Liberia, Madagascar, Malaysia, Maldives, Mexico, Mongolia, Mozambique, Myanmar, Namibia, Nepal, Nigeria, Niger, Pakistan, Peru, Philippines, Samoa, Senegal, Seychelles, South Africa, South Korea, Sri Lanka, Tajikistan, Tanzania, Thailand, Togo, Tunisia, Turkmenistan, Uganda, United Arab Emirates, Uzbekistan and Vietnam.

Child Addiction Initiative: INL is supporting the development of evidence-based training to establish effective and appropriate drug prevention and treatment practices to young children (aged 12 and under) exposed to drugs. This initiative is in response to increasing reports of acute and growing substance use disorders among children in Asia, Africa and South America, where age-appropriate treatment may be unavailable or not scientifically sound. Working with a panel of global child drug addiction experts, INL developed six child-focused psychosocial and pharmacological treatment training courses to serve as a tool to help strengthen international capacities in this field. This program is being implemented through Colombo Plan and UNODC in collaboration with the University of North Carolina.

Women’s Drug Treatment Initiatives: INL supports research-based prevention, treatment, and recovery programs in high-risk countries to improve services for addicted women and their children, a chronically under-served and stigmatized population. In 2018, INL redesigned its Guiding the Recovery of Women (GROW) curriculum addressing the unique needs of women with substance use disorders across the globe. The first course of four of the new curriculum Women’s Interventions for Substance Exposure (WISE) completed its pilot testing in December 2018 and will complete the remaining three courses in the spring of 2019 before it is peer reviewed and finalized.

Alternatives to Incarceration: The United Nations Special Session on Drugs Outcome Document and the U.S.-sponsored CND resolution in 2016 called on countries to support alternatives to incarceration and proportionate sentencing, especially for drug dependent, nonviolent offenders. Alternatives to incarceration – including an emphasis on gaining access to drug treatment and care – can occur before an arrest, at an initial court hearing, within the jail, at re-entry and through community corrections such as probation. In 2018, INL supported the development of training for policymakers and agency heads from both the public health sector and criminal justice sector to discuss critical areas of need within a particular country related to alternatives to incarceration. The course was pilot tested in Jamaica in October and will also be pilot tested in Guyana in 2019 before undergoing a peer review process and finalization.

Intranasal Naloxone Feasibility Study: In 2016, INL support to UNODC and the World Health Organization initiated a feasibility study (Stop Overdose Safely, or S-O-S) on community management of opioid overdoses, including the intranasal use of naloxone. This study includes training for people likely to witness overdoses on how to correctly administer naloxone. In 2018, training was provided for trainers and researchers from Ukraine, Tajikistan, Kyrgyzstan, and Kazakhstan to prepare for country-wide roll outs of trainings and data collection.

Development of the International Consortium of Universities for Drug Demand Reduction (ICUDDR): In June 2018, INL and a consortium of international organization partners and universities from around the world held its third ICUDDR meeting in partnership with San Diego University in San Diego, with participation from representatives of 32 universities from 24 countries. The ICUDDR is a network of universities working together to promote academic programs in addition studies (drug prevention and treatment) to further the dissemination of evidence-based practices and develop the drug demand reduction workforce. With INL support, ICUDDR membership grew by 565 percent in two years to 137 members in 47 countries.

Drug-Free Communities: INL assists civil society and grassroots organizations to form and sustain effective community anti-drug coalitions aimed at preventing substance use disorders in their communities. INL support has resulted in the establishment of over 280 active coalitions consisting of over 6,700 volunteers in 23 countries around the world (Argentina, Brazil, Costa Rica, Dominican Republic, Ecuador, Honduras, Mexico, Paraguay, Peru, Uruguay, Cape Verde, Ghana, Kenya, Mauritius, Senegal, South Africa, Togo, Uganda, Kyrgyzstan, Tajikistan, Philippines, Indonesia, and Albania).

Methodology for U.S. Government Estimates of Illegal Drug Production

Introduction

Illicit drug crops are grown, refined into illegal drugs, trafficked, and sold on the street by criminal enterprises that attempt to conceal every step of the process. Accurate estimates of such criminal activity are difficult to produce. The estimates of illicit drug production presented in the INCSR represent the United States government's best effort to assess the current dimensions of the international drug problem. They are based on agricultural surveys conducted with satellite imagery and scientific studies of crop yields and the likely efficiency of typical illicit refining labs. As we do every year, we publish these estimates with an important caveat: they are *estimates*. While we must express our estimates as numbers, these numbers should not be seen as precise figures. Rather, they represent the midpoint of a band of statistical probability that gets wider as additional variables are introduced and as we move from cultivation to harvest to final refined drug.

As needed, the United States government revises its estimate process and occasionally the estimates themselves – in the light of field research and technological advancements. The clandestine, violent nature of the illegal drug trade makes field research difficult. Geography is also an impediment, as the harsh terrain on which many drugs are cultivated is not always easily accessible. This is particularly relevant given the tremendous geographic areas that must be covered and the difficulty of collecting reliable information over diverse and treacherous terrain. Weather can affect our ability to gather data, particularly in the Andes, where cloud cover can be a major problem.

Improved technologies and analytical techniques may also lead us to produce revisions to United States government estimates of potential drug production. This is typical of annualized figures for most other areas of statistical tracking that must be revised year to year. When possible, we apply these new techniques to previous years' data and adjust appropriately, but often, especially in the case of new technologies, we can only apply them prospectively. These illicit drug statistics represent the current state of the art. As new information and technology becomes applicable, the accuracy of the estimates will improve.

Cultivation Estimates

The United States government conserves limited personnel and technical resources by employing sample survey methodologies to estimate illicit crop cultivation and concentrating survey efforts on areas with strategic amounts of illegal cultivation or areas most *likely* to have illicit crop cultivation. Each year, analysts review a variety of datasets – including eradication data, seizure data, law enforcement investigations information, previous field locations, and other information – to determine areas likely to have illegal cultivation, and revise and update the search area, if necessary. They then survey and estimate cultivation in new areas using proven statistical techniques.

The resulting estimates meet the U.S. government's need for an annual estimate of illicit crop cultivation for each country. They also help with eradication, interdiction, and other law enforcement operations. As part of the effort to provide accurate and comprehensive assessments, the areas surveyed are often expanded and modified, so direct comparison with previous year estimates is sometimes not possible.

Production Estimates

Illicit crop productivity depends upon a number of factors. Changes in weather, farming techniques, soil fertility, and disease prevalence can produce widely varying yields from year to year and place to place. Some illicit drug crop areas are not easily accessible to the U.S. government, which can make scientific information difficult to obtain. However, we continually strive to improve our drug production estimates. The relative productivity of poppy crops in some cases can be estimated using imagery, and our confidence in coca leaf yield continues to improve as a result of field studies conducted in Latin America. Coca fields which are less than 18 months of age ("new fields") produce much less leaf than mature fields. In Colombia, for example, fields on average get their first small harvest at six months of age; in Bolivia and Peru, fields are usually first harvested at 12 months of age. The U.S. government estimates include the proportion of new fields detected each year and adjust leaf production accordingly.

Processing Estimates

The wide variation in processing efficiency achieved by narcotics producers complicates the task of accurately assessing the quantity of cocaine or heroin that could be refined from a crop. Differences in the origin and quality of the raw material and chemicals used, the technical processing method employed, the size and sophistication of laboratories, the skill and experience of local workers and chemists, and decisions made in response to enforcement pressures all affect production.

The U.S. government estimates for coca leaf, cocaine, marijuana, opium, and heroin production are *potential* estimates; that is, it is assumed that all of the coca, cannabis, and poppy grown is harvested and processed into illicit drugs. This is a reasonable assumption for coca leaf in Colombia. In Bolivia and Peru, however, the U.S. government potential cocaine production estimates do not remove for coca leaf locally chewed and used in products such as coca tea. In Southwest and Southeast Asia and Latin America, it is not unrealistic to assume that virtually all poppy is harvested for opium gum, but substantial amounts of Asian opium are consumed or stored rather than being processed into heroin; the proportion of this opium ultimately processed into heroin is unknown.

Other International Estimates

The United States helps fund estimates done by the United Nations in some countries. These estimates use different methodologies from the U.S. government assessments and utilize a mix of imagery and ground-based observations. The UN estimates are often used to help determine the response of the international donor community to specific countries or regions.

There have been some efforts for the U.S. government and the UN to understand each other's methodologies with the goal of improving both sets of estimates. These efforts are ongoing.

This report also includes data on drug production, trafficking, seizures, and consumption that come from host governments or non-governmental organizations. Such data is attributed to the source organization, especially when we cannot independently verify it.

Worldwide Potential Illicit Drug Production 2009-2017

(all figures in metric tons; no USG estimates for 2018 were available at the time of this report)

	2009	2010	2011	2012	2013	2014	2015	2016	2017
Opium*									
Afghanistan	5,300	3,200	4,400	4,300	5,500	6,300	4,100	5,800	9,140
Burma	305	530	450		795	900		834	
Colombia	22					20	24		
Guatemala				4	6	14	6	7	<i>In Process</i>
Laos	12	23	57					91	
Mexico			250	220	225	360	600	685	944
Pakistan	26			28	220	105	29	52	
Potential Pure Heroin									
Afghanistan	630	390	510	510	650	740	480	680	1,070
Burma	29	51	43		76	85		79	
Colombia	3					3	3		
Guatemala				.5	1	2	1	1	<i>In Process</i>
Laos	1	2	6					9	
Mexico			30	26	26	42	70	81	111
Pakistan	3			3	26	12	3	6	
Total Potential L. America Heroin Production			30	27	27	47	74	82	<i>In Process</i>
Total Potential Worldwide Heroin Production			590	540	780	880	560	856	
Potential Pure Cocaine									
Bolivia	180	190	195	165	190	225	255	275	249
Colombia	315	280	220	210	235	324	545	772	921
Peru	245	340	310	310	360	355	410	410	491
Total Potential Pure Cocaine	740	810	725	685	785	904	1,210	1,460	1,660
Potential Export-Quality Cocaine									
Bolivia	205	210	220	190	240	300	310	320	289
Colombia	420	380	290	270	310	423	723	990	1,100
Peru	290	390	370	395	435	435	510	475	544
Total Potential Export-Quality Cocaine	915	980	880	855	985	1,160	1,540	1,790	1,930

Notes:

Estimates may not add to totals due to rounding.

Opium production is reported at zero percent moisture.

Some Asian opium is consumed and not processed into heroin.

Worldwide Illicit Drug Crop Cultivation 2009-2017

(all figures in hectares)

	2009	2010	2011	2012	2013	2014	2015	2016	2017
Poppy									
Afghanistan	131,000	119,000	115,000	180,000	198,000	211,000	201,000	207,000	329,000
Burma	19,000	45,500	36,500		51,000	52,000		44,800	
Colombia	1,100					800	1,100		
Guatemala				220	310	640	260	310	<i>In process</i>
Laos	940	1,800	4,400					4,200	
Mexico			12,000	10,500	11,000	17,000	28,000	32,000	44,100
Pakistan	705			755	4,300	2,800	930	1,400	
Coca									
Bolivia	29,000	29,000	25,500	25,000	27,000	35,000	36,500	37,500	31,000
Colombia	116,000	100,000	83,000	78,000	80,500	112,000	159,000	188,000	209,000
Peru	40,000	53,000	49,500	50,500	59,500	46,500	53,000	44,000	49,800
Total Coca	185,000	182,000	158,000	153,500	167,000	193,500	248,500	269,500	289,800
Cannabis									
Mexico			12,000	11,500	13,000	11,000		11,500	

Note on Colombia
poppy cultivation:

No estimates in 2008 and 2010-2013 due to cloud cover.

Note on Guatemala
poppy cultivation:

2012 survey limited to fall season in San Marcos and Huehuetenango only.

Note on Laos poppy
cultivation:

Estimates for 2009-2010 are for Phongsali only. Survey area for 2011 was significantly expanded.

Note on Mexico
poppy cultivation:

2011 and later surveys incorporate a major methodological change; 2007-2010 estimates have therefore been removed.

Note on Pakistan
poppy cultivation:

2008 and 2012 estimates are for Bara River Valley in Khyber Agency only. 2009 estimate is for Khyber, Mohmand, and Bajaur Agencies only. 2013, 2015, and 2016 includes Khyber, Mohmand, Bajaur, and selected areas in Balochistan. 2014 includes Khyber and areas in Balochistan.

Parties to UN Conventions

(with dates ratified/acceded)

As of 14 November, 2018

<i>Country</i>	<i>Convention Against Transnational Organized Crime</i>	<i>1988 UN Drug Convention</i>	<i>Convention Against Corruption</i>
1. Afghanistan	24 September 2003	14 February 1992	25 August 2008
2. Albania	21 August 2002	27 June 2001	25 May 2006
3. Algeria	7 October 2002	9 May 1995	25 August 2004
4. Andorra	22 September 2011	23 July 1999	
5. Angola	1 April 2013	26 October 2005	29 August 2006
6. Antigua and Barbuda	24 July 2002	5 April 1993	21 June 2006
7. Argentina	19 November 2002	28 June 1993	28 August 2006
8. Armenia	1 July 2003	13 September 1993	8 March 2007
9. Australia	27 May 2004	16 November 1992	7 December 2005
10. Austria	23 September 2004	11 July 1997	11 January 2006
11. Azerbaijan	30 October 2003	22 September 1993	1 November 2005
12. Bahamas	26 September 2008	30 January 1989	10 January 2008
13. Bahrain	7 June 2004	7 February 1990	5 October 2010
14. Bangladesh	13 July 2011	11 October 1990	27 February 2007
15. Barbados	11 November 2014	15 October 1992	
16. Belarus	25 June 2003	15 October 1990	17 February 2005
17. Belgium	11 August 2004	25 October 1995	25 September 2008
18. Belize	26 September 2003	24 July 1996	12 December 2016
19. Benin	30 August 2004	23 May 1997	14 October 2004
20. Bhutan		27 August 1990	21 September 2016
21. Bolivia	10 October 2005	20 August 1990	5 December 2005
22. Bosnia and Herzegovina	24 April 2002	1 September 1993	26 October 2006
23. Botswana	29 August 2002	13 August 1996	27 June 2011
24. Brazil	29 January 2004	17 July 1991	15 June 2005
25. Brunei Darussalam	25 March 2008	12 November 1993	2 December 2008
26. Bulgaria	5 December 2001	24 September 1992	20 September 2006
27. Burkina Faso	15 May 2002	2 June 1992	10 October 2006
28. Burundi	24 May 2012	18 February 1993	10 March 2006

29. Cambodia	12 December 2005	7 July 2005	5 September 2007
30. Cameroon	6 February 2006	28 October 1991	6 February 2006
31. Canada	13 May 2002	05 July 1990	2 October 2007
32. Cape Verde	15 July 2004	8 May 1995	23 April 2008
33. Central African Republic	14 September 2004	15 October 2001	6 October 2006
34. Chad	18 August 2009	9 June 1995	26 June 2018
35. Chile	29 November 2004	13 March 1990	13 September 2006
36. China	23 September 2003	25 October 1989	13 January 2006
37. Colombia	4 August 2004	10 June 1994	27 October 2006
38. Comoros	25 September 2003	1 March 2000	11 October 2012
39. Congo		3 March 2004	13 July 2006
40. Cook Islands	4 March 2004	22 February 2005	17 October 2011
41. Costa Rica	24 July 2003	8 February 1991	21 March 2007
42. Cote d'Ivoire	25 October 2012	25 November 1991	25 October 2012
43. Croatia	24 January 2003	26 July 1993	24 April 2005
44. Cuba	9 February 2007	12 June 1996	9 February 2007
45. Cyprus	22 April 2003	25 May 1990	23 February 2009
46. Czech Republic	24 September 2013	30 December 1993	29 November 2013
47. Democratic People's Republic of Korea	17 June 2016	19 March 2007	
48. Democratic Republic of the Congo	28 October 2005	28 October 2005	23 September 2010
49. Denmark	30 September 2003	19 December 1991	26 December 2006
50. Djibouti	20 April 2005	22 February 2001	20 April 2005
51. Dominica	17 May 2013	30 June 1993	28 May 2010
52. Dominican Republic	26 October 2006	21 September 1993	26 October 2006
53. Ecuador	17 September 2002	23 March 1990	15 September 2005
54. Egypt	5 March 2004	15 March 1991	25 February 2005
55. El Salvador	18 March 2004	21 May 1993	1 July 2004
56. Equatorial Guinea	7 February 2003		30 May 2018
57. Eritrea	25 September 2014	30 January 2002	
58. Eswatini	24 September 2012	3 October 1995	24 September 2012
59. Estonia	10 February 2003	12 July 2000	12 April 2010
60. Ethiopia	23 July 2007	11 October 1994	26 November 2007
61. European Union	21 May 2004	31 December 1990	12 November 2008
62. Fiji	19 September 2017	25 March 1993	14 May 2008
63. Finland	10 February 2004	15 February 1994	20 June 2006

64. France	29 October 2002	31 December 1990	11 July 2005
65. Gabon	15 December 2004	10 July 2006	1 October 2007
66. Gambia	5 May 2003	23 April 1996	8 July 2015
67. Georgia	5 September 2006	8 January 1998	4 November 2008
68. Germany	14 June 2006	30 November 1993	12 November 2014
69. Ghana	21 August 2012	10 April 1990	27 June 2007
70. Greece	11 January 2011	28 January 1992	17 September 2008
71. Grenada	21 May 2004	10 December 1990	1 April 2015
72. Guatemala	25 September 2003	28 February 1991	3 November 2006
73. Guinea	9 November 2004	27 December 1990	29 May 2013
74. Guinea-Bissau	10 September 2007	27 October 1995	10 September 2007
75. Guyana	14 September 2004	19 March 1993	16 April 2008
76. Haiti	19 April 2011	18 September 1995	14 September 2009
77. Holy See	25 January 2012	25 January 2012	19 September 2016
78. Honduras	2 December 2003	11 December 1991	23 May 2005
79. Hungary	22 December 2006	15 November 1996	19 April 2005
80. Iceland	13 May 2010	2 September 1997	1 March 2011
81. India	5 May 2011	27 March 1990	9 May 2011
82. Indonesia	20 April 2009	23 February 1999	19 September 2006
83. Iran		7 December 1992	20 April 2009
84. Iraq	17 March 2008	22 July 1998	17 March 2008
85. Ireland	17 June 2010	3 September 1996	9 November 2011
86. Israel	27 December 2006	20 May 2002	4 February 2009
87. Italy	2 August 2006	31 December 1990	5 October 2009
88. Jamaica	29 September 2003	29 December 1995	5 March 2008
89. Japan	11 July 2017	12 June 1992	11 July 2017
90. Jordan	22 May 2009	16 April 1990	24 February 2005
91. Kazakhstan	31 July 2008	29 April 1997	18 June 2008
92. Kenya	16 June 2004	19 October 1992	9 December 2003
93. Korea, Republic of	5 November 2015	28 December 1998	27 March 2008
94. Kiribati	15 September 2005		27 September 2013
95. Kuwait	12 May 2006	3 November 2000	16 February 2007
96. Kyrgyz Republic	2 October 2003	7 October 1994	16 September 2005
97. Lao Peoples Democratic Republic	26 September 2003	1 October 2004	25 September 2009
98. Latvia	7 December 2001	24 February 1994	4 January 2006
99. Lebanon	5 October 2005	11 March 1996	22 April 2009

100. Lesotho	24 September 2003	28 March 1995	16 September 2005
101. Liberia	22 September 2004	16 September 2005	16 September 2005
102. Libya	18 June 2004	22 July 1996	7 June 2005
103. Liechtenstein	20 February 2008	9 March 2007	8 July 2010
104. Lithuania	9 May 2002	8 June 1998	21 December 2006
105. Luxembourg	12 May 2008	29 April 1992	6 November 2007
106. Macedonia, Former Yugoslav Rep.	12 January 2005	13 October 1993	13 April 2007
107. Madagascar	15 September 2005	12 March 1991	22 September 2004
108. Malawi	17 March 2005	12 October 1995	4 December 2007
109. Malaysia	24 September 2004	11 May 1993	24 September 2008
110. Maldives	4 February 2013	7 September 2000	22 March 2007
111. Mali	12 April 2002	31 October 1995	18 April 2008
112. Malta	24 September 2003	28 February 1996	11 April 2008
113. Marshall Islands	15 June 2011	5 November 2010	17 November 2011
114. Mauritania	22 July 2005	1 July 1993	25 October 2006
115. Mauritius	21 April 2003	6 March 2001	15 December 2004
116. Mexico	4 March 2003	11 April 1990	20 July 2004
117. Micronesia, Federal States of	24 May 2004	6 July 2004	21 March 2012
118. Moldova	16 September 2005	15 February 1995	1 October 2007
119. Monaco	5 June 2001	23 April 1991	
120. Mongolia	27 June 2008	25 June 2003	11 January 2006
121. Montenegro	23 October 2006	23 October 2006	23 October 2006
122. Morocco	19 September 2002	28 October 1992	9 May 2007
123. Mozambique	20 September 2006	8 June 1998	9 April 2008
124. Myanmar (Burma)	30 March 2004	11 June 1991	20 December 2012
125. Namibia	16 August 2002	6 March 2009	3 August 2004
126. Nauru	12 July 2012	12 July 2012	12 July 2012
127. Nepal	23 December 2011	24 July 1991	31 March 2011
128. Netherlands	26 May 2004	8 September 1993	31 October 2006
129. New Zealand	19 July 2002	16 December 1998	1 December 2015
130. Nicaragua	9 September 2002	4 May 1990	15 February 2006
131. Niger	30 September 2004	10 November 1992	11 August 2008
132. Nigeria	28 June 2001	1 November 1989	14 December 2004
133. Niue	16 July 2012	16 July 2012	3 October 2017
134. Norway	23 September 2003	14 November 1994	29 June 2006

135. Oman	13 May 2005	15 March 1991	9 January 2014
136. Pakistan	13 January 2010	25 October 1991	31 August 2007
137. Palau			24 March 2009
138. Panama	18 August 2004	13 January 1994	23 September 2005
139. Papua New Guinea			16 July 2007
140. Paraguay	22 September 2004	23 August 1990	1 June 2005
141. Peru	23 January 2002	16 January 1992	16 November 2004
142. Philippines	28 May 2002	7 June 1996	8 November 2006
143. Poland	12 November 2001	26 May 1994	15 September 2006
144. Portugal	10 May 2004	3 December 1991	28 September 2007
145. Qatar	10 March 2008	4 May 1990	30 January 2007
146. Romania	4 December 2002	21 January 1993	2 November 2004
147. Russia	26 May 2004	17 December 1990	9 May 2006
148. Rwanda	26 September 2003	13 May 2002	4 October 2006
149. St. Kitts and Nevis	21 May 2004	19 April 1995	
150. St. Lucia	16 July 2013	21 August 1995	25 November 2011
151. St. Vincent and the Grenadines	29 October 2010	17 May 1994	
152. Samoa	17 December 2014	19 August 2005	18 April 2018
153. San Marino	20 July 2010	10 October 2000	
154. Sao Tome and Principe	12 April 2006	20 June 1996	12 April 2006
155. Saudi Arabia	18 January 2005	9 January 1992	29 April 2013
156. Senegal	27 September 2003	27 November 1989	16 November 2005
157. Serbia	6 September 2001	12 March 2001	20 December 2005
158. Seychelles	22 April 2003	27 February 1992	16 March 2006
159. Sierra Leone	12 August 2014	6 June 1994	30 September 2004
160. Singapore	28 August 2007	23 October 1997	6 November 2009
161. Slovakia	3 December 2003	28 May 1993	1 June 2006
162. Slovenia	21 May 2004	6 July 1992	1 April 2008
163. Solomon Islands			6 January 2012
164. South Africa	20 February 2004	14 December 1998	22 November 2004
165. South Sudan			23 January 2015
166. Spain	1 March 2002	13 August 1990	19 June 2006
167. Sri Lanka	22 September 2006	6 June 1991	31 March 2004
168. Sudan	10 December 2004	19 November 1993	5 September 2014
169. Suriname	25 May 2007	28 October 1992	
170. Sweden	30 April 2004	22 July 1991	25 September 2007

171. Switzerland	27 October 2006	14 September 2005	24 September 2009
172. Syria	8 April 2009	3 September 1991	
173. Tajikistan	8 July 2002	6 May 1996	25 September 2006
174. Thailand	17 October 2013	3 May 2002	1 March 2011
175. Tanzania	24 May 2006	17 April 1996	25 May 2005
176. Timor-Leste	9 November 2009	3 June 2014	27 March 2009
177. Togo	2 July 2004	1 August 1990	6 July 2005
178. Tonga	3 October 2014	29 April 1996	
179. Trinidad and Tobago	6 November 2007	17 February 1995	31 May 2006
180. Tunisia	19 July 2003	20 September 1990	23 September 2008
181. Turkey	25 March 2003	2 April 1996	9 November 2006
182. Turkmenistan	28 March 2005	21 February 1996	28 March 2005
183. Tuvalu			4 September 2015
184. UAE	7 May 2007	12 April 1990	22 February 2006
185. Uganda	9 March 2005	20 August 1990	9 September 2004
186. Ukraine	21 May 2004	28 August 1991	2 December 2009
187. United Kingdom	9 February 2006	28 June 1991	9 February 2006
188. United States	3 November 2005	20 February 1990	30 October 2006
189. Uruguay	4 March 2005	10 March 1995	10 January 2007
190. Uzbekistan	9 December 2003	24 August 1995	29 July 2008
191. Vanuatu	4 January 2006	26 January 2006	12 July 2011
192. Venezuela	13 May 2002	16 July 1991	2 February 2009
193. Vietnam	8 June 2012	4 November 1997	19 August 2009
194. Yemen	8 February 2010	25 March 1996	7 November 2005
195. Zambia	24 April 2005	28 May 1993	7 December 2007
196. Zimbabwe	12 December 2007	30 July 1993	8 March 2007

*Not included on this list is the “State of Palestine,” which, according to the United Nations, has purportedly acceded to the UN Convention against Corruption (2014), to the UN Convention against Transnational Organized Crime (2015), and to the 1988 UN Drug Convention (December 29, 2017). The Government of the United States of America notified the United Nations that it does not believe the “State of Palestine” qualifies as a sovereign state and does not recognize it as such. Therefore, the Government of the United States of America believes that the “State of Palestine” is not qualified to accede to the Conventions and does not believe that it is in a treaty relationship with the “State of Palestine” under the Conventions.

USG ASSISTANCE

U.S. Department of State FY 2018-2019 Budget

Counternarcotics Program Area

\$ in thousands for all items	FY 2018 653(a)	FY 2019 Request
TOTAL	\$ 386,954.00	\$ 293,311.00
Africa	\$ 1,000.00	\$ 1,300.00
Liberia	\$ 1,000.00	\$ 1,300.00
East Asia and Pacific	\$ 4,200.00	\$ 2,800.00
Burma	\$ 1,100.00	\$ 1,100.00
China	\$ 1,200.00	\$
Indonesia	\$ 400.00	\$ 300.00
Philippines	\$ 1,500.00	\$ 1,400.00
South and Central Asia	\$ 69,997.00	\$ 52,270.00
Afghanistan	\$ 64,000.00	\$ 43,740.00
Kazakhstan	\$ 391.00	\$
Pakistan	\$ 2,000.00	\$ 6,500.00
Tajikistan	\$ 700.00	\$
Uzbekistan	\$ 300.00	\$
Central Asia Regional	\$ 2,606.00	\$ 2,030.00
Western Hemisphere	\$ 232,718.00	\$ 181,075.00
Colombia	\$ 103,500.00	\$ 93,000.00
Mexico	\$ 54,183.00	\$ 36,000.00
Peru	\$ 29,900.00	\$ 24,900.00
State Western Hemisphere Regional (WHA)	\$ 45,135.00	\$ 27,175.00
<i>of which, CARSI</i>	\$ 35,950.00	\$ 20,750.00
<i>of which, CBSI</i>	\$ 9,185.00	\$ 6,425.00
INL - International Narcotics and Law Enforcement Affairs	\$ 79,039.00	\$ 55,866.00
INL - CFSP, Critical Flight Safety Program	\$ 5,402.00	\$ 3,500.00
INL - Demand Reduction	\$ 12,500.00	\$ 10,000.00
INL – Drug Supply Reduction	\$ 11,825.00	\$
INL - Inter-regional Aviation Support	\$ 34,577.00	\$ 22,000.00
INL - International Organizations	\$ 2,175.00	\$ 4,075.00
INL - Program Development and Support	\$ 12,560.00	\$ 16,291.00

International Training

International counternarcotics training is managed and funded by the U.S. Department of State's Bureau of International Narcotics and Law Enforcement Affairs (INL), and implemented by various U.S. law enforcement organizations including the Drug Enforcement Administration (DEA), the Federal Bureau of Investigation (FBI), Immigration and Customs Enforcement (ICE), U.S. Customs and Border Patrol (CBP), and U.S. Coast Guard. Major objectives are:

- Contributing to enhanced professionalism of the basic rule of law infrastructure for carrying out counternarcotics law enforcement activities in countries which cooperate with and are considered significant to U.S. narcotics control efforts;
- Improving technical skills of drug law enforcement personnel in these countries; and
- Increasing cooperation between U.S. and foreign law enforcement officials.

INL-funded training supports U.S. counternarcotics priorities worldwide, and focuses on encouraging foreign law enforcement agency self-sufficiency. The overarching goal of U.S. counternarcotics training is to support the development of effective host country enforcement institutions, capable of removing drugs from circulation before they can reach the United States. U.S. training can take two forms: as part of a planned bilateral assistance program in target partner countries; and as regional training with international participants from multiple countries. The regional training provided at International Law Enforcement Academies (ILEAs) consists of both general law enforcement training as well as specialized training for mid-level managers in police and other law enforcement agencies.

U.S. bilateral training assistance program works closely with international organizations including the UN Office on Drugs and Crime (UNODC) and the Organization of American States. The United States coordinates assistance planning with other donors through mechanisms such as the Dublin Group (an informal body of countries and organizations that provide law enforcement training), and the Paris Pact (an informal network of states dedicated to stopping the spread of Afghan opiates). The United States continuously works to promote burden-sharing with our allies in the provision of training, as well as ensuring that our respective efforts are complementary and directed towards common goals.

International Law Enforcement Academies (ILEAs)

The International Law Enforcement Academies (ILEAs) pursue three core objectives: building the capacity of foreign criminal justice partners of the United States to stop crime before it impacts the United States; fostering partnerships across national borders within important regions of the world; and advancing partner nations' engagement with U.S. law enforcement agencies. These academies are an important part of the interagency U.S. effort to combat transnational criminal organizations.

Since the first ILEA opened in Budapest in 1995, the program has grown to six facilities worldwide, and has provided training to approximately 70,000 students in from countries in

Africa, Europe, Asia, and across Latin America. The ILEA program hosts approximately 150 courses per year. The program implements a number of key programming initiatives including an anti-corruption course series, courses focused on countering violent extremism, and executive-level symposiums on combating transnational criminal organizations. Training includes specialized skill development and tactics in law enforcement areas such as counternarcotics; investigating money laundering and financial crimes; cybercrime investigations; border control; and countering all forms of trafficking including weapons, wildlife, and trafficking in persons. ILEA also works with senior officers and administrators on principles of leadership and effective management at ILEA Roswell. The ILEAs help to develop an extensive network of alumni who exchange information with their regional and U.S. counterparts and assist in transnational investigations. Many ILEA graduates become the leaders and decision-makers in their respective law enforcement organizations. The Department of State coordinates with the Departments of Justice, Homeland Security and Treasury, and with foreign government counterparts to implement the ILEA program.

Africa. ILEA Gaborone (Botswana) opened in 2001 and the Regional Training Center in Accra (Ghana) opened in 2012. ILEA Gaborone delivers one multi-week leadership and development course annually and also specialized courses for police and other criminal justice officials to boost their capacity to work with U.S. and regional counterparts. These courses concentrate on specific methods and techniques in a variety of subjects, such as anticorruption, financial crimes, border security, crime scene investigations, counternarcotics, explosives, trafficking in weapons and wildlife, gender-based violence, and community policing. A Regional Training Center is operated in Accra, Ghana, in coordination with the ILEA, and addresses the unique needs of the West African region. ILEA Gaborone and RTC Accra provided training to approximately 2,015 students in 2018.

Asia. ILEA Bangkok (Thailand) opened in 1999, and focuses on enhancing regional cooperation against transnational crime threats in Southeast Asia with ASEAN member states. ILEA Bangkok's specialized courses focus on counternarcotics, anticorruption, financial crimes, environmental crimes, and trafficking in persons, weapons, and wildlife. ILEA Bangkok trained approximately 1,107 students in 2018.

Europe. ILEA Budapest (Hungary) was the first ILEA and was established in 1995. ILEA Budapest delivers three multi-week leadership and development courses annually and also offers specialized courses on regional threats such as anticorruption, organized crime, cybercrime, financial crimes, women in law enforcement, gender-based violence, and specialized training for judges and prosecutors. ILEA Budapest trained approximately 1,060 students in 2018.

Global. ILEA Roswell (New Mexico) opened in September 2001. ILEA Roswell hosts senior officials and policy makers including top prosecutors, judges, police commanders and lawmakers to discuss policy formulation and enforcement to facilitate an effective criminal justice system in these priority areas. These delegates are at the senior levels of leadership in their countries, and are positioned to implement substantive changes to the criminal justice systems upon their return. ILEA Roswell draws senior officials from all participating ILEA countries. ILEA Roswell trained approximately 324 students in 2018.

Latin America. ILEA San Salvador (El Salvador) opened in 2005. ILEA San Salvador delivers two multi-week leadership and development courses annually and also offers specialized courses on regional threats, as well as specialized courses for police, prosecutors, and judicial officials. ILEA San Salvador courses concentrate on anti-gangs, human rights, counternarcotics, border security, and financial crimes. ILEA San Salvador trained approximately 1,154 students in 2018.

Drug Enforcement Administration (DEA)

The mission of the DEA is to enforce the controlled substances laws and regulations of the United States. As part of this mission, DEA seeks to bring to justice the criminal organizations and principal members of Drug Trafficking Organizations (DTOs) based in the United States or foreign nations involved in the cultivation, manufacture, or distribution of controlled substances, as well as the money laundering of illicit finances derived from drug trafficking.

To achieve this mission, DEA has nearly 10 percent of its Special Agent and Intelligence Analyst work force permanently assigned overseas at 90 DEA foreign offices located in 69 countries. DEA's foreign offices act as conduits of actionable and strategic information, intelligence, and evidence to law enforcement and prosecutorial components in the United States and vice versa. In this manner, DEA is able to identify, target, and dismantle the entire global spectrum of the DTO. DEA foreign offices are tasked with four principle missions:

- Conduct bilateral and multilateral investigations with host law enforcement partners;
- Coordinate counternarcotics intelligence gathering with host governments;
- Implement training programs for host country police and prosecutor agencies;
- Support the advancement and development of host country drug law enforcement institutions.

The emphasis placed on each objective is determined by the host nation's unique conditions and circumstances as it relates to their drug trafficking threat, infrastructure and law enforcement capabilities. DEA works side-by-side with host nation counterparts to develop relevant training, promote intelligence sharing, conduct bilateral investigations, and support joint counter-drug operations. The vast majority of DEA foreign efforts and resources are dedicated to conducting international drug and drug money laundering investigations. In addition to that mandate, in 2018 DEA dedicated considerable effort in the fields of training, multinational law enforcement collaboration, and forensic science.

International Training: In Fiscal Year 2018, DEA Training Division conducted 81 formal (bilateral) and multilateral seminars for 2,628 participants from 73 countries. DEA has been conducting international counter-narcotics training since its creation in 1973. DEA is recognized as the world pioneer in international training and serves as the model for a variety of international law enforcement training efforts. The specific courses and curricula offered by DEA have evolved over the years in response to experience, changes in law enforcement priorities, current international narcotics trafficking situations, new technologies, and specific requests of the host governments. All DEA international training programs have as a major objective the building of regional working relationships between countries.

International Drug Enforcement Conference (IDEC) - Strengthening International Relations: In 1983, IDEC was established to institutionalize regional cooperation of drug law enforcement officials from countries within the Western Hemisphere. Over the years IDEC has evolved into an important global forum where the highest ranking agency leaders and prosecutors from around 125 countries gather to develop a cooperative vision and establish strategies for

combating DTOs. Participants continue to build, balance, and integrate the tools of law enforcement power to combat these criminal networks and build a framework for international cooperation to protect all our citizens from the violence, harm, and exploitation wrought by drug trafficking and commensurate threats to national security. IDEC is an operational targeting opportunity and global forum for important topical issues in international drug enforcement, and to identify and attack DTO vulnerabilities. IDEC initiatives have demonstrated that a multilateral enforcement approach has a cumulative effect as member nations increasingly coordinate their law enforcement efforts to investigate and prosecute major DTOs and their leaders and to seize and block their assets. The 36th annual IDEC is scheduled for April 2019 in Baku, Azerbaijan, where it will be co-hosted by the Republic of Azerbaijan government and DEA.

The Special Testing and Research Laboratory's Programs: The Heroin and Cocaine Signature Programs (HSP/CSP) at the DEA Special Testing and Research Laboratory (STRL) determine the geographic origins of heroin and cocaine seizure samples. In addition, the laboratory maintains a Methamphetamine Profiling Program (MPP) that determines the synthetic routes and precursors employed in producing methamphetamine. The classification schemes for these programs were developed using authentic samples collected from drug source countries world-wide, as well as drug processing laboratories within those countries. By collaborating with partner nations, numerous such "authentic" are submitted annually to the laboratory from the DEA foreign offices. Currently, the laboratory classifies several thousand drug exhibits seized within the United States and abroad annually.

The Signature and Profiling Programs provide the counterdrug intelligence community with science-based heroin and cocaine source data and intelligence information regarding methamphetamine synthesis. The HSP, CSP, and the MPP are viewed as crucial tools to investigate and support strategic intelligence regarding illicit production, trafficking, and availability of these three high profile drugs within the United States and foreign countries. Over the past several years, the laboratory has established a robust Emerging Trends Program to analyze new psychoactive substances for enforcement and intelligence purposes. This group has identified over 400 synthetic cannabinoids, substituted cathinones, opioids and powerful hallucinogenic compounds that have come into the drug market.

To assist with addressing the nation's current opioid crisis, STRL developed and implemented a new Fentanyl Signature Profiling Program (FSPP). Through an in-depth analysis including quantitation, impurity profiling, isotopic characterization, and occluded solvents analysis, the FSPP provides unique science-based forensic investigative leads on seizures where linkages were unknown or only suspected; real-time data to investigators; answers to key questions from the counterdrug intelligence/enforcement community and U.S. policymakers; and direct support to the National Drug Control Strategy. Since its inception, this program has established 36 linkages involving 65 cases and 152 samples from DEA seizures of 250 kilograms of fentanyl.

Office of Global Enforcement/Financial Investigations (OGF): The Office of Global Enforcement, Financial Investigations Section (OGF) at DEA Headquarters serves as DEA's lead body for coordinating DEA's efforts across domestic and foreign offices with respect to the targeting of the financial aspects of drug trafficking organizations (DTO). OGF works in

conjunction with DEA field offices, foreign counterparts, and the inter-agencies to support and provided guidance in via a variety of investigative tools, as well as by providing oversight on DEA's undercover financial investigation. OGF facilitates cooperation between countries, resulting in the identification and prosecution of money laundering organizations operating on behalf of DTOs, as well as the seizure of assets and denial of revenue around the world. OGF regularly briefs and educates United States government officials and diplomats, foreign government officials, and military and law enforcement counterparts regarding the latest trends in money laundering, narcoterrorism financing, international banking, offshore corporations, international wire transfer of funds, and financial investigative tools.

In conjunction with the DEA Office of International Training, OGF conducts training for DEA field offices, as well as foreign counterparts in order to share strategic ideas and promote effective techniques in financial investigations. During 2018, OGF participated and led a number of workshops and strategy sessions focused on money laundering trends, engagement with financial institutions, guidance and overview on undercover money laundering operations, virtual currency, and investigative case coordination.

DEA has prioritized having a financial component to its investigations by making it a key component of Priority Target Operations, the Domestic Cartel Initiative, and Organized Crime Drug Enforcement Task Force investigations. DEA has approximately 20 dedicated financial investigative teams across DEA's domestic offices, as well as approximately three foreign-based DEA team in Mexico, Peru, and Colombia.

United States Coast Guard (USCG)

The U.S. Coast Guard plays a crucial role in efforts to keep dangerous illicit drugs moving by sea from reaching the United States. Working within the Department of Homeland Security (DHS) in carrying out its responsibilities within the National Drug Control Strategy, the USCG maintains a multi-faceted, layered approach to attack Transnational Organized Crime (TOC) networks and their transport of illicit contraband from South America toward the United States via the Caribbean Sea, the Eastern Pacific Ocean, and through the littorals of Central America and Mexico. The overarching strategy is to increase maritime border security through a layered offensive system that extends beyond U.S. land borders to attack the networks responsible for smuggling drugs. This system begins overseas, spans the offshore regions, and continues into U.S. territorial seas and ports. The USCG's mix of cutters, aircraft, boats, and deployable specialized forces, as well as international and domestic partnerships, allow the Coast Guard to leverage its unique maritime law enforcement authorities and competencies to address threats and improve security throughout the maritime domain.

USCG efforts focus on removing illicit drugs close to their origins and as far from U.S. shores as possible where drug shipments are in their most concentrated bulk form. Moreover, these illicit cargoes are most vulnerable while in transit at sea through international waters where interdiction forces have the highest tactical advantage and best opportunity to interdict drug movements. The next step in the maturation of maritime law enforcement is conducting operations to disrupt and dismantle the TOC networks by targeting any illicit activity in which they are engaged, to include drug, migrant, weapons and bulk cash smuggling, human trafficking, and illegal, unreported, or unregulated fishing.

Counternarcotics Operations: Detection of drug-trafficking vessels occurs principally through the collection, analysis, and dissemination of tactical information and strategic intelligence combined with effective sensors operating from land, air, and surface assets. The six million square mile transit zone is far too expansive to randomly patrol; targeting information is necessary to focus efforts. Upon detection, U.S. and partner nation law enforcement agencies provide monitoring, relaying data, imagery, and position information until an appropriate interdiction asset arrives on scene. The U.S. Coast Guard is the lead U.S. federal agency for drug interdiction on the high seas and takes tactical control of U.S. and allied assets for the interdiction and apprehension operational phase. A crucial ingredient for continued maritime drug interdiction success is the USCG's counterdrug bilateral agreements and operational procedures held with over 40 partner nations. By facilitating operational communications and enabling law enforcement officers to stop, board, and search vessels suspected of illicit maritime activity, these agreements deter smugglers from using another nation's vessel and/or territorial seas as a haven from U.S. law enforcement efforts.

International Cooperative Efforts: In 2018, the USCG had personnel permanently assigned overseas as Coast Guard Liaison Officers, Defense Attachés, and Support to Interdiction and Prosecution team members to facilitate maritime counterdrug activities, including security assistance, intelligence collection and dissemination, and to liaise with the U.S. interagency and international community. The USCG, in concert with the U.S. Department of State, hosts three counter drug summits per year: an annual Multilateral Maritime Interdiction and Prosecution

Summit (Caribbean) and two semi-annual Multilateral Maritime Counter Drug Summits (Central and South America). These summits have a combined annual attendance of more than 35 countries, over 60 international agencies, and more than 300 experts. Topics include maritime interdiction, prosecution, criminal investigations, and improving regional success in all aspects of the interdiction continuum. To counter trans-Atlantic drug flows, the USCG continues to work with U.S. Africa Command to expand maritime training and operations for West African countries through the African Maritime Law Enforcement Partnership.

International Training and Technical Assistance: The USCG provides international training and technical assistance to enhance the interdiction capacities of international partners. The Technical Assistance Field Team, a joint initiative between the USCG and the U.S. Southern Command (SOUTHCOM), is a team of nine Coast Guard engineers and logisticians whose purpose is to professionalize and improve the operational readiness of 11 Caribbean maritime forces through technical assistance visits. The USCG's Security Assistance Program offers both resident training programs and mobile training teams (MTTs) to partner nation maritime services around the world to advance the capability of their naval and coast guard forces. In Fiscal Year 2018, the USCG deployed 55 MTTs to 26 countries, and approximately 297 students from 64 countries attended 297 resident courses at USCG training installations.

Operational Highlights: In Fiscal Year 2018, the USCG expended over 2,400 cutter days, over 1,400 Airborne Use of Force capable helicopters days, and over 3,400 surveillance aircraft hours on counter drug patrols, and USCG Law Enforcement Detachments deployed for over 600 days aboard U.S. Navy, British, Dutch, and Canadian warships. As a result, the USCG disrupted 222 drug smuggling attempts, which included the seizure of 160 vessels, detention of 602 suspected smugglers for further investigation and prosecution, and removal of 209.6 metric tons (MT) of cocaine and 24.4 MT of marijuana.

U.S. Customs and Border Protection (CBP)

The Department of Homeland Security's U.S. Customs and Border Protection (CBP) processes all goods, vehicles, and people entering and exiting the United States. CBP officers are charged with identification and prevention of terrorist travel to the United States and interception of illicit drugs and other contraband, improperly classified merchandise, unlicensed technology and material, weapons, ammunition, fugitives, undocumented immigrants, and unreported currency at America's 329 international ports of entry (POEs).

United States Border Patrol (USBP) agents are assigned the mission of securing the border against all threats between the POEs along the over 8,000 miles of land and coastal border. These threats include criminal/undocumented aliens, drug smugglers, potential terrorists, wanted criminals, and persons seeking to avoid inspection at the designated POEs. CBP's drug interdiction activity includes staffing 35 permanent and 140 tactical checkpoints nationwide. CBP checkpoints utilize experienced agents, canine teams, technology, and shipper-CBP partnerships to detect and apprehend the above mentioned threats. Additionally, agents patrol targeted border areas that are frequent entry points for the smuggling of drugs and people into the United States.

Since its creation, CBP has also been charged with the border regulatory functions of passport control and agriculture inspections in order to provide comprehensive, seamless border control services. This merger of responsibilities is intended to simplify border security operations and is termed: "One face at the border." CBP is the nation's first line of defense against the introduction of dangerous drugs from foreign sources.

U.S. Customs and Border Protection's (CBP) Air and Marine Operations (AMO) is a critical component of CBP's risk-based and layered approach for border security, with 1,300 federal agents, 248 aircraft, and 331 marine vessels operating throughout the United States and Puerto Rico. AMO interdicts unlawful people and cargo approaching U.S. borders, investigates criminal networks and provides domain awareness in the air and maritime environments, and responds to contingencies and national taskings.

International Training and Assistance: As part of its efforts to extend the nation's zone of security beyond U.S. ports of entry, CBP works with other U.S. government and foreign government partners to provide a wide array of short-term and long-term technical training and assistance to countries throughout the world in conjunction with the Department of State, as appropriate. These programs are designed to standardize and build the capacity of foreign government organizations to implement more effective customs trade operations, border policing, and immigration inspection.

International Visitors Program: The State Department's International Visitors Program can provide an opportunity for foreign customs officials and other foreign officials to consult with their U.S. counterparts and appropriate high-level managers in CBP Headquarters. International visitors can also participate in on-site tours of selected U.S. ports and field sites to observe actual CBP operations.

Port of Entry Interdiction Training: The correct approach to border interdiction varies with border environments, e.g., land, seaport, rail, and airport. Training are designed for the problems encountered and interdiction techniques useful for each type of operation. CBP also provides specialized U.S. Border Patrol training in techniques used by smugglers who do not use official ports of entry to cross borders, but who attempt to smuggle contraband in lightly patrolled border areas.

International Bulk Currency Smuggling Training: With an increased enforcement focus on money laundering, organized criminals and terrorists have turned to bulk cash smuggling to move valuables across borders. Bulk Currency Smuggling training assists foreign government enforcement personnel in identifying techniques used by bulk currency smugglers. Further, CBP training helps international partners to design and implement programs to counter that threat, resulting in seizures of millions of dollars from the proceeds of crime.

Overseas Enforcement Training: Overseas Enforcement Training encompasses a curriculum which includes Border Enforcement Training; Supply Chain Security; Detection, Interdiction and Investigation; Concealment Methods; Bulk Currency Smuggling; False and Fraudulent Documents; Train-the-Trainer; Anti-Corruption; Targeting and Risk Management; Hazardous Materials; and X-ray Systems. These courses can also be conducted at foreign ports of entry. They include both basic training and refresher training/mentoring abroad for graduates of training at U.S. port facilities.

CBP Attachés, Representatives and Advisors and Special Customs' Programs: A growing network of attachés, representatives and advisors who serve in U.S. diplomatic missions, U.S. military bases, or directly for foreign border security agencies. Attachés have a broad mandate, including enforcement and investigative activities on behalf of CBP. They also exchange expert information with foreign counterparts, improving the effectiveness of law enforcement activity, policies, and resources relating to border enforcement. Their efforts help to ensure that enforcement cooperation is seamless across borders and that the battle against illegal transnational activity is effective.

Customs Mutual Assistance Agreements: CBP and U.S. Immigration and Customs Enforcement (ICE) co-lead negotiations on Customs Mutual Assistance Agreements (CMAAs). CMAAs are negotiated with foreign governments and provide for mutual assistance in the enforcement of customs-related laws. Under the provisions of CMAAs, CBP provides assistance to its foreign counterparts and receives reciprocal assistance from them primarily in the exchange of information that facilitates the enforcement of each country's laws. As of the end of Fiscal Year 2017, the United States had signed 80 CMAAs, with three signed during Fiscal Year 2017. CMAAs also provide a foundational basis for the development and implementation of other subsequent cooperation-based arrangements with foreign partners, especially as it relates initiatives that require information sharing and protections related thereto.

CBP Preclearance Field Office: Preclearance operations involve the strategic stationing of CBP law enforcement personnel overseas to inspect travelers prior to boarding U.S.-bound flights. Through preclearance, CBP Officers conduct the same immigration, customs, and agriculture inspections of international air travelers typically performed upon arrival in the

United States before departure from foreign airports. CBP has more than 600 law enforcement officers and agriculture specialists stationed at 15 air preclearance locations in six countries. The aviation security benefits of preclearance are substantial because a uniformed, U.S. law enforcement officer interviews the precleared passenger before he or she boards the plane. This added security layer provides an additional opportunity to detect and stop threats as early in the process as possible.

In addition to enhancing security, preclearance has the potential to increase capacity and create growth opportunities for airports and air carriers in the United States and abroad, while improving the passenger experience. Preclearance generates the potential for significant economic benefits for the United States and our international partners by facilitating travel through all gateways, creating an overall increase in clearance capacity, and maximizing aircraft and gate utilization. For travelers, preclearance leads to faster connections and the ability to exit the airport immediately upon landing the United States.

National Targeting Center: The National Targeting Center (NTC) collaborates with international partners to identify, disrupt, and manage risks in the cargo and passenger environments through information sharing and implementing joint targeting operations in accordance with memoranda of understanding and CMAAs. As part of this collaboration, the Center hosts representatives from participating foreign agencies, and works with these international liaisons, as well as with other U.S. government agencies, to detect and disrupt terrorism, threats to national security and public safety, and transnational criminal activity including but not limited to drug smuggling operations and drug trafficking organizations and their associates. The NTC also provides training and technical assistance in risk assessment and targeting to foreign Customs, Immigration and other border enforcement agencies.

DOD Preclearance: The Customs Border Clearance Agent (CBCA) program is designed to permit cargo consigned to the care of the Department of Defense (DoD), as well as returning military personnel, to be pre-cleared for import/entry into the Customs Territory of the United States. The preclearance of such cargo and personnel is accomplished by DoD personnel that have been trained by CBP officers to perform pre-clearance inspections. CBCA personnel conduct Customs and Agricultural inspections and certify personnel and cargo have met all CBP and USDA entry requirements, as well as Defense Travel Regulations, prior to departing to the U.S. CBCA inspections are conducted at 28 locations in seven foreign countries throughout the Middle East. CBP officers also provide Technical Assistance Visits and annual Site Inspections/Certifications at these DoD preclearance facilities.

Immigration Advisory Program: Immigration Advisory Program (IAP) works with air carriers and host authorities, at foreign airports, to prevent terrorists and other high-risk passengers from boarding U.S.-bound flights. CBP's Joint Security Program (JSP) is a component of the IAP with the goal of identifying high-risk air travelers and contraband arriving and departing the host country. In 2014, IAP and JSP expanded to include the deployment of Police Liaison Officers (LO) to foreign partner law enforcement agencies to enhance information exchange posed by terrorist and criminal travel. IAP, JSP and LO play a central role in CBP's multi-layered strategy to mitigate threats before they reach the United States. IAP currently operates in 20 distinct engagements across the globe.

CHEMICAL CONTROLS

Introduction

Chemicals play two critical roles in the production of illicit drugs: as chemical inputs for the production of synthetic drugs such as methamphetamine and fentanyl; and as refining agents and solvents for processing plant-based materials such as coca and opium poppy into cocaine and heroin. Preventing criminals from gaining access to chemicals needed to produce illicit drugs is a key international obligation codified by the United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances of 1988 (1988 UN Drug Convention), and an enduring challenge. This challenge has taken on new importance in recent years, corresponding to the growing threat of synthetic opioids and synthetic drug analogues known as new psychoactive substances (NPS). Comprehensive efforts to prevent chemical diversion require strong national efforts to control the production, transport, sale, and storage of these substances, as well as international coordination and information sharing between governments and cooperation from private industry.

Some of the most widely-known chemicals used to produce plant-based drugs include potassium permanganate (used to produce cocaine) and acetic anhydride (used to produce heroin). Preventing diversion of such chemicals depend on how nations improve their internal controls and take the initiative to join international regulatory efforts such as the ones managed by the International Narcotics Control Board (INCB). The international community recognizes adherence to international regulatory efforts as an essential commitment to improve efforts against diversions of chemicals used to produce plant-based drugs.

Some illicit drug production methods have remained relatively constant through the years, involving the same common chemicals, particularly those used to refine traditional plant-based drugs such as cocaine and heroin. Chemicals used as key ingredients to produce synthetic drugs and NPS have shifted more regularly. The United Nations Office on Drugs and Crime (UNODC) has identified over 850 different forms of NPS and estimate the number of potential fentanyl analogues alone to number in the thousands. Innovations in synthetic drug design and production continue to accelerate as drug producers seek to evade drug controls and tailor products to meet evolving consumer demand. Sustained cooperation and expanded information sharing both within and between national governments is critical to keep pace with emerging trends in this field.

In March 2017, the 60th session of the United Nations Commission on Narcotic Drugs (CND) decided unanimously, at the request of the United States, to require all state parties to the 1988 UN Drug Convention to control the two key precursor chemicals used to produce illicit fentanyl: 4-anilino-N-phenethylpiperidine (ANPP) and N-phenethyl-4-piperidone (NPP). This binding international obligation went into effect in October 2017, and serves as a prime example of how the international drug control system should swiftly react to emerging drug control challenges and threats to public health, and to take concrete action to save lives, when quickly and properly applied.

In March 2018, at the 61st CND, the United States introduced a resolution focusing on the non-medical use of synthetic opioids and their precursors, including fentanyl and its analogues.

Specifically, the U.S. resolution, which the CND ultimately adopted by consensus, promotes expanded use of existing tools developed by UNODC and INCB that facilitate real-time cooperation between international law enforcement partners to disrupt the illicit supply chain of these dangerous precursors.

The International Framework

The 1988 UN Drug Convention is the legal framework for international cooperation to prevent precursor chemical diversion. Specifically, the 190 UN member states that are party to the convention are required, under Article 12, to monitor their international trade in the chemicals listed in Tables I and II of the Convention. These chemicals have legitimate industrial uses and the tables are updated regularly to account for changes in the manufacture of illicit drugs. State parties are required to share information with one another and with the INCB on their international transactions involving these chemicals to identify and prevent diversion for illicit purposes. Article 12, Sections 8 and 9 of the Convention requires licensing or similar control of all persons and enterprises involved in the manufacture and distribution of listed chemicals.

Resolutions from the CND – the treaty-based body within the UN system with prime responsibility for international drug-control policy – have provided additional guidance to states parties on how to implement their obligations according to specific best practices. These resolutions have also encouraged greater dissemination and use of the INCB's International Special Surveillance List (ISSL) – a mechanism for monitoring chemicals not regulated by the Convention but for which substantial evidence exists of their use in illicit drug manufacture.

The INCB is an independent, quasi-judicial monitoring body for the implementation of the three UN international drug control conventions – the 1988 UN Drug Convention, the Single Convention on Narcotic Drugs of 1961 as amended by the 1972 Protocol, and the Convention on Psychotropic Substances of 1971. The INCB monitors compliance with the drug control treaties and proposes appropriate remedial measures and technical assistance to governments that are not fully applying the provisions of the treaties or are encountering difficulties in applying them. The United States provides funding to the INCB to monitor the measures called for in the Conventions, and to improve detection and tracking of chemicals subject to diversion.

In addition to ISSL, the INCB has developed a number of instruments to address the challenges of precursor chemicals:

- The Pre-Export Notification Online system (PEN Online) is an online database system that enables the exchange of information between member states on the import and export of chemicals required for the manufacture of illicit drugs, and to provide the ability to raise alerts to stop suspect shipments before they reach illicit drug manufacturers. The system facilitates information sharing on the global level by collecting data on precursor chemical trafficking and use trends, and then publicizing this data. In practice, electronic responses are sent to exporting countries which are required to acknowledge receipt and confirm clearance to export chemicals. Since the PEN Online system was first launched in March 2006, 162 governments have registered to use it. On average, there are 2,910 PEN pre-export notifications made monthly via

the online system. More than 35,000 pre-export notifications have been submitted using the PEN Online system.

- The Precursors Incident Communication System (PICS) is another INCB tool that facilitates real-time communication exchange among law enforcement officials worldwide. The system supports intelligence sharing and facilitates direct coordination and collaboration among national authorities to advance investigations on chemical trafficking. As of November 2018, more than 2,300 incidents communicated through PICS; an increase of more than 230 from the previous year. Those incidents involved more than 30 different countries and territories. The system has registered users from 109 countries and territories, representing nearly 250 agencies.

In addition to PEN Online and PICS, the INCB manages task forces to implement Project Prism, Project Cohesion, and Project ION — three INCB international initiatives in matters related to chemicals used in the illicit manufacture of drugs, specifically synthetic drugs (Project Prism), heroin and cocaine (Project Cohesion), and NPS (Project ION). These ongoing mechanisms facilitate coordinating the monitoring of chemical transactions and targeted, time-bound intelligence-gathering operations.

The Board also maintains a Precursor Task Force and a Project ION Task Force. At the 61st CND, the Precursor Task Force held a side event delivering presentations on flexible approaches to drug precursor control. Those included examples of voluntary cooperation with industry in Germany; regulatory measures in the United States to reduce administrative burdens on control measures; and steps to cope with non-scheduled precursor chemicals in China.

The Project ION Task Force is primarily engaged in the coordination, collection, and communication of strategic and operational information and intelligence related to synthetic NPS with little or no known medical, scientific, or industrial uses. This task force promotes international operational initiatives by supporting national authorities' efforts in preventing non-scheduled NPS from reaching consumer markets. Additionally, the INCB recently implemented a special project (Project Opioids) to interdict the illicit distribution and sales of synthetic opioids by developing partnerships and practical actions with governments and relevant industries.

Regional Bodies. The regulatory framework codified by the United Nations does not exist in isolation. Regional bodies, such as the European Union (EU) and the Organization of American States (OAS) actively work in partnership with the United States on multilateral chemical control initiatives, including the implementation of CND resolutions.

Chemical Control Activities and New Trends

Fentanyl. Fentanyl is a powerful and deadly Schedule II synthetic opioid that is between 50 and 100 times more potent than morphine. Within North America, drug traffickers are increasingly lacing illicit fentanyl into heroin and other drugs to create a more potent high for users. Fentanyl is also pressed into pill form and sold as counterfeit prescription opioid pills. In many instances, buyers are not aware of the presence of fentanyl in heroin, alternatively the user may have sought out fentanyl-laced heroin for the greater high.

Fentanyl is responsible for a surging number of overdose fatalities in the United States, Canada, and some European countries. Specifically in the United States between 2017 and 2018, fentanyl-related overdose claimed the lives of more than 30,000 Americans. In Canada, from January to June 2018, opioids, mainly fentanyl and its analogues, were responsible for nearly 2,100 overdose deaths. While fentanyl deaths have been highest in North America, fentanyl availability and overdose deaths have also increased in other parts of the world. In the United Kingdom, 122 fentanyl-related deaths were recorded from between 2017 and March 2018, up from 58 recorded in 2016.

The two precursor chemicals used to produce illicit fentanyl and fentanyl-related substances (for example, acetyl fentanyl) are NNPP and ANPP. While there are several chemicals and pathways to manufacture fentanyl, the NPP and ANPP processing method is currently the preferred one used by clandestine manufacturers. On October 18, 2017, these two chemicals were added to Table I (internationally controlled chemicals) of the 1988 UN Drug Convention, implementing the decision of the 2017 CND. With the addition of ANPP and NPP, there are now 28 chemicals controlled under Table I. International control of these chemicals under the 1988 UN Drug Convention requires states parties to the convention to institute domestic regulation of the import and export of ANPP and NPP, which is intended to reduce their availability to criminals and reduce their availability in the illicit supply chain.

The INCB has identified a list of 93 fentanyl-related substances with no currently known legitimate medical or industrial uses, beyond limited research and analytical purposes. Seventy-seven of those substances are not currently scheduled under any of the three UN drug conventions. In response to Member State requests, the Board disseminated this list of fentanyl-related substances and invited all countries to refrain on a voluntary basis from any manufacture, import, export or distribution of the substances on the list. The list is a valuable tool used by DEA and international law enforcement practitioners to increase identification and detection of fentanyl-related substances in criminal channels.

New Psychoactive Substances and Opioid Analogues. NPS are substances of abuse, either in a pure form or a preparation, that are not controlled by the 1961 Convention or the 1971 Convention, but which may pose a public health threat. Producers modify and experiment with new chemical formulas in a search for new NPS that can avoid detection by authorities and skirt the international control regime.

The rapid proliferation of NPS is creating a critical challenge for law enforcement officials worldwide because of the speed in which they can be reformulated and remarketed to avoid international control. Over 850 formulations of NPS were reported to the United Nations through 2018, exceeding the capacity of law enforcement and regulatory authorities to curb this problem. Traffickers sell these substances via the Internet, through both open and non-indexed online websites (the so-called “Dark Web”), then utilize international mail and express consignment shipments to deliver them. Because of the extreme potency of these substances, tiny quantities, often only milligrams, are required to generate powerful and deadly highs; consequently, such small shipments can easily evade law enforcement and regulatory detection.

The UNODC's Global Synthetics, Monitoring Analyses, Reporting and Trends (SMART) program helps law enforcement and forensic officials to combat the challenges posed by NPS through increased information sharing worldwide. The United States is a staunch supporter of the Global SMART program as a critical tool to increase voluntary cooperation among member states in sharing information on NPS trafficking and use trends on a global level. Data collected and analyzed by Global SMART informs CND scheduling decisions that affect international control of NPS under the UN drug conventions. This information is available on online portals, and is used to generate reports updating member states on the scope of this problem.

Illicit manufacture, trafficking, and use of synthetic opioids and NPS are poised to expand to new countries and regions. Many countries in the Middle East and Africa have reported increased trafficking and misuse of the synthetic opioid tramadol. Misuse of tramadol could lead to a demand for even more toxic forms of synthetic opioids. Criminals have been quick to capitalize on the low risk and cost of synthetic opioids, and continue to develop and introduce new analogues to markets. In 2012, governments reported just three synthetic opioid NPS to the United Nations, increasing to 10 in 2016. By 2018, according to the INCB, 37 countries had reported seizing 40 different opioid-type NPS, mostly fentanyl or fentanyl-related substances.

In addition to new fentanyl analogues, counterfeit variations of oxycodone, tramadol, and other pharmaceutical products continue to make inroads in the United States and other markets. Trafficking and abuse of synthetic opioids has become a top concern of governments in Africa, South Asia, and the Middle East, particularly related to counterfeit or illicitly manufactured tramadol. Within the EU, 38 synthetic opioid NPS have been detected since 2009, with 13 reported in 2017, including 10 fentanyl analogues.

The international legal framework for drug control is struggling to keep pace with the speed by which criminals can develop new NPS. The United Nations drug control treaties, as well as the laws of many countries, continue to control drugs individually according to their chemical structure – a time consuming process. Many countries – including the United States – have enacted legislative reforms within the scope of international law to review and control NPS based on their psychoactive effects or broader category of classification (class-based scheduling), rather than precise chemical structure.

In November 2018, during the G-20 Meeting in Buenos Aires, China agreed to reclassify fentanyl as a controlled substance in its internal list of regulatory precursor chemicals. According to China's Foreign Ministry, the country will schedule the entire category of fentanyl-type substances as controlled substances, and start the process of revising relevant laws and regulations. Full implementation of this announced reform could make an important impact in reducing the availability of fentanyl analogues.

Carfentanil. Carfentanil is a particularly potent fentanyl analogue not approved for use in humans that is contributing to opioid-related overdose deaths. Used as a veterinary tranquilizer for large mammals, carfentanil is up to 100 times more potent than fentanyl, and controlled under Schedule II of the Controlled Substances Act.

Evidence obtained from seized drug supplies indicates that carfentanil is commonly used as an adulterant in other illicit drugs, such as heroin or cocaine, or mixed with diluents and pressed into counterfeit prescription pills. According to data obtained from National Forensic Laboratory Information System (NFLIS), there have been at least 2,900 domestic carfentanil encounters in over 21 states in the United States since 2016.

The presence of carfentanil in the illicit drug market poses a serious threat to the public health given users are often unaware the product they are purchasing contains carfentanil. At the 61st CND in March 2018, based on the WHO's recommendation, UN Member states voted to internationally control carfentanil and five other fentanyl analogues under Schedules I and IV of the 1961 Single Convention on Narcotic Drugs.

The Single Convention on Narcotics Drugs of 1961 is an international treaty barring production and supply of specific narcotic drugs of similar effects except under license for specific purposes, such as medical treatment and research. Schedules I and IV of the 1961 Single Convention on Narcotic Drugs are considered the strictest level of controls of dangerous narcotics and their production components.

Heroin. Heroin is derived from the opium poppy plant and can be lethal if taken on regular basis. Traffickers are increasingly mixing fentanyl into heroin to stretch supplies and maximize profits, often without the knowledge of users. The main precursor chemical used to produce heroin is acetic anhydride, a substance also widely used in legitimate industry. Drug trafficking organizations continue to channel acetic anhydride to illicit producers through diversion, or smuggling. Acetic anhydride may also be used as a compound substance to produce a chemical reaction in the production of methamphetamine.

According to the INCB, there has been a sharp increase in the demand for acetic anhydride for illicit purposes since 2016, particularly in the EU. However, detected attempts by traffickers to divert the substance from international supply channels have gradually decreased in number. One reason for the detected decline in diversion attempts could be that traffickers have succeeded in diverting and stockpiling sufficient amounts.

Seizures of acetic anhydride of suspected European origin continued in Europe and West Asia in 2017 and 2018. In total, 20 countries reported seizing shipments of acetic anhydride in 2017, amounting to almost 127,000 liters. The largest volume of total seizures was reported by Afghanistan (37,700 liters), followed by Turkey (23,200 liters) and Iran (20,300 liters). Countries reporting total seizures of more than 5,000 liters included Bulgaria, Mexico, Japan, the Netherlands, and Pakistan.

Despite the fact that diversion attempts appear to have decreased since 2016, suspicious requests for supplies of acetic anhydride continue to be posted on certain online trading platforms. In this regard, the United States continues to work closely with participant countries of the INCB Precursor Task Force of Project Prism and Project Cohesion to counter acetic anhydride diversion. The United States also provides assistance to expand international use of the INCB's PEN Online and PICS to control and to monitor the diversion of acetic anhydride and other chemicals.

For activities under Project Prism and Project Cohesion, participating governments are requested to register points of contact (focal points) for their relevant national authorities involved in precursor control, such as national regulatory, law enforcement, customs and drug control agencies, and to actively use the system to communicate all incidents involving precursor chemicals. Governments that have not yet registered PICS points of contact for their national authorities involved in precursor control may request an account by writing to incb.pics@un.org.

Methamphetamine. Methamphetamine is produced using a variety of methods, but most require one or more of the following precursor chemicals: pseudoephedrine; ephedrine; pharmaceutical products containing these chemicals; phenyl-2-propanone (P-2-P); and phenylacetic acid. Use of ephedrine and pseudoephedrine in the illicit manufacture of methamphetamine is predominant in Asia, Oceania, Africa and in some regions in Europe. In the Western Hemisphere, the bulk of illicitly manufactured methamphetamine is made using P-2-P-based methods.

As these precursor chemicals have become more difficult to obtain due to increased controls, traffickers have started using other chemicals, or seeking non-controlled pre-precursor chemicals or esters, and derivatives of phenylacetic acid to produce the precursor chemicals necessary for methamphetamine production.

In 2017, seizures of phenylacetic acid were predominantly in Mexico, with 19.5 metric tons (MT) seized in clandestine methamphetamine laboratories. It was not clear if the phenylacetic acid seized in Mexico had been illicitly manufactured from one of its precursors, such as 2-phenylacetamide, which is also controlled in Mexico.

Traffickers, particularly in Europe, may be still using the pre-precursor APAAN, or alpha-phenylacetoacetonitrile for the production of methamphetamine. This chemical was added to the list of internationally controlled chemicals under the 1988 UN Drug Convention in 2014. In Europe, there are limited legitimate uses for APAAN, and therefore imports are likely to be intended for conversion to benzyl methyl ketone (BMK), an amphetamine precursor. According to the INCB, three European countries reported seizing APAAN between 2016 and 2017. Together, the amounts seized totaled less than 600 kilograms (kg) in 2017, less than half the amount seized in 2016.

Methamphetamine production takes place domestically within the United States and worldwide. Domestic small production capacity laboratories (SPCLs) are the most frequently encountered type of clandestine laboratory. These SPCLs tend to be low production operations (grams or ounces), and make up only a small percentage of the drug that is consumed in the United States. The emergence of the “one-pot labs” (a.k.a. “shake-n-bake” labs) constitute the majority of SPCLs found domestically. These laboratories typically use two-liter plastic soda bottles, 16-20 ounce drink containers, and other such receptacles. Only rudimentary technical skills are required to manufacture methamphetamine using these methods.

Pseudoephedrine and ephedrine are the principal precursor chemicals used in the SPCLs and are purchased over the counter from retail pharmacies and convenience stores. Most of the

methamphetamine available in the United States, however, is produced abroad, and trafficking across the U.S. southern border increased exponentially in 2018. Traffickers increasingly prefer new production methods to manufacture methamphetamine that do not require ephedrine and pseudoephedrine. These methods were identified in 98 percent of all samples seized by the DEA in the United States in 2017.

Most large-scale manufacturers in Mexico are believed to use the P-2-P method to manufacture the precursor chemicals required to produce methamphetamine. However, there have been some indications of a possible shift to the phenylacetic acid method. Mexican authorities seized large volumes of phenylacetic acid (20 MT) in 2017. Chemical analysis of future seizures may help provide additional analysis on emerging production methods used by Mexican drug trafficking organizations.

Countries in Africa and Asia, where precursors like P-2-P and APAAN are relatively unknown, continue to rely on ephedrine and pseudoephedrine to produce top quality methamphetamine. There are indications, however, that Mexican alternate methods to produce methamphetamine are being expanded in Africa. Moreover, traffickers may also be shifting to adopt the use of APAA, or Alpha-phenylacetoacetamide, as a substitute chemical for P-2-P and APAAN. This shift began after APAAN was scheduled under Table I of the 1988 UN Drug Convention in 2014. In 2018, the INCB recommended that APAA be added to the list scheduled under Table I.

Cocaine. Potassium permanganate, an oxidizer, is the primary chemical used to remove the impurities from cocaine base. It has many legitimate industrial uses, including waste-water treatment, and as a disinfectant and deodorizer. During the first 10 months of 2018, more than 30 countries shipped more than 25,500 MT of potassium permanganate to over 120 importing countries and territories. Potassium permanganate can also be combined with pseudoephedrine to produce methcathinone, a synthetic psychoactive stimulant controlled under the 1971 UN Convention.

In South America, the only region of the world where large quantities of coca leaf are cultivated, traffickers continue to divert chemicals from legitimate industry, either from domestic or international sources, for cocaine production. A growing trend cited by law enforcement officials is the recycling of chemicals, which allows clandestine laboratory operators to reuse chemicals up to four times before they need to be replaced. The two main sources of the potassium permanganate used for illicit purposes appear to be diversion from licit domestic distribution channels and subsequent smuggling to illicit processing sites either within the same country or across sub-regional borders, and illicit manufacture. Traffickers are also producing their own potassium permanganate, particularly in Colombia.

Alternative precursor chemicals as well as solvent mixtures used in cocaine manufacturing have also been detected. Countries in Central and South America have a variety of other chemicals under national control, which are known to have been used in the illicit manufacture of cocaine. These include common acids and bases, oxidizing agents, solvents used for the extraction of cocaine base from coca leaves and for the conversion of cocaine base into cocaine hydrochloride, as well as precursors of and substitutes for potassium permanganate.

Additionally, traffickers continue to recycle the chemical containers, making it difficult to trace the origin of the chemicals inside. INCB's Project Cohesion monitors the imports of potassium permanganate to cocaine processing areas. The United States, the INCB, and other international partners encourage countries in South and Central America to continue sharing information on these new trends.

Future Trends. Drug traffickers will continue to adapt to new production methods and exploit chemicals not controlled under the Convention or domestic laws. To avoid enforcement pressure, criminals will also continue to take advantage of countries with limited enforcement and regulatory capacity, and frequently obtain chemicals produced within countries where illicit drugs are produced, thereby escaping international monitoring, surveillance, and interdiction efforts. It is critical to continue efforts to strengthen the capacity of law enforcement, public health institutions, and transportation and shipment industries to minimize illicit precursor chemical diversion. It is also important to enhance international cooperation to combat the threats posed by domestic chemical diversion.

Toxic adulterants is also of concern as drug traffickers continue to manipulate illicit drug composition with distinct pharmacological products. Drug traffickers have traditionally mixed non-toxic materials such as lactose and glucose into drug supplies to increase profitability, but there is growing evidence that traffickers are increasingly mixing banned or controlled toxic substances including pharmaceutical drugs and fungicides into illicit drugs to increase drug potency and produce enhanced psychoactive effects.

Many street drugs contain multiple toxic adulterants, numerous controlled substances, and impurities from the heroin manufacturing process. However, crime laboratories, emergency departments, and medical examiners do not routinely test for adulterants unless given a specific reason to do so. It is vital that law enforcement authorities continue to test drug samples for toxic adulterants, alerting public health authorities of additional negative effects toxic adulterants can cause to the body, including death.

Major Chemical Source Countries and Territories

This section focuses on individual countries with large chemical manufacturing industries that have significant trade with drug-producing regions and those with significant chemical commerce susceptible to diversion domestically for smuggling into drug-producing countries. Designation as a major chemical source country does not indicate a lack of adequate chemical control legislation or the ability to enforce it. Rather, it recognizes that the volume of chemical trade with drug-producing regions, or proximity to them, makes these countries the sources of the greatest quantities of chemicals liable to diversion. The United States, with its large chemical industry and extensive trade with drug-producing regions, is included on the list.

Many other countries manufacture and trade in chemicals, but not on the same scale, or with the broad range of precursor chemicals, as the countries in this section. These two sections are broken down by region.

Africa

Nigeria

Nigeria's National Agency for Food and Drug Administration and Control (NAFDAC) is the primary government agency responsible for preventing diversion of precursor chemicals in Nigeria. Since 2011, 11 clandestine methamphetamine laboratories have been detected in Nigeria, making Nigeria an emerging major producing country for methamphetamine. In addition to the emerging methamphetamine threat, Nigeria is also developing into a major transshipment country for ephedrine, a precursor chemical used in the production of methamphetamine. Precursor chemicals – mainly ephedrine – are imported from India and China then diverted to the laboratory operators.

In July 2018, the National Drug Law Enforcement Agency's Sensitive Investigative Unit reported that it seized 50 kg of ephedrine destined for a methamphetamine lab in Anambra, Nigeria. The ephedrine was produced in India then shipped to Ghana. From Ghana it was smuggled to Kano, Nigeria and was seized in Kogi, Nigeria while in route to Anambra. Aggregate 2018 seizure data pertaining to precursor chemicals were not available at the time of this report.

South Africa

South Africa is a leading regional importer of chemicals used in the production of illicit drugs, particularly synthetic drugs. The South African Police Services (SAPS) has a trained, dedicated clandestine laboratory team. The SAPS division of the Directorate for Priority Crime Investigations (DPCI) estimates 40-50 clandestine laboratories are dismantled annually within the country. According to statistics released in September 2018, SAPS reported a 10.5 percent increase in drug-related crimes from fiscal years 2016-2017 to 2017-2018. Enforcement teams from the South African Revenue Service (SARS) also seize illicit drugs and precursor chemicals, including ethanol and toluene.

Ephedrine and pseudoephedrine used in South Africa to synthesize methamphetamine largely originate in Nigeria and India. South African authorities regularly report newly identified precursor substances used in illicit drug production to the INCB. South Africa also submits information on seized precursor shipments to the INCB's PICS. Restricting and analyzing the trade of precursors are mandated by the South Africa National Drug Policy, which mandates the establishment of computerized inventory control systems for scheduled chemicals and regulating and monitoring the purchase of medicines containing precursors via a registry system. Such measure have not been fully implemented.

The nexus between wildlife trafficking and trafficking in precursors and illicit drugs is being investigated. U.S. law enforcement collaboration with South Africa on investigations is productive but sporadic, and U.S. authorities regularly share information on container shipments suspected of containing possible illicit materials with South African counterparts.

North America

Canada

Canada has a large chemical industry and strong legislation, which allow for effective regulatory controls over the industry. Canada's "Controlled Drugs and Substances Act" (CDSA) and its regulations provide the legislative framework for the control of chemical precursors. Health Canada submits an annual report to the INCB with respect to its obligations under the 1988 UN Drug Convention. The annual report provides information on licit imports and exports for the previous year, stopped shipments and seizures, and refusals of permit applications due to objections from foreign authorities. The report also details information received from the INCB, and incomplete or invalid application information.

Canada cooperates fully with the INCB in cases where shipments may pose a concern. Scheduling of substances under the CDSA and its regulations give law enforcement agencies the authority to take action against activities that are not in accordance with the law. These instruments also authorize Health Canada to communicate information collected to law enforcement agencies, border control officers, foreign competent authorities and the INCB if necessary. As a state party to the 1988 UN Drug Convention, Canada is obligated to impose controls on substances in response to decisions of the CND. Canada continues to explore ways to prevent the illicit diversion of chemical precursors through legislative and regulatory channels.

Mexico

Mexico has several major chemical manufacturing and trade industries that produce, import, or export chemicals required for illicit drug production. Mexican laws regulate the production and use of many of these substances and the Mexican Federal Commission for the Protection Against Sanitary Risk (COFEPRIS) is responsible for enforcing chemical control laws. In addition, Mexico controls all chemicals listed in the 1988 UN Drug Convention. Mexican government agencies, to include Customs and the Mexican Regulatory Agency, continue to monitor the importation of controlled precursor chemicals, but this has not significantly deterred local methamphetamine production.

Although Mexico-based transnational criminal organizations are major producers of methamphetamine, imports of methamphetamine precursors pseudoephedrine and ephedrine are outlawed, and they are not produced legally within the country. Mexico regulates the importation of precursor chemicals, including phenylacetic acid, methylamine, hydriodic acid, and red phosphorous. The importation of formaldehyde and ammonium chloride continues to be monitored due to their potential diversion, as these chemicals can be used to manufacture methylamine, a key chemical for methamphetamine production.

Despite monitoring and regulations, illicit precursor importers attempt to move chemicals undetected within the country. Importers continue to mislabel shipments, which poses a challenge for law enforcement in detecting the importation of chemicals coming from source countries such as India and China. Importers also exploit regulatory vulnerabilities in Central America to smuggle precursor chemicals into Guatemala and Honduras and eventually to Mexico for use in methamphetamine production.

The Mexican government controls two fentanyl precursor chemicals NPP and ANPP. While these controls have not fully deterred criminal organizations from obtaining these chemicals, it has forced criminals to seek chemical alternatives, while providing Mexican regulatory and law enforcement agencies a legal basis to seize these substances and file criminal or civil charges against those illegally importing them. Despite controls, the small quantities needed for fentanyl production present a challenge to law enforcement in the detection of these chemicals as they enter Mexico.

Mexico participates in international efforts to control precursors and has a strong bilateral working relationship with the United States. Mexico signed a memorandum of cooperation with the United States in 2012 to address precursor chemicals and clandestine laboratories. The two governments also cooperate to share best practices with Central American countries affected by the trafficking of precursor chemicals. U.S. government agencies continue to provide training and equipment to both Mexican and Central American law enforcement agencies to address existing and emerging synthetic drug threats in the region.

The United States

The United States manufactures and/or trades in almost all 28 chemicals listed in Tables I and II of the 1988 UN Drug Convention to which it is a party, and it has laws and regulations implementing chemical control provisions.

The foundation of U.S. chemical control is the Chemical Diversion and Trafficking Act of 1988. This law and subsequent chemical control provisions of the U.S. drug law are interwoven into the Controlled Substances Act of 1970, rather than individual stand-alone legislation. The DEA is responsible for administering and enforcing these laws.

The Department of Justice, primarily through its U.S. Attorneys, handles criminal and civil prosecutions at the federal level. In addition to registration and recordkeeping requirements, the legislation requires importers and exporters to file import or export notifications at least 15 days before the transaction is to take place. The 15-day advanced notification permits DEA to evaluate the transaction. However, the legislation and regulations allow for a waiver of the 15-day advance notification if a company has an established business relationship for a specified listed chemical or chemicals with its foreign customer that has been reported to DEA, subject to the criteria in the Code of Federal Regulations. In these cases, same-day notification is permitted for future shipments. Diversion investigators and special agents communicate with exporting and importing government officials in this process. The legislation also gives the DEA the authority to suspend shipments.

U.S. legislation requires chemical handlers to report to DEA suspicious transactions such as those involving extraordinary quantities or unusual methods of payment. Criminal penalties for chemical diversion are strict; the penalties for some chemical trafficking offenses involving methamphetamine are tied to the quantities of drugs that could have been produced with the diverted chemicals. If the diversion of listed chemicals is detected, persons or companies may be prosecuted or the DEA registration may be revoked.

The Combat Methamphetamine Epidemic Act of 2005 (CMEA) mandated DEA to establish total annual requirements, import quotas, individual manufacturing quotas, and procurement quotas for three List 1 chemicals: pseudoephedrine, ephedrine, and phenylpropanolamine. This affected those DEA-registered importers and manufacturers that wish to import or conduct manufacturing activities with these chemicals. The CMEA also restricted retail level transactions of nonprescription drug products that contain ephedrine, pseudoephedrine, or phenylpropanolamine, now known as “scheduled listed chemical products.” The CMEA and other chemical control legislation are aimed at preventing the illicit manufacture of illegal drugs domestically and internationally.

The United States has played a leading role in the design, promotion, and implementation of cooperative multilateral chemical control initiatives. The United States also actively works with other concerned nations, and with the UNODC and the INCB to develop information sharing procedures to better control precursor chemicals and non-controlled substances used in the illicit production of drugs. U.S. officials are members of a combined task force for both Project Cohesion and Project Prism. The United States has established close operational cooperation with counterparts in major chemical manufacturing and trading countries. This cooperation includes information sharing in support of chemical control programs and to prevent chemical diversion.

Central America and the Caribbean

Costa Rica

Costa Rica has a stringent licensing process for the importation and distribution of precursor chemicals, and has implemented precursor diversion prevention measures recommended by the INCB. Costa Rica has controls for Table I and Table II precursor and essential chemicals as defined by the 1988 UN Drug Convention.

The Costa Rican government’s National Plan on Drugs for 2018-2025 recognizes the international problem of production and trafficking of chemical precursors. Costa Rica has yet to seize large amounts of the substances compared to elsewhere in the region and imports a relatively low volume of precursor chemicals.

The Costa Rican Drug Institute has a special unit dedicated to the control and regulation of precursor chemicals, and this unit has broad powers to monitor and respond to illegal activity. By law, importers and businesses that handle chemical precursors or certain types of prescription drugs are required to submit monthly reports through an online tracking system. During the first 10 months of 2018, there were 2,336 authorized import transactions, licensed to 199 registered importers of chemical precursors (three occasional importers and 196 regular importers). The system tracks the movement of chemical precursors and solvents and also generates alerts. Costa Rica received one specific alert during the January-October 2018 period for possible participation of one importer in irregular activity. The source of the alert provided limited information, which was in the process of being verified and investigated at the time of this report.

Dominican Republic

The Dominican Republic has implemented a chemical control regime in accordance with Article 12 of the 1988 UN Drug Convention. Dominican laws regulate the production and use of the 28 chemicals listed in the Convention and the Dominican Republic annually submits information required by the Convention. The National Directorate for Drug Control (DNCD) is responsible for enforcing chemical control laws.

The Dominican Republic does not have a large petrochemical industry engaged in the manufacturing, importation, and exportation of chemical products. Chemicals for industrial production are imported from the United States. The two largest chemical imports are sodium carbonate and toluene, used in the Dominican Republic as an additive for gasoline and as a solvent for paint.

The DNCD regulates and enforces the importation and use of precursor chemicals. The DNCD receives pre-notifications for precursor imports and issues certificates of importation. The DNCD also controls and regulates prescription drugs and issues annual permits to medical doctors, clinics, and hospitals, maintaining a register of the type of drug and amount each doctor prescribes each year, especially for drugs containing opiates. Clinics and hospitals are mandated to report prescriptions for certain drugs before dispensing them and the DNCD verifies that the prescription number and the doctor are valid before authorizing the sale. The DNCD is taking steps to automate its paper-based chemical control registration.

El Salvador

El Salvador is party to the 1988 UN Drug Convention, and invokes its rights to pre-notification of scheduled precursor chemicals under Article 12. Precursor chemical trafficking remains a regional threat, as methamphetamine production continues to spread from Mexico into neighboring Guatemala.

With U.S. assistance, the INCB trains the Government of El Salvador and its national authorities to comply with the provisions of the three international drug control conventions in the regulatory control of the licit trade in narcotic drugs and psychotropic substances, and the monitoring of precursor chemicals. The ultimate goal is to facilitate the appropriate availability of internationally controlled substances for medical, scientific and industrial purposes, yet prevent their abuse and diversion to illicit channels.

Guatemala

In 2018, the Guatemalan Vice Minister of Counter Narcotics devoted increased attention to the problem of precursor chemical diversion, after an annual seizure of 26 MT of precursor chemicals used to produce heroin, cocaine hydrochloride, and methamphetamine. However, the Ministry of Health is responsible for the regulation of chemicals in Guatemala and lacks the investigative depth to verify any information beyond cursory regulatory permits.

Due to a lack of cooperation between investigators and regulators, the Guatemalan government determined that it lacked legal standing to seize these chemicals, and these 26 MT were ultimately returned to their owner. Existing Guatemalan laws and regulations are not sufficiently utilized to determine whether chemical imports are ultimately used for legitimate commercial purposes or diverted to produce illicit drugs. Additionally, there are no verifications in place that would allow authorities to determine whether quantities of imports are reasonable for stated commercial purposes.

To improve the local government's capability to manage the precursor chemical issue, the U.S. government supported training to increase the Guatemalan government's ability investigate, and interdict precursors in 2018, as well as promote improved interagency cooperation. The United States is also working with Guatemalan authorities to establish a Precursor Chemicals Response Team, and provides training to local investigators on precursor cases. In addition, the United States is providing training for up to 50 drug detection canines to detect precursor chemicals and synthetic drugs, including fentanyl.

Since 2005, the Guatemalan government has been storing large quantities of seized precursor chemicals, though an incinerator donated by the United States in 2017 continues to be utilized by local authorities to reduce the backlog. As of October 2018, there were approximately 2,400 MT of seized precursor chemicals in Guatemala. Authorities are working to consolidate seized precursors currently stored around the country at the incinerator site.

Honduras

Precursor chemical diversion continues to be a problem in Honduras. The Government of Honduras works closely with U.S. authorities to disrupt the importation and diversion of precursor chemicals through Honduras. The United States provides training and other assistance to help strengthen the capacity of Honduran institutions responsible for controlling precursor chemicals.

Scientific knowledge within Honduras about precursor chemicals is limited and often out of date, and information sharing between government institutions regarding synthetic drug and precursor chemical trafficking is challenging. The responsibility for the control of precursor chemicals is spread through a variety of agencies in Honduras including the Directorate of Investigation and Intelligence; the Directorate for the Fight against Drug Trafficking; the Public Ministry; the HNP; the Health Ministry, the Agency of Sanitary regulation and the Customs Authority. These agencies have limited experience working together and do not have an established means to collaborate comprehensively to combat the diversion of precursor chemicals.

The 1989 Law on the Misuse and Illicit Traffic of Drugs and Psychotropic Substances is the current legislation governing the illicit movement of precursor chemicals, but the legislation does not adequately address synthetic drug trafficking or precursor chemicals. The Precursor Chemical and Synthetic drug Board is working with health, justice, and law enforcement officials to draft a specific law to address the trafficking of chemical precursors.

South America

Argentina

Argentina's proximity to top cocaine producing nations and its role as a large producer of chemical precursors makes it vulnerable to the use of precursors in the production of illegal narcotics. Argentina has enacted legislative measures to curb the illicit use and diversion of chemical precursors. The Security Ministry's National Register of Chemical Precursors was created in 2005. Its Federal Council for Chemical Precursors is responsible for analysis and investigations of crimes associated with chemical precursor diversions. Argentina maintains a focus on chemical precursors used in the production of cocaine, but is shifting attention towards those used in the production of methamphetamines and synthetic drugs.

Brazil

Brazil is one of the world's 10 largest chemical producing countries by volume. Brazil licenses, controls, and inspects essential and precursor chemical products, including potassium permanganate and acetic anhydride, in conformity with its obligations under the 1988 UN Drug Convention. Controls on both potassium permanganate and acetic anhydride allow for commercial sales without restriction for quantities of up to one kg for potassium permanganate and one liter of acetic anhydride.

The Brazilian Federal Police (DPF) Chemical Division controls and monitors 146 chemical products in conjunction with 27 DPF regional divisions and 97 resident offices. The Chemical Division is composed of two units: the Chemical Control Division, subordinate to the DPF Executive Directorate, and the Criminal Diversion Investigations unit under the Organized Crime Division. Both divisions routinely coordinate and share information when conducting administrative inspections and criminal investigations.

The Brazilian National Health Surveillance Agency (ANVISA) controls precursor chemical substances used in the pharmaceutical industry. In March 2017, ANVISA added ANPP and NPP to its list of controlled chemical substances, without banning their use.

Regulatory guidelines require chemical handlers to be registered and licensed to conduct activities such as manufacturing, importing, exporting, storing, transporting, commercializing and distributing chemicals. The DPF uses a National Computerized System of Chemical Control to monitor all chemical movements in the country, including imports/exports, and licensing. This system requires all companies to register with an online system and to report all activity conducted, including the submission of monthly reports for all chemical related movements and existing chemical inventories.

Brazil reports to the INCB its annual estimates of legitimate requirements for ephedrine and pseudoephedrine for quantities above 10 grams, and P-2-P in any amount using the INCB's PEN Online. The DPF routinely uses PEN Online in cases of international trade and in coordination with UN member states to alert importing countries with details of an export transaction.

Chile

Chile complies with its international obligations to the 1988 UN Drug Convention and furnishes reports through the International Narcotic Control Board's online reporting system, PEN Online. Chile has a large mining industry engaged in the manufacturing, import, and export of chemical products. Most of the chemical substances seized by law enforcement are those used for the processing of cocaine products, such as sulfuric acid, hydrochloric acid, acetone and sodium hydroxide. Since 2009 there have been no seizures of ephedrine and pseudoephedrine, used as precursors for methamphetamine. The largest imports of controlled chemical substances and related products come from Germany and the United States, while Ecuador and Bolivia are the primary export destinations.

The regulatory entity for chemical controls is the Unit of Controlled Chemical Substances (DSQC), a sub secretariat of the Ministry of Interior and Public Safety. The DSQC manages the System of Registration and Administration of Controlled Chemical Substances (SIREGAD-SQC), which collects information on the production, manufacture, preparation, importation, and exportation of chemical substances that could be used in the production of illicit drugs. Companies that import, export, or manufacture chemical precursors must register with SIREGAD-SQC, maintain customer records, and are subject to regular inspections. The new online SIREGAD-SQC has improved capabilities for real-time data, and can analyze controlled chemical trends in Chile. Currently, 586 companies are registered in the system. In 2018, the government proposed to add 15 new chemical substances to the country's control list, among them adulterants, bulking drugs derived from cocaine, and substances used for the manufacture of synthetic drugs.

Chilean law enforcement entities have specialized chemical diversion units and dedicated personnel assigned responsibility for investigating chemical and pharmaceutical diversion cases. Customs, which is not a traditional law enforcement agency, has a risk analysis unit that profiles suspicious imports and exports, which may include chemical precursors.

During 2017, the Ministry of Interior conducted training sessions for law enforcement and security personnel to highlight the role of chemical precursor agents in the illegal manufacture of psychoactive drugs. From 2017 to 2018, the DSQC conducted 304 inspections and audits, which resulted in sanctioning procedures against 64 companies for failure to comply with the registration and declaration requirements for Chilean precursor chemicals.

Ecuador

Under Ecuadorian law, potassium permanganate and acetic anhydride are designated as controlled chemicals. Buying, selling, or importing such chemicals requires the permission of the Ministry of Interior, the primary agency responsible for precursor chemical control in Ecuador. According to Article 219 in the 2014 Penal Code, the use of precursor chemicals to produce, manufacture, or prepare illicit materials, such as cocaine or heroin is punishable by three to five years in prison.

The chemical unit of the National Antinarcotics Directorate (DNA) in the Ecuadorian National Police plays an active role in chemical control by carrying out investigations and intelligence

operations. Although DNA's chemical unit is a highly competent entity, its small size and outdated technology hinder operations. The unit conducts limited operations in Esmeraldas and Huaquillas, where drug labs and trafficking are prevalent, due to the porous land borders with Colombia and Peru. Because of its small workforce of only 26 employees, the chemical unit must often rely on ad hoc support from police officers from other units who generally lack adequate chemical training.

Ecuador has been importing large quantities of potassium permanganate for at least the past decade. According to the Central Bank of Ecuador, during the first eight months of 2018, Ecuador imported 31.2 MT of potassium permanganate, compared to 40.8 MT in all of 2017. Potassium permanganate is a controlled chemical and requires an import license in order to be imported into the country. Most 2018 imports of potassium permanganate originated from China. Similar to potassium permanganate, acetic anhydride is also a controlled chemical requiring an import license. During the first eight months of 2018, Ecuador imported 49.21 MT of acetic anhydride, compared to 0.12 MT imported during all of 2017. There were few imports of acetic anhydride imports in 2017 due to vendor difficulties in complying with importing controls that year. Most 2018 imports of acetic anhydride originated from Mexico. Traffickers also continue to smuggle liquid chemicals, including ether, from Ecuador to Colombia and Peru for cocaine processing.

Venezuela

Limited coca cultivation occurs along Venezuela's border with Colombia. Some precursor chemicals used to produce cocaine are trafficked through Venezuela, but the quantity is unknown. In 2018, Venezuelan authorities did not release statistics on seizures of drug labs or precursor chemicals. The Venezuelan government has not reported the production of NPS in Venezuela.

Asia

Bangladesh

Transnational drug trafficking organizations with connections to Burma and India operate within Bangladesh. Over the past three years, Bangladeshi law enforcement agencies have reported trafficking of synthetic drugs such as "yaba" (a mixture of caffeine and methamphetamine, sometimes with heroin) and diverted pharmaceutical drugs, such as phensedyl (codeine-based cough syrup). Bangladesh has successfully engaged bilaterally with India to control the diversion of phensedyl, and Bangladeshi law enforcement agencies work closely with DEA to seize and disrupt illicit drugs and chemicals. According to the Bangladesh Ministry of Home Affairs, phensedyl diversion into the country reduced dramatically in 2018.

In October 2018, Prime Minister Sheikh Hasina approved in principle the draft of "Narcotics Control Act 2018," (NCA 2018) which prescribes a death sentence as a maximum punishment for anyone involved in producing, smuggling, distributing or using over five grams of yaba or amphetamine-type stimulants (ATS). The minimum sentence is life in prison. NCA 2018 also prescribes between five and 15 years in jail for carrying, trafficking, or smuggling less

than five grams of yaba. Furthermore, NCA 2018 prescribes a death sentence as maximum punishment, and life imprisonment as a minimum, for anyone involved in producing, smuggling, distributing, or using 25 grams or more of “Category A” drugs, which include heroin or cocaine. Yaba and ATS are elevated to Category A drugs under the NCA 2018. Officials at the Department of Narcotics Control (DNC) and other law enforcement agencies have stated that drug offenders exploited loopholes under existing legislation in order to evade punishment.

The Government of Bangladesh is committed to the implementation of the 1988 UN Drug Convention and regional agreements regarding control of narcotic drugs, psychotropic substances and precursor chemicals. Twenty-three of the 28 precursor chemicals listed in the 1988 UN Drug Convention are included in the “Schedule of Drugs” of NCA 1990 to comply with the provisions of Article 12 of the 1988 UN Drug Convention. NCA 1990 also allows financial investigations and freezing of assets derived from trafficking in drugs and precursors. The government provides the INCB with annual estimates of Bangladesh’s legitimate use requirements for imports of the four precursors frequently used in the manufacture of ATS—3, 4-MDP-2-P, pseudoephedrine, ephedrine, and P-2-P under CND Resolution 49/3.

The Directorate General of Drug Administration has developed a draft national drug policy, approved by the Cabinet in December 2016, in response to the threat posed by the abuse of, and trafficking in, pharmaceutical preparations and other drugs. The “National Drug Policy 2016” replaced the “National Drug Policy 2005” and aims to ensure that the manufacturing of medicines is in compliance with international standards to increase export of pharmaceutical items. The new policy also proposes forming a National Drug Regulatory Authority to stop the adulteration of medicines and raw materials. Responsible authorities will be required to update the price of drugs every year and publish the updated prices online.

Bangladesh has a nascent but growing commercial pharmaceutical industry. Besides meeting 97 percent of the local demand, many pharmaceutical companies are exporting medicines to over 122 countries. In 2015, the first Bangladeshi company received U.S. Food and Drug Administration (FDA) approval to export a prescription drug for hypertension to the United States, followed by a second approval to export a cardiovascular drug. Other top listed pharmaceutical companies are now trying to get FDA approval to enter the U.S. market.

Bangladeshi pharmaceutical companies focus primarily on branded generic final formulations. About 85 percent of the drugs sold in Bangladesh are generic and 15 percent are patented drugs. Bangladesh manufactures more than 450 generic drugs, sold under 5,300 registered brands that have 8,300 different dosages and strengths. These include a wide range of products from anti-ulcerants, fluoroquinolones, anti-rheumatic non-steroid drugs, non-narcotic analgesics, anti-histamines, and oral anti-diabetic drugs. Bangladesh is also producing high-tech medicines like anticancer drugs, hormonal products, enzymes and coenzymes at a limited scale, meeting only four percent of Bangladesh’s total requirements. As such, Bangladesh’s chemical imports are primarily in these pharmaceutical categories.

China

China has implemented a strict licensing regime for the production, sale, and transport of drug precursor chemicals. The National Narcotics Control Commission of China (NNCC) is the agency with primary responsibility for drug precursor chemical control. China maintains a list of controlled precursor chemicals called the “Catalogue of Precursor Chemicals,” which currently includes 32 drug precursor chemicals. China’s catalogue includes notable precursors potassium permanganate (cocaine), acetic anhydride (heroin), and ephedrine and pseudoephedrine (methamphetamine). In February 2018, China added key fentanyl precursors ANPP and NPP to the catalogue. China regularly provides precursor shipment data the INCB’s Pre-Export Notification system.

During the November 2018 G-20 Meeting in Buenos Aires, China agreed to reclassify fentanyl as a controlled substance in its internal list of regulatory precursor chemicals. According to China’s Foreign Ministry, the country will schedule the entire category of fentanyl-type substances as controlled substances, and start the process of revising relevant laws and regulations. Full implementation of this announced reform could make an important impact in reducing the availability of fentanyl analogues.

Both U.S. law enforcement and China’s NNCC recognize the diversion of drug precursors to illicit manufacture as a significant problem in China. In their 2017 Annual Drug Report, the NNCC reported 388 cases of drug precursor-related crime, an increase of 39.6 percent over the previous year. Additionally, the NNCC reported seizing 2,384 MT of precursor chemicals, an increase of 50.5 percent over the previous year. U.S. law enforcement reports that the most common diversion tactic used by traffickers is the intentional mislabeling of shipments containing precursors. Perpetrators caught mislabeling precursor shipments often face only civil penalties and small fines rather than criminal charges. The challenge of preventing precursor diversion is further exacerbated by China’s ineffective enforcement of land, air, and sea transport regulations.

Hong Kong Special Administrative Region

Hong Kong, a Special Administrative Region of the People’s Republic of China, is neither a drug manufacturing nor chemical producing economy. With well-developed logistics connectivity to China, one of the world’s largest precursor chemical exporters, Hong Kong’s chemical trade is mostly in the form of imports for consolidation and subsequent re-export or transshipments; only small amounts are consumed locally by industrial, pharmaceutical, testing or education activities.

In 2017, the most recent year for which data is available, controlled chemical imports totaled approximately 12.32 MT, with approximately 1.31 MT re-exported. Hong Kong supports international efforts to prevent precursor chemical diversion through a combination of effective legislation, strong law enforcement, and close collaboration with the INCB, other foreign counterparts, and the business community.

The Control of Chemicals (COC) Ordinance, in effect since 1996, is Hong Kong’s basic legislation for regulating possession, manufacture, transport, and distribution of designated controlled chemicals. In May 2018, the COC Ordinance (Amendment of Schedule 2) Order

2018 and the Hong Kong Dangerous Drugs Ordinance (DDO) (Amendment of First Schedule) Order 2018 came into effect. The COC Order added a total of 29 chemicals, including ANPP and NPP, two precursor chemicals used in the synthesis of fentanyl and its analogues, and all chemicals in the 1988 UN Drug Convention, to Schedule 2 of the COC.

The DDO Order added additional synthetic drugs to the First Schedule of the DDO, including EPH, MPA, MDMB-CHMICA, SF-APINACA, and the synthetic opioid U-47700. The COC, which establishes a licensing regime over importers, exporters, dealers, traders, manufacturers, and handlers of the designated chemicals, applies equally to imports, exports, and transshipments. Permits for every shipment are mandatory. Government approval for all premises and containers used to store such chemicals is also mandatory. The maximum penalty for illicit chemical trafficking is imprisonment for 15 years and a fine of \$130,000. The Controlled Chemicals Group (CCG) of the Hong Kong Customs and Excise Department's Drug Investigations Bureau administers and enforces the Ordinance.

Permit applications to handle controlled chemicals, including those for the partial removal of chemicals while in transit, must be received by CCG at least 10 days prior to the proposed date of activity. CCG uses this interim period to establish the bona fides of a proposed shipment, including through coordination with foreign counterparts via the Pre-Export Notification System. Export permits are only issued upon receipt of "No Objection" letters from competent authorities in importing jurisdictions. While Hong Kong does not control sales of over-the-counter medicines containing ephedrine and pseudoephedrine, CCG does investigate reports of possible diversion or parallel trading involving those substances.

Hong Kong supports international efforts to prevent illicit chemical diversion, though tends to be less engaged when chemicals transiting Hong Kong are not controlled in the territory.

India

India's Narcotic Drugs and Psychotropic Substances Act (NDPS) provides the country's legislative framework to implement precursor chemical control obligations required by the 1988 UN Drug Convention. The Act requires control measures pertaining to finished pharmaceutical products as well as chemicals used to manufacture those products.

India regulates 19 of the 28 precursor substances scheduled in Tables I and II of the 1988 UN Drug Convention. Of the 19 substances, India's NDPS Act designates five as "Schedule A" (i.e., subject to the most stringent controls): acetic anhydride; ephedrine; pseudoephedrine; n-acetylanthranilic acid; and anthranilic acid.

India continues to participate in international precursor control initiatives such as the INCB-led Project Cohesion and Project Prism. Nevertheless, precursor chemical diversion from licit producers to illicit brokers remains a challenge. India-based precursor trafficking organizations are involved in the illicit exportation and domestic sale of precursor chemicals such as ephedrine and pseudoephedrine, both of which are used in the manufacture of methamphetamine.

To avoid Chinese controls on the export of precursors, DEA has observed entrepreneurs and dealers shift to India as their new source of supply for precursor chemicals and domestic production of drugs including fentanyl. Multi-ton shipments of precursor materials from India have been shipped to Africa and Mexico. This trend is expected to continue.

Republic of Korea (South Korea)

The Republic of Korea's well-developed commercial infrastructure renders it an attractive location for criminals to obtain and transship precursor chemicals. Precursor chemicals used to manufacture illicit drugs are imported from the United States, Japan, India, and China, and then either resold within South Korea or smuggled into other countries. In 2017, the most recent year for which data is available, South Korea imported approximately 38.25 MT of ephedrine, up from 28.5 MT in 2016, and approximately 37.75 MT of pseudoephedrine. As of September 2018, Korean authorities controlled 33 precursor chemicals, two more than in 2016. Acetic anhydride remains the chemical of greatest concern. The Republic of Korea imports acetic anhydride for legitimate use, such as film production, cigarette filters, and other industrial and medical applications. Law enforcement investigations have traced illicit acetic anhydride exports from South Korea to Pakistan and countries in the Middle East.

Both the Korea Customs Service and Ministry of Food and Drug Safety (MFDS) participate in INCB-led taskforces, including Projects Cohesion and Prism, which monitor imports of potassium permanganate and chemicals used to produce amphetamine-type stimulants. Korean law enforcement authorities also cooperated with Southeast Asian nations to verify documents and confirm the identities of importing businesses, including by physical inspection.

The National Assembly passed a law in 2011 requiring manufacturers and exporters of precursor chemicals to register with the government. The MFDS periodically provides training and updates to South Korean businesses to keep them from unknowingly exporting precursor chemicals to fraudulent importers.

Illegal precursor chemical shipments can be hidden by exploiting South Korean customs and chemical regulations. Most chemicals are shipped by containerized cargo via ocean freighters. The 1,000 kg reporting requirement threshold in the current regulations makes the Republic of Korea vulnerable to the "smurfing" of acetic anhydride – a diversion method in which smugglers make multiple small quantity purchases from different retail outlets to avoid detection, then combine them for shipment. South Korean authorities work closely with U.S. counterparts to track suspect shipments.

Singapore

Singapore's geographic advantage and robust port infrastructure contribute to its rank as one of the world's top trade hubs, including for the trade of precursor chemicals. The Government of Singapore continues to be a partner with the United States and other concerned countries in international chemical control initiatives to prevent the diversion of synthetic drug precursor chemicals, including ephedrine, pseudoephedrine and other essential primary chemicals, like potassium permanganate and acetic anhydride. Singapore is one of the largest distributors of

acetic anhydride in Asia. Used in film processing and the manufacture of plastics, pharmaceuticals, and industrial chemicals, acetic anhydride is also the primary acetylating agent for heroin.

Singapore does not produce ephedrine or pseudoephedrine; however, Singapore sees significant volumes of ephedrine and pseudoephedrine coming through its ports. In 2017, Singapore exported approximately 21 MT of pseudoephedrine (down from 35.29 MT in 2016) and 6.55 MT of ephedrine (down from 8.78 MT in 2016). Singapore imported approximately 23 MT of pseudoephedrine and 6.38 MT of ephedrine in 2017 (down from 37.6 MT and 10 MT in 2016).

Most of the ephedrine imported to Singapore originated from India and Taiwan, the bulk of which is then re-exported to Indonesia's pharmaceutical companies. The imported pseudoephedrine originates mostly from India, China, Germany, and Taiwan, and is also often re-exported to pharmaceutical companies in Indonesia. Singapore also exports both chemicals to Vietnam, Cambodia, Malaysia, and Nepal for pharmaceutical purposes. Ephedrine and pseudoephedrine that are not re-exported and remain in Singapore are used primarily by the domestic pharmaceutical industry.

In 2017, Singapore imported approximately 9.57 MT and exported 9.73 MT of acetic anhydride. Singapore imported 23.5 MT and exported 5.26 MT of potassium permanganate. Singapore uses potassium permanganate in the treatment of reclaimed water, rainwater, and seawater, which Singapore relies on for over 70 percent of its water supply.

Singapore imported 100 grams of phenyl-2-propanone in 2017. Singapore did not export any phenyl-2-propanone in 2016. Singapore did not import or export any ANPP and NPP, the two primary chemicals used to produce illicit fentanyl and fentanyl analogues. Since 2012, the Singapore Central Narcotics Bureau (CNB) had no diversion-related seizures of ephedrine and pseudoephedrine.

The CNB is the competent authority in Singapore for the 1988 UN Drug Convention and is tasked with undertaking measures to prevent the diversion of ephedrine and pseudoephedrine. All imports, exports and transshipments of these controlled substances require a permit from the CNB, and supporting documentation must be kept by the companies for a minimum of two years and made available for inspection by the CNB. Supporting documents may include invoice, sale contracts, and documentary proof from the competent authority of the exporting countries. The movement of these controlled substances is also tracked and monitored by CNB. If the permit application is approved, CNB will provide Pre-Export Notification or PEN-Online to the competent authority of the importing country for any exportation of substances.

Information on all goods imported and exported through Singapore's borders must be provided in advance to enable Singapore Customs, the Immigration and Checkpoints Authority or other controlling agencies to facilitate legitimate and secured trade through measures such as timely pre-clearance risk assessment. Singapore does not currently require advance cargo manifest information nor screen transshipments unless they involve conveyances from select countries of international concern, a Singapore consignee, or contain strategic or controlled items, including certain chemicals. However, Singapore is conducting a three-year trial of the World Customs

Organization's Cargo Targeting System that utilizes carriers' electronic cargo manifest data including transshipments to identify high-risk shipments across a variety of threats.

Singapore solicited carriers to provide data on a voluntary basis; as of October 2018, 11 shipping lines were transmitting manifest data electronically, representing over 50 percent of the cargo shipments in Singapore. In instances where precursor diversion for illicit drug manufacturing purposes was suspected, Singapore's authorities have assisted foreign law enforcement agencies. The Government of Singapore conducts site visits of companies dealing with controlled chemicals to ensure awareness of the requirements and overall compliance.

The Port of Singapore is the world's second busiest port in terms of shipping tonnage and is the world's busiest transshipment port. Singapore's authorities have never reported a diversion of precursor chemicals used in the manufacturing of methamphetamine from Singapore's pharmaceutical, biotechnology, and fine chemical industries, nor have they reported the seizure of any domestic clandestine methamphetamine laboratories.

Taiwan

The Taiwan Ministry of Economic Affairs Industrial Development Bureau imposes strict reporting requirements in tracking the production, distribution, sale, storage, and export/import of 25 of the 28 precursor chemicals scheduled under the 1988 UN Drug Convention. As of December 31, 2018, Taiwan's government had not imposed controls over ANPP and NPP. In January 2019, however, Taiwan's Ministry of Justice initiated a process to control these chemicals.

Taiwan's Food and Drug Administration (TFDA) supervises the trade and use of finished products containing ephedrine, pseudoephedrine, and other chemicals under the Controlled Drugs Act, including by end-users such as hospitals.

Thailand

Thailand is not a major source country for drug precursors, nor are precursors widely imported into Thailand. Domestic drug production is relatively limited. The major drug threat to Thailand is finished product, such as crystal methamphetamine and methamphetamine tablets.

According to Thai authorities, most chemicals and precursors are imported for legitimate medical and industrial purposes. For exports, Thai chemical companies sometimes do not adequately identify their potential customers and may not be fully aware of the intended use of chemical shipments.

The legal and regulatory framework for preventing the diversion of precursors is extensive and long-standing, beginning with the Commodity Control Act of 1952. More recently, Order 32/2599 (2016) of the National Council for Peace and Order introduced new regulations to monitor the import, export, production, trafficking, and possession of precursors and chemicals. Pre-export notification is conducted to mitigate diversion. The Precursor Chemical Control Committee, which has been in place since 1993, formulates national strategy on precursor

control. Thailand is compliant with the controlling chemicals listed under the 1998 UN Drug Convention.

In 2018, there were two noteworthy seizures of sodium cyanide totaling 18.5 MT. Sodium cyanide is a non-regulated base chemical used to produce benzyl cyanide, which is a U.S. List I precursor chemical. The chemicals were seized at the border, transiting through Thailand en route to Burma for possible use in methamphetamine production. Although stable in-shipment, sodium cyanide produces deadly hydrogen cyanide vapor when mixed with an acid.

Europe

Chemical diversion control within the EU is based upon EU regulations binding on all 28 member states. EU regulations meet the chemical control provisions of the 1988 UN Drug Convention, including provisions for record-keeping on transactions in controlled chemicals, a system of permits or declarations for exports and imports of regulated chemicals, and authority for governments to suspend chemical shipments. EU regulations are updated regularly and directly applicable in all EU member states.

EU regulations establish common risk management rules to counter chemical diversion at the EU's borders. Member states are responsible for investigating and prosecuting violators.

The U.S.-EU Chemical Control Agreement, signed May 28, 1997, is the formal basis for U.S. cooperation with the EU and its member states in chemical control through enhanced regulatory cooperation and mutual assistance. The agreement calls for annual meetings of a Joint Follow-up Group to review implementation of the agreement and to coordinate positions in other areas, such as national or joint positions on chemical control matters before larger multilateral fora, including the CND.

In December 2013, the EU adopted new basic legislation that strengthens controls on ephedrine and pseudoephedrine, and tightens controls on companies in the EU using acetic anhydride.

For external trade, the change strengthened controls on medicinal products containing ephedrine or pseudoephedrine exported from or transiting through the EU. The EU developed a new category of scheduled substances (Category 4), imposed mandatory export authorization and pre-export notification, and extended enforcement power to stop and seize cargo if there is "reasonable doubt" concerning the shipment. For trade within EU territory, compulsory registration of end-users for acetic anhydride was introduced by creating a new subcategory (2A). Additionally, a definition of "user" was added for natural or legal persons possessing substances for purposes other than placing them in the market.

Other amendments to the regulation to facilitate tracking and enforcement include: clarifying definitions for scheduled substance and natural products; strengthening the rules for licensing and registration by introducing explicit criteria for granting or refusing licenses and registrations; increasing the power of competent authorities to control non-scheduled substances; implementing a quick reaction mechanism to add new chemicals to the list of scheduled

substances via the so-called 'catch-all'-provision; and developing an EU database on drug precursors, and improving data protection provisions.

In 2015, a Commission Delegated Regulation and a Commission Implementing Regulation entered into force (replacing previous implementation legislation). These regulations complete the revision of the EU drug precursor legislation that started at the end of 2013. However, the EU is currently carrying out an evaluation of the EU drug precursor legislation. This is expected to be finalized by the end of 2019. If needed, the EU may introduce amendments to its drug precursor legislation. Additionally, on November 23, 2018, the EU introduced new legislation for a quick response to public health and social threats against NPS. The new legislation intends to strengthen the EU Early Warning System and risk assessment procedures on NPS and shortens control processes.

Bilateral chemical control cooperation continues between the United States and the EU as well as its member states. Many EU member states participate in voluntary initiatives such as Project Cohesion and Project Prism. In 2007, the EU established guidelines for private sector operators involved in trading in precursor chemicals, with a view to offering practical guidance on the implementation of the main provisions of EU legislation on precursor chemicals, in particular the prevention of illegal diversion. These guidelines, now titled “Guidelines for Operators – Drug Precursors' Control in the EU,” have been updated in 2017.

Germany

Germany continues to be a leading manufacturer of legal pharmaceuticals and chemicals that can be used to produce illicit drugs. According to the most recent available data from 2017, Germany was one of the largest global exporters of ephedrine (20.6 MT) and pseudoephedrine (259.1 MT), as reported by the Global Trade Atlas (GTA) database, which relies on statistics from the European Commission Statistics Office (Eurostat). Most of the 28 scheduled precursors under international control and listed in Tables I and II of the 1988 UN Drug Convention are manufactured and/or sold by the German chemical and pharmaceutical industry.

Germany's National Precursor Monitoring Act complies with EU regulations. Germany has a highly developed chemical sector, which is tightly controlled through a combination of national and EU regulations, law enforcement action, and voluntary industry compliance. Cooperation between the chemical and pharmaceutical industry, merchants, and German authorities is a key element in Germany's chemical control strategy.

Germany works closely with the UNODC, and is an active participant in chemical control initiatives led by the INCB, including Project Prism and Project Cohesion. The United States works closely with Germany's chemical regulatory agency, the Federal Institute for Drugs and Medical Devices, on chemical control issues and exchanges bilateral information to promote transnational chemical control initiatives. German agencies cooperate closely with their U.S. counterparts to identify and stop chemical precursor diversion.

The Netherlands

The Netherlands has a large chemical industry with large chemical storage facilities, and Rotterdam serves as a major chemical shipping port. The Netherlands has strong legislation and regulatory controls over the industry, and law enforcement authorities track domestic shipments and work closely with international partners. Trade in precursor chemicals is governed by the 1995 Act on the Prevention of Misuse of Chemicals to Prevent Abuse of Chemical Substances (WVMC), which aims to prevent the diversion of legal chemicals. Parliament approved minor legislative changes October 9, 2018, to bring the WVMC in line with changes in EU Regulation. Chemical substances are also governed under The Act on Economic Offences and the Opium Act, and EU regulations.

Production of synthetic drugs is significant in the Netherlands. Recent trends show an increase in new types of precursors and pre-precursors to circumvent national and international legislation. APAAN is used in amphetamine production and acetic anhydride is used as a pre-precursor for benzyl methyl ketone (BMK). Safrole continues to be used as a pre-precursor for piperonyl methyl ketone (PMK), though availability has decreased since 2014. The main (pre-) precursors used in the Netherlands are APAA, PMK, and BMK-glycidates.

In recent years, law enforcement, especially in the south, reinforced its efforts to combat synthetic drugs and pre-precursors.

The Financial Investigation Service (FIOD) of the Ministry of Finance oversees implementation of the WVMC and has responsibility for law enforcement efforts targeting precursors. Customs monitors the trade and production of chemicals.

The chemical industry is legally obliged to report suspicious transactions. The Netherlands abides by all EU regulations for drug precursors. The Netherlands an active participant and an initiator of the INCB-led Project Prism taskforce. The Dutch government also continues to work closely with the United States on precursor chemical controls and investigations. The Netherlands has had a memorandum of understanding with China since 2004 concerning chemical precursor investigations.

The Netherlands requires a license for the manufacture and trade of ephedrine. Relevant reports on suspicious transactions are shared nationally and internationally. The Netherlands also monitors a number of non-registered substances used in the production of methamphetamine.

Poland

Poland is both a transit country for drug trafficking and the source of production of synthetic drugs for Western European markets. Poland is one of the major source countries of amphetamine-type stimulants in the European market, and in recent years the production of methamphetamine has also emerged. The manufacturing process and the distribution of illicit drugs are handled by organized criminal syndicates, which establish, equip, and supply clandestine laboratories. Polish police have reported changes in the modus operandi of criminal

groups, which have started to divide amphetamine manufacturing into stages. These production stages take place in various locations, which tend to change frequently.

The 2005 Act on Counteracting Drug Addiction prohibits the production, import, and marketing of precursor chemicals in Poland. The State Sanitary Inspector exercises supervision over compliance with this prohibition. The division of roles and responsibilities for drug and chemical controls in Poland are delineated in a 2011 Memorandum of Understanding between the Chief Sanitary Inspector, Commander of the National Police, Customs Service Chief, and Chief Pharmaceutical Inspector. The memorandum lists the goals of the memorandum; general provisions; and applicable laws, procedures, and protocols for each entity, as well as information sharing agreements.

Poland's precursor chemical controls are governed by a number of national anti-drug laws, which also implement UN and EU requirements on chemical controls. Most recently, updated anti-drug regulations came into force, namely the Act of July 20, 2018, which amended the 2005 Act on Counteracting Drug Addiction and the Act on the State Sanitary Inspection, as well as the August 17, 2018, law regarding the Health Ministry's list of psychotropic substances, intoxicants and NPS. These recent amendments aim to strengthen the scope of NPS risk assessments, due to their growing availability.

The Ministry of Health's State Sanitary Inspector and State Pharmaceutical Inspector are the lead entities in implementing drug and chemical controls. The State Sanitary Inspector is in charge of controls for category 2 and 3 drug precursors (such as permanganate and acetic anhydride), and supervises manufacturing, importation, and commercial entities associated with handling these substances. The State Pharmaceutical Inspector is the competent authority in controlling category one drug precursors (such as ephedrine and pseudoephedrine) and supervises manufacturing, importation, and commercial entities associated with handling these substances. In situations of possible illegal handling of said precursors, the relevant Chief Inspectors notify the Central Bureau of Investigation Police (CBŚP). In 2015, an amendment to the 2001 Pharmaceutical Law came into force, restricting the sale of over-the-counter medical products containing psychoactive substances (including pseudoephedrine).

According to the September 6, 2001, Pharmaceutical Law, manufacturers, importers, and distributors of pharmaceutical substances must be an approved business entity on Poland's National Register of manufacturers, importers, and distributors of active substances, run by the State Pharmaceutical Inspector. A business entity wanting to enter the market must apply for a license, and the State Pharmaceutical Inspector will conduct an inspection of the business entity within 60 days. If approved, the business entity can be registered and begin operating. The State Pharmaceutical Inspector conducts control audits on all registered entities every three years thereafter. Poland's National Registry complies with EU-Directive 2011/62/EU relating to medicinal products for human use.

Polish law enforcement activities are mainly focused on the detection and prevention of the illegal production of synthetic stimulants, including the control of precursors and pre-precursors. These activities are coordinated by the Central Bureau of Investigation Police (CBŚP), in close cooperation with the State Sanitary Service. In 2016, police reportedly dismantled 24

laboratories: 18 for the production of amphetamine; three for methamphetamine; two for mephedrone; and one producing an NPS (4-CMC). In July 2017, CBŚP, in cooperation with the State Sanitary Inspection, dismantled a laboratory producing 4-chlorometcatinone (4-CMC), seizing a total of 128 kg of substances in various stages of production, including over 56 kg of finished product.

While retail shops selling NPS are actively identified and shut down, challenges persist with online sellers of NPS within Poland. The State Sanitary Inspectorate have also found difficulties in prosecuting transnational crimes outside the EU concerning illegal chemical product trade through e-commerce.

The Republic of Poland enters information into the PEN system for all exports and imports of drug precursors. This information is forwarded to the International Narcotics Control Board by the Main Pharmaceutical Inspector in cooperation with the Chief Sanitary Inspector.

Switzerland

The Government of Switzerland continues to be a strong partner with the United States and other concerned countries in international chemical control initiatives to prevent the diversion of synthetic drug precursor chemicals, including ephedrine and pseudoephedrine, and other primarily essential chemicals, including potassium permanganate and acetic anhydride. Switzerland is a significant importer and exporter of ephedrine and pseudoephedrine.

In 2017, according to the most recent available U.S. data, Switzerland imported approximately 70.94 MT of pseudoephedrine (2nd largest importer) and 1.8 MT of ephedrine (19th largest importer). Switzerland exported approximately 47.3 MT of pseudoephedrine (4th largest exporter) and 178 kg of ephedrine (5th largest exporter) during the same period. Data from Swiss Customs shows negligible differences in the amounts listed above, with the exception of ephedrine imports, which Swiss Customs data lists at just 176 kg for 2017.

Swiss control measures concerning precursor chemicals such as ephedrine and pseudoephedrine are governed by the Federal Narcotics Control Ordinance and the Federal Department of Home Affairs' Ordinance on the Directory of Narcotics. The Ordinances require importers and exporters of ephedrine and pseudoephedrine to obtain a license from Swissmedic, Switzerland's relevant regulatory authority, and require chemical manufacturers to provide "end user" certificates. To more effectively deter illegal dissemination of these precursor chemicals, regulations were enacted in October 2017 requiring a license and "end user" certificates for import or export of preparations containing these precursor chemicals. In 2018, there were no significant changes reported to Swiss legislation regarding import and export of these substances.

Switzerland participates in multilateral chemical control initiatives led by the INCB, including Project Prism and Project Cohesion. Switzerland also participates in the International Import and Export Authorization System (I2ES), which facilitates effective implementation of import and export authorization systems for legal international trade in narcotic drugs and psychotropic substances.

Swiss law enforcement agencies have established close cooperation with the Swiss chemical manufacturing and trading industries and counterparts in major chemical manufacturing and trading countries. This cooperation includes information exchanges in support of chemical control programs and in the investigation of diversion attempts. Cooperation between U.S. and Swiss law enforcement agencies on chemical control related issues is excellent, particularly with the Swiss Federal Criminal Police.

The United Kingdom

The UK is a leading producer of precursor chemicals commonly used to manufacture illicit drugs. However, because the UK applies a strict regulatory regime to control the production and trade of precursor chemicals, only relatively small amounts of these chemicals are believed to be diverted for illicit use. Between January 2017 and early 2018, the UK Border Force seized over two metric tons of precursor chemicals destined for northwest England intended for the illicit manufacture of amphetamine-type stimulants and methamphetamine. Law enforcement authorities estimate that this volume of chemicals had the potential to produce as much as two metric tons of unadulterated amphetamine sulphate, with an estimated street value of over \$51 million. The United States and United Kingdom cooperate closely in international bodies to promote global regulation of precursor chemical.

Middle East

Egypt

Egypt oversees the import and export of all internationally-recognized chemicals through a committee composed of the Ministry of Interior (ANGA), Ministry of Finance (Customs), and Ministry of Health (Pharmaceutical). This committee approves or denies requests to import or export chemicals. Over the past few years, there was a spike in the importation of ephedrine. With the large amounts of ephedrine imported relative to the population of Egypt, it is possible that not all of it is used for legitimate medicinal production. However, the Egyptian government has not reported any large scale diversion of ephedrine or observed any increase in the use of methamphetamine.

During 2018, there was an increase in the amount of tramadol seized by the Egyptian government at the ports. There was also an increase in the amount of heroin smuggled into the country, as well as a rise in new drugs combining aromatic plants – such as marjoram or incense – infused with synthetic cannabinoids up to 100 times as powerful as natural marijuana.

United Arab Emirates

The United Arab Emirates (UAE) is a major cargo transshipment point, and therefore an ideal transit point for precursor chemicals used to produce illicit drugs. UAE chemical controls and customs regulations are based on international conventions, Gulf Cooperation Council guidelines, and local laws and ordinances. In the UAE, the Ministry of Health (MOH), Ministry of Climate Change and Environment, and the Export Control Executive Office are responsible for the licensing of export and transshipment of controlled chemicals. UAE authorities adhere to

UN conventions related to the shipment of chemical precursors and other commodities through established licensing procedures.

According to UAE Ministerial Decree No. 1986 issued in 1995, the MOH must approve the import of chemicals listed in the 1988 UN Drug Convention, which includes ANPP, NPP, potassium permanganate, and acetic anhydride. The UAE signed onto and implemented the convention in May 1990 with publication in the official gazette. According to the 2015 GCC Unified Guide for Customs Procedures at First Points of Entry, shipments of restricted goods must include approvals and authorizations from the competent authorities. These shipments must also include the Harmonized System codes for hazardous goods and chemicals on the packing list.

In August 2007, the UAE government enacted Federal Law Number 13 of 2007, which bans the export or re-export of certain strategic and controlled items and established penalties for parties involved in the diversion of controlled shipments, including chemical and biological materials. The law authorizes government bodies to restrict or ban the import, export, or re-export of goods deemed a threat to UAE national security, foreign policy, natural resources, public health and safety, or the environment.

On January 7, 2018, the MOH issued a ministerial decree updating the list of banned medications, narcotics, and psychotropic drugs. The MOH cited concerns over individuals importing large quantities of controlled drugs potentially destined for resale rather than personal use. Pharmacy law No. 4 of 1983 and Narcotics Law No. 14 of 1995 warn travelers entering the UAE against bringing in controlled or psychotropic medicines and illegal narcotics. On February 10, 2018, the Anti-Narcotics Council approved strategic indicators for combatting drugs in order to intensify drug enforcement efforts.

Transshipment of methamphetamine and cocaine precursors is virtually non-existent in UAE ports. However, the UAE is a crossroads for methamphetamine from Iran, heroin from Afghanistan, and cocaine from Latin America, in the form of finished product. Traffickers generally prefer to use larger ports in order to increase the odds of evading detection due to the large shipping volume at such ports. Dubai's Jebel Ali Port is the largest container port in the Middle East and the ninth largest in the world, with a total volume of 15.4 million twenty-foot equivalent units (TEU) in 2017 and capacity of approximately 20 million TEU. The Dubai Airport Free Zone (DAFZA) and Dubai International Airport Cargo Gateway, formerly Dubai Cargo Village, handled 1.74 million tons of freight in 2017 and the Al Maktoum Airport (DWC) 972,295 tons of air cargo in 2017.

Significant Illicit Drug Manufacturing Countries

This section is also broken down by region and focuses on illicit drug manufacturing countries, their chemical control policies, and related efforts.

Asia

Afghanistan

Inadequate border security and weak enforcement capacity hamper control of precursor chemicals in Afghanistan.

Both acetic anhydride and ammonium nitrate are illegal in Afghanistan and have no legitimate uses. Hydrochloric acid, acetone, and sulfuric acid are controlled substances and subject to seizure for other reasons, such as customs violations. Ammonium chloride is not illegal, but if found at a laboratory site, Afghan authorities seize and destroy it. Since 2013, the United States has supported the UNODC Container Control Program (CCP) to develop units in Kabul and at key ports of entry on Afghanistan's borders with Pakistan, Uzbekistan, Tajikistan, and Iran. Through training and assistance, CCP promotes effective container controls to prevent drug trafficking and other illicit activities and to facilitate legitimate trade. The program enables effective information sharing with other countries participating in CCP, especially the neighboring Central Asian states.

The Precursor Control Unit (PCU) of the Counter Narcotics Police of Afghanistan is a specialized unit devoted to combating the precursor problem. Afghanistan uses the INCB's PICS to enhance information sharing between national authorities on precursor incidents. The PCU communicates directly with the Central Asian Regional Information and Coordination Center for Combating Illicit Trafficking of Narcotic Drugs, Psychotropic Substances and their Precursors as well as the Pre-Export Notification system. Beginning in early 2016, the United States funded capacity building for regional PCU staff through a UNODC training program.

Afghanistan maintains a Drug Regulation Committee (DRC) to monitor and regulate the licit precursor chemical trade. The DRC licenses chemicals for licit use and stores data on the use of chemicals so authorities can better understand emerging trends. The DRC also authorizes investigations and spot checks on companies importing chemicals.

Burma

The illicit production and export of synthetic drugs in Burma continued to increase in 2018, and Shan State has become the locus of synthetic drug production in the region. The fact that Burma does not have a major chemical industry and does not manufacture the precursor chemicals necessary to produce heroin and ATS on an industrial scale indicates the sheer volume of essential and precursor chemicals smuggled into the country from elsewhere.

Organized criminal syndicates transport precursor chemicals into Burma across porous borders primarily from China, and to a lesser degree from Thailand and India. The precursor chemicals are then diverted to clandestine laboratories and refineries in regions of northern and eastern Shan State that are under the control of armed ethnic groups or militias. Recent record-breaking seizures along the Burmese-Thai border indicate the establishment of numerous clandestine laboratories in key transit towns on the Burmese side of the border. The best available information suggests that significant methamphetamine production takes place in clandestine laboratories that operate in the Wa Self-Administered Division in Shan State.

The Supervision Committee for the Control of Precursor Chemicals, which functions within the Central Committee for Drug Abuse Control (CCDAC), monitors the possession, use, sale, production, and transportation of chemical precursors. Importers of licit chemicals are required to use a pre-import notification system to obtain a certificate of verification from the CCDAC, and retailers must also apply for a certificate to transport chemicals across and within Burma's borders. After the Committee added two precursors (ANPP and NPP) in 2017, there are now 28 identified precursor chemicals prohibited for import, sale or use in Burma.

However, authorities faced overwhelming challenges that fundamentally limited their ability to control the illicit import and diversion of precursor chemicals for use in the production of illegal narcotics. The most significant of these challenges involve extremely porous borders, particularly those portions of the border in eastern Shan State that are not under government control. A UNODC finding showed that 70 percent of law enforcement officials in border areas had not received any specialized training to police cross-border crimes, nor any training on how to conduct presumptive drug and precursor tests in the field.

During the first nine months of 2018, Burmese authorities reported seizing 450,000 tablets of pseudoephedrine; 18.66 metric tons of caffeine powder; 47,787 liters of sulfuric acid; 165,733 liters of hydrochloric acid; 190,578.25 liters of ethyl ether; and 75,450.15 liters of sodium hydroxide. Burma is a party to the 1988 UN Drug Convention, but has not instituted laws to meet all of the UN chemical control provisions.

The United States funds UNODC's support for Border Liaison Offices to strengthen border management. This program includes capacity-building trainings for frontline officers on effective uses of field test kits, training-of-trainers courses, and delivery of field test kits. UNODC, also with U.S. support, hosted a High-Level Asia Regional Conference on Precursor Control in November 2018. Heads of law enforcement agencies from ASEAN and neighboring countries shared information and discussed steps needed to establish a coordinated response to precursor chemical diversion and trafficking in the Asia-Pacific region.

Indonesia

Indonesia's 2009 National Narcotics Law gave the country's National Narcotics Board of Republic of Indonesia (BNN) the authority to monitor narcotics and precursor production at pharmaceutical plants, and to conduct investigations and arrests in response to precursor and narcotics violations. Although there were several laws and regulations regarding the import and export of precursor chemicals, the extent of enforcement was largely unknown.

Regarding the two most widely sought-after precursor chemicals used for cocaine and heroin production – potassium permanganate (cocaine) and acetic anhydride (heroin) – the United States was unaware of a single seizure in 2018 by Indonesian law enforcement. BNN reported that it regularly conducts unannounced inspections to companies that are listed importers of precursor chemicals. In the past year, BNN hired an additional 300 personnel.

Every year, through the Ministry of Health, Indonesia reports estimates of its legal domestic narcotics precursors to the International Narcotics Control Board. The bulk of precursors comes

in via ocean routes from China, Taiwan, and India; however, Indonesia is not a prime destination for precursors, as the vast majority of illegal narcotics is not manufactured within country.

Pakistan

Pakistan is a destination and transshipment point for diverted shipments of acetic anhydride and other precursor chemicals used in the production of heroin and amphetamine-type stimulants. Pakistan does not domestically produce industrial-scale quantities of either acetic anhydride or ephedrine, though it has chemical and pharmaceutical industries with a legitimate, albeit modest, demand for these substances.

Pakistan enforces a basic precursor control regime as part of its obligations under the UN drug control conventions, covering the import of seven multi-use chemicals: acetic anhydride; pseudoephedrine; anthranilic acid; acetone; potassium permanganate; methyl-ethyl ketone; and toluene. The country's Anti-Narcotics Force (ANF) is charged with managing precursor control and does so largely by conducting ground checks on importing businesses, licensing those businesses, and reviewing Pre-Export Notifications (PENs) requesting the sale of these substances within Pakistan. Besides ANF, 15 federal and provincial agencies share responsibility for chemical control throughout the country. Per UN Commission on Narcotic Drugs Resolution 49/3, ANF established two review committees to manage the precursor control mechanism, the Committee for Granting Non Objection Certificates to Companies and Firms for Use of Precursor Chemicals and the Committee for Quota Allocation to Pharmaceutical Companies.

During the first nine months of 2018, ANF received 63 PENs, approving 54 and denying nine. It is likely that significant imports of precursor chemicals circumvent the PENs system via mislabeled shipping containers and by maritime smuggling along Pakistan's coastline. During the first nine months of 2018, ANF reported seizing 4,283 liters of acetic anhydride.

In 2018, both ANF and Pakistani Customs continued to submit information via the International Narcotics Control Board Precursor Incident Communication System, which distributes real-time information on precursor seizures to law enforcement agencies worldwide.

The Andean Region

Bolivia

Bolivia's government passed a Controlled Substances Law in March 2017 that schedules precursor chemicals in coordination with the International Narcotic Control Board. Precursor chemicals continue to be diverted through black market channels into Bolivia for processing cocaine. According to the Chemical Substances Investigations Group (GISUQ) of the Bolivian counterdrug police (FELCN), the majority of these chemicals come from Brazil, Argentina and Chile.

The most common chemicals seized as contraband match those commonly found in drug factories (where base paste is prepared) and cocaine labs (where base paste is transformed into

cocaine HCl). In addition to serving as a transit country for illicit drug shipments, Bolivia is also a source country for coca and cocaine processing. The number of labs within Bolivia that process Peruvian base paste and Bolivian base paste into cocaine has significantly increased over the last five years. The most common chemicals found in cocaine factories and labs are sulfuric acid; hydrochloric acid; sodium carbonate; caustic soda; phenacetin; sodium metabisulfite; activated carbon; ethyl acetate; and levamisole. The last five products are not listed as controlled substances under Bolivian law, and GISUQ believes they are alternative chemicals that drug producers use to avoid law enforcement controls. Traffickers use activated carbon to deodorize and discolor water and other liquids, and phenacetin, a highly toxic analgesic, is used to increase the volume of cocaine.

The GISUQ is charged with locating and interdicting chemicals used in the traditional cocaine process, such as sulfuric acid, hydrochloric acid, and gasoline. The GISUQ coordinates activities with the General Directorate for Controlled Substances, a civilian entity under the Government of Bolivia that administers and licenses the commercialization and transport of controlled substances listed under Bolivian domestic law. Under the Controlled Substances Law, violation of controlled substances could result in penal action against all participants, a change from the old law wherein unlicensed transport and commercialization generated only an administrative violation. The new law provides the legal framework for GISUQ, in coordination with other agencies, to add or eliminate chemical substances controlled under Bolivian law.

The Bolivian government does not have control regimes for ephedrine and pseudoephedrine. The GISUQ, however, coordinates with the Ministry of Health to supervise and interdict illegal commercialization of methamphetamine. In September 2016, the Ministry of Health created the State Agency of Medicines and Health Technologies to regulate the use and commercialization of synthetic drugs.

In 2018, the GISUQ seized 236.8 MT of solid substances and 597,210 liters of liquid precursor chemicals.

Colombia

Precursor chemical diversion in Colombia is a serious problem that the government is working to address. The Colombian government has tightened controls on coca-processing chemicals, though traffickers still are able to import them illicitly into Colombia. Colombian police and military forces have stepped up enforcement efforts. The Ministry of Justice reported that during the first nine months of 2018, the Colombian National Police (CNP) and military forces seized 18,681 MT of solid precursors and 3,815,216 gallons of liquid precursors.

The Colombian government controls the import and distribution of chemicals needed for processing coca leaves into cocaine, such as sulfuric acid, hydrochloride acid, and potassium permanganate, as well as cement. It limits production, distribution, and storage of precursors nationwide and prohibits gasoline and other chemicals in certain zones. Additionally, Colombian companies are not authorized to export ephedrine or pseudoephedrine in bulk form. Colombian law bans all pharmaceutical products containing ephedrine or pseudoephedrine from domestic distribution.

Since 2015, the government has focused on regulating essential chemicals for drug production and has expanded its enforcement efforts related to these chemicals. Also in 2015, the government began implementing the Information System for the Control of Substances and Chemical Products (SICOQ), a tracking tool that the CNP and the Ministry of Justice developed to strengthen the control of chemicals in real time. In October 2018, more than 5,811 companies were registered in the platform, which allows the government to track the movement of chemicals. However, of the over 5000 registered companies, only 3,330 have valid government-issued authorizations for the legal use of controlled substances and chemical products as of October 26, 2018. The remainder either have not yet been inspected or must provide additional information regarding their use of chemicals in their businesses.

While the Colombian government has strengthened chemical-control legislation, traffickers are still able to camouflage precursors to import them clandestinely into Colombia. Although chemical companies require government permission to import or export specific chemicals and controlled substances, the CNP have the burden to prove seized chemicals were intended for illicit drug production. Further, to bring U.S. charges against an illicit chemical trafficker, the CNP must be able to prove that the trafficker had knowledge that the chemicals seized were going to produce drugs that would end up in the United States. Additionally, traffickers and clandestine laboratories recycle controlled chemicals and replace controlled chemicals with non-controlled chemicals.

The CNP created a special unit specifically tasked with the interdiction of precursor chemicals. The Colombian Marines have also increased their efforts against precursor chemicals traveling via rivers, particularly in the Department of Nariño, the department that produces the most coca and cocaine in Colombia. Nariño has over 745 miles of rivers and few roads connecting it to the rest of the country, making the riverine route the most attractive option for precursor traffickers. Recognizing this challenge, the Colombian Marines have increased the operational tempo on the rivers to better cover riverine chokepoints, areas through which traffickers must cross to move illicit chemicals.

Peru

Peru is a producer and major importer of chemicals essential to cocaine production. Chemicals are principally imported into Peru licitly by wholesalers through the Port of Callao and are later diverted for illicit purposes by smaller actors for cocaine production. Peru requires all chemical sector entities to obtain a license.

Peru's authority to regulate the precursor chemicals used in illicit drug production is based on Legislative Decree 1126 and the regulation set forth in Supreme Decree 010-2015EF, which establish protocols for sanctions and fines related to the chemical industry. However, Supreme Decree 010-2015EF is not effectively enforced. The National Superintendence of Tax Administration (SUNAT) is the regulatory agency handling all issues related to the chemical industry, but SUNAT does not have law enforcement powers and is limited to investigative activities. SUNAT coordinates with the Peruvian National Police (PNP) to combat diversion of precursor chemicals.

The PNP's Precursor Chemical Unit, DEPCIQ, reported an increase in PNP seizures of precursor chemicals over the first nine month of 2018 in comparison to the same period in 2017 – from 7,826 MT in 2017 to 8,199 MT. Peru continued to implement the 2015 Precursor Chemicals Initiative to cover approximately 70 percent of roads in the VRAEM, the Peru-Bolivia border, as well as the Junín, Ayacucho, and Lima regions, utilizing 12 backscatter x-ray scanners in strategic corridor routes.

Alleged corruption within SUNAT and the PNP fosters mistrust between the entities, leading to an unwillingness by either to share investigative information related to precursor chemicals.

The Ministry of Health manages estimates of Peru's INCB licit demand for ephedrine, pseudoephedrine, and P-2-P. The Ministry's Health Department does not have a regulatory or enforcement arm to prevent the diversion of chemicals. According to INCB records, Peru does not have strict controls to prevent the diversion of ephedrine, pseudoephedrine, and P-2-P. Indications suggest that ephedrine and pseudoephedrine are entering the country in larger quantities than required by the INCB assessment.

Major Exporters and Importers of Pseudoephedrine and Ephedrine (Section 722, Combat Methamphetamine Epidemic Act "CMEA")

This section of the INCSR is produced in response to the CMEA's Section 722 requirement to report on the five major importing and exporting countries of the identified methamphetamine precursor chemicals. In meeting the CMEA requirements, the Department of State and DEA considered the chemicals involved and the available data on their export, import, worldwide production, and the known legitimate demand. The available data does not address illicit trafficking and production.

Ephedrine and pseudoephedrine are no longer the preferred chemicals for methamphetamine production shipped to the United States, since traffickers are increasingly using substitutes or pre-precursors. The phenomenon of substitute chemicals used in methamphetamine production is particularly observed in Mexico, where the nitrostyrene method is used to produce P-2-P, which starts from benzaldehyde and nitroethane, or from the intermediary product 1-phenyl-2-nitropropene, and in Europe, where the method using APAAN, are largely used. Phenylpropanolamine, a third chemical listed in the CMEA, is not a methamphetamine precursor, although it can be used as an amphetamine precursor.

In 2000, the FDA issued warnings concerning significant health risks associated with phenylpropanolamine. As a result, phenylpropanolamine is no longer approved for human consumption. Phenylpropanolamine is still imported for veterinary medicines, and for the conversion to amphetamine for the legitimate manufacture of pharmaceutical products. Phenylpropanolamine is not a methamphetamine precursor chemical, and trade and production data are not available on phenylpropanolamine. Therefore, this section provides information only on ephedrine and pseudoephedrine.

The Global Trade Atlas (GTA), compiled by Global Trade Information Services, Inc. (WWW.GTIS.COM), provides export and import data for ephedrine and pseudoephedrine collected from major trading countries. However, given the reporting cycles by participating countries, data often lags behind one year. The most recent year for which full-year data is available is 2017. The data, including data from the previous year, is continually revised as countries review and revise their data. GTA data analysis and a chart identifying the sources of the data are presented in the tables at the end of this section.

During the preparation of the 2018 CMEA report, GTA data for U.S. exports and imports for both ephedrine and pseudoephedrine for calendar years 2014-2016 were updated in light of revised estimates provided by DEA. For the 2019 CMEA report, GTA data for U.S. exports and imports for both ephedrine and pseudoephedrine for calendar years 2015-2017 were also updated in light of revised estimates provided by DEA.

Obtaining data on legitimate demand also remains problematic. Such data is still not sufficient to enable any accurate estimates of diversion, or to comply with the economic and compliance analyses required by the CMEA report. There are significant numbers of countries that have yet to report regularly to the INCB on their reasonable estimates about the trade in the end products that form the basis of legitimate demand – although each year the number of countries reporting increases.

Nevertheless, many countries do not report trade in ephedrine and pseudoephedrine when it is incorporated into a finished pharmaceutical product, in the form of finished dosage units such as liquids, tablets, and capsules, due to concerns that this type of information is commercially sensitive. Further challenges include governments that may not be able to ascertain this data if, for example, they do not subject pharmaceutical preparations to national control, or if a different ministry with different or less stringent means of oversight regulates preparations versus bulk chemicals.

Ephedrine and pseudoephedrine pharmaceutical products are not specifically listed chemicals under the 1988 UN Drug Convention. Therefore, reporting licit market trade and demand for ephedrine and pseudoephedrine as well pharmaceutical products derived from them is voluntary. Even so, the trend toward better reporting has been positive.

Thus far, the economic analysis required by the CMEA remains challenging because of outdated, insufficient, and unreliable data. Often the collection and reporting of such data requires a regulatory infrastructure that is beyond the means of some governments. It is also important to note that not all countries are familiar with the methodology and data sources used by the GTA to report the final numbers and some countries dispute the accuracy of the data. This increases the difficulty of comparing import or export totals across years. It remains challenging to determine with precision the top-five countries exporting and importing the largest amount of pseudoephedrine and ephedrine.

Nevertheless, the United States will continue to urge countries in diplomatic and technical fora – in both bilateral and multilateral settings – to provide reporting on their licit domestic requirements for methamphetamine precursor chemicals to the INCB. The United States will

also continue to work with the INCB and with authorities in the reporting countries to secure explanations for anomalies between reported imports and reported licit domestic requirements, and to follow the development of other chemicals used in the production of methamphetamine.

This report provides export and import figures for both ephedrine and pseudoephedrine for calendar years 2015-2017. The report illustrates the wide annual shifts that can occur in some countries, reflecting such commercial factors as demand, pricing, and inventory buildup. GTA data on U.S. exports and imports have been included to indicate the importance of the United States in international pseudoephedrine and ephedrine trade. Complete data on the worldwide production of pseudoephedrine and ephedrine are not available because major producers will not release this proprietary data.

CMEA Trade data. All units in kilograms (KG).

Top Five Exporting Countries and the United States Ephedrine and Its Salts 2015-2017 (GTA Annual Series Ending Dec 2017)				
Reporting Country	Unit	Quantities		
		2015	2016	2017
India	KG	70,479	80,274	72,829
Italy	KG	729	567	32,824
Germany	KG	19,476	21,894	20,575
China	KG	3,778	3,259	10,963
Singapore	KG	8,875	8,650	6,551
Top Five Total		103,337	114,644	143,742
United States (GTA)	KG	841	2,382	66
United States (DEA)	KG	2	0	1.8

Analysis of Export Data: The top-five exporters of ephedrine in 2017 were India, Italy, Germany, China, and Singapore. According to the Global Trade Atlas (GTA) database, ephedrine exports increase 20.24 percent in 2017, due to a substantial increase in exports from Italy and China. India's exports had a 10.22 percent decrease; going from 80,274 kg in 2016 to 72,829 kg in 2017. The country continues to rank as the top global exporter of ephedrine for this year's report. Italy increased its export from 567 kg in 2016 to 32,824 in 2017, a 98.27 percent increase. The reason for this increase is unknown. China now appears as the fourth top exporter of ephedrine, going from 3,259 kg in 2016 to 10,963 kg in 2017; a 70.27 percent increase. The top-five economies in 2016 were: India, Germany, the UK, Singapore, and Switzerland.

According to the most current information provided by the Drug Enforcement Administration (DEA), U.S. exports were 2 kg in 2015, 0 kg in 2016, and 1.8 kg in 2017. For the purposes of this report, we have relied on the data provided by DEA.

Top Five Exporting Countries and the United States Pseudoephedrine and Its Salts 2015-2017 (GTA Annual Series Ending Dec 2017)

Reporting Country	Unit	Quantities		
		2015	2016	2017
India	KG	355,351	434,307	432,167
Germany	KG	313,715	276,862	259,078
United Kingdom	KG	220,663	268,156	185,142
Switzerland	KG	39,338	33,027	47,298
China	KG	68,144	30,530	42,539
Top Five Total		997,211	1,042,882	966,224
United States (GTA)	KG	1,275	18,281	1,424
United States (DEA)	KG	23,870	26,327	22,638

Analysis of Export Data: According to the GTA database, the aggregated volume of worldwide exports of pseudoephedrine for the 2017 top-five exporters slightly decreased from 1,042,882 kg in 2016 to 966,224 kg in 2017; a 7.93 percent decrease. The top-five exporters of pseudoephedrine in 2017 were India, Germany, the UK, Switzerland, and China. In 2016, the top-five economies were India, Germany, the UK, Singapore, and Switzerland. Only Switzerland and China increased their pseudoephedrine exports in 2017. Switzerland exports increased from 33,027 kg in 2016 to 47,298 kg in 2017; a 30.17 percent increase. By the same token, China exports increased between 2016 and 2017, going from 30,530 to 42,539; a 28.23 percent increase. India, Germany, and the UK's exports dropped .5 percent, 6.86 percent, and 44.84 percent respectively.

According to the most current information provided by the DEA, the United States increased its pseudoephedrine exports from 23,870 kg in 2015 to 26,327, a 9.33 percent increase. In 2017, the United States decreased its pseudoephedrine exports from 26,327 kg in 2016 to 22,638 kg, a 14.01 percent decrease.

Top Five Importing Countries and the United States Ephedrine and Its Salts 2015-2017 (GTA Annual Series Ending Dec 2017)				
Reporting Country	Unit	Quantities		
		2015	2016	2017
Republic of Korea	KG	23,354	28,504	38,313
Indonesia	KG	39,008	32,306	33,955
India	KG	39,811	16,002	27,088
Egypt	KG	15,219	86,775	11,491
Taiwan	KG	10,123	8,851	8,850
Top Five Total		127,515	172,438	119,697
United States (GTA)	KG	149,235	178,429	23,500
United States (DEA)	KG	3,093	3,494	2,789

Analysis of Import Data: According to the GTA database, the top-five ephedrine importers in 2017 were Republic of Korea, Indonesia, India, Egypt, and Taiwan. The Republic of Korea has appeared this year as the top ephedrine importer. The country had a 25.60 percent increase in ephedrine importation, going from 28,504 kg to 38,313 kg. The reason for such importation increase is unknown. Indonesia and India also increased their ephedrine importation. Egypt's imports significantly decreased, going from 86,775 kg in 2016 to 11,491 kg in 2017; a 655.16 percent decrease. Taiwan appears fifth in 2017, with no major variations between 2016 and 2017. Greece, Egypt, Republic of Korea, Spain, and Switzerland were the top-five ephedrine importers in 2016.

According to the most current information provided by DEA, U.S. ephedrine imports decreased from 3,494 kg in 2016 to 2,789 kg in 2017, a 20.18 percent decrease.

Top Five Importing Countries and the United States Pseudoephedrine and Its Salts 2015-2017 (GTA Annual Series Ending Dec 2017)				
Reporting Country	Unit	Quantities		
		2015	2016	2017
Switzerland	KG	56,466	49,965	70,938
Greece	KG	48,750	15,756	66,886
Turkey	KG	33,086	39,137	45,848
France	KG	41,682	34,209	43,336
Republic of Korea	KG	33,593	37,002	37,753
Top Five Total		213,577	176,069	264,761
United States (GTA)	KG	145,310	163,464	123,512
United States (DEA)	KG	153,959	173,752	126,683

Analysis of Import Data: According to the GTA database, the quantity of pseudoephedrine imported by the top-five importers has increased in 2017. The aggregated amount of pseudoephedrine imported by the top-five economies in 2017 was 264,761 kg; a 33.50 percent increase compared to 2016. Switzerland imports went from 49,965 in 2016 to 70,938 in 2017, a 29.57 percent increase. According to the same database, in 2016, Greece originally reported the importation of 1,409,807 kg of pseudoephedrine. However, that amount has been corrected by GTA to 15,756 kg. Based on the latest GTA information, Greece has increased its pseudoephedrine importation from 15,756 kg in 2016 to 66,886 in 2017, a 76.44 percent increase. The reason for this increase is unknown.

The top-five pseudoephedrine importers in 2017 were Switzerland, Greece, Turkey, France, and Republic of Korea. In 2017, all top-five importing economies increased their pseudoephedrine imports. The 2016 list was Greece, Switzerland, Indonesia, Turkey, and Republic of Korea.

According to the most current information provided by DEA, U.S. imports decreased from 173,752 kg in 2016 to 126,683 kg in 2017, a 27.09 percent decrease. It should be noted that the United States no longer bulk manufactures pseudoephedrine.

INCB Tables on Licit Requirements

Annual legitimate requirements (ALR) as reported by Governments for imports of ephedrine, pseudoephedrine, 3,4-methylenedioxyphenyl-2-propanone, 1-phenyl-2-propanone and their preparations

Status: 8 October 2018

<i>Country or territory</i>	<i>Ephedrine</i>	<i>Ephedrine preparations</i>	<i>Pseudoephedrine</i>	<i>Pseudoephedrine preparations</i>	<i>3,4-MDP-2-P^a</i>	<i>P-2-P^b</i>
Afghanistan	0	40	0	2 000	0	0
Albania	45	0	5	0	0	0
Algeria	20		17 000		0	1
Argentina	45	0	25 098	175	0	0
Armenia	0	0	0	0	0	0
<i>Ascension Island</i>	0	0	0	0	0	0
Australia	5	8	4 800	1 680	0	1
Austria	130	1	1	1	1	1
Azerbaijan	20		10		0	0
Bahrain	1	10	1	850	0	0
Bangladesh	200		0		0	0
Barbados	200		200	58	0 ⁱ	
Belarus	0	25	20	20	0	0
Belgium	600	100	9 000	8 000	0	5
Belize			P	P	0 ⁱ	
Benin	2	3	8	22	0 ⁱ	
Bhutan	0	0	0	0	0	0
Bolivia	25	1	600	755	0	0
Bosnia and Herzegovina	1	2	1 810	1 532	0	0
Botswana	300				0 ⁱ	
Brazil	1 200 ^c	0	33 000	0	0	0
Brunei Darussalam	0	1	0	16	0	0
Bulgaria	1 098	296	20	0	0	0
Burundi		5		15	0 ⁱ	
Cabo Verde	0	1	0	0	0	0
Cambodia	200	50	300	900	0 ⁱ	
Cameroon	25			1	0 ⁱ	
Canada	7000	10	30 000	25 000	1	1
Chile	30	0	5 500	560	0	0
China	24 000		86 000		0 ⁱ	
<i>Hong Kong SAR of China</i>	2 500	0	10 149	0	0	0

<i>Macao SAR of China</i>	1	10	1	159	0	0
<i>Christmas Island</i>	0	0	0	1	0	0
<i>Cocos (Keeling) Islands</i>	0	0	0	0	0	0
Colombia	0 ^d	0 ^e	3300 ^d	P	0	0
Cook Islands	0	0	0	1	0	0
Costa Rica	0	0	869	109	0	0
Cote d'Ivoire	30	1	0	400	0	0
Croatia	50	1	5	1	1	1
Cuba	200			6	0 ⁱ	
<i>Curacao</i>	0		0		0	0
Cyprus	10	10	600	300	0	0
Czech Republic	264	5	525	385	0	0
Democratic People's Republic of Korea	50	1 200			2	
Democratic Republic of the Congo	275	8	720	487	0 ⁱ	
Denmark					0	0
Dominican Republic	75	6	315	350	0	0
Ecuador	10	6	900	1 500	0	0
Egypt	4 500	0	63 000	2 500	0	0
El Salvador	P(6) ^f	P(6) ^f	P	P	0	0
Eritrea	0	0	0	0	0	0
Estonia	3	5	1	500	0	0
Ethiopia	1,000			100	0	
<i>Faroe Islands</i>	0	0	0	0	0	0
<i>Falkland Islands (Malvinas)</i>	0	1	0	1	0 ⁱ	0
Fiji		1			0 ⁱ	
Finland	4	50	0	450	0	1
France	1	10	32 000	500	0	0
Gambia	0	0	0	0	0	0
Georgia	1	1	1	1	1	1
Germany	400		5 000		1	7
Ghana	4 500	300	3 000	200	0	0
Greece	100	0	500	0	0	0
<i>Greenland</i>	0	0	0	0	0	0
Guatemala	0		P	P	0	0
Guinea	36				0 ⁱ	
Guinea-Bissau	0	0	0	0	0	0
Guyana	120	50	120	30	0	0
Haiti	200	1	350	11	0	0

Honduras	P	P 1050 ^e	P	P	0	0
Hungary	900	0	31	0	0	1 800
Iceland	0	0	0	0	0	0
India	702 507	112 729	269 350	193 801	0	0
Indonesia	13 000	0	52 000	6 200	0	0
Iran (Islamic Republic of)	2	1	17 000	1	1	1
Iraq	3 000	100	14 000	10 000	0	P ^h
Ireland	150	4	1	1 164	0	0
Israel	248	6 075	20 582	164	0 ⁱ	
Italy	100	100	10 000	30 000	0	0
Jamaica	70	150	550	300	0	0
Japan	5 000		12 000		0 ⁱ	
Jordan	130		38 000		0	P
Kazakhstan	0	1	0	1	1	1
Kenya	1 500	2 000	1 500	2 000	0	0
Kyrgyzstan	0	0	0	100 000	0	0
Lao People's Democratic Republic	0	0	1000	130	0	0
Latvia	10	4	50	200	0	0
Lebanon	60	3	550	900	0	0
Lithuania	1	1	1	700	1	1
Luxembourg	1	0	0	0	0	0
Madagascar	0	153	0	174	0	0
Malawi	1 000				0 ⁱ	
Malaysia	44	5	3 660	3 017	0	0
Maldives	0	1	0	0	0	0
Mali	P	P	P	P	P	P
Malta	0	220	0	220	0	0
Mauritius	0	0	0	0	0	0
Mexico	P(150) ^f	P ^f	P	P	0	1
Monaco	0	0	0	0	0	0
Mongolia	0	0	0	0	0	0
Montenegro	0	2	0	205	0	0
Montserrat	0	0	0	1	0	0
Morocco	41	16	2 971	0	0	0
Mozambique	3				0 ⁱ	
Myanmar	15	11	0	0	0	0
Namibia	0	0	0	0	0	0
Nepal		1	5 000		0 ⁱ	
Netherlands	300	50	650	0	0	1
New Zealand	50	0	1000		0	3

Nicaragua	P ^g	P ^g	P	P	0	0
Nigeria	9 650	500	5 823	15 000	0	0
<i>Norfolk Island</i>	0	0	0	0	0	0
Norway	10	0	1	1	1	1
Oman	1	3	228	443	0 ⁱ	
Pakistan	12 000		48 000	500	0 ⁱ	
Panama	0	5	200	200	0	
Papua New Guinea	1		200		0	0
Paraguay	0	0	2 500	0	0	0
Peru	45	0	2 524	1 078	0	0
Philippines	46	0	149	0	0	0
Poland	310	100	7 500	3 000	3	4
Portugal	8	0	665	0	0	0
Qatar	0	0	0	80	0	0
Republic of Korea	28 897		27 544		1	1
Republic of Moldova	0	8	0	600	0	0
Romania	225		2 295		0	1
Russian Federation	1 500				0 ⁱ	
Rwanda		10		10	2	2
Saint Helena	0	1	0	1	0	0
Saint Lucia	0	6	0	15	0	0
Saint Vincent and the Grenadines	0		0		0	0
Sao Tome and Principe	0	0	0	0	0	0
Saudi Arabia	1	0	12 000	0	0	0
Senegal	123	1	0	510	0	0
Seychelles		1		1	0 ⁱ	
Serbia	1.8	1	205	351	0	1
Singapore	7 000	45	25 000	2 800	1	1
Slovakia	20	6	1	1	0	0
Slovenia	374		250		0	0
Solomon Islands	0	1	0	1	0	0
South Africa	1 071	2 630	3 001	887 112	0	0
Spain	227		8 284		0	13 790
Sri Lanka	0	0	0	0	0	0
Sudan	0	50	1500	3000	0	
Sweden	190	160	1	1	1	11
Switzerland	2 000		85 000		50	5
Syrian Arab Republic	1 000		50 000		0 ⁱ	
Tajikistan	38				0 ⁱ	
Thailand	15	0	2 601	0	0	1

Trinidad and Tobago					0 ⁱ	0
<i>Tristan da Cunha</i>	0	0	0	0	0	0
Tunisia	1	15	3 000	1	0	30
Turkey	250	0	55 000	7 000	0	0
Turkmenistan	0	0	0	0	0	0
Uganda	150	35	3 000	200	0	0
Ukraine	0	56	23	0	0	0
United Arab Emirates	0	0	1 533	3 894	0	0
United Kingdom	64 448	1 011	25 460	1 683	8	1
United Republic of						
Tanzania	100	1 500	2 000	200	0 ⁱ	
United States of America	4 860		186 000		0 ⁱ	47 183
Uruguay	15	0	0	0	0	0
Uzbekistan	0	0	0		0	0
Venezuela (Bolivarian						
Rep. of)	60	500	2 425	500	0	0
Yemen	75	75	3 000	2 000	0 ⁱ	
Zambia	50	25	50	100	0 ⁱ	
Zimbabwe	25	1	400	50	0	0

Notes: The names of territories, departments and special administrative regions are in italics.

A blank field signifies that no requirement was indicated or that data were not submitted for the substance in question.

A zero (0) signifies that the country or territory currently has no licit requirement for the substance.

The letter "P" signifies that importation of the substance is prohibited.

Reported quantities of less than 1 kg have been rounded up and are reflected as 1 kg.

^a 3,4-Methylenedioxyphenyl-2-propanone.

^b 1-Phenyl-2-propanone.

^c Including the licit requirements for pharmaceutical preparations containing the substance.

^d The required amount of ephedrine is to be used for the manufacture of injectable ephedrine sulphate solution. The required amount of pseudoephedrine is to be used exclusively for the manufacture of medicines for export.

^e In the form of injectable ephedrine sulfate solution.

^f Imports of the substance and preparations containing the substance are prohibited, with the exception of the imports of injectable ephedrine preparations and ephedrine as a prime raw material for the manufacture of such ephedrine preparations. Pre-export notification is required for each individual import.

^g Imports of the substance and preparations containing the substance are prohibited, with the exception of the imports of injectable ephedrine preparations and ephedrine as a prime raw

material for the manufacture of such ephedrine preparations. Such export requires an import permit.

- h Includes products containing P-2-P.
- i The Board is currently unaware of any legitimate need for the importation of this substance into the country.

COUNTRY REPORTS

Afghanistan

A. Introduction

Afghanistan remains the dominant source of the world's illicit opiate supply. The insurgency and widespread corruption present major challenges to the central government's efforts to establish the physical and economic security necessary to bring the illicit drug trade under control. The UN Office on Drugs and Crime (UNODC) and the Afghan Ministry of Counter Narcotics (MCN) estimate the total area under opium poppy cultivation in Afghanistan for the 2018 season to be approximately 262,673 hectares (ha). This is a decrease of 20 percent in area under cultivation compared with 2017, due largely to an ongoing drought and lower market prices. Afghan opium is typically refined into heroin or morphine in Afghanistan or neighboring countries for export.

A symbiotic relationship exists between the insurgency and illicit drug trafficking. Traffickers provide weapons, funding, and material support to the insurgency in exchange for protection. Some insurgents traffic drugs or tax their production and transportation to finance their operations. However, trafficking is not limited to insurgent-controlled areas. The drug trade is also a primary driver of corruption, which undermines governance and rule of law throughout Afghanistan.

Afghanistan suffers from widespread illicit drug use. The U.S.-supported 2015 Afghanistan National Drug Use Survey profiling urban, rural, and national drug use conservatively estimated that roughly 11 percent of the population tested positive for one or more drugs, including 5.3 percent of the urban population and 13 percent of the rural population. Drug use by women and children is among the highest documented worldwide, and 38.5 percent of rural households tested positive for some form of illicit drug. These figures portend a massive health crisis that Afghans are gradually acknowledging.

Senior Afghan government officials state that the government recognizes the deleterious impact of illegal drugs and is attempting to address the problem, citing the 2015 adoption of the National Drug Action Plan (NDAP) as proof. Despite public displays of support for this comprehensive national drug control strategy, the Afghan government has been slow to implement it. The Afghan government will require financial and technical assistance from the international community for the foreseeable future to achieve the NDAP's objectives.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Afghan government is publicly committed to confronting the drug problem in Afghanistan, focusing particularly on what it identifies as the underlying root causes of the drug economy, including instability, poverty, organized crime, and lack of economic opportunity. MCN is the lead agency for developing drug control policy and coordinating related government activities. As part of President Ashraf Ghani's reform agenda, the Afghan National Unity Government (GNU) has pledged "to intensify efforts to control narcotic production and sale." MCN is also

working to “mainstream” drug control into the activities of the entire government. Enlisting the support of other ministries to counter illicit drugs requires top-level Afghan government support, which has been historically lacking.

To combat drug trafficking, the Afghan government, with assistance from the United States and other donors, operates the Criminal Justice Task Force (CJTF), a self-contained judicial unit established under the 2010 Counter Narcotics Law and housed at the Counternarcotics Justice Center (CNJC). CNJC also houses the Counter Narcotics Tribunal and a detention center. It serves as the central facility for the investigation, prosecution, and trial of major drug and drug-related corruption cases. From December 22, 2017, through September 22, 2018 (the first nine months of 2018 according to the solar calendar), the CNJC processed 269 cases, involving 322 suspects. From these cases, the government confiscated approximately 1.69 metric tons (MT) of heroin, along with 19.4 MT of raw opium, 3.87 MT of morphine, and 31.09 MT of hashish.

The United States and Afghanistan have neither a bilateral extradition treaty nor a mutual legal assistance treaty in force, but they do cooperate on investigations on a case-by-case basis. Afghanistan’s new penal code authorizes confiscating assets (including land, structures, and vehicles) used in, or earned through, narcotics production and trafficking. However, the government did not have procedures in place to distribute the proceeds of seized assets to support law enforcement.

2. Supply Reduction

According to the 2018 Afghanistan Opium Survey – jointly produced by UNODC and MCN – growers cultivated 262,673 ha of opium poppy in 2018, a 20 percent decrease from 2017. MCN analysis suggests the decrease is due to both lowered crop yield resulting from drought conditions and a low market price following 2017’s record crop. The 2018 poppy cultivation figure for Helmand province was 136,798 ha, which was the highest of any province and 48 percent of the 2018 country total. U.S. government estimates for 2018 Afghanistan opium production were not available at the time of this report. Aside from opium, Afghanistan cultivates cannabis and produces significant amounts of hashish. The latest available cannabis survey (2012) estimates that 10,000 ha of commercial cannabis cultivation is sufficient to potentially produce approximately 1,400 MT of hashish.

Poppy eradication decreased in 2018, with officials destroying 327 ha of opium poppy fields, compared to 750 ha in 2017. This is well short of eradication totals in 2015 (3,760), 2014 (2,692), and 2013 (7,348). Only four provinces conducted eradication in 2018, and the majority of eradication took place in Nangarhar province (287 ha). Deteriorating security conditions, changes in the way eradicated fields are verified, a lack of political will, Taliban control over many rural areas, and MCN’s ineffective management of the Afghan inter-ministerial process all contributed to anemic eradication efforts in 2018. The United States supports the Afghan government-led eradication efforts through the Governor-Led Eradication (GLE) program that reimburses provincial governors at a rate of \$250 per hectare for costs associated with verified poppy eradication.

The Counter Narcotics Police of Afghanistan (CNPA) are increasingly able to plan and conduct effective counterdrug operations. The United States supports specialized units within the CNPA, including the Sensitive Investigative Unit (SIU) and the National Interdiction Unit (NIU). These units are mentored by the U.S. Drug Enforcement Administration (DEA) and U.S. Special Operations Forces, a relationship that has increased access to key military enablers and has led to record seizures. During the first nine months of 2018, the NIU and the SIU conducted 85 joint operations and reported the seizure of drugs and chemicals worth more than \$109 million, including nine MT of opium, 1.3 MT of heroin, and 15.7 MT of morphine base, according to figures provided to DEA by the Afghan specialized units. Additionally, the NIU and SIU arrested 175 individuals during this period, including 29 leaders identified by DEA as “Major Targets.”

Primary trafficking routes into and out of Afghanistan are through the Balkan route (Iran to Turkey to Eastern and Western Europe); the southern route (Pakistan and Iran to Africa, Europe, Asia, the Middle East, and Canada); and the northern route (Central Asia to the Russian Federation). Clandestine drug laboratories within Afghanistan and in neighboring countries process a large portion of the country's opium into heroin and morphine, illicitly importing large quantities of precursor chemicals to facilitate production. NIU operations targeting these laboratories and chemicals resulted in the destruction of over 100 laboratories and the reported seizure of nearly 93,800 liters and 16.3 MT of precursor chemicals during the first nine months of 2018.

3. Public Information, Prevention, and Treatment

The Afghan government acknowledges that Afghanistan has one of the highest substance abuse rates in the world. The 2015 Afghanistan National Drug Use Survey identified that rural drug use is far higher than urban use, and more than 38 percent of rural Afghan households included at least one member who tested positive for some form of illicit drug. To stem the effects of this public health crisis, the United States funded a rural treatment pilot project to expand substance abuse treatment to the hardest hit local communities, in addition to continuing to support 86 drug treatment centers across the country in conjunction with the Ministry of Public Health. The demand for treatment and prevention services far exceeds the capacity of the centers, most of which have extensive waiting lists for new patients. The United States also supports UNODC's global children's addiction program to develop protocols for treating children, training treatment staff, and delivering services through non-governmental organizations.

The United States engages in robust public information programming and funds communication and outreach programs aimed at discouraging poppy cultivation, preventing drug use, and encouraging licit crop cultivation. The United States also supports an anti-drug curriculum in Afghan schools, which has trained more than 1,900 teachers and reached more than 600,000 students in 900 schools.

4. Corruption

The Afghan Government as a whole does not encourage or facilitate illicit drug production or distribution, nor is it involved in laundering illicit proceeds. Widespread and longstanding

credible allegations and media reporting suggest, however, that many individual government officials directly engage in, and benefit from, the drug trade. Corrupt practices range from facilitating drug activities to benefiting from drug trade revenue streams, to thwarting arrests and prosecutions.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

In, 2015, President Ghani approved a four-year National Drug Action Plan (NDAP), establishing three interrelated goals: 1) decrease the cultivation of opium poppy; 2) decrease the production and trafficking of opiates; and 3) reduce the demand for illicit drugs while increasing the provision of treatment for users. The NDAP targets all facets of the drug trade, from cultivation and production to trafficking and use, by employing incentives such as alternative development and deterrents such as eradication, interdiction, and prosecution. The U.S. government's drug control priorities for Afghanistan include disrupting the drug trade and targeting drug revenues that finance the insurgency; developing licit alternative livelihoods; strengthening law enforcement and eradication efforts; reducing the demand for drugs; and building the Afghan government's drug control capacity.

More broadly, the United States seeks to restore Afghanistan's agriculture economy, to strengthen its institutional capacity, and to disrupt the nexus of drugs, insurgents, and corruption. Agriculture accounts for one quarter of Afghanistan's gross domestic product and employs approximately 62 percent of its workforce; a key challenge to reducing drug production is developing economically viable alternatives to poppy and sustained workforce employment. The United States, in coordination with Afghan and international partners, promotes licit crop production where poppy is cultivated and funds projects designed to support farmers and agribusinesses in targeted value chains, including wheat, livestock, and high-value horticulture.

The United States is currently implementing alternative development initiatives, within the framework of the Afghanistan Integrated Country Strategy, to reduce illicit drug production and promote sustainable agriculture-led economic growth. The Boost Alternative Development Interventions through Licit Livelihoods (BADILL) project, implemented by UNODC, aims to strengthen and diversify licit livelihoods of small and marginal farmers through alternative development methods. The project supports and strengthens selected value chains in production, processing, quality control, and market linkages across 13 target provinces. The Community-Based Agriculture and Rural Development projects implemented by the UN Development Program (UNDP) work to improve household income while reducing dependency on illicit poppy cultivation for selected communities in 12 high-poppy cultivating districts in Badghis, Farah, and Nangarhar provinces. The projects will also develop and strengthen community-based agri-business infrastructure, such as irrigation, transportation, and storage facilities.

D. Conclusion

The illicit cultivation, production, trade, and use of illicit drugs undermine public health and good governance in Afghanistan, while fueling corruption, providing significant funding for insurgents, and eroding security. Opium cultivation is most prevalent where physical and economic infrastructure is least developed, and where the Afghan government lacks control.

Afghanistan will not succeed in combating the drug trade and drug use until Afghans view illicit drugs as a serious domestic problem. That awareness is slowly building, but will remain incomplete until the Afghan government demonstrates the political will to challenge vested political and economic interests more robustly.

Most importantly, security will need to be established in areas controlled or contested by the Taliban before meaningful progress can be expected. Afghanistan cannot interdict or eradicate itself out of this problem. Alternative development, demand reduction, and public information, are important elements of a comprehensive poppy reduction strategy. Increased efforts to enforce Afghan laws against illicit poppy cultivation and to arrest traffickers are necessary for success. In addition to mainstreaming drug control efforts into other existing national strategies and programs, Afghanistan must actively combat corruption at all levels of government to regain public trust in its counterdrug campaigns, and ensure that provincial governors and other sub-national officials genuinely cooperate on national drug control plans and policies. None of these achievements would be sufficient by itself, and each faces significant challenges in the coming years. Success in countering Afghanistan's place in the global drug trade will not come quickly or easily.

Albania

Albania is both a source country of cannabis and, increasingly, a transit country for cocaine and heroin commanded largely by organized crime elements moving illicit drugs from source countries into European markets. The volume of drug seizures and number of drug-related arrests in 2018 was significant, driven largely by Albanian law enforcement cooperation with international partners, increased international pressure, and Albania's efforts to accede to the European Union.

Albania's role as source or market for illicit drugs beyond cannabis is minor, but there has been an increase in seizures of cocaine transiting Albania to Europe, in addition to discoveries of heroin and cocaine processing labs in northern and central Albania. Albanian crime groups traffic cocaine and heroin to European markets from source countries in South America and Asia.

Albania's institutions are moderately equipped to fight drug crimes, but corruption at every level of government limits their overall effectiveness. Official corruption is pervasive and fosters an environment in which drug traffickers are largely able to operate with impunity.

Efforts to eradicate and prosecute cannabis growers have been extensive but uneven, and disrupting the drug trafficking infrastructure that has developed over two decades is a challenge. A high rate of unemployment and weak rule of law have created an ideal environment for the organized crime groups driving Albania's drug control problem. Albania's exportation of cannabis and movement of illicit drugs to European markets is a highly lucrative enterprise for drug traffickers. The status quo, which infrequently leads to convictions or imprisonment, is no deterrent for criminals. Albania is, however, moving towards justice reform to prosecute and convict criminals of trafficking drugs by leveraging organized crime affiliation. Prosecutors now combine drug-related charges with organized crime charges.

U.S. assistance supports Albania's integrated border-management risk analysis to identify potential drug traffickers; law enforcement training on investigative techniques; provision of equipment to enhance drug search capabilities; and implementation of justice reforms that are impacting the legal landscape of drug trafficking. Sustained U.S. engagement has increased Albania's ability to detect drug smuggling at borders and set up a framework for Albania to target organized crime rings moving illicit drugs across the globe. It is vital that the Albanian government continues implementation of justice reform and works to erode the influence of organized crime.

Algeria

Algeria is principally a transit country for illicit drugs rather than a center of production or consumption. The Government of Algeria is actively working to address the problem through increased enforcement and treatment efforts. Although the Algerian government's security forces focus primarily on counter-terrorism efforts and border security, officials have become increasingly concerned about possible links between al-Qa'ida in the Islamic Maghreb and drug trafficking. Algerian authorities report the bulk of drugs transiting Algeria consisted of cannabis originating from Morocco. Traffickers also smuggle smaller quantities of cocaine, heroin, and psychotropic drugs into and through Algeria. Most of these drugs travel by sea to Europe, while some are smuggled overland to Middle Eastern destinations. Algeria's borders stretch over 4,000 miles and are sparsely populated and difficult to monitor. Cannabis resin remains the most widely consumed and transited drug, though cocaine, heroin, and psychotropic substances are also used and trafficked through the country.

The government is combatting domestic consumption of illicit drugs through expanding facilities for treating drug addiction. Currently, there are 42 Intermediate Addiction Treatment Centers (CISAS) operating in Algeria. Patients received at these centers rose from 9,897 in 2007 to 22,444 in 2017. Voluntary hospitalization, therapeutic interventions, and outpatient consultations form the basis of CISAS treatment.

Algerian law provides for jail time of up to two years for use and between 10-20 years for drug trafficking and distribution. For consumption cases, the law gives preference to treatment over penal judgments. Algeria has updated its drug control regulations to conform to international agreements, including relevant UN treaties. Algeria works within the Euro-Mediterranean cooperation network MedNET, created in 2006 to advance regional cooperation in the fight against drugs.

The National Office for the Fight Against Drugs and Addiction coordinates the Government of Algeria's drug policies and produces official reports on the country's drug problem. The National Police, Customs, and National Gendarmerie are responsible for day-to-day enforcement. During the first eight months of 2018, authorities seized 27.7 metric tons of cannabis and 958,476 doses of psychotropic substances, and arrested 33,595 individuals on drug-related charges. In May 2018, authorities seized a shipment of 701 kilograms of cocaine in the port of Oran. Algeria would benefit from further training to boost counterdrug capabilities of its security forces.

Argentina

Transnational criminal organizations utilize Argentina as a transshipment point for Andean cocaine destined to European and other international markets. Domestic cocaine processing and consumption are growing concerns, and the consumption of domestically processed cocaine base is prevalent in poorer neighborhoods. U.S.-Argentine security cooperation has strengthened under President Mauricio Macri's administration. The Security Ministry has adopted best practices from U.S. law enforcement, strengthening collaborative criminal intelligence efforts between federal and provincial forces through interagency task forces. An interagency task force launched in 2018 in Salta province focuses on a key entry point for Andean cocaine.

The government unveiled a national program to combat drug trafficking in 2016 that proposed increased targeting of drug trafficking organizations and efforts to reduce cocaine base consumption. A presidential decree in 2016 declared a state of national emergency that resulted in the federal Drug Demand Reduction Agency implementing demand reduction policies throughout the country. The government continues to deploy federal forces into major urban centers in response to public safety concerns. These efforts reduce resources available for combating smuggling at the border and along key corridors. In July 2018, President Macri issued executive decree 683 authorizing the military to support domestic civilian security efforts against non-state actors, including transnational drug traffickers.

Seizures of cocaine conversion laboratories and the availability of cocaine base suggested increased domestic processing. Official statistics show seizures of cocaine, marijuana, and synthetic drugs all increased from 2015 to 2017. During the first 10 months of 2018, Argentine authorities reported seizing approximately 137.8 metric tons (MT) of marijuana and 5.56 MT of cocaine, a 66 percent increase and a 35 percent drop, respectively. Most cocaine seizures were in the Salta and Jujuy provinces bordering Bolivia and Paraguay. Marijuana seizures primarily were in the Misiones and Corrientes provinces, bordering Brazil and Paraguay. Argentina is a regular participant in the semi-annual Multilateral Maritime Counter Drug Summits, which bring together maritime counterdrug professionals from nearly 25 countries and over 65 international organizations spanning North, Central and South America, and Europe.

Argentina adopted legal and procedural reforms to improve investigations and prosecutions of drug trafficking and other criminal enterprises. These reforms allow for greater use of certain special investigative measures, including informants and undercover officers in investigations. New legislation enabling cooperating witnesses helped advance corruption cases.

Constructive measures Argentina could undertake include focusing interdiction efforts on targeted regions and transportation sectors; allowing defendant cooperation for sentence reductions and controlled deliveries to further investigations; further enhancing federal and provincial coordination; boosting judicial efficiency in case management, investigations, and prosecutions; increasing border security resources; and coordinating drug supply and demand reduction strategies.

Argentina's extradition, customs, and mutual legal assistance treaties with the United States are utilized to the benefit of both countries.

Armenia

Armenia is primarily a transit country for illicit drugs originating in Southwest Asia and destined for markets in Europe and Russia. Most drug supplies transiting Armenia originate in Afghanistan and transit Iran before entering Armenia over land borders or by aerial transshipment. The Armenian Government maintains directive control over law enforcement, border enforcement, prosecutorial, and judicial functions. Russian border guards manage Armenia's borders with Turkey and Iran and compose part of the immigration staff at the Yerevan and Gyumri international airports. Armenian law enforcement agencies typically do not cooperate with the Armenian customs service on international investigations.

A popular revolution in April-May 2018 resulted in a new government that promised to fight corruption, but said little about illicit drugs until October 2018, when the acting prime minister pledged to eliminate drug trafficking through Armenia's Syunik province. Despite an increase in the volume of drugs seized over the first six months of 2018 compared to the same period in 2017 that included some highly publicized seizures, there have been no arrests of high-level criminal figures related to drug trafficking. Interceptions of large shipments remain rare.

Between January and June 2018, Armenian law enforcement registered 512 criminal cases involving illegal distribution of illicit drugs, including 45 cases of drug smuggling. Authorities seized 32.2 kilograms (kg) of illicit drugs, 25.5 grams of psychotropic substances, and three grams of precursor chemicals. Heroin seizures increased by over 300 percent in the first six months of 2018 compared to the same period in 2017, which could be due to better screening practices at borders and checkpoints and/or a more robust focus on anti-drug policing. Multi-ton quantities of heroin, nevertheless, likely continue to pass through Armenian borders.

On May 1, two Iranian nationals flying to Armenia were detained carrying "large quantities" of opium, methamphetamine, and heroin. In June, Armenia announced the investigation of a transnational criminal group that attempted to smuggle opium, heroin, and marijuana from Iran through Armenia to Georgia. On September 30, a Guatemalan citizen was detained at Yerevan's international airport for smuggling 3.5 kg of cocaine.

The Bahamas

A. Introduction

The Bahamas is not a significant drug producing country, but remains a significant transshipment point for illicit drugs bound for the United States and other international markets. The Bahamas' location, less than 50 miles off the coast of Florida at its closest point, makes it a natural conduit for drug trafficking. The Bahamian archipelago stretches over a nautical area the size of Florida with over 700 islands and 2,000 cays, the vast majority of which are uninhabited. The Bahamas boasts 10 international airports, 56 airstrips, and more than 80 marinas. Traffickers blend in among numerous pleasure craft moving between Florida and The Bahamas. Trafficking also occurs through commercial freighters and commercial and private planes. Trafficking enables and strengthens transnational criminal organizations and gang activity.

The United States and The Bahamas enjoy a long-standing history of law enforcement cooperation. There is strong political will within the Bahamian government to tackle drug trafficking and organized crime. Operation Bahamas, Turks and Caicos (OPBAT), a tripartite agreement dating back to the 1980s, spells out the obligations of The Bahamas, Turks and Caicos Islands, and the United States to improve their effectiveness in the fight against drug trafficking. Bolstered by this agreement, Bahamian and U.S. law enforcement agencies have partnered in several major law enforcement operations targeting trafficking organizations. In 2018, these operations resulted in numerous arrests and the seizure of cocaine and marijuana.

Demand for cocaine within the country remains low, though a small domestic market does exist. Use of marijuana, including among adolescents, remains a concern. The government is reviewing a 2018 CARICOM Regional Commission on Marijuana report that recommended the declassification of marijuana as a dangerous drug and its reclassification as a controlled substance; however, the government has not proposed any associated policy changes.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

During 2018, there was a notable increase in communication, effectiveness, and cooperation between Bahamian law enforcement agencies and the United States. New leadership in the Royal Bahamas Police Force (RBPF) and Ministry of National Security, as well as the leadership within the Royal Bahamas Defense Force (RBDF), were integral to many of these improvements.

The Bahamas passed a new Proceeds of Crime Bill in March 2018, which strengthened the measures to recover any income or assets received from criminal activity and created a new category for unexplained wealth. The Bahamas also updated The Financial Transactions Reporting Act in 2018, which increased reporting requirements, as well as abilities for investigation into financial matters by relevant bodies.

The greatest challenge to the host government in tackling the trafficking issue remains the weakness of the Bahamian criminal justice sector. While the average time between initial arraignment and trial in 2017 was within 90 days for minor offenses, for more serious matters, such as those involving trafficking, smuggling, firearms, or gang violence, regular adjournments prolonged cases, in some instances for several years. Many accused choose to go to trial, confident the courts will take years to move their case through the system and the government will eventually drop the charges. Despite these challenges, the Judiciary has begun making important improvements. In 2018, the Magistrate Courts, Supreme Court, and Court of Appeals courts introduced U.S.-provided digital audio recording equipment in the courtroom to record procedures and serve as the official record in the Magistrate's courts. The Judiciary expects this improvement to increase both the transparency and efficiency of the justice sector.

The Bahamas signed a comprehensive maritime agreement with the United States in 2004, which continues to enable cooperation in counterdrug and migrant interdiction operations in and around Bahamian territorial waters. The Bahamas has an extradition and mutual legal assistance treaty (MLAT) in place with the United States.

2. Supply Reduction

U.S. law enforcement agencies integrate with the RBPF and RBDF to gather law enforcement intelligence, conduct investigations, and execute interdictions. These operations are supported by marine, technical, and training resources provided through U.S. assistance programs. With a small population base (353,000 according to the 2010 Census) and significant territory to cover, pooling U.S. and local resources and knowledge are essential to efficient deterrence and interdiction.

Beginning in January, four major law enforcement operations targeting trafficking networks were executed within The Bahamas in 2018. All four operations resulted in multiple arrests, as well as weapons and drug interdictions. For three of the four operations, the RBPF and RBDF worked in partnership - a first in many years and a sign of increasing cooperation between the two agencies. Additionally, the RBPF and RBDF prioritized the forward deployment of their marine assets throughout the archipelago, improving interdictions further afield, including numerous interdictions from the windward pass and throughout the southern Bahamian islands.

On March 20, Bahamian security forces successfully executed Operation Northern Strike, one of the most significant Bahamian-planned, executed, and led operations in recent history. With technical assistance and planning support from U.S. law enforcement, Bahamian law enforcement accomplished their mission of targeting transnational criminal organizations responsible for trafficking drugs, people, and weapons, arresting 51 individuals and confiscating narcotics, weapons, and currency. On September 24, RBPF and RBDF forces successfully executed Operation Tidal Surge in the Abaco Islands, targeting another smuggling network. This operation resulted in 26 arrests and the seizure of cocaine, marijuana, and weapons. This operation demonstrated the ability of these Bahamian forces and U.S. law enforcement to work together and across a distance in the archipelago. On November 5, RBPF forces intercepted two high-speed vessels travelling from Andros Island to Nassau resulting in the seizure of nearly 900 kilograms (kg) of marijuana.

During the first 10 months of 2018, coordinated U.S.-Bahamian operations in The Bahamas led to 203 arrests and the seizure of approximately 176 kg of cocaine, 5.66 metric tons of marijuana, and \$1,693,809 in currency and \$43,400 in assets. Joint operations also eradicated 2,520 cannabis plants – an amount similar to 2017 and an indication that cannabis cultivation remains steady. U.S. and local law enforcement investigations indicate that illicit trafficking through The Bahamas remains high. The total number of major operations increased significantly from the previous year due to increased levels of cooperation.

Throughout 2018, traffickers continued to split up larger loads into smaller loads before entering the southern Bahamas. Traffickers move cocaine through The Bahamas via “go-fast” boats, small commercial freighters, maritime shipping containers, and small aircraft. Traffickers move cocaine from The Bahamas to Florida by blending in with legitimate traffic that transits these areas. Larger go-fast and sport fishing vessels transport marijuana from Jamaica both to The Bahamas and through The Bahamas into Florida. Haitian and Haitian-Bahamian drug trafficking organizations, networked between Haiti and the significant Haitian diaspora in The Bahamas, continue to play a role in the movement of cocaine.

3. Public Information, Prevention, and Treatment

With U.S. support, the Bahamian government partnered with the Organization of American States to conduct a comprehensive drug use survey in 2018. According to the survey respondents, 20 percent of male respondents admitted to smoking marijuana, while the same was true for 7 percent of females. Of the respondents who admitted to smoking, 40 percent admitted to smoking on a daily basis. Only 1 percent of respondents admitted to cocaine usage. Over 40 percent claimed to know a friend or family member who takes illegal drugs, with most reporting knowing two or more people.

The Public Hospitals Authority offers residential substance abuse treatment programs, drop-in treatment programs, substance abuse prevention programs, and relapse prevention programs. The United States partnered with the Public Hospitals Authority to train, mentor, and certify drug treatment professionals both from within and outside government. Following the certification of its professionals, the Public Hospitals Authority and other partners developed a training program for other substance use treatment staff in the country to learn about substance use issues. From the completion of the certification program in 2016, the Public Hospitals Authority has trained over 150 staff from local hospitals, the prison, the school for boys and girls, and local emergency rooms on New Providence Island and Grand Bahama Island.

The Bahamas Department of Correctional Services has a small residential drug treatment program, which can accommodate up to 21 inmates at a time. The United States has provided training for the corrections officers that provide drug treatment programs at the facility; several prison guards have also received additional training from the Public Hospitals Authority.

4. Corruption

The Government of the Commonwealth of The Bahamas does not, as a matter of government policy, encourage or facilitate illicit drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. Further, Free National Movement government has prioritized addressing public corruption as part of its national agenda. During calendar year 2018, at least four government employees were arrested and charged with drug-related offenses. These officials were investigated by the RBPF.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States supports a wide range of efforts designed to reduce illicit trafficking, advance public safety and citizen security, and promote justice through the Caribbean Basin Security Initiative (CBSI). In 2018, a CBSI-funded maritime surveillance system radar was installed in the southern-most island of Great Inagua to provide greater visibility of maritime and air traffic through the windward pass. CBSI funds have also been used over the past two years to provide maintenance and logistic support for the RBDF maritime interceptor vessels. In addition, security cooperation activities with the RBDF enhance capabilities in maritime law enforcement, intelligence, small boat operations, port security, engineering, disaster relief, and maintenance.

The United States and The Bahamas maintain close maritime law enforcement cooperation and coordination under a comprehensive maritime agreement to combat illicit trafficking of illicit drugs by sea and air. The Bahamas is a regular participant in the annual Multilateral Maritime Interdiction and Prosecution Summit and hosted the sixth iteration of the summit in Nassau on August 7-8, 2018, bringing together over 100 maritime counterdrug professionals from over 15 countries from across the Caribbean and Europe.

The United States has delivered training, technical assistance, and equipment needed by Bahamian government counterparts to combat transnational organized criminal networks and improve citizen security in The Bahamas. In October 2018, the United States completed the installation of digital recording equipment in the Magistrates and Supreme Court courtrooms in New Providence, Grand Bahama, and Abaco Islands. The courts use this equipment to record court proceedings in support of Bahamian plans to increase justice sector efficiency. Additionally, the Embassy donated ballistics vests and protective gear, a new Leica macroscope, and updated licenses and training on IBM computer programs to the RBPF. Finally, the Embassy provided training for the Internal Affairs Division within the Bahamas Department of Corrections.

The United States sent officials from the police and justice sector to external training focused on organized crime, investigating gangs, and trafficking in persons. The United States organized a training for magistrates and registrars to prepare them for the administrative changes involved with the new digital audio recording equipment. Additionally, the United States provided a senior justice advisor to meet with key staff in the Ministries of National Security, Legal Affairs, and Finance to provide technical assistance as these ministries establish practices to address issues with corruption. The advisor provided guidance on draft legislation, as well as established a program for increasing contact between these ministries and several U.S. counterparts. The United States supported Bahamian participation in the International Drug Enforcement Conference (organized by DEA) and other regional counterdrug training opportunities.

U.S. assistance for demand reduction supports the Ministry of National Security, the Public Hospitals Authority, and nongovernmental organizations. Additionally, the United States supported training focused on drug demand reduction and improved corrections policies addressing drug use and demand within prisons.

D. Conclusion

The United States and The Bahamas enjoy a long-standing cooperative relationship against drug trafficking and transnational organized crime. Drug trafficking and related smuggling will remain a primary concern for the United States in The Bahamas. The United States will continue to assist Bahamian efforts to counter these networks and increase efficiencies in the administration of justice through a range of assistance, and OPBAT and the CBSI framework will continue to bolster Bahamian drug-control institutions and enhance U.S. and Bahamian law enforcement relationships.

Belgium

Belgium is a primary entry point for cocaine smuggled into Europe. South America-based drug trafficking organizations transport cocaine through the Port of Antwerp to reach the lucrative European drug market and beyond. Highly profitable cocaine sales in Europe strengthen the various drug trafficking organizations, allowing them to expand their reach to other points around the world, including the United States.

The Port of Antwerp has experienced record-breaking cocaine seizures over the past several years from within containerized cargo arriving at the port. This is the result of increased coca production in Colombia, the port's relative exposure as an area difficult to fully police, and successful law enforcement at other European ports. Belgian authorities seized approximately 30 metric tons (MT) of cocaine in 2016, approximately 41 MT of cocaine in 2017, and approximately 36 MT of cocaine during the first 10 months of 2018 at the Port of Antwerp. In addition, South American authorities seized approximately 28 MT of cocaine destined for Antwerp during the same period in 2018.

The seized cocaine in 2017 alone would have generated more than \$1.2 billion in drug proceeds, and consequently, significant drug money laundering. Criminal networks increasingly use virtual currencies to facilitate illicit drug trafficking in Belgium. The online sale of synthetic drugs, including via non-searchable web sites ("Dark Web"), has increased significantly, resulting in more cyber currency investigations by Belgian police authorities.

Belgium and U.S. law enforcement agencies maintain close operational cooperation, focusing on cocaine trafficking and drug money laundering. The United States and Belgium fully utilize extradition and mutual legal assistance agreements. Despite strong international information sharing and cooperation, local capacity issues have prevented police from fully carrying out many large-scale drug investigations. Drug trafficking organizations appear to operate with little fear of legal reprisal, in part due to the relative lack of applicable criminal sanctions.

Belgium has not historically been a source of precursor chemicals used to produce illicit drugs, despite a robust chemical industry. Belgium has, however, served as transit point for precursor chemicals sourced out of China and India and destined for clandestine synthetic drug laboratories in the Netherlands, Mexico, and elsewhere.

Belize

A. Introduction

Belize is a major transit country for illegal drugs that originate from countries in South America. Due to Belize's location and sparse population, transnational criminal organizations exploit both clandestine and legal airstrips to refuel or offload drugs, primarily cocaine, for further transshipment by land through Guatemala or Mexico and ultimately to the United States. Traffickers also exploit Belize's offshore barrier islands and porous coastline to move drug shipments by "go-fast" boats. Authorities in 2018 successfully seized 996.2 kilograms (kg) of cocaine from aircraft carrying illicit drugs, the first major interdictions in eight years. Better-resourced drug interdiction efforts in neighboring Guatemala and nearby Honduras will increase the likelihood that traffickers will expand their efforts to exploit Belize's permissive environment and limited law enforcement capacity.

The Belizean police, military, and Coast Guard share responsibility for drug interception, but none is adequately resourced. Belize has no air defense systems, no radar systems capable of monitoring night flights, and no maritime radar. It has significant equipment and equipment maintenance needs, limited law enforcement response capability, and systemic investigative and prosecutorial limitations. These resource constraints directly inhibit Belize's ability to interdict shipments and prosecute traffickers.

B. Drug Control Accomplishment, Policies, and Trends

1. Institutional Development

The Government of Belize is cognizant of the dangers posed by its status as a transit point. It is particularly concerned that growing violence in Belize is, and will increasingly be, tied to the drug trade. However, Belize's domestic criminal concerns are focused on extremely high levels of local gang-related violence, which is not yet clearly tied to transnational organized crime. Members of transnational criminal gangs, such as MS-13, have been arrested in Belize, but such regional groups do not appear to be organized in the country. Given Belize's resource constraints, most of its law enforcement and legislative initiatives are necessarily tied to domestic gang activity. U.S.-funded programs focus on improving specialized units, police and criminal justice procedures, border security, technology, information sharing (internally and regionally), forensic improvements, and police professionalism.

Belize assists in the capture and repatriation of U.S. citizen fugitives through provisions of the Belize Immigration Act. Extraditions from Belize have been less successful. A bilateral extradition treaty between the United States and Belize has been in force since 2001, and a bilateral mutual legal assistance treaty between the United States and Belize has been in force since 2003. Belize also has an extradition treaty with Mexico.

Belize also has a shiprider agreement with the United States (1992, amended in 2000). Belize's other shiprider agreements are the Agreement Concerning Co-operation in Suppressing Illicit Maritime and Air Trafficking in Narcotic Drugs and Psychotropic Substances in the Caribbean

Area and the Proliferation Security Initiative Agreement. Regionally, Belize is a party to the Inter American Convention on Mutual Legal Assistance and the Caribbean Community (CARICOM) Mutual Legal Assistance Treaty. Belize also has a Mutual Legal Assistance Act, which provides a basis for considering request for legal assistance with countries with which it does not have a legal assistance treaty. Belize is giving consideration to adhering to the CARICOM Arrest Warrant Treaty.

A Pharmaceutical Ad Hoc Committee, established in 2014 to assess the trends relating to the movement of pharmaceutical drugs in Belize, dissolved from inactivity. In late 2018, the Ministry of National Security instructed the National Security Council to establish a task force to begin collecting precursor chemical data.

2. Supply Reduction

Belize operates a multi-agency approach to drug interdiction. The Belize Police Department is the primary agency responsible for drug law enforcement. It has two U.S.-supported specialized units – the Anti-Narcotics Unit comprised of 15 police officers and Mobile Interdiction Team comprised of 38 members. The Belize Coast Guard is responsible for the protection of Belize's territorial waters and interdiction of illicit activities in the maritime environment. The Belize Defense Force (army) is often used as a supplemental force. Interdiction activities are coordinated through the Joint Intelligence Operations Center.

Since November 2017, eight aircraft became stranded in Belize, mainly due to suspected damage from rough landings at illicit strips. Authorities seized 556.2 kg of cocaine from one of the planes. An additional seizure of 440 kg of cocaine was made after a ninth illicit aircraft landing. Based on the size of the aircraft that are known to have landed, the smallest being a Cessna and the largest a Hawker jet, the potential quantity of narcotics transported ranges from 300 to 3,000 kg per aircraft. It is unknown how many total aircraft landed and successfully departed undetected.

The Belize Defense Force, Coast Guard, Anti-Narcotics Unit, and other police forces conducted multiple cannabis eradication operations in the first nine months of 2018. The Anti-Narcotics Unit seized 44.32 kg of cannabis and arrested six persons between those seizures and the aircraft interdiction; the Mobile Interdiction Team seized approximately 31 kg of cannabis and arrested six persons at highway checkpoints in the same timeframe. If other seizures are made by the police, the numbers are not disseminated.

3. Public Information, Prevention, and Treatment

Belize's domestic drug use is difficult to quantify, and no data is collected by the government. Historically, marijuana is the primary illicit drug used in the country. In November 2017, Belize decriminalized the possession of up to 10 grams of marijuana for both recreational and medicinal purposes. There are some indications that there is increasing public use of cocaine and crack cocaine. However, Belize does not have the capacity to locally test for cocaine, other narcotics, or synthetics by its forensic services. The public health sector is able to test for marijuana and cocaine.

Belize's National Drug Abuse Control Council (within the Ministry of Health) is the lead agency in the prevention and control of drug abuse. The Council provides drug education prevention programs to schools and communities. Its objective is to reduce the demand and supply of drugs and alleviate the associated consequences. From 2015-2017, the Council provided drug prevention education programs to 48,138 students. Its outreach services for persons living with drug addiction grew from 256 clients in 2015 to 373 clients in 2017 (the most recent available data). Its other efforts include attending regional fora and organizing community health and education fairs, workshops on drugs and the workplace, and prevention training for school counselors.

Belize's central prison, co-managed by the government and a church-affiliated non-governmental organization The Kolbe Foundation, launched the Ashcroft Rehabilitation Center in 2018. The program features a group-based approach to address personality disorders, substance abuse, and habitual addiction, all aimed at inmate reform reducing recidivism rates, including drug-related crimes.

4. Corruption

The Government of Belize does not, as a matter of government policy, encourage or facilitate illicit drug production or distribution. However, insufficient resources, weak law enforcement institutions, an ineffective judicial system, and inadequate compensation for civil service employees and public safety officials facilitate corruption.

Belize lacks laws specifically addressing drug-related corruption. The Prevention of Corruption Act, passed in 2000, includes measures to combat corruption related to illicit monetary gains and the misuse of public funds while holding public office. It also provides a code of conduct for civil servants. Belize did not charge anyone under this act in 2017 or 2018. A Special Audit of the Immigration and Nationality Department found multiple cases of fraud and corruption within the department. After this revelation and other reports of corruption among senior government officials (not related to illicit drugs) and significant public pressure, Belize signed and ratified the United Nations Convention against Corruption (UNCAC) in 2016. In the course of implementing UNCAC, the government completed a self-assessment checklist; participated in a technical exchange visit in Jamaica; and initiated an impact of corruption assessment.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

U.S.-funded programs support citizen security, border security, and rule of law programs aimed to improve Belize's security structures. U.S. assistance, consistent with the U.S. Strategy for Central America, through the Central America Regional Security Initiative (CARSI), focuses on building transparency and accountability, capacity building, and other institutional-level improvements.

Belize is a participating member of the CARICOM Implementation Agency for Crime and Security (IMPACS), which provides research and passenger data support through the Joint Regional Communications Center based in Barbados. IMPACS is assisting Belize in

implementing the Advance Passenger Information System (APIS), a widely-used data interchange system that allows air and sea carriers to streamline and transmit traveler data. APIS is recognized by commercial carriers and the international community as the standard for passenger processing and enhanced security in the commercial air and vessel environment. Once implemented, commercial carriers will be able to share information with Belizean officials on individuals and cargo flagged by international law enforcement authorities for suspicious behavior or outstanding warrants, including related to drug crimes.

Belize is also focused on improving its information and data sharing processes and is working with the United States and international partners. The Joint Information Operations Center was designed to be the hub for collating and sharing information within Belize and with international partners. Through the information sharing process, its goal is to combat transnational criminal threats and transnational criminal networking by addressing the reduction of violent crime, border crossings, weapon smuggling, human and drug trafficking, and dismantling of local criminal networks. U.S. advisors are working with the Government of Belize to improve the policies and procedures that will provide a better process for responses to transnational threats and drug crimes.

The United States and Belize have signed Letters of Agreement (LOAs) concerning both drug control and maritime security. The LOAs, dated August 2010, include elements of establishing the police vetted unit and its area of responsibility, security sector reform, drug control, transnational crime, demand reduction, and community policing.

The United States also maintains a bilateral agreement with Belize to suppress illicit traffic by sea and air, which includes provisions for ship boarding, ship riders, pursuit, entry to investigate, over flight of territorial seas, order to land, and for the use of third-party platforms. Belize is a regular participant in the semi-annual Multilateral Maritime Counter Drug Summits, which bring together maritime counterdrug professionals from nearly 25 countries and over 65 international organizations spanning North, Central and South America, and Europe.

D. Conclusion

Belize faces a challenging drug control environment and strong leadership is necessary to reduce the impact of drug trafficking and crime in the country. The United States will continue to assist Belize's law enforcement and justice sectors by providing training, advisory, and institutional support to combat drug trafficking. The United States encourages Belize to strengthen its public security and law enforcement institutions through more effective anti-corruption legislation, modern drug control legislation, comprehensive background checks and vetting of new and existing personnel, enhanced training, and continuing education programs.

Benin

Benin is a significant transshipment point for cocaine, heroin, methamphetamine, and chemical precursors used to produce illicit drugs. Nigerian drug syndicates partner with Beninese nationals based in Benin. Cocaine from South America and heroin from Southwest Asia via East Africa transit Benin for major markets in Western Europe. Methamphetamine produced in Nigeria transits Benin for markets in Europe, Southeast Asia, and South Africa. There was also some evidence of illicit drug trafficking to the United States in 2018, according to U.S. law enforcement authorities.

Locally cultivated cannabis remains the most accessible illegal drug for consumption in Benin. There is a small but growing domestic market in Benin for heroin, cocaine and methamphetamine. Benin receives registered commercial freight shipments from India of the prescription opioid tramadol, destined for the Sahel, with high levels of local consumption and abuse. Tramadol pills exceeding the usually prescribed dosage by tenfold (500 milligrams vs 50 milligrams) are commonly sold in Benin.

Benin introduced new measures in 2018 aimed at improving efficiency and performance in law enforcement and judicial operations. In January, Benin merged its National Police and Gendarmerie to create a single law enforcement unit, the Republican Police. The merger eliminated overlapping responsibilities in practice between units involved in drug control. In September, a specialized criminal court with exclusive jurisdiction for drug-related crimes began hearing cases. The ability of police and courts to insulate themselves from corruption and partiality remains a longstanding challenge in Benin and the region.

The Central Office for Repression of Illicit Trafficking of Drugs and Precursors (OCERTID) was created in 1999 under the national police to coordinate drug enforcement operations. OCERTID reports monthly statistics on drug seizures; the national drug lab lacks equipment to test drugs or confirm purity. Benin's Law on Control of Drugs and Precursors provides penalties of between one and 20 years in prison for trafficking drugs. Individuals prosecuted for drug-related crimes in Benin are typically human couriers. The Government of Benin must continue to make progress in improving coordination between its relevant agencies and build cooperation and trust with neighboring countries to successfully pursue complex case investigations.

Benin does not have a bilateral extradition treaty or a mutual legal assistance treaty with the United States, though it is party to multilateral conventions that enable cooperation.

Bolivia

A. Introduction

Although illicit drug consumption remains low in Bolivia, it remains the third largest source country of coca in the world, according to UN Office on Drugs and Crime (UNODC) estimates, and is also a major transit zone for Peruvian cocaine. In March 2017, President Evo Morales signed into law a bill increasing the licit area of coca production from 12,000 hectares (ha) to 22,000 ha. However the United States government estimated 2017 cultivation amounts to be 31,000 ha (a modest decrease in coca cultivation from 2016 to 2017), and UNODC estimated Bolivia coca cultivation to be 24,500 ha (an increase of 1,400 ha from 2016 to 2017), both in excess of the limits established by the Government of Bolivia. European Union (EU) studies reveal that domestic demand for the traditional, cultural, and religious use in Bolivia is less than 15,000 ha.

The Bolivian government has inadequate controls over its domestic coca cultivation, and UNODC calculated an estimated 35-48 percent of the coca that was cultivated in 2017 did not go to the two authorized coca markets for sale. The United States government estimated cocaine production potential in Bolivia to be 249 metric tons (MT) in 2017. Most Bolivian cocaine is exported to other Latin American countries, especially Brazil and Argentina, for domestic consumption, or for onward transit to West Africa and Europe, rather than to the United States.

In September 2018, the United States again determined that Bolivia “failed demonstrably” to adhere to its obligations under international drug control agreements and the U.S. Foreign Assistance Act of 1961, as amended. This Presidential determination was based, in part, on insufficient justification for the increase in coca production authorized under Bolivian law. According to the 2017 UNODC report, 91 percent of the coca grown in the Yungas region, approximately 20,822 MT, is sold in the legal market. Conversely, nearly 91 percent of the coca grown in Cochabamba’s Chapare region, approximately 21,738 MT, is diverted away from the legal market. Bolivian President Evo Morales is “president in perpetuity” of the coca growers’ federation in the Chapare region.

Peruvian officials estimate 41 percent of all Peruvian cocaine departs to or through Bolivia via ground or aerial transshipment, commonly known as the “air bridge.” Bolivia reportedly confiscated seven aircraft involved in drug trafficking in 2018, down from 17 reportedly seized in 2017 by the Special Counter-Narcotics Police Force (FELCN). In traditional (authorized) coca cultivation areas, Bolivia maintains a “social control” policy to curb illicit coca production. Under this approach, the government usually negotiates with coca growers to obtain their consent for eradication. In nontraditional (unauthorized) areas, including national parks, eradication is officially mandatory.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

In March 2017, President Morales promulgated two new laws to replace the Coca and Controlled Substances Law 1008 (1988). In addition to increasing the licit area of coca production from 12,000 ha to 22,000 ha, the General Law on Coca (Law 906) provides a framework for the regulation of the production, circulation, transportation, marketing, consumption, research, industrialization, and promotion of coca in its natural state. The new Controlled Substances Law (Law 913) includes three key enhancements: a procedure for the payment of informants and plea-bargaining in drug-related cases; a procedure for asset forfeiture; and a framework for wiretapping in drug-related investigations. It also provides a legal basis for two studies – one on coca yield per hectare and another to determine coca leaf-to-cocaine yield. Both studies are under way by UNODC with European EU funding and their results are expected in the second half of 2019. As of November 2018, the Controlled Substances Law’s implementing regulations were still pending approval from the Bolivian legislature and not in effect.

Bolivia has numerous entities with drug control mandates. The National Drug Control Council (CONALTID), chaired by the Ministry of Government, is the central drug control policy-making body in Bolivia. The Vice Ministry for Social Defense and Controlled Substances (VMSD) is mandated to combat drug trafficking, regulate coca production, advance coca eradication and drug prevention, and execute rehabilitation programs. The General Law on Coca is enforced through a series of regulations that clarify responsibilities between governmental institutions and reinforce the role of the National Council for Revaluation, Production, Marketing, Research and Industrialization of Coca (CONCOCA) as the point for intergovernmental coordination.

Biometric registration of all coca producers and sellers is also mandatory by law, and regulations exist to monitor coca transportation routes, markets, and industrial research on coca.

FELCN reports to the VMSD and comprises approximately 1,700 personnel, and is the agency that focuses primarily on interdiction and money laundering cases. The Joint Eradication Task Force (FTC) conducts manual coca eradication with approximately 2,300 personnel. The Unit for the Execution of the Fight against Narcotics (UELICN) plans and funds drug enforcement operations. In 2018, UELICN’s budget remained unchanged from 2017 at \$48.3 million; however, a budget increase of about 25 percent is expected for 2019. In 2018, Bolivia, with UNODC support, created the Regional Center for Counternarcotics Intelligence (CERIAN), a regional fusion center for intelligence analysis and information sharing based in Santa Cruz with the participation of Brazil, Argentina, and Paraguay. Other border countries may join once a framework is finalized.

Bolivia’s 2016-2020 Strategy to Combat Drug Trafficking and Reduction of Excess Cultivation of Coca Leaf prioritizes actions against criminal organizations rather than what the Bolivian government considers legitimate farmers who cultivate coca for traditional uses. The strategy includes four pillars: reduction of supply; reduction of demand; control of the excess supply of coca; and shared international responsibilities. Current Bolivian coca cultivation far exceeds the country’s demand for coca for traditional purposes. The Inter-American Drug Abuse Control Commission of the Organization of American States continues to recommend that Bolivia implement a system to monitor narcotics and psychotropic drugs used in healthcare settings to ensure the medicines are not diverted for illegitimate uses.

Bolivia receives most of its foreign counternarcotic financial support from the EU. The EU is currently implementing a \$50 million three-year (2016-2018) assistance program, and provides an additional \$10 million to support UNODC drug control programs and technical assistance. The Bolivian government denies that foreign drug cartels operate within its borders, but acknowledges the presence of cartel emissaries.

The United States and Bolivia are parties to a 1995 extradition treaty that permits the extradition of nationals for the most serious offenses, including drug trafficking. Bolivia and the United States do not have a mutual legal assistance treaty, but both countries can request assistance through various multilateral conventions to which both are signatories.

2. Supply Reduction

FELCN reported destroying 93 cocaine hydrochloride processing labs and 1,004 rustic cocaine labs during 2018, a 62 percent increase and 62 percent decrease, respectively, from 2017. According to the Bolivian government, FELCN seized 10.48 MT of cocaine base and 7.59 MT of cocaine hydrochloride in 2018 – a 7.4 percent decrease and 153 percent increase, respectively, from what was seized during the first 10 months of 2017. FELCN arrested 3,986 individuals on drug-related offenses in 2018. Corruption, interference by other branches of government, and insufficient judicial resources undermine due process and create delays in the administration of justice.

The United States government estimated that coca cultivation was 31,000 ha in 2017, a 17 percent decrease from 2016, and that the production potential of cocaine decreased 9 percent from last year to 249 MT. The modest reduction in the U.S. cultivation estimate is attributable to better survey data and analysis. UNODC estimated that 24,500 ha of coca were cultivated within Bolivia in 2017, a 6 percent increase from 2016. UNODC officials have noted that 91 percent of the Chapare region's coca cultivation is destined for illicit cocaine production and not traditional consumption. According to UNODC's 2017 report published in August, there were 8,400 ha of coca cultivated in the Chapare region, an increase of 17 percent over the previous year. According to the most recently available information from the Bolivian government, Bolivian authorities eradicated 8,600 ha of coca as of October, compared to 7,237 ha during all of 2017. The Bolivian government estimates it needs to eradicate 11,000 ha of coca yearly to see a net reduction in coca cultivation.

3. Public Information, Prevention, and Treatment

Illicit drug consumption remains low in Bolivia, according to UNODC and the 2016 World Drug Report. According to a joint 2016 CONALTID/UNODC study funded by the European Union on drug use in the university student population, 6.1 percent of Bolivian university students had used illicit drugs in the previous year. Broken down by category, 5 percent of surveyed students had used marijuana; 0.8 percent used LSD; and 0.4 percent used cocaine. In October 2017, CONALTID, the EU and UNODC launched a "Listen First" campaign aimed at preventing the abuse of drugs by children, focusing on parents, prevention staff, health workers, teachers, and decision makers.

There are approximately 80 drug treatment and rehabilitation centers in Bolivia. According to the Bolivian government's 2016-2020 Strategy to Combat Drug Trafficking and Reduction of Excess Cultivation of Coca Leaf, 98 percent of those centers are run by nongovernmental organizations. There are only two public treatment centers, one in Tarija and one in Santa Cruz.

4. Corruption

As a matter of official policy, the Government of Bolivia does not encourage or facilitate illegal activity associated with drug trafficking. However, President Morales and other senior government officials have acknowledged serious corruption problems in the judiciary and police. In 2017, the Ministry of Anticorruption and Transparency was dismantled and its responsibilities transferred to the Ministry of Justice, which was thereafter named the Ministry of Justice and Transparency.

FELCN is the only police unit with a known polygraph program. All FELCN members are required to take an annual polygraph test, and those who do not pass are supposed to transfer out of the program. However, reports vary as to whether those two requisites are uniformly applied.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States Embassy meets periodically with the Vice Ministry for Social Defense and Controlled Substances and FELCN officials to discuss Bolivia's drug control efforts. Bolivia sent participants to five courses at the U.S.-funded International Law Enforcement Academy in 2018. The participants represented two Bolivian institutions: FELCN and the Financial Investigative Unit. The United States does not have a counterdrug presence in Bolivia, but it consults with international organizations and third-country governments involved in supporting Bolivian drug control goals and efforts to strengthen the rule of law.

Bolivia participated in the semi-annual Multilateral Maritime Counter Drug Summit held in May, which attracted 125 maritime counterdrug professionals from nearly 25 countries and over 65 international agencies spanning North, Central and South America, and Europe. In conjunction with the Multilateral Maritime Counter Drug Summit, the Vice Minister of Social Defense visited the State Department and requested continued cooperation and exchange of information of eradication imagery and data.

D. Conclusion

Bolivia remains the third largest source of coca and cocaine in the world, and a major transit country for Peruvian cocaine. For the second time since 2010, UNODC estimates coca cultivation is increasing and, even with a decrease in U.S. coca cultivation estimates, both UNODC and U.S. 2017 estimates are well above the government-sanctioned limit of 22,000 ha. Despite a decrease in U.S. estimates in 2017, potential pure cocaine production in Bolivia remains historically high at 249 MT when compared to 170 MT less than a decade ago. There is no available data to support the Bolivian government's statements that traditional, cultural, and medicinal coca consumption have increased, which it made in justifying the increase in the legal limit of coca cultivation in the new General Law on Coca from 12,000 ha to 22,000 ha. This

limit exceeds the amount of coca needed for traditional purposes by approximately 38 percent, per EU reporting.

Bolivia's inadequate controls over its legal coca markets remain a matter of concern, as is Bolivia's status as a transit country for cocaine trafficking. In 2013, Bolivia re-acceded to the 1961 U.N. Single Convention on Narcotic Drugs with a reservation permitting coca to be used only within Bolivia for traditional, cultural, and medicinal purposes. Despite these stated conditions, Bolivia continues to promote the use of coca in other countries and discuss potential export opportunities for coca products. These actions undermine Bolivia's commitments to its international drug control obligations.

In addition, Bolivia should strengthen efforts to stem the diversion of coca to cocaine processing by tightening controls over the coca leaf trade, achieving net reductions in coca cultivation, and improving law enforcement and judicial efforts to investigate and prosecute drug-related criminal activity. Provisions of the new Controlled Substances Law are still not in effect nor will they be until the Bolivian legislature approves the implementing regulations. The law nonetheless could be a significant advance in the fight against drug trafficking, as it will institutionalize the use of modern investigative techniques previously absent from the Bolivian legal framework.

Bosnia and Herzegovina

Bosnia and Herzegovina is not a major producer or consumer of illicit drugs or precursor chemicals. It is primarily a transit country, positioned between drug processing centers in Southwest Asia and markets in Western Europe. The Adriatic coast is also a major gateway for South American cocaine destined for Europe.

Transnational criminal organizations dominate the drug trade in the Balkans and largely traffic cannabis, heroin, and cocaine. Bosnian criminal organizations often operate outside of the Balkans, though leaders of these organizations reside within the country. Law enforcement and security institutions in Bosnia and Herzegovina remain limited and do not effectively deter trafficking. The fragmented structure of law enforcement agencies and inter-agency rivalries impede effective cooperation in detecting drug crimes and pursuing joint investigations. There is little coordination between units that could connect drug activity to larger organized crime and money laundering operations. Little political will exists to create policies and programs to reduce demand for illicit drugs. Corruption is an endemic problem, which can also hamper effective investigations and prosecutions.

Drug demand is increasing within Bosnia and Herzegovina, but remains relatively low compared with other European countries. During the first 10 months of 2018, police seized 3.35 kilograms (kg) of heroin; 2.7 kg of cocaine; 1.84 metric tons of marijuana/cannabis products; 2,500 tablets of cannabis sativa and 8,998 cannabis plants; 23.9 kg and 10.6 liters of amphetamine-type stimulants; 1,605 tablets and 17.7 kg of MDMA (ecstasy); and 67,968 tablets of diverted pharmaceutical products. Many of these seizures resulted from joint investigations with neighboring countries.

Nationally, the State Investigation and Protection Agency (SIPA) and the Border Police are responsible for drug control enforcement. The Customs Administration, within the Indirect Taxation Authority, conducts routine drug seizures at border crossings but does not possess investigative or arrest authorities. Seized drugs are transferred to either the Border Police or SIPA for criminal investigation and prosecution. At the entity-level, the Federation Ministry of Interior, Republika Srpska Ministry of Interior, Brcko District Police, and the 10 cantonal Ministries of Interior are engaged on drug issues. During the first 10 months of 2018, Bosnian police filed 2,014 reports related to drug crimes.

Bosnia and Herzegovina law enforcement agencies' ability to conduct complex investigations is limited. Bosnia and Herzegovina continues to work closely with the United States to develop its interdiction, investigative, and prosecutorial capacity, and also cooperates with the European Monitoring Centre for Drugs and Drug Addiction, the UN Office on Drugs and Crime, and other bilateral partners.

Brazil

A. Introduction

Brazil is a significant transit and destination country for cocaine. The country's borders with the cocaine source countries of Colombia, Peru, and Bolivia are porous and over three times the length of the U.S. border with Mexico. The government views the large, violent, and well-organized drug trafficking organizations operating throughout the country as its primary domestic security threat. Brazil suffers from a substantial and growing domestic drug consumption problem. After the United States, Brazil is the world's second-largest consumer of cocaine hydrochloride and likely the largest consumer of cocaine-base products. The Brazilian government appreciates the gravity of the illicit drugs issue and is committed to combating drug trafficking, but lacks the capacity to fully stem the flow of illicit drugs across its borders.

In 2018, Brazil entered into another year of economic recession and fiscal short-fall, combined with inflation, resulting in austerity cuts across the government, including at enforcement and social welfare agencies that address drug flows and substance use disorders. The government continues to prioritize border security and pursues a whole-of-government approach to counter drug trafficking and other forms of organized and violent crime, working in cooperation with international partners.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Brazilian government's lead agency for combating drug trafficking is the Federal Police (DPF). The lead agency for policy on reducing drug demand is the National Secretariat for Drug Policy (SENAD). SENAD is part of the Ministry of Justice, the Brazilian government's lead agency for drug control policy.

The DPF's 2018 budget increased by 18 percent, a significant increase over 2017 levels. However, DPF operations continued to be impacted by across-the-board fiscal austerity and deep cuts to some operational budgets. The DPF is capable by global standards, but recognizes that its force of 11,000 agents is insufficient to effectively combat drug trafficking in addition to other duties. SENAD's National Anti-Drug Fund budget was cut by 11 percent from 2017 levels.

Reform of drug sentencing laws is a source of public debate, as nearly a quarter of the Brazilian prison population is incarcerated for drug-related crimes (150,000 people), more than any other single crime. The National Justice Council, which oversees Brazil's federal judiciary, is creating standardized sentencing guidelines to better distinguish between drug consumers and traffickers.

Brazil maintains bilateral drug control agreements with the United States and every country in South America, in addition to formal partnerships with the UN Office on Drugs and Crime (UNODC), the Organization of American States' Inter-American Drug Abuse Control Commission, and INTERPOL. In May, the United States and Brazil launched a Permanent Security Forum to facilitate bilateral cooperation and plan coordinated strategies in six areas,

including drug trafficking. Brazil has extradition and mutual legal assistance treaties with the United States.

2. Supply Reduction

Brazil remains a major transit route for cocaine from the source countries of Bolivia, Colombia, and Peru. Cocaine products are smuggled across land borders via small aircraft and trucks, as well as by boats using the Amazon riverine system. Brazil's seaports play a key role in drug smuggling, and Brazilian law enforcement and customs continue to improve port screening and interdiction. The majority of cocaine entering Brazil is destined for its domestic market and Europe, often through West Africa. In August, Brazilian police in conjunction with United States law enforcement seized 2.2 metric tons (MT) of cocaine from a drug trafficking organization in Belém, Para destined for Antwerp, Belgium. In September, Brazilian police cooperated with United States law enforcement to seize 840 kilograms of cocaine HCL base in Manaus, Amazonas destined for transport to the port of Belém at the mouth of the Amazon River.

Since 2011, Brazil's Strategic Border Plan has confronted drug trafficking and transnational crime, including support of periodic operations. Operation Sentinela, supervised by the Ministry of Justice, is an ongoing intelligence-building effort to coordinate state, local, and federal police forces, particularly on the border. Operation Ágata, coordinated by the Ministry of Defense, conducts periodic tactical missions at strategic border points. These operations took place periodically in 2018 with some success, but consolidated seizure statistics were not available at the time of this report. In April, Brazil approved the Strategic Plan of the Integrated Border Program, established in November 2016 to improve cooperation among agencies and with international partners.

The first nine months of 2018 saw an increase of counter drug operations and seizures of cocaine and other illicit drugs, though aggregate volumes have not yet been made available. A lack of a central uniformed reporting system makes consolidated statistical data difficult to attain.

Brazil conducts recurring cannabis eradication operations in the country's northeast. In a single operation in June, the DPF eradicated approximately 2.5 hectares of cannabis plantings, with an estimated yield of 88 MT. Comprehensive statistics for cannabis eradication in 2018 have not yet been released.

Synthetic drugs are present in Brazil, though combating them is a lower government priority given the overwhelming cocaine problem. Complex synthetic drugs such as MDMA and LSD are usually smuggled in small amounts via couriers flying commercial airlines from Europe. A study published in June based on data from the Brazilian National Health Surveillance Agency (ANVISA) showed an increase of opioid sales by 465 percent in Brazil between 2009 and 2015, including fentanyl and fentanyl analogues.

3. Public Information, Prevention, and Treatment

Brazilian federal and state authorities continued to actively promote drug threat awareness, demand reduction, and treatment programs in 2018. The government continues to implement its 2005 National Drug Policy via its regular budget process, with emphasis on distance-learning training for substance use disorder professionals and civil society organizations and building social service capacity at the municipal level. In 2018, SENAD approved a new resolution that provides for studies to realign the National Drug Policy.

Brazil approaches the reintegration of people with substance use disorders into society holistically, providing a range of services from medical care to job training. Brazil's programs are not yet commensurate with the size of the addicted population.

4. Corruption

As a matter of government policy, the Brazilian government does not encourage or facilitate illegal activity associated with drug trafficking, and there is little evidence to suggest that senior government officials are engaged in such activity. While there were numerous allegations and examples of political corruption throughout Brazil, including at the highest levels of government, there were no direct links between political corruption and drug trafficking at the national level. Delays in judicial proceedings often resulted in cases being dismissed.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The 2008 U.S.-Brazil Memorandum of Understanding on Narcotics Control and Law Enforcement supports capacity building in Brazilian federal and state agencies to combat illicit drug trafficking. In 2018, the United States provided significant training support to Brazilian law enforcement through 29 courses reaching nearly 1,000 officers on topics ranging from money laundering to community policing. Cooperation between Brazilian and U.S. law enforcement is excellent. The United States also regularly engages with Brazilian security forces and the Brazil Navy to strengthen cooperation against drug trafficking through subject matter expert exchanges, forums, and other engagements. The U.S.-Brazil Permanent Security Forum on Security launched in May 2018 as a formal mechanism to coordinate six thematic areas of cooperation, including drug trafficking. The drug trafficking working group convened in September.

D. Conclusion

Brazil has institutionalized its commitment to combating illicit drug trafficking and addressing a growing domestic consumption problem. Brazil would benefit from comprehensive population surveys to determine the scope of its domestic drug consumption, consolidated nationwide data on drug interdiction, increased monitoring of its seaports, and greater cooperation with neighboring countries.

Burma

A. Introduction

Burma continues to be a major source of illicit opiates and amphetamine-type stimulants (ATS). According to the UN Office on Drugs and Crime (UNODC), Burma is the world's second largest source country of opium poppy cultivation, and one of the largest producers of heroin. Burma is also one of the world's largest producers of methamphetamine, primarily in the forms of crystallized methamphetamine and "yaba" tablets (caffeine with small doses of methamphetamine). In 2018, countries across Southeast Asia and beyond experienced record-breaking seizures of crystal methamphetamine and yaba tablets that originated in Burma. Production sites for heroin and ATS are generally situated in Shan State along Burma's eastern borders in areas controlled by ethnic armed groups and militias. There are also mobile ATS laboratories along the Burma-Bangladesh border, which have created another hub for ATS trafficking. Precursor chemicals are brought to these production sites from outside the country, primarily from China.

Illicit drugs produced in Burma are trafficked throughout the region, with routes extending beyond the Mekong countries to Australia and New Zealand. Burma is not a major source of or transit country for drugs entering the United States. Domestic consumption of illicit drugs is substantial and widespread, though it varies by region. However, there are no reliable comprehensive studies providing statistics on the scope of the problem.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Central Committee for Drug Abuse Control (CCDAC) is Burma's interagency mechanism for coordinating drug control efforts, which involve multiple ministries and justice institutions. In February 2018, the CCDAC passed and enacted a National Drug Control Policy in accordance with recommendations from the 2016 UN General Assembly Special Session on the World Drug Problem (UNGASS). The 1993 Narcotic Drugs and Psychotropic Substances Law was amended in February 2018 to be consistent with the new policy.

Burma's Drug Enforcement Division (DED) is the country's primary interdiction force, but it lacks resources commensurate with the size of the problem. Burma's justice system is underdeveloped, and judicial and prosecutorial institutions lack the legal framework to effectively handle the volume of drug-related crimes and complex drug networks. The DED is theoretically allotted nearly 4,000 employees; however, as of August 2018, there were only 1,164 employees on staff. The country's criminal legislation does not permit law enforcement actions that are essential for sophisticated narcotics investigations, such as controlled deliveries. Accordingly, there have been few investigations and prosecutions of mid- or high-ranking drug trafficking suspects.

In June 2018, President Win Myint ordered the establishment of a Drug Abuse Reporting Department within his office to identify drug offenders. While the initiative shows a growing

recognition of drug use and trafficking in the country, it has thus far not provided law enforcement with the tools or resources necessary to interdict significant drug networks.

The Ministry of Social Welfare, Relief, and Resettlement (MSW) and the Ministry of Health and Sports (MOHS) share responsibilities for addressing drug treatment, and rehabilitation. The MSW established a new Department of Rehabilitation in January 2018 to oversee rehabilitation facilities and services. The Government of Burma recognizes that the social sector remains significantly underfunded, and that the country still lacks a corps of health and social welfare officials qualified to provide services to those using or addicted to drugs.

The amended Narcotic Drugs and Psychotropic Substances Law places more focus on treating drug use as a public health matter rather than exclusively as a criminal justice matter. However, law enforcement authorities continue primarily to arrest and prosecute low-level users and traffickers due to inadequate resources and poor understanding of the new law, as well as limited access to health services for drug users. The majority of tips sent to the Drug Abuse Reporting Department concern low-level drug dealers, and the burden for handling these cases falls on law enforcement, justice, and correctional institutions. According to CCDAC reports, 48 percent of prisoners nationwide were arrested for drug-related offences; in Kachin and Shan States, this figure is closer to 70 or 80 percent. The Union Attorney General's Office (UAGO) has estimated that as many as 50 percent of all cases prosecuted nationwide relate to drug offenses.

The UAGO oversees all prosecutions in the country, and consults on legislation in the criminal justice field. Prosecutors below the Union level work in 14 state and regional, 71 district, and 330 township level law offices. In addition to the lack of resources and rudimentary investigative techniques, they face challenges including: inconsistent testimony from civilian witnesses; the requirement to have a township elder present during a search warrant; and a lack of by-laws for implementation of the Narcotics Law. The UAGO recognizes the benefits of police-prosecutor cooperation on investigations and prosecutions. However, there has been no specialized drug prosecution training to date, and prosecutors receive drug cases after the police have already completed their investigations, without prior consultations, which makes prosecutions more difficult.

Burma's law enforcement and justice institutions have the ability, in principle, to cooperate internationally. However, due to lack of experience and exposure to international institutions, local law enforcement and judicial officials have limited understanding of regulations relating to extraditions and mutual legal assistance. On a working level, DED officers and commanders maintain relationships with counterparts in neighboring countries, most notably Thailand and China. Burma signed new agreements related to drug control in 2018; in addition, Burma is undergoing the process to sign memoranda of understanding with Indonesia and the Philippines on law enforcement cooperation.

2. Supply Reduction

According to the 2017 UNODC Burma Opium Survey, an estimated 41,000 hectares of opium poppy were cultivated in Shan and Kachin States, representing a 25 percent decrease from the results of the 2015 survey. Shan State remains the largest source of opium cultivation. The

Burmese government and UNODC are conducting a survey for the 2018 opium poppy season, the results of which are expected to be released in early 2019. DED officials anticipate that opium and heroin production will continue to decline due to low opium prices and reduced regional demand for opium and heroin.

During the first nine months of 2018, Burmese authorities seized approximately 84,148,000 ATS tablets; 2.57 metric tons (MT) of opium; 750.6 kilograms (kg) of heroin; 2.68 MT of crystal methamphetamine; 72.2 kg of concentrated opium; 29.7 kg of low-grade opium; 1.97 liters of opium oil liquid; 353.5 kg of brown opium powder; and 11.65 liters of liquid opium. At three drug destruction ceremonies on June 26 marking the annual International Day Against Drug Abuse, law enforcement officers destroyed \$187 million worth of seized narcotic drugs, a reduction of more than 50 percent compared to the \$386 million worth of seized illicit drugs destroyed in 2017.

During the first nine months of 2018, there were 14,008 drug-related arrests, compared to 13,734 arrests during the entire year in 2017. As of September 30, there had been 9,784 drug-related prosecutions, compared to 9,366 in all of 2017. In January, law enforcement officials seized 30 million methamphetamine pills and more than two metric tons of crystal methamphetamine and heroin in Shan State. This single seizure, worth \$54 million on the illicit market, was the largest of the year.

Drug traffickers are consolidating larger volumes of drugs for transport, compared to small retail trafficking in the past. In June 2018, 12 drug traffickers received prison sentences up to 48 years in connection with a 2015 case involving the largest single seizure ever of ATS in Southeast Asia (and second largest in the world), worth \$26.7 million.

3. Public Information, Prevention, and Treatment

The Ministry of Home Affairs did not grant the CCDAC permission to develop Burma's first National Drug Use Survey in 2018, despite an agreement with UNODC and the United States to support and fund the project. Anecdotally, domestic consumption of illicit drugs is extremely high, especially associated with migrant workers in extractive industries, such as jade and gold mines. The country's existing public health capacity falls far short of accommodating those who seek or need treatment.

The government, with technical support from UNODC, adopted the first National Drug Control Policy in February 2018. The policy references international best practices and aligns with the approach of the 2016 UNGASS and complies with the three international drug conventions.

The MOHS and the MSW rely on the international community to provide much of the training on drug treatment and prevention that health and education professionals receive. The United States continues to fund the Colombo Plan, which trains health professionals on the U.S.-developed Universal Treatment Curriculum for Substance Use Disorders and teachers from the Ministry of Education on the Universal Prevention Curriculum. Basic education teachers received drug prevention curriculum assistance for the first time in 2018, and expressed eagerness to benefit from additional capacity-building programs. The United States also

provides support through local organizations to deliver effective training in life skills and behavior change interventions as well as link drug users to various services, including detoxification, methadone maintenance, HIV testing and AIDS treatments. The United States also supports drug use prevention through community engagement activities, including a successful Facebook social media campaign.

The MOHS National Methadone Maintenance Therapy Program opened four new sites in 2018 and now has a total of 55 sites nationwide. Currently, there are 26 major and 47 minor drug treatment centers, and the Government of Burma plans to open an additional three major and nine minor centers. Significant challenges remain to reaching rural and remote communities. The U.S. government has donated health and recreational materials to the CCDAC rehabilitation center, and worked with local authorities in 2018 to launch Kachin State's Drug Use Prevention Strategic Plan. A similar plan is in development for northern Shan State.

4. Corruption

The Government of Burma does not, as a matter of policy, encourage or facilitate the illicit production or distribution of drugs, or the laundering of proceeds from illegal drug transactions. However, corruption is widespread in Burma, and illicit proceeds from the drug trade fuel corruption.

The Anti-Corruption Commission has made important strides in building capacity to identify and investigate corruption, and has initiated important cases. However, it still lacks the resources to lead a systematic fight against corruption. Government officials participate regularly in conferences and trainings on corruption and related topics sponsored by international partners.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

CCDAC, in collaboration with UNODC, developed Burma's first modern National Drug Control Policy in 2018, which presents a comprehensive approach to tackling the drug situation, involving government, non-government, and civil society stakeholders. In addition to law enforcement and criminal justice efforts, it includes health and social policy responses, outlining a path to promoting sustainable alternative development for opium poppy farmers, and promoting international cooperation. Major changes in this policy include increasing compliance with international standards of human rights.

In August 2017, Burma signed an amended Letter of Agreement with the United States that facilitates broadened engagement in law enforcement, drug control, and rule of law issues.

The U.S. Drug Enforcement Administration (DEA) continues to work closely with the DED on operations and the collaboration has expanded to regional level cooperation in forms of intelligence sharing and conducting joint investigations. However, the government's ongoing objections to Leahy vetting for in-country police training has hindered U.S. efforts to conduct in-country capacity building trainings. DEA provided joint interdiction training for Burmese and Thai law enforcement officials in late 2018, and introduced specialized technical equipment to assist Burmese officials in interdicting and analyzing drug shipments. During the year, 38 law

enforcement officials attended 16 courses at the International Law Enforcement Academy in Bangkok. Burmese law enforcement officials also participated in additional international training opportunities, including courses pertaining to illicit drugs; cyber-enabled crime; and crimes against children.

D. Conclusion

The scale of Burma's drug problem – the consumption and trafficking of illicit opiates and ATS – is enormous. Domestic consumption is widespread and degrades many communities. Burma is a major source of illicit drugs throughout Southeast Asia, and illicit proceeds from the trade threaten political stability in many places. Burma requires legal and organizational reforms to facilitate effective criminal investigations and transparent criminal prosecutions, and the country needs to dedicate resources to building law enforcement capacity to investigate and effectively prosecute drug traffickers and interdict drugs and precursor chemicals in order to see improvements in the future. The United States remains a close partner with the Government of Burma on all elements of the country's drug control policy and will continue to work with regional and international partners to help the country address its challenges.

Cabo Verde

Cabo Verde remains an important transit hub for cocaine, cannabis, and small amounts of other drugs trafficked from Latin America to Europe. The archipelago's extensive maritime territory, minimal interdiction resources, and remote parts of its 10 islands make Cabo Verde vulnerable to trafficking via aerial and maritime conveyance. Tourist and business traffic continues to expand through the major international airports on the islands of Santiago and Sal and the secondary airports on the islands of Boa Vista and Sao Vicente, expanding opportunities for drug trafficking via human couriers. Expanding cargo and cruise ship traffic through the country's major ports on Santiago, Sao Vicente, and Sal also increase opportunities for drug trafficking. The UN Office on Drugs and Crime reports that cannabis, cocaine, hashish, heroin, and methamphetamine are the most commonly used illicit drugs in Cabo Verde. There are reports that synthetic drugs including MDMA (ecstasy) are available on the tourist destination islands of Sal and Boa Vista.

Corruption is relatively low in Cabo Verde. Support from the United States and other international donors is helping to improve the capacity of Cabo Verdean law enforcement agencies to identify and interdict illicit drug shipments. U.S. support has also increased Cabo Verde's ability to combat money laundering and other financial crimes often associated with drug trafficking. There are few drug demand reduction programs active in the country, and recidivism for drug crimes is a major problem.

In August 2017, police seized a reported 1,157 kilogram shipment of cocaine from a private yacht in Mindelo, headed from Brazil to Europe. The crew, three Brazilians and a French national, were found guilty and are serving a 10-year sentence.

The United States and other partners support Cabo Verde in combating drug trafficking and associated crime, providing robust and varied training to law enforcement and armed forces in Cabo Verde. The Center for Maritime Security Operations (COSMAR) in Praia and the Joint Operations Center in Mindelo provide oversight of Cabo Verde's maritime territory. U.S. Africa Command partners with Cabo Verdean authorities on periodic patrols in the region to interdict suspected drug shipments and other illicit activities, as well as providing training and building capacity within Cabo Verdean security sector institutions.

Canada

A. Introduction

The Government of Canada continued to combat the production, distribution, and consumption of illicit drugs in 2018. Canada and the United States cooperate extensively in drug control efforts, including by sharing information and coordinating operations. Canada is a source of MDMA (ecstasy), cannabis, and fentanyl to the United States. Canada aggressively targets the trafficking of synthetic and conventional drugs, particularly fentanyl and fentanyl precursors.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Canada's national drug control policy is codified by the Canadian Drugs and Substances Strategy (CDSS), which was announced in 2016 and includes four pillars – prevention, treatment, harm reduction and enforcement. The Strategy has a five-year budget (2017-2022) of \$660 million. Provinces and territories have separate dedicated budgets to address problematic substance use.

In May 2017, Canada's Parliament passed Bill C-37, amending the Controlled Drugs and Substances Act. The bill authorized temporary scheduling to control dangerous emerging drugs and streamlined the process for establishing supervised consumption sites. It also prohibits unregistered importation of devices that could be used to manufacture controlled substances, such as pill presses and encapsulators, and authorizes Canadian border officers to open mail weighing 30 grams or less that may contain controlled substances.

Effective October 17, 2018, the production, sale, and use of recreational cannabis (Cannabis Act) became legal throughout Canada. However, under this legislation, unauthorized cross-border movement of cannabis remains subject to criminal prosecution.

Canada continued to experience a growing number of opioids-related overdose deaths, with over 8,000 deaths since 2016, including 3,996 in 2017; there were more than 1,000 apparent opioid-related deaths during the first quarter of 2018.

Canada is party to the Inter-American Convention on Mutual Legal Assistance in Criminal Matters, and the Inter-American Convention against Corruption. The Royal Canadian Mounted Police (RCMP) is a member of the International Narcotics Control Board's (INCB) Task Forces, including Project ION (International Operation on New Psychoactive Substances).

2. Supply Reduction

Canada is a primary source of cannabis and MDMA to the United States, and a source of synthetic drugs and amphetamine-type stimulants to Asia and Australia. Synthetic opioids have also reached the United States from Canada. Cannabis cultivation and synthetic drug manufacture are concentrated in British Columbia, Quebec, and Ontario. Methamphetamine also continues to be produced in Canada. South America remains Canada's primary source for

cocaine, some of which transits the United States. Afghanistan remains Canada's primary source of heroin.

Canadian officials report that the volume of fentanyl trafficked from China decreased in 2018, and the majority of fentanyl seizures were trafficked in powder form through the postal stream with minimal concealment. During the first six months of 2018, Canada seized 20 fentanyl shipments totaling 1.28 kilograms (kg) in powder form. In 2017, there were 113 seizures for a total of 11.95 kg seized in powder form.

3. Public Information, Prevention, and Treatment

The Substance Use and Addictions Program is a federal program under the CDSS. It provides \$28.3 million annually to Canada's provinces, territories, non-governmental organizations and other stakeholders, particularly for activities and research to combat the opioid crisis.

The Canadian government produces and implements various public education materials and campaigns to inform Canadians about the health and safety risks of using dangerous drugs and substances, including opioids, and cannabis. One of the government's priorities is to reduce the negative stigma associated with seeking mental health services and treatment for substance use disorders. Health Canada plans to invest more than \$350 million annually in community programming to help address the mental wellness needs of First Nations and Inuit populations.

Canada's comprehensive approach to substance use involved various harm reduction initiatives, including: needle exchange programs; supervised consumption sites; overdose prevention sites; and legislation to protect individuals seeking emergency assistance for overdoses. Canada also supports medication-assisted therapies for the treatment of opioid dependence, and naloxone is widely available without a prescription, including in all First Nations primary health care centers.

According to the INCB, Canada is the second largest per capita consumer of prescription opioids in the world. In 2015, 13 percent of Canadians aged 15 years and older reported using an opioid pain reliever in the past year. Among them, 2 percent reported abusing opioids, a decrease from 2012 (5 percent).

The Government collects substance use prevalence data through the Canadian Tobacco Alcohol and Drugs Survey and the Canadian Student Tobacco, Alcohol and Drugs Survey. The most recent data showed the prevalence of cannabis use among Canadians aged 15 years and older was 16 percent in 2018, up from 2013 (11 percent). In 2016-17, 17 percent of students in grades 7 to 12 (approximately 340,000) reported using cannabis in the year preceding the survey, unchanged from 2014-15. Use of other illicit drugs such as MDMA (0.4 percent), hallucinogens (0.6 percent), cocaine (0.9 percent) and methamphetamine (0.2 percent) remained largely unchanged since 2004.

4. Corruption

Canada has strong anti-corruption laws and policies and holds its officials to a high standard of conduct. The Canadian government pursues malfeasant civil servants and subjects them to

prosecution. No government officials are known to engage in, encourage, or facilitate illegal activity associated with drug trafficking. Corruption among law enforcement officials is rare.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States and Canada exchange forfeited assets through a bilateral asset-sharing agreement and share information on customs offenses through a customs mutual assistance agreement. Judicial assistance and extradition matters operate under a mutual legal assistance treaty, an extradition treaty, and related domestic legislation and law-enforcement protocols, including a memorandum of understanding (MOU) between the U.S. Drug Enforcement Administration and RCMP.

U.S. federal, state, local, and tribal entities collaborate with RCMP, Canada Border Services Agency (CBSA), provincial and local police, and other Canadian law enforcement authorities to combat drug trafficking. Cooperation is coordinated through the Cross Border Law Enforcement Advisory Committee, Joint Management Teams, and other bilateral groups. Integrated teams of Canadian and U.S. law enforcement authorities operate along the Northern Border across a variety of structures, including Border Enforcement Security Taskforces (BEST), Integrated Border Enforcement Teams (IBET), and the Integrated Cross-Border Maritime Law Enforcement Operations (aka "Shiprider").

Canada participates with the United States and Mexico in the North American Dialogue on Drug Policy (NADD). On November 9, 2018, Canada hosted the third annual high-level NADD in Ottawa. Canada also takes part in the North American Maritime Security Initiative, a joint operations and information sharing effort to target suspect vessels. Through a longstanding MOU, U.S. Coast Guard detachments are deployed on Canadian Navy ships in the Caribbean Sea and Eastern Pacific Ocean, which resulted in the seizure of over 3.64 metric tons of cocaine during the first six months of 2018.

D. Conclusion

The United States cooperates extensively with Canada on law enforcement matters and acknowledges the strong and consistent anti-drug efforts of Canada's federal government. The United States will continue to work with Canada to stem the flow of illegal drugs across our shared border and enhance regulatory frameworks to prevent access to precursor chemicals and lab equipment for criminal use.

China

A. Introduction

China's geographical location, vast land area, massive population, and expanding economy have all contributed to the country becoming a hub for drug and precursor chemical production and trafficking. China also faces significant illicit drug consumption challenges, including synthetic drugs. China shares borders with drug source countries in both Southeast and Southwest Asia and remains a major destination and transit country for heroin produced in these areas. Its numerous coastal cities with high-volume seaports and its vast network of major international airports make China an ideal destination and transit country for illicit drugs. China is a major source of synthetic drugs, new psychoactive substances (NPS), and precursor chemicals used to produce illicit drugs. Domestic Chinese criminal organizations traffic illicit drugs within China as well as to international markets, and Chinese authorities have noted the presence of international drug trafficking organizations originating from Mexico and Southeast Asia operating within the country.

China is a major source of NPS and other synthetic drugs, including fentanyl and methamphetamine, and domestic use of synthetic drugs (primarily methamphetamine and ketamine) is becoming increasingly prevalent. China's large chemical and pharmaceutical industries provide an ideal environment for the illicit production and export of these drugs. According to U.S. and international law enforcement sources, China remains a major source of NPS seized in North America and Europe, which are often purchased via the internet and shipped to overseas customers. Chemical alterations of scheduled drugs to circumvent existing anti-drug laws have hampered efforts to stem the flow of these drugs.

The current opioid crisis in the United States underlines the importance of bilateral U.S.-Chinese drug control cooperation. Based on U.S. Customs and Border Protection seizure data, China is the principal source country of illicit fentanyl and fentanyl-related compounds in the United States, including both scheduled and non-scheduled substances. The challenges posed by trafficking via the internet and small parcel trafficking patterns are formidable and will test the cooperative spirit and ingenuity of law enforcement authorities in both countries.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

China's drug control strategy focuses on prevention, education, illicit crop eradication, interdiction, rehabilitation, commercial regulation, and law enforcement. The Ministry of Public Security (MPS) National Narcotics Control Commission (NNCC) is the primary national drug enforcement entity and works in conjunction with provincial public security bureau offices. The Anti-Smuggling Bureau within the General Administration of Customs is responsible for the enforcement of China's drug control laws at seaports, airports, and land border checkpoints. China maintains bilateral drug control agreements with many countries and international organizations, including the United Nations Office on Drugs and Crime, and participates in a variety of international drug conferences and bilateral meetings. There is no extradition treaty

between China and the United States. China and the United States signed a bilateral mutual legal assistance agreement in 2000, which entered into force in 2001. Despite the existence of a mutual legal assistance agreement, many outstanding requests by both the United States and China remained unfulfilled.

2. Supply Reduction

According to the NNCC's 2017 Annual Drug Report (published June 2018), Chinese law enforcement investigated 140,000 drug – related cases, including 102,000 trafficking-related investigations and made 169,000 drug related arrests in 2017, a slight increase over the previous year. Chinese authorities also targeted clandestine labs used to produce NPS and other synthetic drugs, illicit drugs, and precursors, destroying 317 clandestine laboratories, arresting 1,345 suspects, and seizing 2,384 metric tons (MT) of precursor chemicals in 2017, an increase of 50 percent over the previous year. In 2017, Chinese authorities seized a total of 89.2 MT of illicit drugs, including 9.5 MT of heroin (an increase of 8 percent), 28.2 MT of methamphetamine (a decrease of 3 percent), and 7.3 MT of ketamine (a decrease of 30 percent).

In February 2018, China added two fentanyl precursors, NPP and 4-ANPP, to the controlled substances schedule. In August, China scheduled an additional 32 NPS, including two fentanyl analogues, bringing the total number of controlled NPS and related precursors to 175 and the total number of controlled fentanyl analogues to 25. During the reporting period, the NNCC initiated “equipment control” measures requiring the registration of nuclear magnetic resonance spectrometry equipment that could be used in synthetic drug production.

The NNCC identified the emergence of new types of NPS as a particular challenge. According to China's National Narcotics Laboratory, 230 types of NPS, including 34 previously unidentified substances, were found in China during 2018. At the November 2018 Group of 20 summit, China announced plans to control all fentanyl-related substances as a class to get ahead of traffickers who switch to non-scheduled NPS as individual substances are scheduled. No timeline for implementation had been announced by the end of 2018.

3. Public Information, Prevention, and Treatment

According to NNCC, synthetic drugs – primarily methamphetamine and ketamine – have surpassed heroin and other opioids as China's primary domestic drug threat. In public statements, the NNCC identified the increase in NPS abuses cases as an emerging trend, and, in addition to ketamine, identified methcathinone and the synthetic cannabinoid JWH-018 as commonly abused NPS. According to the NNCC's 2017 Annual Drug Report, the total number of registered illegal drug users in China is 2.553 million, but the actual number of drug abusers is estimated to be at least 14 million, according to media reports. Of the reported registered drug users, 1.538 million (60.2 percent) reportedly used synthetic drugs, while 970,000 (38 percent) reportedly used opioids (e.g., heroin) and 46,000 (1.8 percent) reportedly used cocaine, cannabis, and other drugs. According to NNCC, 18 to 35 year olds were the largest demographic among registered drug users (55.6 percent). In 2018, 344,000 new registered drug users were identified, with synthetic drug abusers accounting for 77.1 percent of new registered drug users.

In 2016, NNCC formulated and distributed its “Work Plan on Community-based Drug Treatment and Rehabilitation, 2016-2020” to further the development of a community-based drug treatment and recovery system. The Plan supports NNCC efforts to combine methadone maintenance treatment and community-based drug treatment and recovery. In addition to 770 clinics offering methadone maintenance treatment, China has in place 3,258 job placement sites and 29,000 township level offices responsible for community-based drug treatment and recovery work, employing 31,000 full-time community workers. According to the NNCC annual report, China placed 321,000 drug users into compulsory rehabilitation, and ordered another 260,000 people for treatment at community rehabilitation centers. NNCC has an outreach program to raise awareness of the negative health effects of illicit drug use and promote drug demand reduction.

4. Corruption

The Ministry of Public Security takes allegations of drug-related corruption seriously, and launches investigations when deemed appropriate. Despite efforts to stem drug-related corruption, financial corruption among provincial, prefectural, county, and district government officials continues to be a concern. The Government of China does not, as a matter of government policy, encourage or facilitate illicit drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. Based on publicly available information, no senior Chinese official at the central government level is known to have facilitated the illicit production or distribution of drugs in 2017. Similarly, no senior Chinese official from the central government is known to have laundered proceeds from drug-related activities.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The U.S.-China Bilateral Drug Intelligence Working Group, the Counter Narcotics Working Group, and a group of chemists and experts meet annually to exchange information on drug trends; discuss laws, regulations, and policies; seek progress and address challenges in precursor chemical control; and improve cooperation on investigations of mutual interest. The August scheduling of 32 NPS was a result of these working-level exchanges. During the reporting period, Chinese and U.S. law enforcement agencies cooperated in several drug-related investigations and officials from both countries met frequently outside of the formal dialogue mechanisms to discuss practical cooperation.

D. Conclusion

Drug control cooperation between the United States and China continues to improve through law enforcement operational cooperation and various working groups and consultative mechanisms. While drug trafficking, manufacturing, diversion, and other drug-related crimes remain significant problems in China, the central government continues to take steps to integrate China into regional and global drug control efforts, as well as to address the country’s domestic drug problem through enforcement and rehabilitation. U.S. law enforcement has made inroads in building working relationships with provincial public security bureaus, with oversight by central authorities, and relations continue to strengthen.

In order to confront the emerging trend of NPS and stem the future flow of fentanyl and other synthetic opioids to the United States, China should implement and strictly enforce as soon as possible the announced class-based scheduling of fentanyl related substances. China also should strengthen enforcement of chemical control laws to prevent the diversion of drug precursors to illicit drug manufacture.

Colombia

A. Introduction

Colombia is the world's top producer and exporter of cocaine, as well as a source country of heroin and marijuana. Colombian coca cultivation and cocaine production exceeded all-time record levels during 2017 (the most recent year for which data is available). The United States estimates potential pure cocaine production increased by 19 percent, from 772 metric tons (MT) in 2016 to 921 MT in 2017. The United States further estimates coca cultivation increased 11 percent from 188,000 hectares (ha) in 2016 to 209,000 ha in 2017. On March 1, 2018, the U.S. and Colombian governments agreed to an ambitious Five-Year Goal to reduce Colombia's coca cultivation and cocaine production by 50 percent by the end of 2023. Since taking office on August 7, 2018, Colombian President Ivan Duque has endorsed this goal and instituted an aggressive plan for police and military to increase coca eradication, interdiction, and operations targeting criminal organizations to achieve the Five-Year Goal. In December 2018, the Duque administration released its whole-of-government drug control strategy, which aims to reduce drug consumption, decrease supply, dismantle criminal organizations, disrupt illicit financial flows, and increase state presence and economic opportunity in poor rural areas where criminal organizations and coca cultivation thrive.

In 2018, the Colombian government took initial steps to increase efforts to reduce cocaine availability. Colombia reported seizing or assisting with the seizure of over 450 MT of pure cocaine and cocaine base. Coca eradication efforts increased, particularly since President Duque took office. The Colombian government reported eradicating approximately 85,000 ha of coca during the calendar year through forced eradication and the crop substitution program, which resulted from the peace accord between the Colombian government and the Revolutionary Armed Forces of Colombia (FARC). By increasing eradication results, the Colombian government eliminated tons of potential cocaine from the drug supply chain.

According to the U.S. Drug Enforcement Administration (DEA), over 90 percent of the cocaine samples seized en route to and in the United States by U.S. law enforcement in 2017, and subjected to laboratory analysis, were of Colombian origin.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Colombia's 2016 peace accord with the FARC ended a 52-year conflict, established new institutions to pursue justice for past crimes, and set in motion a disarmament, demobilization, and reintegration process for FARC ex-combatants. Colombia continues to struggle with persistent security, governance, and economic challenges in neglected rural regions vacated by the FARC. The Colombian government recognizes the illicit drug trade and the organized criminal groups it empowers are the greatest threats to peace and security in Colombia.

The Colombian government suspended aerial eradication of coca in October 2015, but President Duque has publicly stated his intent to restart the use of aerial spray as a component of an

integrated drug control strategy that includes both manual and aerial eradication combined with interdiction, alternative development, and counter-criminal network operations.

2. Supply Reduction

The United States estimates coca cultivation in Colombia increased 11 percent from 188,000 ha in 2016 to 209,000 ha in 2017. In 2017, the Nariño department remained the leading coca-producing region in Colombia, with an estimated 46,000 ha, up from 39,500 ha in 2016. Other top coca-producing departments also saw increases from 2016 to 2017: Norte de Santander (from 36,000 ha to 42,800 ha); Cauca (from 32,000 ha to 39,000 ha); and Putumayo (from 19,500 ha to 21,000 ha).

Several factors contributed to the surge in coca cultivation in Colombia since 2013, including: the end of aerial spray of glyphosate on coca; a crop substitution program that created perverse incentives for coca growers to grow more coca; and the failure of the FARC to comply with the illicit drug provisions of the peace agreement. Drug traffickers employ effective counter-eradication tactics such as protests and the use of improvised explosive devices in coca fields to kill, injure, and demoralize eradicators and to slow eradication operations.

The Colombian government continued to make drug interdiction one of its drug control priorities, alongside investigating, prosecuting, and dismantling criminal groups and extraditing top drug traffickers to the United States. Reducing the availability of illicit drugs requires a stable post-peace accord environment, the extension of citizen security and the rule of law throughout Colombia, economic development in rural areas, and the countering of illegal armed groups that have plagued Colombia for decades. Colombian authorities, and third countries using Colombian intelligence, reported seizing over 450 MT of pure cocaine and cocaine base in 2018, as well as approximately 250 MT of marijuana, over 320 kilograms of heroin, and destroyed 3,855 cocaine base laboratories and 319 cocaine hydrochloride (HCl) laboratories.

3. Public Information, Prevention, and Treatment

According to the most recent National Household Survey of Drug Consumption, from 2014, drug use in Colombia rose between 2008 and 2013, making Colombia the country with the fourth highest consumption of cocaine and marijuana in South America. Previously, it had one of the lowest consumption rates in the region. As of 2013, there were over three million consumers of all categories of illicit drugs in Colombia, of which around two million were in major cities including Bogota, Medellin, and Cali.

There are indications that drug use continues to increase among Colombian youth, with marijuana the substance of choice. Use of inhalants and a cocaine by-product called “basuco” is high among those displaced by years of internal conflict in Colombia. The Colombian National Police (CNP) has a prevention unit of 2,000 instructors who teach drug prevention to vulnerable schoolchildren nationwide.

On October 1, 2018, two months after assuming office, President Duque signed a decree instructing the CNP to confiscate any drugs held by individuals in public spaces and issue a fine.

Legislation and judicial rulings previously allowed citizens to carry small amounts of marijuana and cocaine for personal use.

Colombia focuses treatment on youth substance abusers. Acknowledging that severe criminal sanctions disproportionately affect the most vulnerable in the drug-trafficking chain and contribute to prison overcrowding, the Colombian government created a juvenile drug court in Medellin and is planning juvenile drug courts in five other departments. The Colombian government is working to expand restorative justice programs and programs that teach life, leadership, and cultural skills to youth treatment and detention centers. The Colombian government will begin training professionals in the U.S.-developed Universal Treatment Curriculum and Universal Prevention Curriculum in 2019. These curricula will provide evidence-based methods for improving treatment and prevention within Colombia.

4. Corruption

As a matter of policy, the Colombian government does not encourage or facilitate illicit drug production or distribution, nor the laundering of proceeds of illicit drugs. Nevertheless, corruption remains a significant problem.

There were a series of high-profile corruption cases in 2018, including in Colombia's justice sector where at least three Supreme Court justices are under investigation for, or charged with, corruption related to their positions. The Colombian Supreme Court recently convicted the chief anticorruption prosecutor for corruption. The prosecution of such high-profile, powerful individuals can be seen as a reflection of strengthened justice institutions, which have the capacity, political will, and autonomy to investigate, prosecute, and adjudicate corruption.

Notwithstanding these notable corruption cases, the Colombian government has made significant strides in implementing its 2013 anticorruption strategy to improve transparency of, and public confidence in, government institutions. The 2014 transparency and access to public information law was implemented in 2016, requiring all government entities to release information pertaining to salaries, management evaluations, the hiring processes, and the public budget.

The government held an August 2018 referendum on anticorruption measures that would have strengthened accountability and transparency measures such as public bidding for contracts and imposed harsher penalties for those convicted of corruption. While the referendum failed to meet the participation threshold, among the 11.5 million Colombian citizens who voted, 99 percent voted in favor of the anticorruption measures.

Colombia benefits from an independent attorney general (Fiscal) and inspector general (Procurador), both of whom publicly identify anticorruption efforts as a priority for their institutions. Between August 1, 2016 and October 30, 2018, the Attorney General's office opened 2,332 corruption investigations, 788 of which were against current government employees. Two-hundred and three of those were against judicial branch employees, including 106 investigations of current employees of the Attorney General's office. Another 550 were against former government employees and 994 were against private citizens.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

On December 13, 2018, the Duque administration released its counternarcotics strategy, which sets clear goals and mandates a whole-of-government approach in key drug supply regions of the country. The strategy outlines four pillars that aim to reduce growing domestic consumption, decrease the supply of drugs, dismantle criminal organizations, and disrupt illicit financial flows. It also focuses on increasing state presence and economic opportunity in poor rural areas where criminal organizations and coca cultivation thrive. The strategy is an important step toward achieving the U.S.-Colombia bilateral goal to cut coca cultivation and cocaine production in Colombia by 50 percent by the end of 2023.

The United States provides counter-drug assistance to the CNP, the Colombian military, and judicial institutions, including the offices of the attorney general and inspector general, the judiciary, and the corrections system, which investigate, prosecute, and incarcerate drug traffickers and other criminals. The United States supports integrated programs designed to expand Colombia's rural policing capabilities, while enabling the transition of rural communities out of coca-based economies by expanding the presence of the state in post-conflict regions, strengthening licit market linkages (for example promoting alternative crops such as coffee, cacao, palm, fruits, and vegetables), and promoting the rule of law and protection of human rights. A notable example of this whole-of-government approach is the "Antioquia Libre de Coca (Free of Coca)" initiative, which brings together national and local governments, police and military forces, and the private sector to achieve sustainable drug control and development objectives. Antioquia was the only major coca-growing department to see a decrease in hectares under cultivation in 2017, according to U.S. government estimates.

Through the U.S.-Colombia Action Plan on Regional Security Cooperation, Colombia's police and military export law enforcement capabilities and build regional connections by training Central America and Caribbean counterparts to counter transnational organized crime and drug trafficking. The Action Plan expanded to include 415 activities in nine countries during 2017. Bilateral maritime counterdrug cooperation, exercised under the Agreement to Suppress Illicit Traffic at Sea that was signed in 1997, continues to be one of the most effective in the region, enabling the seizure of over 146 MT of cocaine in 2016.

D. Conclusion

The illicit drug situation in Colombia remains a top concern of the U.S. government. The CNP and military forces have begun to increase efforts to stem coca cultivation and cocaine production. Colombia can achieve the Five-Year Goal to cut coca cultivation and cocaine production by 50 percent by the end of 2023 through aggressive implementation of and resourcing for its new whole-of-government drug control strategy, which seeks to increase eradication, interdiction, and counter-network operations, as well as to achieve sustainability of short-term efforts through rural development. Extradition remains a crucial tool against individuals involved in drug trafficking, and demonstrates the cooperative effort of Colombia and the United States. The U.S. government stands by the Colombian government in its efforts to achieve our shared objectives to combat illicit drug cultivation and trafficking. The U.S. government will continue to closely monitor the development and implementation of Colombia's

drug control strategy to ensure progress is made to reduce the production and trafficking of illicit drugs.

Costa Rica

A. Introduction

Costa Rica's strategic location, vast maritime territory, and the small size of its security forces combine to make it an attractive transit and logistics hub for illicit drug trafficking. In 2018, Costa Rica remained one of the primary countries in the region for transshipment of cocaine to the United States. During the first nine months of 2018, Costa Rican authorities seized a total of 22.3 metric tons (MT) of cocaine.

Though low for the region, the murder rate in Costa Rica surpassed 600 homicides in 2018, setting a new record for the third year in a row. Continued turf war-related shootings and cartel-style assassinations have exacerbated heightened public concern and intensified the Costa Rican government's sharp focus on the fight against illicit drug trafficking.

The government continued to increase its security spending in 2018, despite a severe fiscal crisis, allowing the hiring of more police officials across all services. Institutional changes are also leading to additional police professionalization, major advances in investigations and prosecutions, and improved success in drug interdiction and disruption of drug trafficking organizations, as well as prevention programs.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Costa Rican government enacted encouraging institutional changes to combat the heightened threats from illicit drugs. The Ministry of Public Security's (MPS) budget increased by five percent in 2018, on top of an 11 percent increase in 2017. This was further boosted by a reinstated security tax on companies (in 2017) which now provides a new annual stream of extra-budgetary resources earmarked for security equipment and additional personnel. As a result, the national police added 1,500 new officers between 2017 and 2018; the Coast Guard (SNG) grew by a third, the Border Police added officials; and the Air Surveillance Service (SVA) doubled its cadre of pilots and mechanics. This represents continued growth in the capacity of the Costa Rican entities responsible for the majority drug seizures.

The government continued important police professionalization efforts in 2018, including outfitting a new police academy, upgrades in the tactical training site, and additional cooperation between national law enforcement agencies and those of local governments.

The reinstated security tax will also allow investment in new capabilities. Through Foreign Military Sales (FMS), the government purchased a plane for \$7.5 million that will be converted into the country's first maritime patrol aircraft, which will be in service by late 2019. Costa Rica also used its own funds to initiate a \$9 million purchase of four highly capable interceptor/patrol boats for its Coast Guard, which will be delivered in 2019-2020.

The SNG remained a highly effective regional partner for maritime interdiction, including a growing desire to develop joint operations with the U.S. Coast Guard (USCG). The arrival of three U.S.-donated 110-foot USCG cutters in April 2018 transformed the SNG. The cutters have been used to great effect, and without pause, to establish Costa Rica's first blue-water patrol in the busiest cocaine transit zone – at a fraction of the cost of using U.S. assets.

Following on its success as the first lab in the region to receive international accreditation in key disciplines, the Costa Rican National Forensics lab was reaccredited in October 2018 for chemical analysis, toxicology, and biochemistry (including DNA testing), and successfully added ballistics. This is the first lab in Central America to attain this top-level rating and only the third in the Latin American region (joining labs in Chile and Mexico). The accreditation of the lab enhances the credibility of forensic evidence in the investigation and prosecution of cases, including cases of drug trafficking and crime and violence with linkages to drug trafficking.

The six-year-old Border Police improved control of Costa Rica's porous land border with Panama, including much expanded use of biometrics and improved cooperation with Panama. The Air Surveillance Service (SVA) pushed to better control its airspace using radar technology supported by the United States. In December, a multi-year project was initiated to donate and nationalize four twin-engine transport helicopters, providing Costa Rica with the ability, for the first time, to insert law enforcement teams where needed to counter the use of illicit airfields. The helicopters will also support maritime interdiction missions. SVA's support for the Coast Guard will further expand upon the arrival of the maritime patrol aircraft (in late 2019), and with improved capability for night-operations. After a favorable constitutional court ruling in 2017, the government continued to expanded use of the Judicial Wire Intercept Program (JWIP) in 2018, and now boasts the largest JWIP capacity in Central America.

2. Supply Reduction

During the first nine months of 2018, Costa Rica seized 22.3 MT of cocaine, already exceeding the amount seized during all of 2017. In addition, the Costa Rican government, working closely with the U.S. Drug Enforcement Administration and regional partners, reportedly disrupted more than 20 international drug trafficking rings in Costa Rica during the first 10 months of the year.

Costa Rica is a regional leader in eradicating and seizing marijuana. During the first nine months of 2018, Costa Rican authorities destroyed 1.25 million plants and seized an additional 4.3 MT of loose marijuana. Local marijuana is grown primarily for domestic use. To combat a growing cocaine-for-marijuana/arms trade between Jamaica and Costa Rica, the SNG will deploy more advanced maritime patrol boats in 2019 in the Caribbean.

The government expanded cooperation on maritime interdiction and information exchange with Panama and Colombia in 2018, and initiated contacts with Jamaica.

Seizure totals of illicit drugs other than cocaine and marijuana, including synthetic drugs, remained minimal in 2018. For example, no heroin was seized in Costa Rica during the first nine months of the year, compared to only seven kilograms during the same period in

2017. Organismo de Investigación Judicial (OIJ) and the Costa Rican Drug Institute monitor for signs of synthetic drugs in Costa Rica, which remain rare. However, capacity building in this area increased in 2018, particularly related to identification of precursor chemicals, as well as understanding the criminal networks and patterns involved in its trafficking.

3. Public Information, Prevention, and Treatment

The production, trafficking, and sale of illicit drugs remain serious criminal offenses in Costa Rica, even if laws against personal consumption are rarely enforced. The Costa Rican Drug Institute is the government agency that oversees drug prevention programs, including publicity campaigns and materials for schools. The Institute on Alcohol and Drug Abuse also offers treatment and prevention programs, though considerable gaps remain. With the uptick in violence, the MPS is increasingly focused on prevention programs. The National Police implement the Drug Abuse Resistance and Education (DARE) program and the Gang Resistance Education and Training (GREAT) program. GREAT began in August 2013, and has grown from 800 graduates in 2014 to over 15,000 in 2018.

4. Corruption

The Costa Rican government does not encourage or facilitate illicit drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. The growing presence of transnational criminal organizations and the harm they inflict on Costa Rican society, including corruption, is a chief concern. The government generally implements a 2006 law that penalizes official corruption; however, there are frequent reports of low- and mid-level corruption, and periodic cases of high-level corruption. The Costa Rican government has estimated it loses about seven percent of its GDP annually to corruption.

The judicial branch is in the midst of a two-year effort to strengthen ethics controls within the judiciary. The United States is actively supporting this and related efforts to stem corruption.

A corruption and influence peddling scandal that broke in July 2017 has triggered investigations and suspensions of officials, and continues to cause political ripples. The Judiciary has been most severely hit, with the head of the Supreme Court opting for early retirement, and a second justice removed from the court. Three separate legal proceedings are being pursued by the Attorney General, the banking sector supervisor, and the National Assembly.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

Costa Rica shares the U.S. priorities of disrupting the flow of illicit drugs and dismantling organized crime. The United States supports Costa Rican efforts to investigate and prosecute crimes more effectively, to make its borders more secure, and to increase the safety of its citizens, consistent with the Central America Regional Security Initiative (CARSI).

The United States supports police professionalization through a range of training, police academy reform, and expanded tactical training capacity. In 2018, the Costa Rican government adopted a U.S.-supported community security program as its national crime reduction plan. In

so doing, they significantly expanded an intelligence-based citizen security initiative based on a Colombian model program designed to increase cooperation between law enforcement and local government to enhance citizen security. The result is a whole-of-government preventative effort, “Sembremos Seguridad,” focused on addressing the drivers of insecurity and criminality, including drug trafficking, in Costa Rica’s most problematic neighborhoods. Costa Rica plans to expand Sembremos Seguridad to all 82 municipalities.

In the justice sector, the United States supports training programs for investigators, prosecutors, and judges on a broad range of topics, including trafficking in persons, money laundering, and counternarcotics. The United States supports a highly successful restorative juvenile justice program, the second phase of which was launched in early 2018.

The United States continues to support Costa Rican efforts to further strengthen the SNG and SVA’s interdiction capabilities, providing boats with greater reach, a ground-based radar, equipment, training, and professional exchanges. These increasingly professional and strategic forces are willing partners with great potential. In early 2018, the first Costa Rican liaison reported to the U.S. Joint Interagency Task Force South, marking an important milestone for multilateral cooperation on maritime drug interdiction.

A U.S.-supported Maritime Interdiction Vetted Unit (MIVU) comprised of representatives from a specialized law enforcement unit and the SNG was organizationally revamped in 2016, retooled with improved equipment in 2017, and expanded to two units in 2018.

D. Conclusion

Costa Rica took another step forward in 2018 in its efforts to strengthen its ability to combat drug trafficking and tackle the rising presence of transnational criminal organizations. In addition to key investments in human capital and equipment, the government’s enactment of a security tax will provide an annual font of resources dedicated to security. That said, Costa Rica must maintain its planned security sector growth over the mid-term if it hopes to keep up with the rapid increase in drug flows now permeating its territory, and the associated criminality.

Top priorities for increasing effectiveness and efficiency should continue to include: 1) professionalizing police and judicial institutions, with an emphasis on anti-corruption; 2) augmenting the use of advanced investigative techniques aimed at organized crime; 3) further investment in border security, to include Border and Customs Police, and the continued build-up of the Coast Guard and Air Surveillance Service capabilities to control the country’s sovereign territory; 4) passing laws that specifically target organized crime and its proceeds; and 5) continuing to strengthen Costa Rica’s cooperation with regional partners. Its successful engagement with Panama and Colombia, for example, already yields results.

Cuba

Cuba is not a major consumer, producer, or transit point of illicit drugs. Cuba's domestic production and consumption remain low due to active policing, strict sentencing, and nationwide prevention and public information programs. Cuba's intensive security presence and interdiction efforts have kept supply down and prevented traffickers from establishing a foothold. Cuba concentrates supply reduction efforts on preventing smuggling through territorial waters, rapidly collecting abandoned drugs found washed up on coastal shores, and conducting thorough airport searches. Cuba dedicates significant resources to prevent illicit drugs and their use from spreading, and regional traffickers typically avoid Cuba.

While most maritime seizures are found washed up on the shores of Cuba's southeastern coast, Cuban authorities have reported an increase in drugs found washed up on shores in the western provinces of Pinar del Rio and Isla Juventud. The United States and Cuba continue to hold expanded bilateral discussions on law enforcement and drug control cooperation.

With respect to international cooperation, the Cuban government reports 40 bilateral agreements for counterdrug cooperation, including the U.S.-Cuba Operational Cooperation Arrangement to Counter Illicit Traffic in Narcotics and Psychotropic Substances (signed in July 2016). The U.S. Embassy maintains a U.S. Coast Guard (USCG) liaison to coordinate with Cuban law enforcement, particularly the Cuban Border Guards. USCG and Cuban authorities share tactical information related to boats transiting Cuban territorial waters suspected of trafficking and coordinate responses between operational command centers. In addition, the U.S. Drug Enforcement Administration (DEA) established direct communications with Cuba's National Anti-drug Directorate in July 2016. Since then, DEA has received approximately 20 requests for information related to drug investigations, as well as cooperation leading to Cuba's successful arrest of a fugitive wanted in the United States.

Cuba has demonstrated a willingness to turn over some U.S. fugitives of high interest. Cuba and the United States continue to share communication between the national central authorities of both countries, which has greatly enhanced bilateral cooperation within the context of the U.S.-Cuba Law Enforcement Dialogue. Cuba has provided evidence and information to assist U.S. state and federal prosecutions. In another first in law enforcement cooperation, on July 7, 2018, the USCG turned over drug samples and a case package on two Jamaican nationals detained by Cuban Border Guard after the USCG collected their jettisoned drugs. Cuba continues to demonstrate a willingness to cooperate on law enforcement matters.

Dominican Republic

A. Introduction

The Dominican Republic is the top transshipment hub for cocaine passing through the Caribbean, and the U.S. government estimates approximately 90 percent of the cocaine bound for North America and Europe through the Caribbean transits through the Dominican Republic. Maritime routes, involving the use of “go-fast” boats and commercial containers, continue to be the primary method of smuggling drugs into and out of the country. The country is experiencing an increase in drug-related violence, especially as local groups engage in violent turf battles to control domestic drug distribution.

To combat the influence of drug traffickers, the Dominican Republic continued its cooperation with the U.S. government in 2018 to interdict illicit drug shipments and extradite criminals. The United States works actively with the Dominican Republic to plan and conduct international operations to seize illicit drugs and dismantle criminal organizations; however, corruption continues to hamper these efforts. The Dominican government conducts outreach efforts to warn youth about the dangers of drugs.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Cooperation remains strong between the Dominican and U.S. governments to combat drug trafficking and related transnational crime. The U.S. government’s primary partners are the National Directorate for the Control of Drugs (DNCD); the Dominican National Police (DNP); the National Council on Drugs (CND); the Office of the Attorney General; the National Intelligence Directorate (DNI); and the Dominican Armed Forces. The Dominican Specialized Corps for Port Security, working in conjunction with U.S. authorities and private port operators, continued efforts to improve security at key ports. The participation of the Dominican government in the Cooperative Situational Information Integration system, the Caribbean Basin Security Initiative (CBSI), and the Central America Integration System enhanced relations with the United States and regional Caribbean partners. Dominican authorities continued joint efforts with the Haitian National Police to exchange information by establishing liaison officers in their respective headquarters.

The Dominican Republic is a party to the Inter-American Convention against Corruption. In 1985, the United States and the Dominican Republic signed an agreement on international narcotics control cooperation. The Dominican Republic signed and ratified the Caribbean Regional Maritime Agreement and has a maritime counterdrug agreement with the United States that entered into force in 1995. The United States and the Dominican Republic signed an extradition treaty in 2015 that entered into force in December 2016, replacing the 1909 treaty, and provides for extradition on a much broader scope of crimes. In 2012, the United States and the Dominican Republic entered into a Permanent Forfeited Asset-Sharing Agreement. Through 2018, approximately \$4 million in assets have been shared under this agreement.

The Dominican Republic continues to be one of the most active extradition partners in the world for the United States. Although there is no formal bilateral mutual legal assistance treaty between the Dominican Republic and the United States, requests for legal assistance are made through informal channels and formal means pursuant to multilateral law enforcement cooperation treaties and conventions to which the United States and the Dominican Republic are parties. The Dominican Republic processes U.S. requests for legal and judicial assistance in a timely manner.

2. Supply Reduction

Illicit drugs are seized throughout the country, but the majority of seizures are made through operations targeting vessels from South America. During the first eight months of 2018, 3.3 metric tons (MT) of cocaine were seized directly by Dominican forces within the territory of the Dominican Republic. During the same period, the Dominican government contributed to the seizure of 2.14 MT of cocaine entering and exiting the Dominican Republic by U.S. authorities and other international partners.

Illicit drugs remain available for local consumption and are transshipped to the United States and Europe, primarily through maritime routes. The DNCD and Dominican military continue to cooperate with the United States and international partners in planning and conducting operations to interdict go-fast vessels attempting to deliver illicit narcotics to the southern coast, as well as to interdict drugs exiting the Dominican Republic. One Dominican port, Caucedo, is certified under the Container Security Initiative (CSI), a U.S. initiative to help increase security for maritime containerized cargo shipped to the United States. However, the other 15 Dominican ports, including Rio Haina, the other major Dominican port handling container traffic destined for the United States, are not CSI certified. The DNCD is increasing efforts to combat contraband at the ports.

3. Public Information, Prevention, and Treatment

Local drug use is concentrated in tourist centers and major metropolitan areas, although drug use and associated violence occurs throughout the country. The CND conducted demand reduction efforts in 2018 to warn Dominican youth of the negative effects of illicit drug use under the Strategic National University Plan on the Prevention and Use of Drugs. The DNP promoted community-based policing as an effective way to deal with crime locally. With the publication of its Community Policing manual, the DNP began outreach at the command level to implement community policing concepts more fully in the capital and other major population centers around the country.

4. Corruption

As a matter of policy, the Dominican government does not encourage or facilitate illicit drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. However, corruption remains endemic. The Government of the Dominican Republic has taken some steps to address corruption among military and law enforcement forces, but corruption remains a significant impediment to law enforcement efforts in the country and prosecution of

corrupt high-level officials is not the norm. The judiciary is politicized and riddled with corruption, and the legal system offers little recourse to those who lack money or influence.

A popular movement called the Green Movement that developed in response to the increased perception of corruption in the government, continued to protest impunity and pressure for greater transparency in 2018. The perceived inaction against those that received \$92 million in bribes from Brazilian company Odebrecht spurred the continuation of popular unrest against the government. The Attorney General initially brought charges against 14 individuals, but eventually only presented charges against seven, including a previously sitting minister. The judicial case began in late 2018 and will be heard before the Supreme Court. While several judges were suspended in 2018 due to alleged links to narcotic traffickers and other officials in the executive and judiciary have been suspended from their functions due to anti-corruption investigations, there have been no convictions in these cases to date.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States supports a wide range of efforts designed to reduce illicit trafficking, advance public safety and citizen security, and promote justice through CBSI. With CBSI funds, the United States government implements programs designed to enhance existing Dominican law enforcement capabilities by improving technical and professional abilities to conduct investigations, to enable effective prosecution, and to coordinate and participate in drug control efforts with the United States and neighboring countries' law enforcement agencies. The U.S. law enforcement community has strong relationships with its Dominican colleagues, as evidenced by the high number of extraditions and deportations of fugitives to the United States.

The United States provided equipment and training in 2018 to increase the capabilities of Dominican law enforcement entities, including support for the DNCD drug-detection canine units, and other specialized DNCD investigative and reactive units. The United States enhanced DNCD's computer training, database expansion, and systems maintenance support. Dominican authorities work with neighboring countries to expand the use of a U.S.-supported canine facility as a regional training center. The United States continues efforts to strengthen maritime capabilities through training in maritime law enforcement, search and rescue, port security, crisis management, and professional development for the Dominican Navy's officer and enlisted corps.

The United States provides tactical training, equipment, and other assistance to both the DNCD and Dominican military involved in illicit trafficking interdiction. The United States assists the DNP with its transformation into a professional, civilian-oriented organization by providing training at the entry and officer levels as well as technical assistance to strengthen strategic planning and communication, operations management and human resource systems. The Dominican legislature ratified a Police Organic Law in 2016 that has the potential to bring about significant institutional improvements to the DNP if fully implemented. The Dominican Republic continues to work towards passing legislative proposals related to illicit enrichment and anti-corruption by public officials. Efforts to strengthen the infrastructure of the Financial Analysis Unit remain ongoing.

The United States supports the Dominican Republic's efforts to establish a transparent and effective justice sector. U.S. assistance promotes justice sector reforms by strengthening Dominican government capacity to manage and prosecute complex money laundering, fraud, public corruption, and illicit trafficking cases, as well as to establish internal controls to prevent corruption. The United States works with the Offices of the Attorney General, Prosecutorial Training School, Judiciary, Public Ministry, Public Defense, Supreme Court of Justice, and Constitutional Tribunal. These CBSI programs strengthen justice sector career, integrity, and accountability systems, and contribute to building the capacity of the national police and prosecutors to develop stronger cases and coordinate efforts leading to more successful prosecutions. As part of CBSI, U.S. assistance strengthens Dominican civil society coalitions for citizen security and criminal justice reform, supports community justice houses that increase access to justice for vulnerable populations, and provides technical assistance for the implementation of the new organic law on police reform. CBSI funds crime prevention programs that help at-risk youth pursue education, vocational training, and employment. These programs support broader drug control efforts by enhancing life skills, facilitating positive interaction with police and improving communities' trust in and willingness to work with police, thereby making communities more resilient to crime including crime with a nexus to drug trafficking, distribution, and drug use.

The Dominican Republic regularly participates in two recurring events to promote cooperation against maritime trafficking; the Multilateral Maritime Counter Drug Summit and the Multilateral Maritime Interdiction and Prosecution Summit. These two events bring together counterdrug professionals from over 30 countries and over 80 international organizations spanning North, Central, and South America, and Europe.

D. Conclusion

Combating pervasive corruption, restoring public confidence in law enforcement, addressing illicit maritime drug smuggling, and confronting rising levels of drug-fueled violence are major challenges facing the Dominican Republic. The Dominican Republic's aerial and maritime interdiction efforts demonstrate institutional capacity and political will to help stem the flow of drugs into the country. The Dominican government must continue to improve its efforts to build a coherent, multifaceted drug control program. Key to this effort will be increased domestic cooperation between the DNP, DNCD, and military units, combined with greater cooperation with law enforcement agencies in other countries in the region.

Dutch Caribbean

A. Introduction

The Dutch Caribbean consists of Aruba, Curaçao, Sint Maarten, Bonaire, St. Eustatius, and Saba. Aruba, Curaçao, and Sint Maarten are autonomous countries within the Kingdom of the Netherlands. Bonaire, St. Eustatius and Saba are special municipalities of the country of the Netherlands.

Aruba and Curaçao are located 30 to 40 miles north of Venezuela and continue to serve as northbound transshipment points for cocaine originating from Colombia and transiting Venezuela. Cocaine is primarily transported via fishing boats and inter-coastal freighters for transshipment to the United States, other Caribbean islands, Africa, and Europe. Sint Maarten is located in the Eastern Caribbean and is a transshipment hub for cocaine, heroin, and marijuana ultimately destined for Puerto Rico and the U.S. Virgin Islands as well as Europe.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Aruba, Curaçao, and Sint Maarten have a high degree of autonomy over their internal affairs, with the right to exercise independent decision-making in a number of drug control areas. The Kingdom of the Netherlands is responsible for the islands' defense and foreign affairs, and assists the governments in their efforts to combat drug trafficking through its support for the RST (Dutch acronym for "Special Police Task Force").

In 2016, the United States, the Kingdom of the Netherlands, Aruba, Sint Maarten, and Curaçao signed a memorandum of understanding (MOU) to enhance existing cooperation and strengthen law enforcement and criminal justice systems in the Caribbean parts of the Kingdom of the Netherlands. No new counterdrug programs were initiated in 2018.

Aruba

Aruba's police force, the Korps Politie Aruba (KPA), continues to evolve into a regional leader in the fight against narcotics trafficking and international criminal organizations. The KPA is at the forefront in collecting and sharing intelligence with regional law enforcement partners. Despite insufficient resources, the KPA continues to investigate trafficking organizations effectively. The Organized Crime Unit of the KPA conducted several successful investigations during fiscal year 2018, which led to the seizure of over 380 kilograms (kg) of cocaine; 75 kg of marijuana; one kg of heroin; \$2,100,000 in illicit drug proceeds; and the arrest of multiple subjects.

Curaçao

Curaçao's police force, the Korps Politie Curaçao (KPC), works closely with the U.S. Drug Enforcement Administration (DEA) to diminish the flow of illegal drugs transiting from

Venezuela and Colombia to the Dutch Caribbean. In June 2018, the KPC seized approximately 102 kg of cocaine, eight kg of heroin, and 11 firearms in a single incident. During the first 10 months of 2018, the KPC seized approximately 1.6 metric tons (MT) of cocaine and eight kg of heroin. KPC continues to investigate trafficking organizations effectively, but institutional weaknesses remain.

St. Maarten

St. Maarten/St. Martin is a transshipment point for cocaine in the Caribbean to the United States, partially due to its proximity to the U.S. Virgin Islands (approximately 100 nautical miles away) and Puerto Rico (approximately 200 nautical miles away), as well as to Europe. This small two-nation island is a challenging place for law enforcement to combat drug trafficking due to its separate legal jurisdictions between the Kingdom of the Netherlands (St. Maarten) and France (St. Martin). In 2015, authorities in St. Maarten lifted the visa requirement for Colombian and Venezuelan nationals to travel to St. Maarten. Colombian and Venezuelan drug trafficking organizations operating in St. Maarten/St. Martin mostly utilize Dominican nationals to transport large cocaine shipments, via “go-fast” vessel to the United States. Many of the go-fast vessels are stored at unlicensed marinas located on the French side of St. Martin.

According to DEA, multi-ton quantities of cocaine are smuggled into Puerto Rico and the U.S. Virgin Islands via go-fast vessels from St. Maarten/St. Martin on a monthly basis. In 2018, U.S. authorities worked effectively with Dutch, French, and Dutch Caribbean authorities to target maritime vessels trafficking large quantities of cocaine from St. Maarten/St. Martin to Puerto Rico and the U.S. Virgin Islands. These operations resulted in the seizure of approximately 1.67 MT of cocaine and \$143,000 in drug proceeds.

Bonaire, St. Eustatius, Saba

The National Office for the Caribbean in the Netherlands Ministry of Interior Affairs and Kingdom Relations assumes the responsibilities of law enforcement, security, and other administrative functions on behalf of the Government of the Netherlands for Bonaire, St. Eustatius, and Saba.

2. Supply Reduction

Due to increased intelligence sharing and cooperation between Dutch Caribbean law enforcement organizations and U.S. authorities, the opportunity to further disrupt drug trafficking is improving. In addition, the aforementioned MOU promotes enhanced police enforcement and better organization for airport security and harbor/cruise terminal security with the goal of reducing drug trafficking. According to DEA, in 2018, Dutch Caribbean authorities working with U.S. law enforcement support seized approximately 3.64 MT of cocaine; 454 kg of marijuana; nine kg of heroin; conducted 112 drug related arrests; and seized approximately \$2,243,000 in assets from drug traffickers. These statistics do not include seizures by the Dutch Navy.

3. Public Information, Prevention, and Treatment

Drug treatment and prevention is accomplished through a combination of privately and publicly funded foundations on each of the islands. Sint Maarten has one drug treatment foundation that suffered severe damage from Hurricane Irma in 2017 and has yet to fully recover.

4. Corruption

None of the Dutch Caribbean countries, as a matter of government policy, encourages or facilitates illegal activity associated with drug trafficking; however, in October 2018 approximately 500 kg of seized cocaine were stolen from the KPC's evidence vault in Curaçao. There is an ongoing investigation, but the evidence obtained at this juncture points to internal corruption in the local police force as the catalyst of the theft.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The objectives of U.S. drug control policy in the Dutch Caribbean are to promote cooperation between law enforcement and military partners, and to reduce illicit drug trafficking. DEA works with its island counterparts to advance joint investigations, both within the Dutch Caribbean and the United States.

The Kingdom of the Netherlands supports drug control efforts by continuing to support U.S. Air Force Forward Operating Locations in Curaçao and Aruba. U.S. military aircraft conduct detection and monitoring flights over the southern Caribbean Sea. In addition, the Dutch Navy regularly conducts drug interdiction operations in the region as the lead for Task Group 4.4 under the auspices of Joint Interagency Task Force South. With support from the U.S. Coast Guard, the Royal Netherlands Navy interdicted approximately 5.1 MT of cocaine during the first 10 months of 2018 (not including Dutch Caribbean Coast Guard seizures).

D. Conclusion

Eight years after the dissolution of the Netherlands Antilles, Curaçao and Sint Maarten are still establishing counterdrug organizational structures among their various agencies. It is imperative that both islands embrace regional cooperation and intelligence sharing efforts. Both Curaçao and Sint Maarten can look to Aruba as an example of how this is accomplished.

Eastern Caribbean

A. Introduction

The Eastern Caribbean (EC) refers to the independent countries of Antigua and Barbuda, Barbados, Dominica, Grenada, Saint Kitts and Nevis, Saint Lucia, and Saint Vincent and the Grenadines collectively in this report.

The EC is a transshipment point for cocaine and marijuana destined for North America, Europe, and the Caribbean. There is cannabis cultivation in all EC countries, mostly for local consumption, and the amount grown varies from country to country. There is a low local demand for cocaine, and negligible use of synthetic drugs.

The geographic and jurisdictional diversity of the EC represent major challenges to combatting the illegal drug trade. These countries do not have sufficient maritime resources to effectively patrol their entire coastlines. Although traffickers use a variety of vessels like yachts and cargo ships to transport illicit drugs, “go-fast” boats are still popular, which enable traffickers to avoid capture by accessing multiple territorial waters.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

All EC countries have strong working relationships with the United States on drug control operations. Grenada’s National Anti-Drug Strategy (2014-2018) was near completion at the end of 2018, and covers legislation, interdiction, education, and public awareness. With the assistance of the Organization of American States, Saint Vincent and the Grenadines is in the process of establishing a new National Drug Council and creating a national drug policy. Saint Kitts and Nevis has increased the size of its police force and opened a new forensics laboratory. Saint Lucia appointed a new drug squad commander in October 2018. Antigua and Barbuda passed the 2018 Misuse of Drugs (Amendment) Act that exempts from criminal liability “a person who is in possession of a maximum of 15 grams of the drug Cannabis or Cannabis resin,” although smoking in public and selling it remains illegal. Children under the age of 18 are required to participate in drug counseling if caught with cannabis or cannabis resin. Barbados and Saint Vincent and the Grenadines are planning to allow cultivation, domestic use, and export of medicinal marijuana under licensing controls to countries where medicinal cannabis is legal. Saint Vincent and the Grenadines is also considering legalization of cannabis for religious purposes.

All of these countries have extradition and mutual legal assistance treaties in force with the United States. All have signed or ratified the Inter-American Convention against Corruption and the Inter-American Convention against Terrorism. Antigua and Barbuda and Saint Lucia ratified the Inter-American Convention on Extradition. Antigua and Barbuda, Dominica, and Grenada have signed and/or ratified the Inter-American Convention on Mutual Assistance in Criminal Matters.

2. Supply Reduction

During the first nine months of 2018, drug seizures in the EC totaled 661 kilograms of cocaine and nine metric tons of marijuana, according to data received from each country. Saint Kitts and Nevis reported eradicating 45 hectares (ha) of cannabis, while Saint Lucia (10.5 ha), Saint Vincent and the Grenadines (eight ha), Dominica (1.2 ha), Antigua (.8 ha), and Grenada (.1 ha) reported eradicating smaller amounts of cultivation. During the same period, Antigua and Barbuda reported 142 drug-related arrests with 70 prosecutions and 66 convictions. Barbados reported 105 drug-related arrests with 105 prosecutions. Dominica reported 49 drug-related arrests, 45 prosecutions, and 18 convictions. Grenada reported 240 drug-related arrests, 401 prosecutions, and 275 convictions. Saint Kitts and Nevis reported 205 drug-related arrests, 205 prosecutions, and 97 convictions. Saint Lucia reported 146 drug-related arrests. Saint Vincent and the Grenadines reported 213 drug-related arrests, 186 prosecutions, and 182 convictions.

Some countries report a growing market for strains of marijuana from the United States and Canada. Some countries also report an increase in the use of commercial cargo airlines and different types of marine vessels for transshipment. Barbados reported more small-scale trafficking in 2018.

The United States has provided assistance to all of the countries in the form of training and equipment. This assistance has built better relationships for operational law enforcement purposes.

3. Public Information, Prevention, and Treatment

Reliable statistics on consumption and use are not available, but the most commonly used drug is marijuana. All of the countries have some form of drug demand reduction programming. Barbados, Grenada, and Saint Vincent and the Grenadines have implemented the U.S. Drug Abuse Resistance Education (DARE) program for youth. Barbados also has programs through the National Council on Substance Abuse, the Centre for Counseling Addiction Support Alternative, and Alcoholics Anonymous. The National Council on Substance Abuse monitors the programs through qualitative assessments, surveys, and pre- and post-tests. The National Drug Avoidance Committee in the Ministry of Education operates Grenada's programs.

Notably, Saint Kitts and Nevis has four formal programs. The Explorer program targets children in the 5-12 year age range. Mentoring Advising Guiding Instructing Children (MAGIC) teaches children about the harmful effects of drugs. Teen and Police Service (TAPS) targets predominantly at-risk or troubled teens. Operation Future brings children and parents together to learn about the perils of drug use.

Saint Lucia's Substance Abuse Advisory Council Secretariat develops policies and programs tailored to individuals, communities, and the entire country. Saint Vincent and the Grenadines has numerous programs, including police youth clubs and summer programs and a local cadet force. The Pan Against Crime Initiative celebrated its 10th anniversary in 2018, and teaches young people to play steel drums. For adults, Saint Vincent and the Grenadines has a Monday night radio program that allows police to reach a large audience with anti-drug messaging.

Not every country has drug rehabilitation clinics. Antigua and Barbuda has two private rehabilitation centers. Barbados has five drug rehabilitation clinics, while Saint Lucia and Saint Vincent and the Grenadines has one each.

4. Corruption

As a matter of policy, the region's governments do not encourage or facilitate the illicit production or distribution of narcotic or psychotropic drugs or other controlled substances, or the laundering of proceeds from illegal drug transactions. In 2018, there were no arrests of senior government officials for drug-related activity.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States supports a wide range of efforts designed to address crime and violence affecting EC citizens, primarily through the Caribbean Basin Security Initiative (CBSI). CBSI is a security partnership between the United States and Caribbean nations that seeks to substantially reduce illicit trafficking, advance public safety and citizen security, and promote justice. CBSI programming in the Eastern Caribbean strengthens the capacity of law enforcement institutions to detect, interdict, prosecute, convict, and incarcerate criminals. The programs support information sharing networks, joint interagency operations, and regional training initiatives to promote interoperability.

The United States maintains bilateral agreements to suppress illicit traffic by sea with Antigua and Barbuda, Barbados, Dominica, Grenada, St. Kitts and Nevis, St. Lucia, and St. Vincent and the Grenadines, which include provisions regarding ship boarding, shipriders, pursuit, entry into territorial waters, overflight, and order to land.

In addition to the bilateral agreements the United States has with each country, the United States signed an agreement with the Regional Security System (RSS). The main drug control goals of that agreement include supporting operations of the RSS Air Wing and the RSS Digital Forensic Lab and collaborating on training for all member states.

D. Conclusion

The United States enjoys strong operational cooperation with EC countries on drug control matters. Through these relations, these countries prosecuted at least 10 major traffickers in 2018. The United States strongly recommends that all countries meet their financial commitments to the RSS and, for those in arrears, pay their back dues. The United States also recommends that standard operating procedures for communication and coordination domestically and internationally between and among EC countries be further developed and implemented, where those procedures do not already exist.

Ecuador

A. Introduction

Situated between two of the world's largest cocaine producing countries, Ecuador is a major transit country for illicit drugs. Cocaine and heroin from Colombia and cocaine from Peru is trafficked through porous land borders and via maritime routes for distribution to the United States and Europe. While not a major drug producing country, Ecuador is a major transit country for chemical precursors to process illicit drugs and is vulnerable to transnational organized crime due to permeable borders and corruption. While committed to combating drug trafficking, Ecuador's police, military, and judiciary lack sufficient resources to confront transnational criminal challenges.

The government of President Lenin Moreno, who took office in May 2017, remains committed to reducing both drug supply and drug demand, as reflected in a new 2017-2021 National Drug Prevention and Control Plan. Domestic drug consumption is rising and public treatment facilities are insufficient to treat the country's population suffering from substance use disorders.

In the first quarter of 2018, the drug trafficking group Oliver Sinisterra Front, led by a former Revolutionary Armed Forces of Colombia (FARC) guerrilla member, carried out attacks, kidnappings, and killings of journalists, military personnel, and private citizens along Ecuador's northern border with Colombia. To respond to this threat, the Ecuadorian government has increased security forces at the border, strengthened cooperation with Colombia, and issued a new Northern Border Security, Peace, and Development Plan. The Moreno government has also made positive steps to expand cooperation with the United States and other international partners to fight transnational crime and drugs.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Ecuadorian government is concerned about the detrimental effects of drug trafficking and transnational organized crime throughout the country. During the first 10 months of 2018, 10,144 individuals were arrested for trafficking-related crimes, compared to 9,054 during the same period in 2017, an increase of 12 percent. In April 2018, as part of a government-wide downsizing initiative, President Moreno eliminated the Technical Secretariat of Drugs (SETED) that was previously responsible for coordinating the overall drug control policy in Ecuador. The Ministry of Health assumed coordination and oversight of drug prevention, demand reduction, and treatment programs. The Ministry of Interior is now responsible for combating the production, trafficking, sale, and use of illicit drugs, as well as regulating the use of controlled substances and destroying seized substances. The now defunct SETED destroyed 35 metric tons (MT) of seized illegal substances during the first six months of 2018. The Ministry of Interior reported it destroyed 16 MT of seized illegal substances between July and October. In early October, Ecuadorian media reported that 26.4 MT of seized drugs were being stored in five warehouses nationwide, waiting to be incinerated.

Ecuador's 2008 constitution categorizes drug abuse as a public health problem and mandates that the government develop prevention programs and provide treatment and rehabilitation options to persons with substance use disorders. A criminal code (COIP) that went into effect in 2014 increased penalties for most crimes, while decriminalizing personal use, possession, and consumption of relatively small amounts of narcotics. The COIP created a tiered approach to drug trafficking and possession, with larger amounts carrying longer prison sentences.

In September 2015, the National Assembly approved amendments to the 2014 COIP that created a table of drug quantities and penalties, drastically reducing the minimum amount of narcotics required to trigger each tier of punishment. In 2016, Ecuador established two special crime laboratories in Quito and Guayaquil.

The Government of Ecuador has bilateral drug control agreements with many countries in the region, including the United States. The United States and Ecuador have agreements on measures to prevent the diversion of precursor chemicals, the sharing of information for currency transactions over \$10,000, and a customs mutual assistance agreement. In April 2018, the Ministry of Interior signed a MOU with DHS to establish a Transnational Criminal Investigative Unit, and a framework agreement MOU with U.S. Immigration and Custom Enforcement and the DEA to facilitate drug control and border security cooperation and information sharing.

In June 2018, the Ecuadorian Ministry of Defense and U.S. Department of Defense signed a memorandum of agreement to place an Ecuadorian liaison officer at the U.S. Joint Interagency Task Force-South (JIATF-S) in Florida. In September 2018, U.S. Customs and Border Patrol, under the authority of JIATF-S, initiated regular maritime patrol flights in coordination with the Ecuadorian Ministries of Defense and Interior and with the participation of Ecuadorian military and police riders, to monitor and interdict maritime drug trafficking in the Eastern Pacific. The U.S. Coast Guard and Ecuadorian maritime authorities also exercise Maritime Operational Procedures that coordinate the boarding of vessels claiming Ecuadorian nationality and stateless vessels in international waters. In October 2018, the Minister of Interior, the Attorney General, and DEA signed an MOU regarding information exchange. DEA continues to support a vetted unit within the National Police Antinarcotics Division.

The United States and Ecuador are parties to an 1873 extradition treaty and a supplementary treaty that entered into force in 1941. However, Ecuador's constitution prohibits the extradition of Ecuadorian citizens. The United States has worked with the Moreno administration to improve administrative processes related to extradition requests. The United States and Ecuador do not have a bilateral mutual legal assistance treaty, but cooperate under the Inter-American Convention on Mutual Assistance in Criminal Matters, as well as relevant UN conventions.

2. Supply Reduction

Ecuador remains a major transit country for cocaine shipments via air, land, and maritime routes, and heroin shipments via air and mail. Drug traffickers use various methods to move shipments, including containerized cargo ships, small fishing boats, self-propelled semi-submersible and fully-submersible submarines, "go-fast" boats, aircraft, human couriers, and mail. Ecuadorian maritime trafficking networks consistently use routes south of the Galapagos Islands to

destinations in Central America to circumvent law enforcement interdiction efforts. Transnational criminal organizations, many based in Mexico and Colombia, continue to operate in Ecuador.

Official police statistics indicate that during the first 10 months of 2018, cocaine seizures totaled 54 MT, equal to the 54 MT of cocaine seized during the same period in 2017. The volume of heroin seized during this same 10-month period totaled 198 kilograms (kg), a decline from 2017, when 305 kg were seized during the same period. Twelve MT of marijuana were seized during the first 10 months of 2018, compared with 10 MT during the first 10 months in 2017. In the month of August 2018 alone, several Ecuadorian National Police (ENP) units in conjunction with DEA carried out a series of highly effective operations that resulted in the seizure of 4.7 MT of cocaine hydrochloride, 14 MT of calcium chloride, 9.45 kg of heroin, and 21 arrests.

Maritime seizures of all illicit drugs totaled 5.8 MT during the first 10 months of 2018, compared to approximately 6.8 MT in all of 2017. This included three MT of cocaine seized in international waters close to the Galapagos Islands as a result of the first deployment of a Customs and Border Protection (CBP) P-3 maritime patrol aircraft to Ecuador in September 2018.

Drug traffickers use containerized cargo and shipping containers to smuggle drugs out of Ecuador, often concealing drugs in licit cargo. The Port of Guayaquil is a major transshipment hub for cocaine concealed in containerized cargo to Europe. The port authority, Contecon, employs security measures at its facility but inspects only 7 percent of containerized exports. During the first 10 months of 2018, the port authority inspected 38,745 containers. In July 2018, the United States and Ecuador signed a Declaration of Principles incorporating Ecuador into the Container Security Initiative, which permits CBP personnel to be posted at the Port of Guayaquil to work with Ecuadorian authorities to strengthen the port security and facilitate trade.

The last survey on coca cultivation in 2014 by the United Nations Office on Drugs and Crime (UNODC) showed no significant coca cultivation in Ecuador. In 2018, Ecuadorian authorities detected small-scale coca cultivation along the northern border. The government's policy is for the police or military to eradicate immediately coca, poppy, or cannabis when discovered, although nearly all poppy plants are wild and not cultivated for heroin production. Largely due to the refocusing of security efforts in response to violence on the northern border in early 2018, the government decreased eradication of coca plants from 10,100 to 3,798 and did not eradicate any poppy plants, compared to the 145,074 poppy plants eradicated during the first 10 months of 2017.

Synthetic drug production and consumption is an issue of growing concern for Ecuadorian authorities, and the government has made arrests of organized groups involved in trafficking synthetic drugs. Ecuador has reported to UNODC the emergence of new psychoactive substances.

3. Public Information, Prevention, and Treatment

Domestic drug abuse is a growing challenge in Ecuador. UNODC carries out demand reduction and drug prevention programs in Ecuador with funding from the United States, European Union, and other international donors. In May 2018, UNODC held a U.S.-funded policymakers workshop for 70 National Assembly members and their advisors on the nature, prevention, and treatment of drug use disorders. According to UNODC data, 12.7 percent of university students used some type of illicit drug in 2016. All drug offenders are entitled to drug treatment under the Ecuadorian constitution, but there is a lack of adequate resources and facilities to treat those with addictions. As of October 2018, there were 45 publicly funded outpatient drug treatment facilities and 12 public inpatient drug treatment facilities in Ecuador. Other drug treatment options, such as the 198 private facilities that provide drug treatment alternatives, are often prohibitively costly.

In January 2018, the Ecuadorian government launched the “2017-2021 National Plan for Comprehensive Prevention and Control of the Socio-Economic Phenomenon of Drugs.” In 2018, the Ministry of Health, Ministry of Interior, and ENP conducted drug abuse public awareness campaigns targeted at teachers, religious leaders, children, and youth, among others. The Government of Ecuador also launched in January 2018 a public awareness television campaign called “Por Un Mar Sin Drogas” (“For a Sea without Drugs”) to highlight the dangers of drug abuse and deter fishermen from engaging in drug trafficking.

4. Corruption

President Moreno has made anticorruption a priority of his administration. A number of prosecutions in 2017-2018 have led to the conviction of government officials involved in corruption cases, including a six-year prison sentence for former Vice President Jorge Glas for illicit association in connection with the Brazilian company Odebrecht’s corruption scandal. As a matter of policy, the Ecuadorian government does not encourage or facilitate the illicit production or distribution of narcotic or other controlled substances, or the laundering of proceeds from illegal drug transactions. In February 2018, a national referendum approved a lifelong ban from public office of government officials convicted of corruption. The National Assembly is also considering proposals for a new law to recover illicit proceeds from corruption.

Drug-related corruption remains a problem within the public security forces. On September 12, two members of the Ecuadorian Air Force were arrested for carrying one metric ton of cocaine in the Ecuadorian military base in Manta. In October, Ecuadorian authorities arrested and said they intended to prosecute seven military officials and six civilians for altering the Armed Forces’ inventory system and trafficking ammunition to the drug trafficking group Oliver Sinisterra Front.

Ecuador has looked to increase international cooperation on anticorruption. The Ministry of Foreign Affairs entered into a Memorandum of Understanding on Anti-Corruption with UNODC in 2017 to exchange international best practices on transparency, education, and prevention. In July 2018, Ecuador joined the Open Government Partnership, an international civil society initiative that promotes government transparency.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The Moreno administration has expressed a strong commitment to work with international partners, including the United States, to fight transnational crime and drug trafficking and strengthen security, particularly in its northern border area. Between January and April 2018, the Oliver Sinisterra Front conducted a series of bombings and attacks against the military and police in Esmeraldas province that resulted in the death of four military officers and culminated in the kidnapping and murder of three journalists and two private citizens. The Government of Ecuador augmented its security presence along the northern border with Colombia to over 12,000 military and police personnel. The Moreno administration also increased its communication and coordination with Colombian authorities. At Ecuador's request, the U.S. government provided assistance and training in post-blast investigations. In September 2018, the Government of Ecuador launched a Northern Border Security, Peace and Development Plan to provide a comprehensive approach to respond to insecurity on the northern border, and has proposed new laws to strengthen public security and strategic intelligence.

The U.S. and Ecuadorian governments reestablished in 2018 a framework for growing bilateral security and drug control cooperation. During a June 2018 visit to Ecuador, U.S. Vice President Mike Pence announced the United States would provide \$3.45 million in new bilateral funding for capacity-building and technical assistance programs to strengthen Ecuador's criminal justice and law enforcement capabilities. Additionally, per the request of the Ecuadorian government, the United States reestablished its Office of Security Cooperation at Embassy Quito in August 2018, which the previous Ecuadorian government had closed in 2014.

In 2018, the United States supported Ecuador's drug prevention efforts in coordination with Ministry of Interior, National Assembly, SETED and other governmental and multilateral entities. In June 2018, the Community Anti-Drug Coalition of America organization began conducting U.S.-funded trainings and workshops in Duran to develop anti-drug use community coalitions.

Throughout 2018, the United States provided ongoing logistical and operational support for Ecuadorian counterdrug operations. As a result of regional cooperation among DEA, the Ecuadorian police, and Colombian law enforcement, Edison Prado Alava, a U.S. Government Consolidated Priority Organization Target, was extradited to the United States in February 2018 and pleaded guilty to charges in a Southern Florida court. Pursuant to the April 2018 agreement, the Ecuadorian National Police established a new Transnational Crime Investigative Unit that received U.S. training. The United States continues to work with Ecuadorian police and security officials to increase their interdiction capacity at sea and in port facilities, including through the P-3 program and Container Security Initiative.

Since 2006, the United States has maintained an operational arrangement with Ecuador to stop, board, and search Ecuadorian vessels reasonably suspected of drug smuggling encountered at sea. Ecuador is a founding member of the semi-annual Multilateral Maritime Counterdrug Summit, which brings together maritime counterdrug professionals from approximately 25 countries and over 60 international agencies spanning North, South and Central America, and Europe.

D. Conclusion

The United States supports Ecuador's drug control efforts and strongly encourages Ecuador to take further steps to interdict illicit drugs and control of chemical precursors, both on land and at sea. To address the growing challenges of drug trafficking, the Ecuadorian government will need to continue working with international partners and devote additional resources to augment the capacity of the police and military through improved communications, equipment, and technology to facilitate investigations, and provision of additional training for the police and the military. The Ecuadorian government should also focus on securing containerized, maritime cargo from illicit use and increasing maritime interdiction capacity.

El Salvador

A. Introduction

El Salvador remains a transit country for illicit drugs originating from source countries in South America destined for the United States. In 2018, El Salvador maintained an active maritime presence through interdiction operations by the Salvadoran Navy and information-sharing with international partners that served to push most maritime traffic beyond the 200 nautical mile mark El Salvador claims as its territorial waters. Analysis of drug trafficking trends suggests drug trafficking organizations are trafficking cocaine shipments by maritime conveyance farther offshore into the Pacific Ocean, beyond the operational capacity of the Salvadoran Navy, to avoid detection.

Transnational cocaine-trafficking organizations use private vehicles to transport small amounts of cocaine to the Guatemalan border along the Pan-American Highway.

The Salvadoran government continues to implement Plan El Salvador Seguro (PESS), a geographically targeted approach to reducing crime in the most violent municipalities that includes support for drug prevention components. The Salvadoran government also continued a series of emergency measures launched in 2016 aimed at securing the nation's prisons and dismantling gang leadership structures that play a role in local drug distribution, and transitioned the majority of the measures into the penal code. A lack of reliable information on the severity of drug consumption and internal distribution within El Salvador continues to present a challenge.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Anti-Narcotics Division (DAN) of the National Civil Police (PNC) is the primary agency responsible for combating drug-related crimes throughout El Salvador. The vetted Special Anti-Narcotics Group (GEAN) within the DAN is responsible for conducting sensitive drug investigations. In 2018, the GEAN continued to build institutional links with more advanced Sensitive Investigation Units (SIUs) in Guatemala and Colombia, greatly expanding El Salvador's ability to respond to drug trafficking alerts and to investigate larger criminal organizations. El Salvador supports a full-time liaison officer within the U.S. Joint Interagency Task Force South (JIATF-S) to support regional drug control coordination.

El Salvador's National Electronic Monitoring Center began operations in June 2012 with support from the United States. The center allows Salvadoran law enforcement authorities with judicial warrants to intercept electronic communications to support drug trafficking investigations, increasing operational coordination between the DAN, GEAN, other Salvadoran investigative authorities, and international partners. This improved intelligence sharing proved pivotal in the August conviction of 61 leaders and members of the transnational criminal gang Mara Salvatrucha (MS-13) on more than 150 criminal charges including drug trafficking.

A sustained decline in maritime drug trafficking within Salvadoran territorial waters led to decreased littoral interdiction operations by the Joint Interagency Task Force “Grupo Conjunto Cuscatlán” (GCC). The unit, equipped for patrols along coastal waterways, encountered little drug trafficking in 2018, and thus continued its focus on operations supporting the arrest of gang members operating from remote estuarine and coastal safe havens. The Salvadoran Navy maintains primary responsibility for maritime interdiction at or beyond 200 nautical miles from El Salvador’s coastline. The average interdiction occurs between 400-500 nautical miles offshore, and suspects are detained and escorted ashore for processing by the Salvadoran justice system. The GCC maintains its primary headquarters away from military facilities and with a primary emphasis on anti-gang efforts, but remains equipped to coordinate with the Navy on littoral interdiction if maritime trafficking trends shift back to where they were in previous years. The deterioration of the GCC’s relationship with the Salvadoran Navy limited the GCC’s ability to regularly support naval interdictions.

In August 2018, El Salvador’s Attorney General and the Director of the PNC announced the arrests of over 350 MS-13 gang members and the seizure of 100 vehicles, property, and businesses during a complex yearlong investigation. The arresting agents secured warrants of known gang members, affiliates, and co-conspirators on charges including homicide, drug trafficking, money laundering, and terrorism. As a result of United States assistance and training, the coordinated takedown represented a significant increase of the Government of El Salvador’s capability to debilitate MS-13 operations through large-scale arrest operations with asset forfeitures.

El Salvador is party to the Central American Convention for the Prevention of Money Laundering Related to Drug-Trafficking and Similar Crimes, the Inter-American Convention Against Corruption, the Inter-American Convention on Extradition, and the Inter-American Convention on Mutual Assistance in Criminal Matters.

2. Supply Reduction

Between January 1 and November 20, Salvadoran authorities seized approximately 12.45 metric tons (MT) of cocaine, 877 kilograms (kg) of marijuana, and 3.39 kg of “crack” cocaine. Cocaine seizures in 2018 increased 120 percent compared to the same period in 2017, due to the GEAN and Salvadoran Navy’s increased cooperation and intelligence-driven operations with U.S. maritime authorities. In November, the Salvadoran Navy conducted an operation based on information provided by international partners that resulted in the seizure of 6.38 MT of cocaine 250 nautical miles off the coast of El Salvador, representing the largest seizure in Salvadoran history. El Salvador continued to divert human and material resources from the DAN to support anti-gang operations in 2018, though the impact on seizures was limited. During the first 10 months of 2018, Salvadoran authorities seized \$550,314 in bulk currency – a 31 percent decrease compared to the same period in 2017 – and arrested 2,949 individuals on drug-related crimes.

3. Public Information, Prevention, and Treatment

Drug use among Salvadorans is a growing concern, particularly among youth. The government has not kept reliable statistics for illegal consumption since 2012. The PNC has been

successfully implementing the Gang Resistance Education and Training (GREAT) program in public schools throughout Model Police Precinct (MPP) locations, which combine training and police-community relation activities. In 2018, the United States trained and certified 80 Salvadoran PNC officers as full-time GREAT instructors, raising the total trained since the program began in 2010 to 470. In 2018, these officers delivered GREAT to over 25,000 at-risk youth throughout the country. In addition to the GREAT program, the PNC established Police Athletic Leagues (PAL), benefitting over 18,800 at-risk youth.

As of October, the United States' partnership with the PNC continued to support citizen security and prevention activities in 50 municipal districts through the MPP Program, with four additional communities scheduled to reach MPP status by the end of 2018. The MPP, GREAT, and PAL programs now cover all 19 delegations across El Salvador, and were nationalized into the Government of El Salvador's National Prevention Strategy. These programs support broader drug control goals by facilitating positive interaction between youth and police and improving communities' trust in and willingness to work with police, thereby making communities more resilient to crime including crime with a nexus to drug trafficking and use.

In 2018, the Government of El Salvador launched its School Resource Officer Program charged with the protection and education of students while promoting safety and respect for law enforcement. The United States provides training to support this initiative, and certified 60 officers in the program during 2018.

4. Corruption

The Government of El Salvador does not, as a matter of government policy, encourage or facilitate illicit drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. However, corruption within the Salvadoran political system remains a serious problem. The United States continues to utilize U.S.-trained Colombian polygraphists via the trilateral U.S.-Colombia Action Plan to assist El Salvador's security forces with anticorruption efforts. During the first 10 months of 2018, Colombian polygraphists completed 630 exams of PNC investigative units, DAN, GCC, Attorney General staff, and U.S.-supported task forces, with plans to complete an additional 250 exams by the end of 2018. In September, Attorney General Douglas Melendez successfully won a conviction against former President Antonio Saca on corruption and money laundering charges, which marks the first former Salvadoran president tried and convicted for illegal acts during his time in office. Melendez, who made large strides in combating corruption in El Salvador, completed his three-year term in January. It is unclear whether his successor, Raul Melara, will demonstrate the same commitment to combating corruption.

In July, El Salvador's legislative assembly passed new legislation giving greater autonomy to the country's Financial Investigation Unit (FIU), in an effort to comply with a request from the Egmont Group, a network of international FIUs. However, a Presidential veto in August over constitutional concerns resulted in the suspension of El Salvador's FIU from the Egmont Group, for its inability to maintain operational independence and autonomy. The Legislative Assembly managed to override a presidential veto in October, following intense pressure by the international community, and the law will be reviewed by the Constitutional Chamber of the

Supreme Court. El Salvador now has until July 2019 to avoid being expelled completely from Egmont, which could further complicate prosecution of corruption cases.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States supports citizen security, law enforcement, and rule-of-law programs in El Salvador through the U.S. Strategy for Central America and the Central America Regional Security Initiative (CARSI), supporting El Salvador's implementation of PESS and the Plan of the Alliance for Prosperity, a regional plan developed by the governments of El Salvador, Guatemala, and Honduras. These programs aim to expand Salvadoran capabilities to interdict, investigate, and prosecute illegal drug trafficking and other transnational crimes, implement prevention programs, and strengthen El Salvador's justice sector. The United States also supports anti-gang and community policing in El Salvador with equipment, vehicles, training, and social and economic programs. The United States provided Salvadoran law enforcement the ability to use COMPSTAT, a statistical analysis tool that tracks the type and location of crime reports to more efficiently allocate law enforcement resources; AFIS, an automated fingerprint database; and IBIS, a ballistics database.

In 2018, U.S. assistance focused on enhancing the operational capacity of Salvadoran law enforcement agencies to interdict drug shipments and combat money laundering and public corruption. Assistance also promoted transparency, efficiency, and institutional respect for human and civil rights within law enforcement agencies and the criminal justice system, including efforts to professionalize the PNC and reduce the role of the military in civilian policing. The United States supported efforts to combat transnational criminal organizations, particularly the MS-13 and 18th Street gangs, while developing and implementing integrated initiatives to disrupt drug trafficking and other criminal activity.

In 2018, U.S. assistance included specialized training for over 1,000 PNC officers in areas such as intelligence-led policing, community relations, and complex investigations. The United States also helped strengthen the effectiveness of criminal justice procedures and practices by training 349 justice sector personnel in asset forfeiture, advanced investigation, and trial skills. The United States also provided technical assistance to increase coordination between justice sector agents and institutions; improve criminal investigations using scientific evidence; and build the capacity of the police and prosecutor's offices.

The August 2000 United States-El Salvador bilateral agreement allows U.S. authorities to use the El Salvador International Airport as a forward operating location. It also allows U.S. access to ports and other governmental facilities in connection with aerial detection, monitoring, and tracking of illicit drug trafficking operations. El Salvador is a regular participant in the semi-annual Multilateral Maritime Counter Drug Summits, which bring together maritime counterdrug professionals from nearly 25 countries and over 65 international organizations spanning North, Central and South America, and Europe.

D. Conclusion

El Salvador maintained its capacity to fight transnational crime in 2018, even as drug traffickers continued to shift their maritime routes further from El Salvador's coast and beyond its territorial waters. Authorities demonstrated increased capacity to lead complex investigations, coordinate and share intelligence between agencies and with overseas counterparts, and dismantle organized crime structures. El Salvador still faces formidable challenges, including the political uncertainty of the future Attorney General and President following the February 2019 national elections.

The successes of 2018 can only be sustained if the Government of El Salvador demonstrates continued commitment to crime prevention, security, and rule of law. Progress in these fields, and the emergence of law enforcement actors capable of sharing information and coordinating effectively with international partners, likely contributed to the 2018 decline in maritime drug trafficking, but continued strengthening of the entire continuum of El Salvador's criminal justice institutions needs to be strengthened to prevent the return of trafficking routes if interdiction efforts in neighboring countries continue to advance. Political will to confront corruption and maintain adequate resources for the DAN and Attorney General's Office, including adequate pay and physical protection, remains a challenge, and the corrections system remains overcrowded and mismanaged.

Georgia

Georgia's location along traditional smuggling routes in the Caucasus leaves it vulnerable to transnational criminal organizations that continue to traffic opium, heroin, and the main precursor chemical used to produce heroin, acetic anhydride. In April 2018, 15 metric tons of acetic anhydride were seized at Georgia's port of Poti on the Black Sea – one of the largest seizures in history. The chemicals originated in China and were destined for Afghanistan to process heroin. Despite record high opium production in Afghanistan, drug seizures in Georgia have declined since 2016.

The Georgian government and non-governmental organizations report substantial drug and substance abuse challenges with an estimated 50,000 illicit drug users in the country. Synthetic and “club” drugs remain the most popular, particularly with the younger generation. April 2018 police raids on two popular Georgian nightclubs led to riots in Tbilisi. Thousands protested the raids as excessive abuses of authority and urged authorities to introduce less strict drug policies. Georgian authorities expressed concern that this type of citizen response may hinder future drug operations for fear of reprisal. July 2018, Georgia legalized the cultivation and production of cannabis for medical purposes and decriminalized its personal use. There is insufficient evidence to evaluate whether this will affect the consumption, sale, and transit of other illicit drugs.

The Government of Georgia actively cooperates with a wide range of actors to combat drug trafficking and consumption and to develop comprehensive responses to drug dependency. These partners include civil society, academia, the UN Office on Drugs and Crime and other international organizations, regional partner states, and the European Union.

The United States continues to support Georgia's fight against crime and illicit drug use and trafficking. Georgia Minister of Internal Affairs Giorgi Gakharia met with the acting administrator of the U.S. Drug Enforcement Administration on July 25, 2018, and both parties affirmed their commitment to bilateral relations and combating drug trafficking in Georgia and the Caucasus region.

Ghana

Ghana remains a transit and destination point for illicit drugs trafficked from Asia and South America to other African nations, Europe, and the United States. Heroin and controlled pharmaceuticals from Asia, as well as cocaine from South America, are smuggled into the country for limited local consumption and onward shipment. Crystal methamphetamine produced in clandestine laboratories in Nigeria also transits the country. Precursor chemicals required to produce crystal methamphetamine are believed to be diverted from Ghanaian sources. Cannabis is also produced in substantial quantities within Ghana, primarily for domestic use but also trafficked to international markets. Officials report that the illegal importation and abuse of tramadol, a controlled pharmaceutical, is increasingly problematic.

Ghana law enforcement and intelligence agencies have alleged that transnational drug trafficking networks operating in the country have links to organized crime and terrorist organizations. Preliminary reports indicate that the volume of cocaine and heroin seized by Ghanaian authorities in 2018 was slightly less than in previous years, while the volume of seized cannabis increased. However, fragmented data collection and incomplete information sharing make accurate figures difficult to obtain.

Ghana's government continues to push for modifications to its drug control laws. The Narcotics Control Commission Bill, which is pending approval in Parliament, will direct the government to treat drug use as a public health issue. It will also address gaps in interagency coordination and enhance the government's toolset for fighting precursor chemicals. The legislation would reduce the stringent mandatory five-year imprisonment for possession and personal use of illicit drugs. The mandatory minimum sentence of 10 years would remain for trafficking.

Ghana maintained a high degree of cooperation with the United States and other international partners on drug control issues in 2018. The United States and Ghana continued successful law enforcement cooperation under the U.S. Drug Enforcement Administration's Sensitive Investigative Unit program. Supported by U.S. funding, the UN Office on Drugs and Crime continued to implement a program to provide training and equipment to new drug law enforcement units in four regions. Ghana continues to work productively with international partners on law enforcement operations targeting transnational drug trafficking organizations and to attend U.S.-sponsored trainings that improve their capabilities. There is no mutual legal assistance treaty between Ghana and the United States, although mutual legal assistance can be provided on a reciprocal basis through letters of request. Extradition between Ghana and the United States is governed by the 1931 U.S.-U.K. Extradition Treaty.

Guatemala

A. Introduction

Guatemala is a transit country for precursor chemicals and illicit drugs bound for U.S. markets. Well-established criminal networks exploit the country's strategic location, porous borders, and widespread corruption to facilitate drug trafficking through the country. Although precise volumes are difficult to determine, U.S. authorities estimate transnational criminal organizations smuggled more than 1,400 metric tons (MT) of cocaine through Guatemala during 2018 by air, land, and sea. While the bulk of cocaine arrives directly from South America via maritime conveyances, noncommercial air and overland smuggling from Panama, Costa Rica, Nicaragua, El Salvador, and Honduras remain persistent threats. Mexican cartels rely on Guatemalan networks and organizations to receive, store, and transport drugs to the United States through Mexico.

In addition to trafficking illicit drugs and precursor chemicals through Guatemala, criminal organizations cultivate cannabis and opium poppy within the country, and coca cultivation was detected for the first time in 2018. The absence of a permanent law enforcement presence in many areas of the country allows other forms of transnational crime, including alien smuggling and trafficking in persons, weapons, counterfeit goods, and other contraband, to flourish.

Ongoing political crises and high turnover of key government officials present challenges to U.S. cooperation on security and countering drug trafficking. Key Guatemalan government drug control officials lack the necessary political will to effectively counter drug trafficking and corruption. While Guatemala achieved some notable successes in 2018, including high levels of drug seizures and a number of extraditions of criminals charged with drug offenses in the United States, Guatemala's fight against criminal organizations continues to be hindered by endemic corruption, weak public institutions, and inadequate resources.

U.S. assistance helped establish 99 Model Police Precincts (MPP) throughout Guatemala. In 2018, these locations improved citizen security and the relationships between police and the communities they serve. A decline in homicides and other violent crimes, noted since 2009, continues, and local police are embracing community-policing methods. MPPs support broader drug control efforts by facilitating positive interaction with police and improving communities' trust in and willingness to work with police, thereby making communities more resilient to crime including crime with a nexus to drug trafficking, distribution, and drug use.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

High volumes of cocaine are trafficked into Guatemala along its Pacific Coast, although trends suggest much of the flow moved offshore in favor of direct routes from Colombia to Mexico for much of 2018. The Guatemalan Special Naval Forces (FEN) has been successful in disrupting maritime networks, pushing maritime trafficking further west, and 2018 was another record year in seizures. The FEN continues to face myriad maritime threats and trafficking challenges,

including the use of semi-submersible and low-profile vessels; small “pangas” boats; parasitic devices attached to larger ships; and an increase in “go-fast” vessels that are faster and hold larger shipments than pangas. In response to FEN pressure at sea, traffickers increasingly turned to aerial conveyance in 2018, with considerable success.

Guatemala lacks the capacity to intercept inbound aircraft suspected of trafficking drugs, and trafficking organizations are easily capable of shifting landing locations as necessary. The Guatemalan Air Force plays a critical role in detecting and monitoring aircraft suspected of trafficking illicit drugs in and out of Guatemala, but lacks capacity, including rotary wing assets. Guatemalan interdiction efforts resulted in the seizure of a single air-delivered cocaine load in 2018 (on the ground) and the seizure of several aircraft, including some hidden by traffickers in remote locations. Guatemalan agencies only disabled two suspected clandestine airfields in 2018, and one of those returned to operational use within two weeks. Traffickers will likely continue to exploit Guatemala’s capacity gaps in this sector.

U.S. assistance to Guatemala in the areas of vetted units, information sharing, and training led to better coordination and drug seizures in 2018. U.S. support to the border police (DIPAFRONT) enabled the addition of 100 agents to its force, now totaling 530, and the agency implemented successful binational operations with Mexico, Honduras, and El Salvador in 2018. Challenges still remain, including lack of infrastructure, equipment, supplies, and personnel. Guatemalan and U.S. law enforcement experts have estimated that 2,500 DIPAFRONT agents are needed to effectively patrol Guatemala’s borders.

Guatemala is a party to several relevant regional agreements, including the Organization of American States’ Inter-American Drug Abuse Control Commission, the Caribbean Regional Agreement on Maritime Counter Narcotics, and the Inter-American Convention on Mutual Assistance in Criminal Matters. A maritime drug control agreement with the United States is fully implemented.

Guatemala continues to work closely with U.S. authorities on extradition matters and regularly extradites its own citizens, including high-level drug traffickers, to the United States for prosecution.

2. Supply Reduction

In May 2018, nearly 75,000 coca plants were discovered by Guatemalan authorities on one hectare (ha) of land in the municipality of Cobán. This was the first known identification of coca cultivation within Guatemala, and the plants were subsequently destroyed.

The Guatemalan government continues to struggle with estimating the number of ha under opium poppy cultivation in the San Marcos region, close to the border with Mexico. Guatemalan government authorities do not have an accurate estimate, and limited government presence and operations since the state of emergency in 2017 have reduced visibility into the current situation. While government authorities have informally claimed there is less poppy cultivation due to declining prices, there is no independent confirmation of these claims. High turnover in Guatemalan agencies led to the cancelation and/or delay of multiple eradication missions in

2018, and budgeted alternative development projects planned for San Marcos were not implemented by the Ministry of Agriculture.

Seizures increased each year since 2016 despite insufficient interdiction resources. During the first 10 months of 2018, Guatemalan authorities reported seizing approximately 13.96 MT of cocaine, surpassing the total amount seized during all of 2017. During this same period, Guatemalan agencies reported confiscating seven kilograms of heroin, more than \$3.6 million in bulk cash, and eradicating approximately 80 ha of opium poppy and 40 ha of cannabis.

Arrests of high-profile traffickers were down in 2018 to 53, approximately half the number arrested in 2017.

3. Public Information, Prevention, and Treatment

A U.S.-funded national drug-use survey released in 2014 remains the most recent. That survey reported young people aged 11 to 20 used marijuana and cocaine at higher rates than their counterparts in Mexico, Colombia, and Costa Rica. It also identified specific risk factors for Guatemalan adolescents, including easy access to illicit drugs, as well as low risk perception associated with the use of marijuana, cocaine, and MDMA (ecstasy). Since the government lacks sufficient resources to address these emerging trends, a U.S. government grant helped reach over 19,000 students and promote drug abuse awareness and prevention among municipal leaders, teachers, students, parents, and the private sector.

The Ministry of Health administers drug treatment centers in Guatemala, but the agency has not provided updated statistics on treatment centers. A 2016 U.S.-funded study of 30 of the country's 100 treatment centers concluded the majority of drug treatment providers, directors, and counselors lack expertise to meet the needs of patients. Most centers lack basic equipment and do not apply a formal therapeutic model to drug treatment.

Guatemalan authorities are concerned about internal drug use and have provided additional resources to fight it, but resources remain insufficient. There is some evidence that criminal organizations are attempting to create demand for illicit drugs in Guatemala to generate new markets. The coca plantation discovered in May, for example, appeared designed to meet internal consumption demands.

4. Corruption

The Guatemalan government does not, as a matter of policy, encourage or facilitate illegal drug production or distribution, nor is it involved in the laundering of the sale of illicit drug proceeds. However, corruption permeates public and private institutions and exacerbates the country's security, governance, and economic challenges. Guatemala's Attorney General and the UN-backed International Commission Against Impunity in Guatemala (CICIG) have investigated hundreds of government officials suspected of corruption. U.S. assistance also supports anticorruption efforts by developing and training specialized vetted units, particularly those tasked with countering drug trafficking, money laundering, and criminal gangs.

Accomplishments in the broader fight against corruption in 2018 included several high profile corruption cases resulting in convictions, including former Vice President Roxana Baldetti. She was convicted in the first of several corruption cases and sentenced to more than 15 years in prison. Former Minister of Government, Mauricio Lopez-Bonilla, was also convicted and received a sentence of more than eight years. U.S. officials assisted efforts to build capacity for police and prosecutorial units that apply enhanced special investigative methods. As a result of investigations, several asset forfeiture cases allowed Guatemala to recover more than \$4.5 million, along with more than 100 assets, such as vehicles, airplanes, boats, real property, and equipment. The seized property will be sold or donated to state institutions and help strengthen state institutions involved in the fight against corruption. Unfortunately, the government's expulsion of CICIG from Guatemala calls into question its commitment to fight entrenched corruption.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

Consistent with the U.S. Strategy for Central America and the Central America Regional Security Initiative (CARSI), and in support of the Central American governments' Alliance for Prosperity, the United States continues to be a key provider of assistance to improve the professional capabilities and integrity of Guatemala's security and judicial institutions to create sustainable, effective structures and organizations to fight illicit drug production and trafficking.

The United States maintains a bilateral agreement with Guatemala to suppress illicit traffic by sea and air, which includes provisions for ship boarding, shipriders, pursuit, entry to investigate, over flight of territorial seas, order to land, and interdiction support. Guatemala also participates in the semi-annual Multilateral Maritime Counter Drug Summit, which attracts counterdrug professionals from nearly 25 countries and over 65 international agencies spanning North, Central, and South America, as well as Europe.

D. Conclusion

Guatemala made progress in the fight against criminal organizations in 2018, including enhanced institutional capacity, improved interagency and regional cooperation, and record interdictions. Significant challenges remain, including high turnover of government officials in key law enforcement roles and lack of political will in key areas. Corruption levels remain high, and, according to U.S. government-funded studies, public confidence in government institutions is low. Following the government's actions against CICIG, there is growing concern about high-level Guatemalan commitment to the fight against corruption and impunity. Limited budget resources hinder the government's effectiveness and ability to address the challenges associated with drug trafficking. The Guatemalan government needs to work to build sustainable counterdrug mechanisms, including accelerated judicial processes, improved interagency cooperation, and provide adequate financial support and personnel to relevant agencies and government ministries.

Guyana

A. Introduction

Guyana is a transit country for cocaine destined for the United States, Canada, the Caribbean, Europe, and West Africa. Cocaine originating in Colombia is smuggled to Venezuela and onward to Guyana by sea or air. Smugglers also transit land borders and the shared river network with Brazil, Venezuela, and Suriname. Cocaine is concealed in legitimate commodities and smuggled through commercial and private air transport, maritime vessels, human couriers, “go-fast” boats, and various postal systems.

Drug traffickers are attracted by the country’s poorly monitored ports, remote airstrips, intricate river networks, porous land borders, as well as corruption and under-resourced security sector. Despite these challenges, the Government of Guyana has demonstrated political will to combat the trafficking of illicit drugs in and through Guyana.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Government of Guyana’s drug control institutions are the Guyana Police Force, Guyana Revenue Authority, Customs Anti-Narcotics Unit, Special Organized Crime Unit, and Guyana Defence Force. These agencies are responsible for the implementation of the National Drug Strategy Master Plan 2016-2020, and the National Anti-Narcotics Agency oversees these efforts. Despite this coordination mechanism, corruption and limited resources have historically limited the effectiveness of these drug control agencies.

In February 2018, the Government of Guyana passed the Witness Protection Act and the Protected Disclosures Act to complement its existing legislative regime addressing corruption and drug trafficking.

In 2008, Guyana acceded to and has since filed information requests under the Inter-American Convention on Mutual Assistance in Criminal Matters, to which the United States is also a party. Guyana has bilateral drug control agreements with its neighbors and the United Kingdom. Guyana is also a member of the Organization of American States’ Inter-American Drug Abuse Control Commission (OAS/CICAD). Guyana signed a maritime drug control bilateral agreement with the United States in 2001, but has yet to take the necessary domestic action to bring the agreement into effect. The 1931 Extradition Treaty between the United States and the United Kingdom is applicable to the United States and Guyana, and Guyana honors that treaty.

2. Supply Reduction

The Government of Guyana’s National Drug Abuse Control Unit trains public health officers, teachers, social workers, and civil society groups as part of the government’s supply reduction strategy. The Guyanese government has a drug enforcement presence at its international airports, post offices, and, to a lesser extent, at seaport and land-border entry points. Drug

control agencies reported several interdiction efforts and drug-related seizures and convictions during the first nine months of 2018. During the first nine months of 2018, authorities seized 164.9 kilograms (kg) of cocaine and 889 kg of cannabis. Guyanese authorities initiated 358 prosecutions and convicted 24 individuals for drug trafficking.

3. Public Information, Prevention, and Treatment

Guyana has a growing domestic drug consumption problem. Marijuana is the most widely used illicit drug in Guyana, followed by cocaine. The Guyanese government has also reported seizing smaller amounts of synthetic drugs, including MDMA (ecstasy). Guyana has a comprehensive demand reduction strategy that adequately addresses drug rehabilitation. The Ministry of Public Health, Ministry of Education, and Ministry of Social Protection are responsible for addressing demand reduction. Non-governmental organizations also offer rehabilitation services, with the government providing financial assistance. The Georgetown Public Hospital also provides free rehabilitation services for drug users. The University of Guyana has a demand reduction curriculum in place through OAS/CICAD funding. The Government of Guyana conducts anti-drug awareness sessions in secondary schools and has plans to create drug treatment courts. As part of the Caribbean Basin Security Initiative (CBSI), the United States supports Guyana through targeted training for law enforcement and maritime officers.

4. Corruption

As a matter of policy, the Government of Guyana does not encourage or facilitate the illicit production or distribution of narcotics or psychotropic drugs or other controlled substances or the laundering of proceeds from illegal drug transactions. However, a lack of resources, weak law enforcement institutions, an ineffective judicial system, and inadequate compensation for civil service employees and public safety officials facilitate corruption throughout all sectors.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States supports a wide range of efforts designed to address crime and violence affecting Guyanese citizens, primarily through the Caribbean Basin Security Initiative (CBSI). CBSI is a security partnership between the United States and Caribbean countries that seeks to substantially reduce illicit trafficking, advance public safety and citizen security, and promote justice. Efforts to increase law enforcement capabilities, protect borders, air and seaports, strengthen workforce development, and promote anti-money laundering effectiveness directly address priority concerns shared by Guyana and the United States.

The Government of Guyana cooperates very closely with all relevant U.S. agencies and departments, but is limited by resource constraints. The current administration, which took office in May 2015, has expressed a strong willingness to cooperate with the United States on drug control, extradition, mutual legal assistance, and other international crime issues.

CBSI-funded programs support Guyana's maritime operations by providing interdiction assets, relevant command and control systems, and associated logistical support and training. In 2018, the United States provided port and maritime training to Guyana's Coast Guard. U.S. assistance

programs also promote law enforcement professionalization and more effective drug investigations. By strengthening Guyana's drug control capacities, the United States seeks to enhance interagency coordination within the Guyanese government including to gather better information on drug trafficking routes.

D. Conclusion

The United States enjoys strong cooperation with Guyana in advancing mutual interests against the threat of international drug trafficking. Guyana has shown strong interest in furthering collaboration under CBSI. The United States looks forward to tangible progress on investigations, prosecutions, and extraditions; expanding security sector capacity; engaging at-risk communities; and enforcing laws against money laundering and financial crimes. To advance cooperation, Guyana should take steps to implement the 2001 counterdrug bilateral agreement with the United States to suppress illicit trafficking by sea and air. Guyana should seek to enhance its anti-corruption initiatives and fully pursue prosecutions for drug trafficking in accordance with its laws.

Haiti

A. Introduction

Haiti remains a transit point for cocaine originating in South America and marijuana originating in Jamaica, traversing the country's porous borders en route to the United States and other markets. This traffic takes advantage of Haiti's severely under-patrolled maritime borders and its extensive land border with the Dominican Republic. Haiti's main drug enforcement unit, Le Bureau de Lutte Contre le trafic de Stupéfiants (Bureau for the Fight Against Narcotics, or BLTS) led several successful investigations and joint interdiction operations against drug trafficking organizations along the southern coast in 2018. Haiti is not a significant producer of illicit drugs for export, although there is cultivation of cannabis for local consumption. Haiti's primarily subsistence-level economy does not provide an environment conducive to high levels of domestic drug use.

In 2018, the Haitian National Police (HNP) strengthened the BLTS with additional officers, and officials at the highest levels of the government have spoken about the need to fight drug trafficking. However, seizures of illicit drugs and smuggled cash declined and the government is unable to secure the country's borders to stem the flow of illicit drugs. The HNP and the Haitian government have recently begun to address the uncontrolled border crossings with the formation of a border police unit (POLIFRONT), based in Morne Casse, near the Ouanaminthe border crossing with the Dominican Republic in Haiti's Northeast Department. POLIFRONT plans to expand to border crossing points at Anse-a-Pitre, Malpasse, and Belladere. The minimal maritime interdiction capacity of the Haitian Coast Guard (HCG) creates a low-risk environment for drug traffickers. While Haiti's interdiction capacity has improved marginally, a largely ineffective judicial system continues to impede successful prosecution of apprehended drug traffickers.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The HNP's 28th Promotion Class graduated 1,022 recruits, including 117 women, in December 2017. The 29th HNP class of 692 recruits graduated in September 2018, bringing the total number of HNP officers to nearly 16,000. A larger force will help the HNP assume increasing responsibility for security as the UN Mission for Justice Support in Haiti starts to drawdown by October 2019.

The BLTS focuses on interdicting illicit drug trafficking. In 2018, the HNP deployed BLTS officers to Terrier Rouge and Ouanaminthe. The BLTS also plans to add officers in Jacmel in the Southeast Department, as well as in Anse-a-Pitres. The United States continues to provide training to the Maritime Counter Narcotics Task Force, made up of BLTS and HCG officers. In April, the United States finished installing a modular unit at the Cap Haitien seaport for BLTS officers to use as an operational base.

The HNP's Office of the Inspector General (OIG) investigates reports of officer misconduct, including participation in drug trafficking. The HNP still faces challenges regulating its internal affairs, particularly in more remote areas in Haiti. The OIG recommended officers for discipline for various offenses in 2018, but most of its recommendations have thus far gone unmet. The HNP held monthly press conferences to inform the public of their roles and responsibilities, and to report cases of misconduct. The OIG maintains a 24-hour hotline to receive public reports of police corruption or misconduct. As of August 2018, the OIG had recommended 23 officers for dismissal, compared with 11 such recommendations in 2017.

The HCG is the sole maritime enforcement agency in the country. An additional 42 officers from the 29th HNP promotion class joined the HCG, bringing the overall size of the unit to 204 officers. The HCG has operating bases in Cap Haitien, Killick (Port-au-Prince), and Les Cayes. The force has 15 maritime vessels, but only five are currently operational, with seven of the remaining 10 vessels non-repairable due to age. Maritime domain awareness and enforcement are daunting tasks for the HCG, considering Haiti's 1,100 miles of coastline and seven international ports. Operational capacity remains low due to insufficient funding, management deficiencies, an inability to refuel, and unavailability of locally procured parts to maintain the vessels. These issues have prevented the HCG from serving as an effective deterrent force to maritime drug trafficking.

Haiti maintains several international agreements on drug control commitments and often cooperates effectively with the United States on drug-related cases. A 1997 bilateral letter of agreement on Cooperation to Suppress Illicit Maritime Drug Traffic allows U.S. law enforcement agencies to enter Haitian territorial waters and airspace in pursuit of suspect vessels or aircraft, to board and search suspect vessels, to patrol Haitian airspace, and to carry members of the HCG as passengers. Although there is no mutual legal assistance treaty between Haiti and the United States, the Haitian government has cooperated on many cases within the limits of Haitian law. A bilateral extradition treaty entered into force in 1905, and the Government of Haiti has willingly surrendered persons under indictment in the United States to U.S. law enforcement agencies.

2. Supply Reduction

During the first 10 months of 2018, BLTS executed several operations that resulted in the seizure of 371 kilograms (kg) of marijuana and 28 kg of cocaine. In addition, the HNP arrested 76 suspects for drug-related crimes during this period. There is no significant availability or traffic of illicit synthetic drugs in Haiti.

3. Public Information, Prevention, and Treatment

Illicit drug abuse is uncommon in Haiti, as the population's minimal discretionary income mitigates against a widespread drug abuse problem. The Government of Haiti runs small-scale public awareness and demand reduction programs funded through the drug control policy commission (CONALD), but there is no data on these programs' impact or usefulness.

4. Corruption

The Haitian government as an institution does not encourage or facilitate illegal activity associated with drug trafficking, or the laundering of proceeds from illicit drug transactions. However, effective government action to fight corruption, particularly related to illicit drugs, is constrained by two major factors coupled with a lack of political will. The first is a historically weak legal framework. Haiti did not codify corruption as a crime until 2014, when a law formally criminalized public corruption and set penalties for bribery and illegal procurement. Implementation of this law, including training of judicial personnel on the law's requirements, remains a challenge. Haiti's asset seizure laws have enabled the financial intelligence unit (Central Unit of Financial Investigations) and the HNP's financial crimes unit (Financial and Economic Affairs Bureau) to seize the assets of drug traffickers convicted outside of Haiti. The Haitian constitution's grant of blanket immunity from prosecution to Members of Parliament is a point of concern for anticorruption and drug enforcement efforts.

The second constraining factor is systematically poor judicial performance, due to antiquated penal and criminal procedural codes, opaque court proceedings, lack of judicial oversight, and widespread judicial corruption. To date, there have been five successful convictions for drug trafficking, and only one conviction on corruption-related charges in Haitian courts. The Haitian Anti-Corruption Unit has advanced 32 corruption-related cases to the judiciary since its inception in 2005, but without tangible results.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

U.S. drug control initiatives in Haiti focus on improving the capacity of the HNP, BLTS, and the HCG to detect, investigate, and deter the flow of illicit drugs. A 2004 letter of agreement (as amended) between the United States and Haiti and a second agreement signed in 2013 (amended annually) govern these activities. Core goals outlined in the agreements are to increase overall counter-drug capabilities, interdict drug shipments, and develop cases against traffickers and criminal organizations. Since 2012, five drug-related arrests have led to trials and convictions.

U.S. assistance supports the development of the HNP and the targeted support of BLTS via complementary programs. Support to the HNP covers a broad range of activities, including infrastructure, equipment, and training. Improved operational capacity and professionalism of the HNP are necessary for effective drug enforcement activity in Haiti.

Specific U.S. support to the BLTS includes provision of communications equipment, vehicles, non-lethal operational gear, canine and maritime units, and training. U.S. support also includes training opportunities for BLTS officers in the United States and in third countries, such as at the U.S.-supported International Law Enforcement Academy (ILEA) in El Salvador. The United States also supports the HNP's Joint Maritime Counternarcotics Task Force through joint enforcement operations between the U.S. Drug Enforcement Administration, the U.S. Coast Guard, the HCG, and the BLTS.

The United States will continue to support training of high-ranking HNP officials in the United States, including in cooperation with various U.S. law enforcement agencies, to develop leaders that can serve as change agents within the HNP.

D. Conclusion

The continued institutional development of both the HNP and BLTS is a positive trend that has helped improve public security and has marginally increased Haiti's capacity to interdict drug trafficking. However, the dysfunctional Haitian judicial system drastically limits domestic prosecution of drug cases and thus reduces disincentives to trafficking operations. Drug seizures remain low, and Haiti's minimal capacity to police its sea and land borders continues to be a particular point of concern.

Continued U.S. engagement in support of BLTS operations and general HNP development will help Haitian law enforcement capitalize on marginal gains in drug interdiction capacity. The benefits of such gains will be limited, however, if the judicial system remains weak, corrupt, and fails to convict drug traffickers. Only the concurrent strengthening of political will, the judiciary, law enforcement, and border security will enable Haiti to make real progress in combating drug trafficking.

Honduras

A. Introduction

Honduras is a transit country for cocaine destined for the United States and precursor chemicals used to produce illicit drugs. The Caribbean Coast of Honduras is vulnerable to drug trafficking by land, sea, and air due to its remoteness, limited infrastructure, and lack of government presence. Drug trafficking organizations are shifting their strategy to take advantage of these vulnerabilities by sending smaller shipments by fast boat or small airplane, making detection and interdiction increasingly challenging for Honduran authorities.

Despite advances, the overall security situation in Honduras remains challenging. While the homicide rate continues to drop, the overall crime rate remains high especially where elevated levels of criminal activity make it difficult for the under-resourced Honduras National Police (HNP) to operate. Transnational criminal street gangs, such as Mara Salvatrucha (MS-13) and 18th Street, are not a significant part of the international drug logistics chain, except as facilitators of shipments through Honduras and small-scale local distributors.

The restructuring of the HNP, improvements in investigative and operational training for both the police and Public Ministry (PM), and the use of interagency task forces to strike against traffickers increased the interoperability of government entities to counter drug trafficking. Drug seizures by the HNP in 2018 surpassed 2017 levels. The Honduran government initiated a purge of the HNP in 2016 to remove corrupt or otherwise unqualified officers from duty; 5,218 HNP officers have been removed from duty as of November 1, 2018. The HNP's lack of strong, mid-level management following the police purge along with a dearth of officers with significant counterdrug experience has hampered the force from staying ahead of evolving drug smuggling threats. However, the Government of Honduras continues its efforts to develop capacity to counter drug trafficking, and to increase seizures and disrupt criminal networks.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The political will of the Honduran government to combat drug trafficking and to coordinate with U.S. law enforcement agencies in doing so remains high. Challenges for drug control institutions include corruption, inadequate budget resources, and persistent violence. Corruption, combined with low tax collection rates, deprives law enforcement agencies, courts, and prosecutors of critical resources. The security tax, instituted in 2014 to offset funding challenges for security agencies, helped key law enforcement institutions somewhat, but funds are inadequate to meet the significant personnel, equipment, and technology needs required to address drug trafficking in Honduras.

U.S. assistance to Honduras in the areas of vetted police units, interagency task forces, criminal justice capacity building, information sharing, and training provided a foundation for government institutions to coordinate their efforts in the fight against the trafficking of illicit drugs. During 2018, the Government of Honduras emphasized interagency operations focused

on specific geographic areas experiencing spikes in criminal activity. These operations have resulted in a high number of arrests, arms seizures, and significant marijuana seizures, but have not yielded notable cocaine seizures or disruptions to drug trafficking organizations. The HNP Special Forces Directorate's elite unit, the TIGRES, has been instrumental in providing the tactical, operational support required for these operations.

The HNP Antinarcotics Directorate (DNPA), created in 2018, began tactical operations in September with support from other HNP Directorates. The DNPA faces various challenges associated with being a new police directorate. As of October, the DNPA had 135 personnel, the bulk of whom are recent police academy graduates or officers with limited experience in drug operations. DNPA does not have an established headquarters, so personnel and leadership work from various locations. In January 2018, the HNP moved the Financial Crimes Task Force (OPIF) from the Directorate of Police Investigations to the DNPA to address the financial aspects of drug investigations. The U.S. government provides advisory support to the DNPA in the areas of organizational development, inter-directorate information sharing, operational planning, and financial investigations.

The U.S.-supported HNP Criminal Investigation School (EIC) provides coursework on the classification of illicit drugs, pharmacology, clandestine laboratories, chemical precursors, and trafficking methods, and incorporates drug control topics in all other courses offered. The HNP remains committed to utilizing continuing education as a means to professionalize their force generally, but also as a way to improve the investigative capacity of the force to counter drug trafficking. The Honduran National Congress increased the EIC budget from approximately \$20,000 in 2016 to \$1.3 million in 2018. The Government of Honduras is also investing, with support from U.S. and international donors, in a specialized training academy that will include a dedicated school for counterdrug training.

Honduras is party to several regional agreements that focus on drug trafficking, including the Organization of American States' Inter-American Drug Abuse Control Commission and the Caribbean Regional Agreement on Maritime Counternarcotics. Honduras has ratified the Inter-American Convention on Mutual Assistance in Criminal Matters.

2. Supply Reduction

The willingness of civilian and military entities to combat illicit drug trafficking and steps taken by the Government of Honduras over previous years to create new drug control entities has not yet translated into significant increases in drug seizures or notable disruptions to drug trafficking organizations. Drug trafficking organizations, recognizing the improved capabilities of Honduran security forces, have begun moving drug shipments in smaller amounts to avoid detection and interdiction by Honduran authorities. While seizures by Honduran authorities in their territorial and maritime domain are down, there is no concrete information to suggest the overall volume of illicit drugs being trafficked through Honduras has decreased. During the first nine months of 2018, there was a threefold increase in seizures of cocaine transiting Honduras according to U.S. government data, seized mostly by non-Honduran authorities in territories outside of Honduras. In contrast to this assessment, in September, the Ministry of Defense claimed that Honduras achieved a 50 percent reduction in the volume of drugs transiting

Honduras, and destroyed nearly 50 clandestine airstrips. The U.S. government is still working to corroborate this information.

The Honduran Navy made efforts during 2018 to modernize its surface fleet and initiated the purchase of new vessels, but has not made a commensurate increase in operational budget and it is uncertain when the vessels will become an active part of the fleet. Fuel availability is a significant limitation for the Honduran Navy to interdict suspected drug trafficking vessels, as these ships often operate at long distances from the Navy's control nodes and current fuel budgets are miniscule compared to the need.

The military controls wiretapping facilities and access to wiretapping results for civilian law enforcement remains inadequate, resulting in a significant loss of actionable intelligence for interdictions that could occur on land. The U.S. government is working with the Ministry of Security to gain additional access to the wiretapping facilities to assist in the development of intelligence for drug control entities.

The Ministry of Defense stated an interest in increasing information sharing with the United States on both licit and illicit maritime activities. Furthermore, the U.S. government began discussions in 2018 with the Ministry of Defense to train and outfit a Maritime Interdiction Unit (Fuerzas Especiales Navales) to be modeled after a similar U.S.-supported unit in Guatemala. The current aerial interdiction law in Honduras prevents the United States from sharing radar or other information related to illicit trafficking by air. The Honduran government does not currently have the capacity to track all suspected drug trafficking flights into or out of clandestine airstrips without outside support.

The analytic capabilities of the Merchant Marine (DGMM) Department of Analysis and Maritime Control, created in 2016, continue to improve and support the fight against drug trafficking. The Honduran Navy and the U.S. authorities receive the majority of DGMM's intelligence, but the Honduran Navy is limited in its ability to make patrols based on this information because of resource constraints. Poor port security, inadequate container inspection protocols, and complicated interagency procedures limit the ability of Honduran authorities to act on DGMM's information on suspect vessels or containers in port.

3. Public Information, Prevention, and Treatment

The primary focus of the Honduran government remains on improving security and economic conditions in Honduras. Public information on drug use is insufficient. Prevention and treatment programs are limited in both scope and geography. The National Directorate of Investigation and Intelligence released a report in August 2018 identifying data collection on drug use as a critical gap that inhibits an appropriate approach to drug use prevention and treatment. The DNPA's Prevention Department is staffed by only two individuals, neither of whom have formal training in drug use prevention.

The United States supports comprehensive, balanced, and coordinated approaches to increase the capacity of the Government of Honduras to address and counter the demand for illegal drugs. Assistance included support to the Gang Resistance Education and Training (GREAT) Program,

estimated to have reached 100,000 students in 2018. Other U.S.-supported grants provided support to host country institutions that deal with drug treatment and prevention in the highest risk areas of Honduras.

4. Corruption

The Government of Honduras does not, as a matter of government policy, encourage or facilitate illicit drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. However, corruption remains widespread in public institutions. The Special Commission for the Purging and Restructuring of the HNP completed its original mission to expel corrupt police officers from the force in 2017 and is slated to disband in January 2019. The HNP continues to hire new police officers to achieve its target of 26,000 by 2022, and as of October 2018 numbered about 18,500 officers.

In April 2018, the OAS Mission to Support the Fight Against Corruption and Impunity in Honduras (MACCIH) completed two years of operations. The Honduran anticorruption court and the PM's Anti-Corruption Unit (UFECIC), stood up with the support of MACCIH, began to investigate and try high-level corruption cases. Since late 2017, MACCIH has launched several large-scale corruption cases, including against current and former public officials. An UFECIC and MACCIH investigation against former First Lady Rosa Elena Bonilla de Lobo for alleged misuse of public funds, fraud, and money laundering, led to her arrest in February 2018. In June, UFECIC, in conjunction with MACCIH investigators, announced the Pandora Case. The case accuses 38 individuals, including a former Secretary of Agriculture and several Congresspersons, of acts of fraud, money laundering, falsifying documents, and abuse of authority. MACCIH continues to pursue a legislative agenda to strengthen anticorruption laws and reduce impunity.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States provides assistance through the Central America Regional Security Initiative (CARSI) to improve the professional capabilities of Honduran justice sector institutions, consistent with the U.S. Strategy for Engagement in Central America, and the Central American governments' Alliance for Prosperity Initiative. The overall objective of U.S. assistance is to reinforce Honduran security and justice sector institutions so they can account for their nation's security, stability, and prosperity.

The U.S. government provides advisory and logistical support along with equipment to various HNP directorates, the PM, and the military to improve host country capacities to investigate and disrupt drug trafficking in Honduras. Specifically, the United States trains and equips HNP special units such as the Violent Crimes Task Force, the National Anti-Kidnapping Unit, the TIGRES, and the Special Tactical Operations Group (GOET). U.S. assistance to community policing efforts continued during 2018 and an additional seven Model Police Precincts (MPPs) were established. These MPPs support broader drug control efforts by facilitating positive interaction with police and improving communities' trust in and willingness to work with police, thereby making communities more resilient to crime including crime with a nexus to drug trafficking, distribution, and use. U.S.-supported HNP vetted units include the Transnational

Anti-Gang Unit, the Sensitive Investigations Unit, and the Transnational Criminal Investigative Unit, which address drug trafficking and other transnational crime.

The United States maintains a bilateral agreement with Honduras to suppress illicit traffic by sea, which includes provisions for shipboarding, shipriders, pursuit, entry to investigate, overflight, order to land and for the use of third-party platforms. Honduras is a regular participant in the semi-annual Multilateral Maritime Counter Drug Summits, which bring together counterdrug professionals from nearly 25 countries and over 65 international organizations spanning North, Central and South America, and Europe.

D. Conclusion

The United States works closely with Honduran authorities to improve the host government's capacity to provide security and justice to its citizens and combat drug trafficking. In 2018, Honduras made progress in improving investigative capacity and the interoperability of security forces to fight criminal organizations but was not able to translate these improvements into notable disruptions to drug trafficking organizations. Inadequate resources and the inability to interdict the frequent, small shipments of illicit drugs through Honduras remain as difficult challenges. The Government of Honduras will need to continue on its path to reform its institutions, accelerate judicial processes, and provide adequate resources to its justice sector operators to achieve greater success against drug trafficking organizations.

India

A. Introduction

India's geographic location and transport links make it an attractive transshipment point for illicit narcotics bound for Europe, Africa, Southeast Asia, and North America. Cross-border heroin trafficking from Pakistan to India continues to be a major problem due to India's porous borders and capacity deficits that prevent the Indian Border Security Forces (BSF) from reducing smuggling.

In 2018, India exported over \$17 billion of licit pharmaceutical drugs, and it has been the leading generic drug manufacturer in the world for several years. Estimates suggest that India exports twice the volume of pharmaceutical drugs as China. Drug traffickers exploit this commercial infrastructure – and India's rare combination of technical expertise and chemical source supplies – to market dangerous synthetic drugs in the United States and elsewhere. U.S. and international law enforcement authorities have voiced concerns that transnational criminal organizations could target India's pharmaceutical laboratories and chemists to produce illicit fentanyl and fentanyl analogues.

U.S.-based customers obtain illegal pharmaceutical drugs from India through online pharmacies, non-indexed web sites ("Dark Web"), or call centers. Thousands of mail shipments of illicit pharmaceutical drugs are sent to the United States each year, feeding the current opioid epidemic. Neighboring countries including Nepal and Bhutan have also identified Indian pharmaceutical drugs as a major problem.

Trafficking of the opioid tramadol from India is another serious drug control challenge. India is the leading global producer of licit tramadol, and approximately 50 companies in the country are licensed to legitimately manufacture the drug. However, billions of tablets of mostly counterfeit tramadol originating in India have been seized across Asia, Africa, and Europe.

India is authorized to produce licit opium for the manufacture of pharmaceuticals and is a major producer of precursor chemicals. There is evidence that opium is also grown illicitly in India, especially in the country's northeast.

India appears to be committed to addressing its drug-related challenges but faces resources and capacity limitations, as well as insufficient law enforcement presence relative to its population size. Additionally, a lack of information technology, including integrated networks and case management software, hampers day-to-day enforcement of Indian drug laws.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

India continues to tighten regulations and increase law enforcement officer training. However, the capacity of India's drug law enforcement personnel to collect and analyze data and conduct complex criminal drug manufacturing and trafficking investigations remains limited by

inadequate training, a lack of modern equipment, insufficient staffing, and poor interagency coordination.

To fulfill India's United Nations treaty obligations for drug control, the Government of India implemented the Narcotic Drugs and Psychotropic Substances (NDPS) Act, 1985. This Act gave rise to the Narcotics Control Bureau (NCB), India's primary drug agency responsible for combating and preventing narcotic drugs and psychotropic substances. In 2018, 24 NCB officers attended a week-long training conducted by the U.S. Drug Enforcement Administration (DEA) on precursor chemicals and diversion.

In addition to the NCB, India's Directorate of Revenue Intelligence (DRI), Central Bureau of Narcotics (CBN), Border Security Force (BSF), Indian Customs Service (ICS), and the Ministry of Home Affairs (MHA) play a role in stemming the drug trafficking in India. India's DRI, housed under the Central Board of Indirect Taxes and Customs, is the primary anti-smuggling intelligence and investigative law enforcement agency. Its responsibilities include investigating violations of the NDPS Act.

The Central Bureau of Narcotics (CBN) supervises the licit cultivation of opium poppy in India. CBN is also responsible for the issuance of licenses required for the manufacture of synthetic narcotic drugs and psychotropic substances listed in the NDPS Act, as well as import/export authorizations for the movement of precursor chemicals and pharmaceutical drugs to and from India. Furthermore, CBN is the central agency authorized to interact with the International Narcotics Control Board and international governments in supervising international transactions of regulated substances.

BSF and ICS share primary responsibility for monitoring India's borders. ICS manages official border crossing checkpoints with Pakistan and is responsible for checking all cargo and persons entering India. However, porous borders and capacity issues limit both agencies' effectiveness in combatting illegal smuggling, cultivation, and production. The porous borders also contribute to the movement of Afghan-produced heroin throughout the region, enabling regional terrorist groups in Afghanistan and Pakistan. BSF and ICS continue to lack the technology necessary to keep pace with traffickers.

India's various national and state-level law enforcement agencies face challenges in institutionalizing effective coordination. Poor intelligence exploitation during drug seizures limits investigative leads. Lengthy delays between drug seizures and prosecutions also complicate efforts to develop an effective enforcement and prosecution strategy. Finally, a lack of modern drug legislation and effective drug courts also severely hamper Indian law enforcement agencies' ability to conduct complex drug conspiracy investigations.

The Government of India has entered into bilateral agreements or memoranda of understanding for mutual cooperation to reduce demand and prevent the illicit trafficking of narcotics, psychotropic substances, and precursor chemicals with 36 countries. India participates in mutual legal assistance treaties with 39 countries, including the United States. India also maintains extradition treaties with at least 28 countries plus additional extradition arrangements.

2. Supply Reduction

India has seen a sharp rise in pharmaceutical and chemical diversion cases with investigative links to the United States as illicit distributors increasingly connect with less-regulated markets such as India for their supply. Online sales (over both surface and non-indexed websites) and call center operations based in India continue to feed the U.S. appetite for opioids.

Based on leads passed from the DEA, Indian drug authorities in Gujarat, Mumbai, and other cities within India, made numerous seizures of diverted controlled drugs in 2018, most of which were destined for the U.S. illicit market. In 2018, Indian authorities acting on DEA information seized over 7.4 million tablets of tramadol destined for illicit diversion in the United States. In September, DEA and DRI also worked together to safely dismantle the first known illicit fentanyl laboratory in India, and seized approximately 11 kilograms (kg) of fentanyl.

In June 2018, Indian law enforcement raided multiple pharmaceutical factories illegally producing ketamine, resulting in the seizure of approximately 308 kg of ketamine and two metric tons of raw materials to manufacture ketamine, hashish, cocaine, and opium. The drug trafficking organization involved in these raids was responsible for trafficking ketamine to Australia, Canada, the Democratic Republic of the Congo, Kenya, Malaysia, Mozambique, Nepal, Spain, Sri Lanka, Switzerland, the United Kingdom, and Vietnam, demonstrating India's role as a central transit point for international drug trade. One month later, officials seized approximately 300 additional kg of ketamine at two separate locations.

The first seizure of Indian fentanyl, believed to have been destined for the U.S. market, occurred in August 2018 in Mexico. In September, Indian Law Enforcement in conjunction with DEA successfully arrested three individuals involved in the operation of a fentanyl laboratory including a Mexican cartel member and a PhD-level chemist.

In October 2018, Indian law enforcement officials arrested a Pakistani national involved in trafficking 300 kg of heroin near the Nepal border, with a believed terrorism nexus. Seizures of MDMA (ecstasy) and ketamine manufactured in India have also been observed.

In 2017 (the most recent data available as of this report), NCB continued to use satellite imagery and other intelligence methods to track and reduce illicit poppy cultivation. NCB's coordination and enforcement resulted in the identification and destruction of over 2,430 hectares (ha) of opium poppies (compared to 2,635 ha in 2016). The U.S. government has not validated these figures. In India's northeast, where illicit poppy production is widespread, insurgent groups reportedly protect the poppy sites in exchange for compensation from traffickers and cultivators, complicating NCB efforts to identify and eradicate the sites.

In 2017, cannabis cultivation was also detected, totaling about 3,446 ha. This supply was subsequently destroyed. The U.S. government has not validated this data.

3. Public Information, Prevention, and Treatment

There is significant pharmaceutical drug abuse in the country, with a ready supply of drugs available over the counter at most pharmacies. However, given India's size and large population, accurate estimates of the extent, pattern, and nature of its drug problem are difficult. Commonly reported drugs of abuse in India include heroin, opium, cocaine, ephedrine, cannabis, and MDMA. India's Ministry of Social Justice and Empowerment (MSJE) and NCB manage India's public demand reduction strategy, which promotes drug abuse awareness, education, counseling, and treatment programs – and trains demand reduction volunteers.

Additionally, India's National AIDS Control Organization (NACO) is implementing programs to reduce public health consequences of drug use in regions with a high concentration of injecting drug users, especially the Northeast and Punjab regions. Over 213 centers in the country provide services to 22,510 injecting drug users of the total estimated 160,968-person population of people who inject drugs in India, according to NACO statistics.

In terms of broader drug use, an opioid dependence survey carried out in Punjab in 2015 found that of the state's 28 million-person population, 230,000 people were opioid dependent and 860,000 were opioid users.

To better understand the national prevalence of drug abuse, MSJE and the National Drug Dependence Treatment Centre of the All India Institute of Medical Sciences launched a survey to compile national and state-level estimates of the numbers of persons abusing drugs in July 2016. The two-year-long survey, originally scheduled for release in late 2018, will map the presence of treatment and rehabilitation services for drug-dependent individuals and identify the gaps in service delivery.

4. Corruption

Although the Government of India does not encourage or facilitate drug trafficking, national and local government officials have been implicated in drug-related corruption. Official corruption has historically undermined the effectiveness of government control regimes for illicit drugs, and Indian media reports allege widespread official corruption, with bribes paid to rural police stations and local governance bodies to ignore illicit poppy and cannabis fields under their jurisdiction. Corrupt border officials also enable the movement of heroin and precursor materials across the border. For example, in October 2018, the Anti-Corruption Bureau arrested an opium inspector and a contracted computer data operator posted at NCB for allegedly taking bribes from local farmers.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

U.S.-Indian law enforcement cooperation led to numerous high-yield and high-value seizures throughout 2018. NCB, DRI and DEA made joint arrests and seized significant amounts of narcotics. U.S. and Indian law enforcement authorities also continue to target international drug organizations based in the United States and other locations with extensive ties to India. Investigations have shown that Indian organizations have transferred proceeds from narcotics trafficking on behalf of multiple drug trafficking organizations.

D. Conclusion

India's booming pharmaceutical and chemical industries are world leaders in pharmaceutical exports, particularly generic drugs. However, the large industry is fragmented, insular, and in some ways, difficult to regulate. Laws, regulations, and government enforcement have not kept adequate pace with the growth, and India is experiencing increased diversion from both licit pharmaceutical manufacturers and clandestine laboratories.

In 2018, Indian NCB and DRI worked closely and effectively with DEA and regional counterdrug partners in Bangladesh, Nepal, Sri Lanka, and the Maldives. Through this regional cooperation, Indian officials were able to make or facilitate numerous arrests and seizures. Further developing this relationship through intelligence sharing and cross training could lead to continued operational improvement.

This collaboration will be critical in 2019, as significant narcotics-related challenges facing the Indian government include growing production and trafficking of synthetic drugs such as fentanyl, as well as diversion of controlled substances from both licit and illicit channels; pharmaceutical smuggling from India to neighboring countries; and poor coordination among India's drug enforcement agencies.

The profitability of manufacturing and distributing methamphetamine and other drugs has transformed India into a significant global source for precursor chemicals and drugs. Global demand for fentanyl, methamphetamine, heroin, and other dangerous drugs has given rise to precursor chemical entrepreneurs in India who are retooling commercial chemical factories to illicitly produce large volumes of ephedrine, methamphetamine, and other drugs. As global demand for synthetic drugs continues to grow, so too will India's illicit manufacturing and trafficking networks.

Indonesia

A. Introduction

As a transshipment and destination point for illicit drugs, the Indonesian government struggles with the maritime interdiction and border control issues inherent in policing the more than 17,000 islands comprising its territory. With the world's fourth largest population, Indonesia is a significant consumer of cannabis, crystal methamphetamine, and MDMA (ecstasy). Much of the methamphetamine available in Indonesia originates in China, Taiwan, or Burma. MDMA is usually sourced from China, but also reaches Indonesia from the Netherlands, while cannabis is primarily grown in northern Sumatra for domestic consumption. The Indonesian Government, including the National Narcotics Board of the Republic of Indonesia (BNN) and Indonesia National Police (INP), continued efforts to investigate, disrupt, interdict, and prosecute crimes related to illicit drugs in 2018, and some traffickers continued to receive the death penalty.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Officers of BNN and INP continued to move aggressively against drug-trafficking suspects, and President Joko Widodo has called for strong enforcement measures to address the on-going drug emergency in Indonesia. International non-governmental organizations periodically criticize excessive use of force in counterdrug operations. On October 23, hundreds of residents attacked and burned a local police precinct building in Aceh following the suspicious death of a drug suspect, who was allegedly tortured while in police custody. Four police were investigated for committing "procedural violations."

BNN's 2018 budget included funding prevention, eradication, and demand reduction programs. According to BNN, each of the three deputies responsible for Prevention, Eradication, and Rehabilitation and Community Empowerment were provided equal funding.

BNN opened three new facilities to respond to narcotics supply and demand challenges: 1) a narcotics lab – the first of its kind in Indonesia – to address emerging issues related to new psychoactive substances; 2) a canine-unit training facility to increase drug interdictions at border areas and major entry points; and 3) a BNN community office pilot project in Surabaya to encourage the public to provide information and tips. BNN also purchased new equipment, including x-rays and scanners, and located them at air and seaports known to be entry points for illicit drugs.

In an effort to disrupt a key drug smuggling route, BNN signed a Memorandum of Understanding (MOU) with PT (Pelabuhan Indonesia IV), a state owned enterprise that covers one of the biggest seaports in eastern Indonesia, Makassar Seaport. Internationally, BNN also signed a MOU with the Kingdom of Morocco to share information involving illicit drug production and trade, evidence seizure, drug rehabilitation and research. Indonesian authorities also continued to coordinate with partners on drug interdiction, including the United States and Taiwan.

BNN reported that during the first 10 months of 2018, 111,000 individuals were incarcerated on drug-related charges, and more than half of those specifically for trafficking. The United States provided counterdrug training for BNN and the INP, including for more than 45 law enforcement officers in February in Medan, North Sumatra. Participants received training in financial analysis, internet investigations, graphic analysis, and cultivating confidential sources. No mutual legal assistance treaty or extradition treaty exists between Indonesia and the United States.

2. Supply Reduction

BNN and INP continued to interdict illicit drugs successfully during 2018, and U.S. assistance proved helpful in this regard. Indonesian law enforcement made a number of significant seizures during the year. The largest, in February, was based on joint cooperation between BNN, INP, Indonesia Customs Narcotics Enforcement Team (CNET), Illegal Unreported and Unregulated Fishing (IUUF) Task Force, and U.S. authorities that resulted in an initial seizure of approximately 470 kilograms (kg) of crystal methamphetamine from a fishing vessel operated by a Taiwanese syndicate, followed two weeks later by the seizure of another 725 kg of crystal methamphetamine from a fishing vessel suspected of being operated by the same Taiwanese organization. These seizures represent the largest Indonesian drug seizures to date.

3. Public Information, Prevention, and Treatment

BNN did not publish any national surveys or research in 2018; the agency's most recent drug research was published in December 2017. According to the December 2017 research, an average of 30 people died daily within the country from overdoses.

Rehabilitative services are provided by the Indonesian government, but supply does not meet demand. BNN is one of the government agencies that provides rehabilitative services, and has the capacity to offer treatment to up to 20,000 drug users annually. However, Indonesia's total drug-using population tops four million, according to BNN statistics.

4. Corruption

The Indonesian government did not encourage or facilitate any illegal activity related to drug trafficking, and no senior government officials were known to be institutionally involved in any such activity. However, corruption at all levels of government and society continues to be endemic, and undermines the country's drug control efforts. Nevertheless, Indonesia made some progress in 2018 in combating official corruption, primarily through the actions of the Corruption Eradication Commission.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

In 2018, the United States and Indonesia continue to follow through on most of the areas of bilateral drug demand reduction cooperation agreed upon in February 2016 at the U.S.-Indonesia Drug Demand Reduction Workshop in Jakarta. In October, two Community Anti-Drug

Coalitions (in Jakarta and Surabaya) graduated from two-year training programs that give communities the skills to assess their own local drug problems, inventory the community's resources, and execute unique solutions to address problems.

The United States is also working with the Indonesian Maritime Police and Maritime Security Agency to promote interagency collaboration and cooperation within Indonesia, and to build maritime patrol and interdiction capacity.

D. Conclusion

Despite the efforts of the Indonesian government, demand for illicit drugs is believed to be growing in Indonesia. Indonesia's commitment to reducing drug consumption and enforcing its drug control laws remains firm. The United States will continue to support Indonesian law enforcement efforts to disrupt the international drug trade, particularly in the maritime arena, while also helping Indonesia embrace a wide range of interventions aimed at reducing drug use and associated problems.

Iran

Iran is a significant transit and destination country for opiates and cannabis products originating mostly in Afghanistan. Significant volumes of methamphetamine are also produced and consumed within Iran, as well as trafficked to international markets. Most opiates and cannabis products are trafficked into Iran across its land borders with Afghanistan and Pakistan. Drug supplies transiting Iran are trafficked overland across Iran's northern borders, primarily through Turkey and Azerbaijan, and to a lesser extent into Iraq. Heroin and other opioids are also trafficked by maritime conveyance from Iran into Eastern Africa, for further transshipment to international markets.

Iran's Drug Control Headquarters (DCHQ) is the country's leading drug policy coordination body and reports directly to the country's president. The Law Enforcement Force (LEF) comprises the country's uniformed police units, including the Anti-Narcotics Police and border interdiction forces. According to media reports quoting DCHQ senior officials, Iranian authorities seized a total of 370 metric tons of all categories during the first five months of Iran's lunar calendar in 2018 (March 21 – August 22). During this period, seizures of heroin, morphine, and opium significantly outpaced what was seized during the same period in 2017 – by 17 percent, 58 percent, and 3 percent, respectively.

The Iranian government recognizes that illicit drug consumption within Iran is a serious challenge, and increasingly prevalent. In 2018, DCHQ authorities estimated that 2.8 million people regularly use some form of illicit drug within the country, with half that total suffering from substance use disorders. Other Iranian authorities and non-governmental organizations have cited higher estimates. Opium is the most widely-used illicit drug in Iran, according to Iranian authorities, followed by cannabis products and methamphetamine (known locally as "shisheh," or "glass"). Approximately 43 percent of Iran's inmate population is jailed for drug offenses, according to media reports. Non-governmental organizations and the private sector implement the vast majority of demand reduction and treatment programs in the country, including opioid substitution treatment, voluntary counseling centers, prison-based treatment, and school-based prevention campaigns.

The UN Office on Drugs and Crime maintains a field office in Tehran that provides some training and capacity support to Iranian authorities, including on demand reduction, drug interdiction, and forensic analysis of drug seizures. Iran maintains liaison relationships with some neighboring countries, but operational cooperation on investigations appears limited. Drug control cooperation between Iran and European states has been limited partially due to concerns over the Iranian government's widespread application of the death penalty for drug offenses. In January 2018, the country's strict trafficking laws were amended, raising the threshold that triggers the death penalty in drug possession cases.

Jamaica

A. Introduction

Jamaica remains the largest Caribbean source country of marijuana and a significant transit point for cocaine trafficked from South America to North America and other international markets. Traffickers also export Jamaican-grown marijuana to other Caribbean countries in return for illicit firearms and other contraband. Jamaica's geographic position in the western Caribbean and its difficult-to-patrol coastline, high volume of tourist travel, and status as a major containerized cargo transshipment hub contribute to its use for drug trafficking via commercial shipping, small watercraft, air freight, human couriers, and private aircraft.

The U.S. and Jamaican governments continue to successfully utilize bilateral legal assistance and extradition treaties, as well as agreements on maritime law enforcement cooperation and sharing forfeited assets. Additionally, the United States and Jamaica made progress in 2018 toward an agreement to formalize information sharing between customs agencies.

Jamaica's drug control efforts face significant challenges from corruption, organized crime, gang activity, resource constraints, and an inefficient criminal justice system.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Cooperation between the United States and Jamaica against illicit drugs and related transnational crime remains strong. The U.S. government's primary Jamaican partners are the Jamaica Constabulary Force (JCF, police), the Jamaica Defense Force (military), the Jamaica Customs Agency, the Major Organized Crime and Anti-corruption Agency (MOCA), and the Financial Investigation Division of the Ministry of Finance. Jamaica's Caribbean Regional Drug Law Enforcement Training Center, housed at the JCF's police college, provides counterdrug training to several regional partners.

The United States and Jamaica are bilateral parties to both a mutual legal assistance treaty and an extradition treaty. The countries have a strong extradition and mutual assistance relationship, and both treaties were successfully used in 2018. The United States and Jamaica also utilized a reciprocal agreement to share forfeited criminal assets and a bilateral agreement on law enforcement cooperation on maritime interdiction of illicit traffickers, including boarding of suspicious vessels and embarkation of law enforcement officials on the other country's ships.

In 2018, the U.S. and Jamaican governments made some progress toward finalizing a bilateral customs mutual assistance agreement (CMAA). The CMAA will provide a legal framework for the exchange of trade information between U.S. and Jamaican customs agencies, which in the long term will assist in targeting the flow of drugs, guns, and other contraband through U.S. and Jamaican ports of entry. The CMAA is still under review by the Jamaican government and is not expected to be signed and in effect until 2019. The Jamaican government ended in 2018 an existing non-binding memorandum of understanding previously used to share intercept

information, on the basis that it did not meet the legal framework required under the Jamaican constitution. The absence of a formal agreement to share intercept information has hampered U.S. investigations in some areas. The United States and Jamaica are currently in negotiations to find a way forward to reaching a mutually agreeable mechanism to restore this longstanding area of cooperation between both governments.

The Jamaica Defense Force Coast Guard is responsible for maritime law enforcement in Jamaica's over 92,000 square mile maritime domain. The Jamaican military purchased its first fixed-wing intelligence, surveillance, and reconnaissance aircraft, and held the launch ceremony on November 14, 2018. Additionally, the Jamaican government has assigned a military officer to serve as a liaison at the U.S. Joint Interagency Task Force South in Key West, Florida, for coordination of operations against maritime traffickers.

Jamaica's efforts to bring traffickers to justice are hobbled by an under-resourced, overburdened judicial system. Repeated delays and trial postponements contribute to significant case backlogs; frustration among police, witnesses, jurors, and the public, and; impunity for many offenders. In response, the Jamaican government passed a plea bargain reform bill in 2017, drafted with U.S. support and designed to incentivize plea bargaining to increase the courts' efficiency and reduce the backlog of criminal cases.

2. Supply Reduction

According to the JCF, authorities seized 63 kilograms (kg) of cocaine over the first nine months of 2018. Jamaican authorities seized 658 kg during the same period in 2017. In 2018, the JCF's forces have been stretched thin by various state of emergency operations.

Significant cocaine seizures at or near the Port of Kingston have indicated that large shipments reached Jamaica via commercial shipping containers from South America. Cocaine also arrives in Jamaica via small "go-fast" watercraft from Central and South America, likely with the assistance of larger fishing vessels that serve as mother ships. After reaching Jamaica, some cocaine shipments are transhipped in containers through the Port of Kingston onto vessels bound for the United States and other international markets. Other shipments enter the country and are divided into smaller quantities for outbound shipment via other means, including concealment in luggage, human couriers, air freight, or small watercraft.

In 2015, legislation to decriminalize the possession and use of small amounts of marijuana for personal use went into effect. During the first nine months of 2018, Jamaican authorities eradicated 186 hectares (ha) of cannabis plants and seized approximately 20.2 metric tons of cured marijuana, according to police data. Jamaican farmers cultivate an estimated 15,000 ha of cannabis every year. The police, supported by the United States, employ an eradication team to cut growing plants, seize seedlings and cured marijuana, and burn them in the field. The team conducts only manual eradication, since Jamaican law prohibits the use of herbicides.

Traffickers smuggle Jamaican-grown marijuana out of the country via commercial shipping and small watercraft. Small fishing vessels and speed boats carry marijuana to Haiti, the Cayman Islands, and the Bahamas. A thriving "guns for ganja (marijuana)" trade continues between

Jamaica and Haiti, as evidenced by seizures in 2018 of illegal firearms traced to Haiti and marijuana shipments prepared for embarkation from coastal Jamaica. Police and customs officials also target marijuana shipments smuggled via commercial shipping directly to the United States.

Jamaica prohibits the manufacture, sale, transport, and possession of MDMA (ecstasy) and methamphetamine and regulates the precursor chemicals used to produce them. There were no reports of synthetic drugs or precursor chemicals produced or trafficked in Jamaica in 2018. The National Council on Drug Abuse, the Pharmacy Council, and the Ministry of Health work to expand awareness among health professionals of the potential for diversion of ephedrine and pseudoephedrine to produce methamphetamine.

U.S. law enforcement agencies work closely with Jamaican police and customs officials to develop leads, share information, and facilitate interdiction of drug shipments originating in or transiting through Jamaica. The U.S. government has supported the Jamaican police's Narcotics Division with equipment, including 17 donated vehicles and a training room, as well as training.

3. Drug Abuse Awareness, Demand Reduction, and Treatment

The Ministry of Health's National Council on Drug Abuse (NCDA), working through the primary care system and mental health clinics, provides assessment, counseling and treatment services for substance abusers. The Jamaican government operates one detoxification center located at the University Hospital of the West Indies in Kingston and also offers services at Kingston's Bellevue Hospital (a mental health institution). In collaboration with the Organization of American States' Inter-American Drug Abuse Control Commission, Jamaica offers a university-level certificate program in drug addiction and drug prevention. The UN Office on Drugs and Crime works directly with the Jamaican government and non-governmental organizations on demand reduction.

4. Corruption

As a matter of policy, the Jamaican government does not encourage or facilitate illegal activity associated with drug trafficking or the laundering of proceeds from illicit drug transactions. Jamaican law penalizes corruption, but in practice, corruption remains entrenched and widespread, and the judicial system has a poor record of prosecuting corruption cases against law enforcement and government officials. The last time a Member of Parliament or similarly high-ranking official was tried or convicted on corruption charges was in 1990, when a former minister of labor was convicted for diverting money from a farm worker program for personal gain. Corruption at Jamaica's airports and seaports allegedly facilitates the movement of drug shipments across borders, and organized crime leaders have historically had ties to government officials, creating a permissive environment for drug trafficking.

In October 2018, the Jamaican government passed a bill to make MOCA, which investigates organized crime and official corruption, fully independent of the police. MOCA was previously a task force within the JCF; the new legislation makes it a free-standing entity with its own

dedicated resources, potentially increasing its freedom to investigate corruption cases throughout the government.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The U.S. and Jamaican governments coordinate closely on shared priorities related to narcotics control, including investigative capacity, customs cooperation, maritime security, and support to the judicial system.

The United States supports a wide range of efforts designed to reduce illicit trafficking, advance public safety and citizen security, and promote justice through the Caribbean Basin Security Initiative (CBSI). CBSI support to Jamaica includes training, equipment, and logistical assistance for interdicting illicit drugs and firearms trafficking; combating cybercrime, money laundering, financial fraud, and other organized crime; improving Jamaica's efforts to seize and forfeit criminally-acquired assets; and enhancing Jamaica's maritime law enforcement capabilities. The United States also funds projects to improve the effectiveness of prosecutors and the courts, the National Forensic Sciences Laboratory, and the Financial Investigation Division.

To increase public and government attention on the need for anticorruption reforms, the United States provides support to the non-governmental organization National Integrity Action (NIA). NIA provides training to government, civil society, and media partners to increase awareness and conducts campaigns to increase public demand for more effective action against corruption.

The United States and Jamaica entered into a bilateral agreement to suppress maritime illicit trafficking in 1998. This agreement includes provisions to stop, board, and search suspect vessels, the authority to overfly Jamaica's territorial waters, the ability to order to land, and the use of third-party boarding platforms. Jamaica is a regular participant in the Multilateral Maritime Interdiction and Prosecution Summits, which bring together maritime counter drug professionals from more than 20 countries across the Caribbean, Europe, and the United States.

D. Conclusion

Cooperation between Jamaica and the United States related to drug trafficking and transnational crime continued to be strong in 2018, as evidenced by the high number of high-level extraditions of wanted criminals from the United States to Jamaica.

Progress against drug trafficking will significantly depend on efforts to combat corruption and strengthen the judicial system so traffickers are held criminally accountable. New legislation to create an independent anticorruption investigation agency and U.S.-supported programs to weed out corrupt officials may represent a step forward in this regard.

Kazakhstan

A. Introduction

Kazakhstan is a transit country for Afghan heroin and other opiates destined for Russia and Europe. Kazakhstan's law enforcement agencies continued to report declining volumes of seizures of Afghan heroin in Kazakhstan in 2018, continuing a multi-year trend. Official statistics were not available at the time of this report. Kazakhstani authorities credited this reported decline to the Government of Kazakhstan's effort to enhance border security in the south of the country, as well as a possible shift in trafficking patterns away from Central Asia in favor of routes through South Asia and the Balkans. The U.S. government lacks sufficient information to corroborate these possible explanations.

Cultivation and trafficking of cannabis occurs within Kazakhstan, with most cannabis originating in the Zhambyl region on the southern border with the Kyrgyz Republic. Law enforcement conducts operations to eradicate cultivation and interdict trafficking of cannabis within those areas of the country. The Government of Kazakhstan has expressed growing concern about the use and trafficking of synthetic drugs within Kazakhstan, many of which are purchased via the internet and imported into the country from Russia, China, Southeast Asia, and Europe.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Government of Kazakhstan pursues efforts to prevent drug addiction and combat drug trafficking as high priorities, and has integrated counterdrug activities into its National Security Strategy. Kazakhstan implements drug demand reduction treatment projects in line with its national healthcare program for 2016-2019.

Kazakhstan embraces regional cooperation to counter drug trafficking, including by hosting of the Central Asia Regional Information Coordination Center for Combating Illicit Trafficking of Narcotic Drugs, Psychotropic Substances and their Precursors (CARICC). The country's law enforcement agencies use CARICC as a platform to exchange operational information on transnational drug trafficking in Central Asia. The government cooperates with various multilateral organizations on drug control activities and policy discussions, including the United Nations Office on Drugs and Crime (UNODC); the Shanghai Cooperation Organization (SCO); the Collective Security Treaty Organization (CSTO); the Commonwealth of Independent States (CIS); and the Eurasian Group on Combating Money Laundering and Terrorism Financing. Kazakhstan continues to provide training assistance to Afghanistan and other states in the region. Cadets from Afghanistan, the Kyrgyz Republic, and Tajikistan study at Kazakhstan's Ministry of Internal Affairs and Border Guard Service academies.

In 2018, Kazakhstan's law enforcement agencies participated in several counterdrug operations and exercises under a CSTO regional umbrella operation called "Kanal" (Channel). Kazakhstan hosted two operations under this initiative, in May and September, respectively. In cooperation with UNODC, Kazakhstan also implemented five capacity building projects to counter illicit

trafficking of narcotics, psychotropic substances and their precursors in Central Asia and other neighboring countries. SCO members adopted an Anti-Narcotics Strategy for 2018-2023, an action plan for its implementation, and a “concept of prevention of abuse of narcotics and psychotropic substances.”

In 2016, Kazakhstan developed draft legislation that would allow scheduling of potentially dangerous psychoactive substances as analogues of narcotic drugs and psychotropic substances, including on an emergency basis. The law still awaits approval by Kazakhstan’s parliament.

2. Supply Reduction

During the first nine months of 2018, Kazakhstan’s law enforcement agencies reported detecting 6,516 criminal drug-related offences, including 2,147 drug-related crimes, 1,446 illicit drug sales, and 172 instances of drug smuggling. Law enforcement agencies reported conducting six controlled delivery operations that resulted in the seizure of 16.5 kilograms (kg) of illicit drugs. The Ministry of Internal Affairs (MVD) reported disrupting nine drug trafficking organizations, initiating 15 criminal cases targeting organized criminal groups, and initiating 12 cases targeting illicit drug sales. Law enforcement reported seizing 18.9 metric tons (MT) of illicit drugs in total (down from 38.5 MT during the same period in 2017), including 55.3 kg of heroin (126.6 kg in 2017); 740 kg of hashish (439.6 kg in 2017); 7.4 kg of opium; and 16.4 MT of marijuana (32.3 MT in 2017).

Kazakhstan conducted its annual cannabis eradication operation from May 20 through October 20. During the first nine months of 2018, the MVD reported detecting 1,571 internet sites involved in illicit drug sales, and the Ministry of Information and Communications blocked 1,446 of those sites. Another 125 sites are still under review.

The MVD reported seizing approximately 1.8 kg of synthetic drugs in 2018, including 1.2 kg of pyrovalerone, 856 grams of fentanyl, and 23.8 grams of methylnmethcathinone. The relatively small synthetic drug seizure totals may not accurately reflect the true scale of trafficking within the country. Kazakhstani agencies have limited forensic capacity to identify new psychoactive substances, and the country’s current legislation does not criminalize analogue substances.

3. Public Information, Prevention, and Treatment

The MVD Counternarcotics Department cooperates with 73 non-governmental organizations (NGOs) on drug demand reduction activities and the medical and social rehabilitation of persons suffering from substance abuse disorders. New narcology standards, treatment methods, prison addict rehabilitation, and harm reduction programs are in development, but remain antiquated.

The Counternarcotics Department worked with the Ministry of Health, the Ministry of Education and Science, and NGOs to conduct 6,453 drug demand reduction events in 2018, reaching over 333,000 youth. The government also introduced a new program in schools to assist with early diagnosis of drug use. A drug use prevention project initiated by the MVD and the Ministry of Education and Science called “Young Police Assistants” has reached 55,000 school children.

The government reported 23,105 registered drug users in 2018, including 1,704 women and 126 minors.

4. Corruption

The Government of Kazakhstan does not, as a matter of government policy, encourage or facilitate illicit drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. However, there are instances of corruption among law enforcement agencies, particularly among front line law enforcement officers, whose low salaries incentivize bribe requests. The government rewards citizens for reporting police corruption

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

Kazakhstan is committed to advancing its drug demand and supply reduction goals and strengthening international cooperation in these fields. To reduce the illicit inflow of drugs, Kazakhstan plans to revise its border procedures for foreign nationals, especially from countries identified as illicit drug trafficking threats. The government is also developing measures to identify and combat maritime trafficking channels.

The United States continues to support drug control capacity building with relevant authorities. The U.S. Drug Enforcement Administration (DEA) signed a memorandum of understanding (MOU) with the MVD in November 2016 to support bilateral drug control efforts and information sharing, allowing a closer relationship, information sharing, and joint operations. DEA also signed an MOU with Committee for National Security of the Republic of Kazakhstan (KNB) on June 27, 2018, which yielded fruitful cooperation over the course of the year. The United States supports efforts to strengthen Kazakhstan's border security, including efforts to expand Kazakhstan's Coast Guard capacity on the Caspian Sea. In 2018, the United States organized 36 training programs for Kazakhstani drug enforcement officers. All U.S. government programs aim to improve Kazakhstan's capacity to combat drug trafficking and drug demand, and enjoy full host government support and shared funding.

D. Conclusion

Kazakhstan remains concerned about regional drug trafficking trends linked to illicit drug production in Afghanistan. To confront the increasing synthetic drug threat, Kazakhstan should work to finalize and adopt its pending legislation that would allow it to schedule narcotic analogues for control, including on an emergency basis, a step that will greatly enhance its ability to counter this threat. The government is seeking to expand its drug control cooperation with international partners, especially the United States, and is also taking steps to combat existing and emerging public health and national security threats posed by drug trafficking and addiction.

Kenya

Kenya is a significant transshipment route for illicit drugs destined for other international markets, and, to a lesser extent, a consumer country of illicit drugs. Transnational criminal organizations that transship drugs through Kenya also engage in a wide range of additional criminal activity, including corruption, money laundering and wildlife trafficking. Drug trafficking organizations utilize Kenya as a transshipment point for heroin and to a lesser extent, cocaine and methamphetamine. The most commonly used illicit drug by Kenyan adults is cannabis, followed by heroin and diverted pharmaceutical drugs.

The Narcotic Drugs and Psychotropic Substances (Control) Act of 1994 and its various amendments provide the basis for drug law enforcement within Kenya. Criminal asset forfeiture laws are also in place allowing for the seizure and forfeiture of proceeds from drug trafficking, as well as assets used in furtherance of such crimes. The Anti-Narcotic Units of the Kenya Police Service enforce narcotics laws throughout the country, while other law enforcement agencies frequently assist in drug enforcement matters.

The importation of heroin into Kenya is a major focus of law enforcement authorities. This criminal activity brings with it a multitude of other threats, including corruption and increased local use of the drug. Although heroin is used throughout Kenya, consumption is most prevalent along the coastal area surrounding Mombasa. Heroin enters Kenya both through maritime smuggling and over land borders, primarily in the south of Kenya. Cocaine frequently transits Kenya, primarily by couriers traveling commercial airlines. Although a majority of the cocaine is destined for other markets, there is evidence of local cocaine trafficking and consumption.

The United States and Kenya enjoy an excellent bilateral relationship and fully cooperate on multilateral drug enforcement efforts. The U.S. Drug Enforcement Administration works closely with Kenya to target national and international drug trafficking organizations. In turn, Kenyan counternarcotics law enforcement authorities also liaise with their counterparts in neighboring countries and throughout the region, fostering a coordinated multinational approach in targeting transnational criminal organizations.

Laos

A. Introduction

Laos is a major drug source country of illicit opium cultivation, and a significant transit hub and consumer of other illicit drugs, particularly amphetamine-type stimulants (ATS). Most of the opium grown in Laos is destined for export and refinement into heroin, with only a small percentage consumed in Laos. Laos is not a significant source of opiates being sent to the United States. ATS production within Laos appears to be limited but increasing, and seizure data indicates that ATS trafficking into Laos from neighboring countries is increasing, fueling rising drug use within the country. Laos shares approximately 3,000 miles of porous land and riverine borders with Burma, Thailand, China, Cambodia, and Vietnam. Although infrastructure remains rudimentary, improving road, bridge, and communication networks in Laos have increased opportunities for drug trafficking.

Poppy cultivation in Laos decreased 96 percent between 1998 and 2007 due to aggressive government action and international cooperation, particularly U.S. alternative development assistance. Although significant amounts of opium poppy are still grown in Laos, often in remote and difficult to access areas, overall cultivation appears to have been relatively stable in recent years, if not declining marginally. According to the most recent UN Office on Drugs and Crime (UNODC) Laos Opium Survey, Laos cultivated an estimated 6,200 hectares (ha) of opium poppy in 2014 and 5,700 ha in 2015. The most recent available data, from a survey completed by Lao and Chinese technical staff, found 5,328 ha of opium poppy in 2017.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Since 1989, the United States has provided Laos approximately \$47 million in law enforcement and drug control assistance, which helped to eliminate much of Laos' opium poppy cultivation. The Lao Bureau for Drug Control and Supervision (LBDC) and the Counternarcotics Police Department (DCD), both under the Ministry of Public Security, are the main coordinating bodies for the implementation of drug demand reduction, crop control, alternative development, and law enforcement activities. The top policy-making body for drug control is the National Steering Committee to Combat Drugs (NSCCD), chaired by the Prime Minister. Lao drug police are organized into 18 provincial counterdrug police divisions known as Counter Narcotics Units (CNU), one for each province and Vientiane Capital.

Laos does not have a bilateral extradition or a mutual legal assistance agreement with the United States, though Laos has acceded to multilateral conventions that enable such cooperation. While the Lao are receptive to training opportunities, bilateral cooperation with the United States on international drug trafficking investigations has been rare to date.

2. Supply Reduction

Lao drug control authorities have increased their cooperation over the past several years on border control and interdiction with counterparts in neighboring countries. In January 2017, Laos joined other ASEAN Member States in adopting the ASEAN Cooperation Plan to Tackle Illicit Drug Production and Trafficking in the Golden Triangle (2017-2019). The Plan is a concerted effort to solve drug problems in the Golden Triangle, and builds on both the Safe Mekong Joint Operation Project, which began in 2013, and the ASEAN Work Plan on Securing Communities Against Illicit Drugs (2016-2025). In October 2018, Laos took over hosting the Safe Mekong Coordination Center and will play the role of host until January 2019. The Safe Mekong Operation Project on Drug Control is specifically focused on disrupting the flow of drugs out of the Golden Triangle and intercepting the flow of chemical precursors into the Golden Triangle. The Safe Mekong initiative partner countries are China, Laos, Thailand, Vietnam, Burma, and Cambodia.

Several Lao drug traffickers were arrested and sentenced in 2017-18. Lao national Xaysana Keophimpha was arrested at Suvarnabhumi airport in Bangkok in January 2017 and sentenced to life in prison in Thailand in March 2018. Several of his associates have also been arrested, including Sisouk Daoheuang (arrested in Laos) and Akarakit Worarojcharoendet (arrested in Thailand), and have been sentenced to lengthy prison terms or are awaiting sentencing.

During the first six months of 2018, the DCD reportedly seized 71.13 kilograms (kg) of heroin; 53.36 kg of opium; 5.9 kg of cannabis; 102.83 kilogram (kg) of crystal methamphetamine; 1,775,360 ATS tablets (weighing 260.53 kg), and 25.9 kg of precursor chemicals. The DCD investigated 2,947 drug cases and arrested 4,404 people, including 110 foreign nationals. Statistics for the second half of the year were not available at the time of this report. The Lao government also continues to support longstanding efforts to assist former poppy-growing farmers by fostering alternative livelihoods, mostly financed by donors.

In 2016, the U.S. government launched a three-year, \$1.5 million alternative development program with the UNODC in Houaphan province. The project focus includes the development of coffee plantations and improved technology for livestock production. In 2018, the U.S. government signed a new \$1.225 million Letter of Agreement (LOA) with the Lao Department of Customs focused on improving border security and disrupting the flow of illicit substances into Laos. The U.S. government has an existing LOA with the Ministry of Public Security's Counternarcotics Police Division and capacity building trainings with Lao CNU are ongoing.

3. Public Information, Prevention, and Treatment

The current Lao government, led by Prime Minister Thongloun Sisoulith, has made combating illicit drugs a top priority, and the Lao government has increased efforts to raise awareness of the risks and negative consequences of illicit drugs through mass media such as television, radio, newspaper, and other channels.

ATS use is thought to be concentrated among Laos' youth population, mostly consumed as "yaba," a mixture of methamphetamine and caffeine that is popular throughout Southeast Asia.

The Lao Government uses an estimate of 40,000 consumers, although this figure is likely an underestimate.

Government drug treatment facilities lack the resources to provide evidence-based treatment and post-discharge follow-up. To support demand reduction efforts, the United States supports the adoption of community-based, voluntary treatment. The United States has provided approximately \$600,000 to the UNODC and the World Health Organization to establish and operate 28 Community-Based Treatment centers providing screening and counseling services at district hospitals across six provinces. The United States is also funding the translation and training for Lao National Trainers on the U.S.-developed Universal Prevention Curriculum and Universal Treatment Curriculum, with the Colombo Plan and UNODC as the implementers.

4. Corruption

The Lao government does not encourage or facilitate the illicit production or distribution of narcotic or other controlled substances, or the laundering of proceeds from illegal drug transactions. However, salaries for police, military and civil servants are low, and corruption in Laos is endemic.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The Lao government's guiding drug control strategy document, the "National Drug Control Master Plan 2016-2020," was approved in May 2016. The Master Plan, which was developed with support from the United States and the UNODC, articulates nine priorities for the Lao government, including:

- Formulation and improvement of legal instruments concerning narcotic;
- Data/Information collection and analysis;
- Education/Training/Dissemination of the laws and adverse consequences resulting from drug abuse;
- Treatment and vocational training for drug addicts;
- Alternative development, replacing opium poppy and cannabis cultivation;
- Law enforcement;
- Precursor control, analysis and test of drug use;
- International cooperation; and
- Streamlining the organizational machinery of the national commission for drug control and supervision at the central and local levels.

The Master Plan implements the country's National Drug Law (promulgated in 2015), and calls for a budget of \$18 million over five years from 2016-2020. Funds for implementing the plan are expected to come from the Lao government and international donors.

The United States supports Laos' goal to strengthen the rule of law by 2020 and to create a better environment for combating transnational crime. Most U.S. counterdrug assistance to Laos supports law enforcement efforts, including training for the DCD, CNUs, and Customs Department.

D. Conclusion

Drug control cooperation between Laos and the United States is increasing and continues to emphasize border security and improved law enforcement capacity. Drug trafficking networks across Southeast Asia ignore national borders, requiring strong regional law enforcement capacity and cooperation. Laos' justice, law enforcement, and security systems lack the resources necessary to counter the increased sophistication of drug-related crime that has accompanied the country's growing economic development. Continued support for institution building within the Lao government as well as basic law enforcement training, emphasizing interdiction, investigation, and prosecution, remains needed.

Liberia

A. Introduction

While Liberia is not a significant transit country for illicit narcotics, the country's nascent law enforcement capacity, porous border controls, and proximity to major drug transit routes contribute to trafficking to and through Liberia. While Liberia is also not a significant producer of illicit drugs, local drug use is very common. There is no reliable data on drug consumption trends within Liberia because of poor transportation and communications infrastructure, and a lack of capacity within the Government of Liberia to undertake the necessary research. However, a recent U.S.-administered survey of Liberian youth found that marijuana, tramadol, and methamphetamine are the drugs of choice. Other drug usage includes heroin (mostly smoked) and cocaine (snorted). Local authorities have reported an increased prevalence of amphetamine-type stimulants (ATS) and intravenous drugs. Other than marijuana, locally consumed drugs enter Liberia via commercial aircraft, maritime vessels, and across land borders by foot and vehicle traffic. Drug use among the country's youth population is a growing public concern.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Local law enforcement agencies, including the Liberia National Police (LNP), Coast Guard, National Security Agency, and the Liberian Drug Enforcement Agency (LDEA), work in concert to fight drug trafficking in Liberia. Established Nigerian criminal networks operate within Liberia, some of which traffic drugs. Local authorities are aware of the threat and are working with the United States and other international partners to prevent illicit criminal networks from gaining a stronger foothold.

During 2018, the LDEA made a number of interdictions and arrests of drug traffickers based upon intelligence and international cooperation. Drug seizures have increased from a few grams of drugs on a single user to multi-kilogram seizures and arrests of international drug traffickers. This is a significant change, as prior to 2013, the LDEA did not have the capacity to perform the basic investigations and surveillance necessary to obtain warrants, maintain chain of custody, and present a proper case in court.

Since 2014, when the LDEA Act and a Controlled Drugs and Substances Act came into effect, Liberian pursuit and prosecution of drug trafficking has increased. In 2015, 107 individuals were arrested under the new Anti-Drug Law with seven indictments; in 2016, there were 70 arrests with 24 indictments leading to 20 prosecutions. In 2017, there were 88 arrests with 11 indictments and 10 prosecutions, leading to a cumulative total of 76 years of imprisonment. During the first 10 months of 2018, there were 83 arrests with nine indictments and four prosecutions. The decline in indictments and prosecutions in 2018 can be attributed to the December 2017 election of a new President who spent several months staffing his administration. Notably, in December of 2016, the LDEA facilitated the transfer and arrest of a Pakistani heroin dealer wanted by the U.S. Drug Enforcement Administration, which resulted in

in his conviction in a U.S. court in May 2018. Many of the effective interdictions and seizures during 2018 came about because of LDEA's increased cooperation with international partners, which has led to greater intelligence sharing and capacity to collect and act on intelligence.

The LDEA continues to improve its operational capacity and professionalism, with such activities as using confidential sources; working with private businesses; initiating controlled deliveries; investigating international smuggling groups; and effectively working across Liberian government agencies. The U.S.-Liberia extradition treaty dates from 1939 and is in effect, and while no mutual legal assistance treaty between Liberia and the United States exists, Liberia is a party to multilateral conventions that enable such cooperation.

2. Supply Reduction

Local marijuana production is not seen as a major concern by the public, and while there is little information on the extent of local cannabis cultivation, or the local sales networks, marijuana is clearly the most widely available drug in the country.

In 2018, the LDEA seized a total of approximately 4.5 metric tons (MT) of marijuana, 4.8 kilograms (kg) of cocaine, 12.5 kg of heroin, and 6 kg of methamphetamine (a new class of illicit drugs just seen in Liberia over the past two years). Also in 2018, the LDEA made significant progress in its fight to counter international drug trafficking through air couriers, and successfully interdicted six foreign nationals and seized 267 kg of khat (a traditional stimulant used in Northern Africa and the Arabian Peninsula), four kg of heroin, and two kg of cocaine at Roberts International Airport.

3. Public Information, Prevention, and Treatment

Due to a lack of resources and capacity, the government has conducted very little drug prevention, rehabilitation or treatment since the 1970's (pre-civil war), with persons with substance use disorders being referred to the only psychiatric hospital in Liberia or to one of the few non-governmental organizations (NGOs) working in the field. A bright spot was on June 26, when the LDEA hosted International Day Against Illicit Drugs-World Drug Day, logistically supported by the United States, which achieved the largest public turnout for this annual event since it was first held in 2003. The event promoted drug demand reduction and community engagement in fighting drug abuse, underscored various enforcement efforts, and highlighted Liberian inter-agency security cooperation to combat drug trafficking and transnational crime. The 2018 event culminated in the public destruction (burning) of seized drugs, an action widely covered in the media as it demonstrated a new level of transparency. The LDEA destroyed 4.38 MT of marijuana, 4.9 kg of cocaine and 12.3 kg of heroin at this event.

4. Corruption

The Government of Liberia does not encourage or facilitate the production or distribution of illicit drugs, nor the laundering of proceeds from illegal drug transactions, as a matter of policy.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States is working with the Government of Liberia to fight international drug trafficking and reduce local demand. Among ongoing initiatives, the United States is funding a \$2.4 million project through the U.N Office on Drugs and Crime to enhance the capacities of Liberian law enforcement agencies to counter transnational crime and trafficking of drugs and other contraband. While these efforts continue, U.S. assistance seeks to build the Government of Liberia's capacity to develop criminal cases against international trafficking organizations active in the country, and encourage judicial application and attorney understanding of anti-drug laws. Many of the seizures and successful cases recorded in 2018 are a direct result of international cooperation in countering international drug trafficking.

D. Conclusion

The Government of Liberia is committed to preventing transnational criminal organizations from gaining a major foothold in its territory, but lacks the resources and capacity to respond adequately to this challenge. Despite significant constraints, the LDEA is also working with other regional drug enforcement entities to exchange intelligence and information – collaboration that has led to the interdiction of international traffickers within Liberia's borders. After four years of effort to overcome institutional and political resistance, the LDEA has deployed to all the Liberian Ports of Entry, and given the advancements in LDEA capacity, judicial acceptance, and successful prosecutions, it is anticipated that 2019 will see significant results. The United States will continue to support and assist Liberia's efforts to strengthen its law enforcement capacities and fulfill its international drug control commitments.

Malaysia

Malaysia is not a significant source country or transit point for U.S.-bound illicit drugs. Nevertheless, trafficking through Malaysia to supply international markets continues and transnational criminal organizations are attempting to expand crystal methamphetamine production within the country. Drugs smuggled into Malaysia include marijuana, heroin, and amphetamine-type stimulants. Synthetic drugs are also trafficked through Malaysia, including MDMA (ecstasy), nimetazepam (a diverted pharmaceutical drug), and crystal methamphetamine. There is no notable cultivation of illicit drug crops in Malaysia and local demand and consumption for illicit drugs is limited.

Although the Royal Malaysian Police are generally effective in arresting drug offenders, Malaysian prosecutors have shown limited success in prosecuting and convicting drug traffickers as Malaysia does not have an effective drug conspiracy law. Coupled with the high burden of proof required for a drug trafficking conviction, which in many cases leads to a mandatory death sentence, prosecutors are limited in their ability to charge and prosecute such cases. The new Prime Minister, elected in May 2018, is seeking to abolish the death penalty in Malaysia, and currently has support in Parliament for the measure.

Drug trafficking through Malaysia in 2018 remained relatively consistent with previous years. Overall, Malaysian authorities seized approximately \$23 million worth of drugs in the first half of 2018, according to the latest Malaysian government statistics available, which is a 17 percent decrease from the same time period last year. Arrests for supplying and possessing drugs decreased 2 percent and 5 percent, respectively, compared to the first half of 2018, while arrests for drug use, based on urinalysis, fell by 27 percent.

Malaysia has an extradition treaty and mutual legal assistance treaty with the United States and is generally cooperative in these cases. The United States continues to send Malaysian police for counter-drug training at the International Law Enforcement Academy in Bangkok. The U.S. Coast Guard continued its maritime law enforcement training program with the Malaysian Maritime Enforcement Agency. In 2019, the United States will seek to promote further coordination between Malaysian and U.S. law enforcement authorities, including joint interdiction efforts, information sharing, and training to further improve Malaysia's investigative and prosecutorial capacity.

Mali

Mali is a transit point for illicit drugs trafficked mostly to Europe. Instability and lawlessness stemming from the ongoing violent extremist conflict in Central and Northern Mali pose challenges to the government's modest drug interdiction efforts, while offering the violent extremists a source of revenue by providing protection for illicit shipments. Senior officials have requested international assistance in both interdiction and in combatting the growing domestic use of illicit drugs in the country.

The Ministry of Security has a dedicated office for drug control, the interagency Central Narcotics Office, with approximately 140 officers, detailed from the Police, Immigration, Gendarmes and Customs services. Although the ministry maintains a number of international liaison relationships, regional drug control cooperation is virtually non-existent.

Drug trafficking is concentrated along the southern and western Malian borders. Mali's 4,500 miles of borders are mostly unpatrolled, and the movement of almost all goods is unregulated. Illicit drugs have also been trafficked through the country by aerial conveyance, though on a lesser scale.

There is a growing concern from Mali's government and traditional and religious leaders over the growing use of illicit drugs among the population, primarily among young people. Consumption of methamphetamine, flunitrazepam, and the synthetic opioid tramadol is growing, fueled by high employment and low costs.

Corruption among counterdrug officials is a concern, and the United States supports a number of on-going security and governance programs to address this matter.

Mali and the United States share common goals of reducing the use and traffic of illicit drugs, and in denying violent extremists access to revenue from the sale of such contraband. The United States is increasing its efforts to work with Mali to combat the illicit flow of drugs through the country, as well as work with the government on domestic efforts to reduce demand for dangerous drugs.

Mexico

A. Introduction

Mexico is a significant source and transit country for heroin, marijuana, and synthetic drugs destined for the United States and a main transit country for cocaine from South America. Mexico is a source of illicit opium poppy and believed to be the primary source of heroin to the U.S. domestic market. Mexico is also a main transit route for fentanyl originating from China. Drug trafficking and its related violence and corruption in Mexico pose considerable problems to citizen security and economic development. According to the Mexican government, murders increased 19 percent nationally (to 27 murders per 100,000 residents) during the first eight months of 2018 compared to the same period in 2017.

The Merida Initiative is the U.S. government's primary mechanism to implement civilian security assistance in Mexico. Merida Initiative projects disrupt transnational criminal organizations and hinder their ability to produce and traffic drugs to the United States. Assistance includes training and equipment to dismantle clandestine drug labs; a poppy eradication tracking program; advanced airport security technology; inspection equipment for border crossings and checkpoints; and reconnaissance technologies to improve maritime interdiction. The United States also provides security assistance for drug interdiction equipment and training to military and law enforcement personnel.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

On July 1, Andres Manuel Lopez Obrador of the National Regeneration Movement party (MORENA) won Mexico's presidential election with 53 percent of the vote. The new administration has expressed a commitment to reducing crime and violence, including through the creation of a new Public Security Ministry, increased investigation and prosecution of financial crimes, and cannabis legalization and regulation as a purported crime-reduction measure. Mexico's 2018 federal budget for justice and national and domestic security increased 6.2 percent compared to 2017.

Mexico is party to several legal agreements relevant to drug control, including the Inter-American Convention on Mutual Assistance in Criminal Matters, the 1996 Anti-Drug Strategy, and the 1990 Ixtapa Declaration and Program of Action. Mexico is a regional observer in the Central American Integration System and participates with Canada and the United States in the North American Maritime Security Initiative to share information, improve response to transnational threats, and develop protocols for maritime interdictions. Mexico participates with the United States and Canada in the North American Dialogue on Drug Policy. The current U.S.-Mexico extradition treaty has been in force since 1980, and Mexico remains one of the United States' strongest extradition partners. Moreover, a bilateral mutual legal assistance treaty in force since 1991 fosters a broad range of cooperation in criminal matters.

2. Supply Reduction

The U.S. government estimates opium poppy cultivation in Mexico reached 44,100 hectares (ha) in 2017, an increase from 32,000 ha in 2016. Most poppy cultivation occurred in the states of Sinaloa, Chihuahua, Durango, and Guerrero. A team from the Mexican Attorney General's Office (PGR), Army (SEDENA), Navy (SEMAR), Foreign Ministry (SRE), and the United Nations Office on Drugs and Crime (UNODC) is working on a new opium yield study with the support of the U.S. government to estimate heroin production. The United States is supporting the project with equipment donations and is collaborating closely with the Mexican government to use the yield study data to establish mutually agreed upon production estimates.

PGR's National Center for Planning, Analysis, and Information to Combat Organized Crime (PGR/CENAPI) publishes drug eradication and seizure statistics for civilian law enforcement agencies. According to PGR/CENAPI, in calendar year 2017, Mexico eradicated 4,231 ha of marijuana and 29,207 ha of opium poppy. During the first six months of 2018, Mexico eradicated 1,162 ha of cannabis and 17,288 ha of opium poppy. In calendar year 2017, Mexico reportedly seized approximately 12.6 MT of cocaine; 416 MT of marijuana; 34,841 cannabis fields; 766.9 kilograms (kg) of opium gum; 202,279 poppy fields; 11.3 MT of methamphetamine; 356 kg of heroin; and 103 clandestine laboratories. During the first six months of 2018, Mexico reportedly seized approximately 5.53 MT of cocaine; 110.7 MT of marijuana; 16,267 cannabis fields; 38.5 kg of opium gum; 149,357 poppy fields; 6.3 MT of methamphetamine; 316 kg of heroin; and 37 clandestine laboratories.

The United States supports SEMAR, SEDENA, the Federal Police, Customs (SAT), and PGR with intelligence, training, and specialized equipment. In August, SEMAR seized and destroyed more than 130 MT of processed methamphetamine and more than 29,000 liters and 10,000 kg of precursor chemicals from multiple clandestine laboratories and underground storage facilities in Sinaloa and Durango. SEMAR used equipment and training provided by DEA under the Merida Initiative to handle and destroy the chemicals on site.

Since January 2018, SEMAR has seen a significant increase in maritime seizures, capturing 11.4 MT of cocaine, almost all of it in the Eastern Pacific. The U.S. government supported the seizures through information-sharing and foreign assistance efforts, including four CASA 235 aircraft with U.S.-managed intelligence, surveillance, and reconnaissance (ISR) upgrades. The ISR-enabled video systems will generate inalterable aerial footage, making it a possible source of evidence for use in court proceedings. The United States recently completed upgrades to four SEMAR Maritime Patrol Aircraft, and is supporting SEMAR interdiction and information gathering efforts.

During the first nine months of 2018, U.S. Customs and Border Protection seized 151 kg of fentanyl at U.S. southwest border ports of entry. In April, officials in Tijuana seized 361 small fentanyl packets that had been prepared for street-level distribution. In August, a Merida-donated canine team discovered 2.6 kg of fentanyl pills and 1.1 kg of crystal methamphetamine during an inspection at a commercial shipping office in Jalisco. In September, Baja California State Police uncovered a suspected carfentanil pill production mill (carfentanil is a fentanyl analogue and up to 100 times as potent). At the site, police found precursor chemicals and a kilogram of suspected carfentanil.

Canines donated through the Merida Initiative to Mexico made significant seizures of illicit drugs in 2018, including fentanyl. In May, Merida-donated canines discovered 25 liters of chemical precursor and 450 liters of hydrochloric acid at parcel companies in Durango and Guadalajara. In July, a Merida-donated canine team located 1,280 liters of sulfuric acid at a parcel company in Guadalajara, and 4.9 kg of methamphetamine during an inspection in Michoacan.

In 2018, Mexican officials consolidated oversight of counterdrug efforts under a new Office of National Drug Policy (ONPD) within PGR.

3. Public Information, Prevention, and Treatment

In 2018, Mexico's National Commission Against Addictions (CONADIC) released official results from a national survey of drug, alcohol, and tobacco usage. The study showed overall marijuana use at 8.6 percent (up from 6 percent in 2011); stable cocaine use at 3.5 percent; inhalants at 1.1 percent; and amphetamine-type stimulants at 0.9 percent. There was no indication of domestic fentanyl use in Mexico.

The United States supports the implementation of court-supervised treatment for criminal offenders with drug use problems in Mexico. Currently, six Mexican states operate 30 drug treatment courts including six juvenile courts, all of which receive training and assistance from the Merida Initiative to facilitate court-supervised drug treatment and social reinsertion.

4. Corruption

As a matter of government policy, Mexico does not encourage or facilitate illicit drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. Nevertheless, corruption continues to impede Mexican drug control efforts. Mexico's National Anti-Corruption System seeks to address impunity for corruption, but implementation is not yet complete. The Senate has not yet appointed a special anticorruption prosecutor or approved the selection of the 18 administrative judges charged with ruling on corruption cases.

A joint working group between the new Lopez Obrador administration and civil society is devoted to transforming the PGR into a new Fiscalía General de la Republica, which would make the Attorney General's Office autonomous from the Presidency. In September, MORENA submitted a bill to congress that would allot one year for the transition from PGR to the new Fiscalía to begin, with 2022 as the completion date for the transition.

A number of high-ranking government officials faced corruption-related charges in 2018, including five former governors currently in custody on pre-trial detention. A sixth, former Veracruz Governor Javier Duarte, pleaded guilty to criminal association and money laundering charges in September and received a sentence of nine years. Federal and state authorities have opened corruption investigations into former Governor of Nayarit Roberto Sandoval and former Governor of Veracruz Flavino Rios. In total, nearly 20 former governors have been sentenced, face corruption charges, or are under formal investigation.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The Merida Initiative is the primary driver of bilateral security cooperation, and it plays a key role in addressing the U.S. opioid epidemic through its efforts to stop illicit opioids from being produced in Mexico and trafficked into the United States. The U.S. government works closely with multiple federal and state agencies of the Mexican government on fentanyl detection and seizure. The Merida Initiative supports training for Mexico's fentanyl response teams and for canines and handlers on fentanyl detection; gas chromatography machines for the PGR forensics laboratory to test unknown drug samples; and non-intrusive inspection equipment to help interdict the transportation of fentanyl and other illicit items.

In February 2018, experts from the Royal Canadian Mounted Police (RCMP), with funding from the Merida Initiative, provided canine fentanyl detection training in Mexico City. RCMP trained canine teams from the Federal Police and SAT; subsequent training in October focused on SEDENA and PGR canine programs. In July, the Nogales Border Patrol Station and the Consulate General Nogales' Regional Security Office conducted a fentanyl class for 34 Mexican law enforcement officials, including federal and state police and customs officials. In August, DEA opioid and synthetic drug experts provided fentanyl awareness and processing procedures training to 70 officers of the Sonora State Police.

As of August, the Government of Mexico had deployed a U.S.-funded biometric data sharing program in all of its 52 migration processing stations. The program supports Mexico's ability to detect threats and has vastly improved Mexico's capability to partner with U.S. law enforcement to dismantle transnational criminal organizations and improve border control. As of October, authorities had identified hundreds of gang members and drug traffickers.

In Mexico City, the bilateral Drug Policy Working Group has taken the lead to operationalize agreements reached at the 2017 cabinet-level meetings of the "Strategic Dialogue on Disrupting Transnational Criminal Organizations" and the "Security Cooperation Group" (a sub-cabinet group with participants from more than 20 U.S. and Mexican federal agencies). The working group met for the fourth time in January 2018, headed by the Embassy Mexico City's Deputy Chief of Mission and PGR. The group focuses on implementing projects to diminish illicit drug production, enhance interdiction efforts, and share best practices to respond to drug demand in both countries.

D. Conclusion

Drug trafficking, corruption, and related violence remain substantial challenges for citizen security in Mexico. The United States will continue to look for opportunities to enhance bilateral cooperation and work toward achieving shared goals through effective targeting of transnational criminal networks, opium poppy eradication, improved interdiction of illicit drugs, and cooperation against money laundering in both countries.

Morocco

Morocco is one of the top cannabis and hashish-producing countries of the world, with Europe being a primary market. Traffickers may be decreasing the use of commercialized containers for smuggling activity due to the deployment of x-ray scanners at the port of Tangier, and increasing the use of “go-fast” boats and non-commercial airplanes to smuggle drugs into Spain. Traffickers may also be expanding internal routes by moving hashish south and then to Morocco’s coast for non-commercial maritime shipment to Europe or overland shipment to African markets. Moroccan hashish is also smuggled south into Mauritania, and then moved east across Mali and Niger into Libya for onward transshipment and distribution.

Over the past decade, Moroccan cannabis farmers have substituted traditional seeds with hybrid strains capable of producing larger yields and higher tetrahydrocannabinol (THC) levels. Yields obtained from hybrid seeds and improved agricultural techniques are three to five times higher than those obtained from traditional cannabis farming methods. Media and U.S. law enforcement reporting indicates that the switch to hybrid seeds was driven by market forces as European customers demanded a higher quality THC product. Accurate estimates for cannabis cultivation and hashish production levels are not available.

Morocco remains a transit point for the commercial and non-commercial maritime shipment of cocaine smuggled into Europe. South American and Mexican drug trafficking organizations utilize West Africa as a transit point for cocaine smuggled into the European market, and Morocco remains a key transit point for this route. Transnational criminal organizations take advantage of Morocco’s pre-existing hashish transportation networks to facilitate the flow of cocaine from West Africa to Europe. During 2018, a coordinated operation between the U.S. Drug Enforcement Administration and Morocco law enforcement dismantled a commercial maritime operation smuggling cocaine from Brazil to Europe via containerized shipping transiting the port of Casablanca, arresting one Brazilian and five Moroccans. Six vehicles, 541 kilograms of cocaine, and approximately \$1.5 million were seized. Media reports indicate Moroccan hashish continues to be smuggled to South America and the Caribbean in exchange for cocaine transported to Europe for distribution.

The United States has a mutual legal assistance treaty with Morocco that entered into force in 1993. The U.S. does not have an extradition treaty with Morocco, but Morocco has been willing to surrender fugitives to the United States via deportation, expulsion, or otherwise lawful removal pursuant to its domestic law.

Mozambique

Mozambique continues to be a transit point for heroin, hashish, cocaine, and precursor chemicals. Transnational criminal organizations based in Asia and South America use Mozambique as a transit hub both to access the South African market and to move products through neighboring countries to their final destinations in Europe and North America. Cocaine transiting through Mozambique from South America is also becoming more prevalent given the ease of access. Resource constraints, endemic corruption, its long coastline, and porous unguarded land borders hamper drug control efforts in Mozambique.

Criminal organizations exploit Mozambique's vast, largely unpatrolled coastline. Heroin and hashish are primarily imported via maritime shipments from South Asia. Shipments arrive hidden in cargo containers or on ships anchored illegally off Mozambique's coastline where they are off-loaded onto smaller watercraft. Cocaine from South America arrives via commercial flights, transported by courier, or hidden in air cargo. Once in the country, illicit drugs can easily be warehoused and transported via the national highway system to any of six neighboring countries. Access to major international air and cargo hubs both in Mozambique and South Africa allow for further international distribution.

The U.S. Drug Enforcement Administration (DEA) has established a working relationship with the office of the Attorney General (PGR) and Mozambique's National Criminal Investigations Service (SERNIC). SERNIC investigates and prosecutes all major criminal activity in Mozambique. In 2018, SERNIC agreed to establish a joint DEA/SERNIC drug investigative unit to combat transnational organized crime. The primary objective of this bilateral cooperation is to increase Mozambique's law enforcement capacity and promote future sustainability.

Although systemic challenges remain, SERNIC executed two significant arrests of well-known international heroin brokers. Notably, in addition to indicting the suspects on drug-related charges, the PGR identified and evaluated evidence of official corruption. As a result, investigators expect those involved will be penalized and additional arrests will be made, serving as a good example of the Government of Mozambique's political will to confront drug-related crime and corruption.

The United States has neither a bilateral mutual legal assistance treaty nor an extradition treaty with Mozambique. Some mutual legal assistance requests are processed under multilateral conventions that enable such cooperation.

The Netherlands

The Netherlands is a significant transit country for illicit drugs, especially cocaine, entering through the port of Rotterdam. The Netherlands also remains an important source country of synthetic drugs, primarily MDMA (ecstasy), destined for international markets. The volume of internet-facilitated trafficking of synthetic drugs through the country has increased significantly.

The Dutch Opium Act prohibits the possession, commercial distribution, production, preparation of production, import, and export of all illicit drugs. The act distinguishes between “hard” drugs (e.g., heroin, cocaine, MDMA), and “soft” drugs (cannabis products). Sales of less than five grams of cannabis products are “tolerated” (illegal but not prosecuted) in regulated establishments called “coffee shops.” Enforcement is a local matter; for example, some cities choose to implement a requirement limiting coffee shop purchases to local residents, while others, including Amsterdam, do not.

A study by the police estimated that the total revenue of synthetic drugs production in the Netherlands in 2017 was close to 20 billion euros. Synthetic drug producers are considered to be at the source of various other types of crime, including local government corruption, especially in the south of the Netherlands. The national government prioritized fighting organized drugs groups.

Dutch police and mail delivery companies established a Mail/Parcel Intervention Team (PIT) in 2017 to intercept outbound envelopes and parcels containing small amounts of drugs.

The port of Rotterdam is a European import hub for cocaine from South America. In 2017 (the most recent year for which data is available), authorities seized 5.3 metric tons of cocaine in the port of Rotterdam. However, due to increased efforts by authorities, Dutch drug smuggling gangs increasingly use the port of Antwerp as a point of entry. There have been incidents of fraud and corruption within the port authority and associated businesses.

Historically, Dutch and U.S. law enforcement agencies have maintained close operational cooperation, but due to a recent reorganization of the Dutch police and capacity issues, there has been a significant decrease in the exchange of information. The United States and the Netherlands have fully operational extradition and mutual legal assistance agreements.

The Royal Netherlands Navy patrols the Dutch Caribbean for drug interdiction operations. The Netherlands has a memorandum of understanding with the United States, which enables the deployment of U.S. Coast Guard Law Enforcement Detachment Teams and Airborne Use of Force Detachments on Royal Netherlands Navy vessels to suppress illicit trafficking in the waters of the Caribbean. The Netherlands is a party to the Caribbean Regional Maritime Agreement and a partner in the U.S. Joint Interagency Task Force South. The Netherlands is a member of the Maritime Analysis and Operation Centre-Narcotics.

Nicaragua

A. Introduction

Nicaragua remains a transit route for illicit drug trafficking, and domestic production of marijuana also occurs in the country. Nicaragua's long Atlantic and Pacific coasts, large inland lakes, porous border crossings, and sparsely populated and underdeveloped Caribbean coastal region provide a favorable environment for international criminal groups to smuggle contraband, including drugs, weapons, currency, and people. Although there is no statistical data to determine current drug consumption trends within Nicaragua, marijuana and crack cocaine are believed to be the most commonly consumed illicit drugs within the country.

Nicaragua does not have sufficient resources to exercise complete control over its air, land, and sea borders. Nicaragua's limited technical and logistical capacity to conduct successful interdiction operations, including a lack of dedicated air assets, is further challenged by limited mobility and communications to patrol the sparsely populated parts of the Caribbean region where some traffickers operate freely.

Nicaragua's efforts to fight drug trafficking are hindered by widespread corruption within the ranks of the police, the prosecutor general's office, and the supreme court. Drug control cooperation between Nicaraguan authorities and international counterparts is limited and inconsistent, and all levels of government lack transparency.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Nicaraguan National Police and Nicaraguan military are the primary institutions responsible for countering drug trafficking in the country. There is limited information sharing between the two institutions and there is limited law enforcement coverage of the country, particularly in the sparsely populated Caribbean Coast region. The Nicaraguan military continues to target illicit drugs through its "Retaining Wall" strategy, which incorporates land-based, air, and maritime patrolling from permanent bases located at key border crossings and maritime and air routes. Coupled with limited resources, however, the principal challenge for Nicaraguan authorities in 2018 was the politicization of the police and the restive political climate resulting from the government's harsh repression of widespread protests.

On August 23, the Government of Nicaragua appointed Francisco Diaz, who was sanctioned by the United States under the Global Magnitsky Act, as the new National Police Director. Diaz was sanctioned due to his involvement in serious human rights abuses against political opponents. According to local security experts, a police unit tasked with anti-organized crime responsibilities is also involved in grave violations of human rights, including illegal detentions of protestors. The police promoted 452 officers of this unit in September.

Nicaragua maintains close ties with Russia. In April, Russia trained 20 police officers from Central America, Mexico, and the Dominican Republic at a Russian Counternarcotics Training

Center in Managua, but the effectiveness of cooperation agreements with Russia against drug trafficking is not yet visible. Also in April, the Nicaraguan and Honduran military forces signed a cooperation agreement to continue joint operations and maintain security levels in both countries; however, a lack of vetted units, limited information sharing, lack of transparency, and limited working-level cooperation hinder regional operation efforts against organized crime and drug trafficking.

Nicaragua participates in the Cooperative Situational and Information Integration System, which enables greater international law enforcement intelligence sharing. A maritime counterdrug bilateral agreement has also been in place between Nicaragua and the United States since 2001. However, information sharing from Nicaragua is limited, and often not accurate or timely.

The Inter-American Convention on Mutual Legal Assistance in Criminal Matters, to which Nicaragua and the United States are both parties, facilitates the sharing of legal information between countries. In spite of being part of this treaty, cooperation in this area is not robust due to the low volume of requests. In the past, the Government of Nicaragua has rarely provided assistance within requested time frames.

The United States and Nicaragua are parties to an extradition treaty signed in 1905 and ratified in 1907, but the Nicaraguan Constitution bars the extradition of Nicaraguan citizens. Cooperation by the Government of Nicaragua with extradition requests has historically been very limited. An International Criminal Police Organization Red Notice is usually required for wanted individuals in order for the Government of Nicaragua to cooperate with the United States in expelling non-Nicaraguan citizen fugitives.

2. Supply Reduction

There was no discernible change in the volume of drugs transiting Nicaragua in 2018. However, there continues to be evidence of increased domestic drug use, increased illegal drug production (mainly of marijuana), and the existence of clandestine airstrips in remote areas of the country. Though some traffickers continue to smuggle illicit drugs through the isolated Caribbean Coast, many trafficking organizations have shifted their operations to deep-water routes off the Pacific Coast using larger, longer-range transportation. This allows larger quantities of drugs to travel further out to sea, avoiding detection by law enforcement and the threat of pirates in the Caribbean regions.

Illicit drugs are also trafficked via land and air. Beginning in April 2018, drug trafficking organizations changed their routes due to roadblocks raised during the political unrest. Traffickers temporarily utilized more sea vessels and aircraft as alternatives, but at the close of 2018 there was evidence that traffickers were slowly returning to land routes.

The Nicaraguan government reported that it conducted 4,416 operations targeting local and international drug trafficking in 2018, a 44 percent reduction from the 7,833 operations conducted in 2017. The government also reported seizing 2.58 metric tons (MT) of cocaine during the first nine months of 2018, a 46 percent decrease from the 4.8 MT seized in all 2017. The Nicaraguan Navy reported seizing 725 kilograms of the total cocaine seized in the country.

Authorities also reportedly seized 1.58 MT of marijuana; destroyed 36,821 cannabis plants growing along the country's Caribbean Coast; and seized \$11,263,060 in cash, 295 vehicles, 150 weapons, 926 communications devices, and four boats. Authorities reportedly arrested 2,305 people for drug crimes (1,138 of whom had been formally accused in court as of October). Nicaraguan authorities do not share with U.S. officials any information about their methods of destroying seized illicit drugs.

3. Public Information, Prevention, and Treatment

There are no reliable national statistics on drug consumption within Nicaragua, but there are anecdotal reports of increased use of marijuana, crack, and powder cocaine, especially in the Caribbean Coast regions and among adolescents. The lack of statistics makes it difficult to measure the impact of prevention and treatment programs.

The Government of Nicaragua reports that the Nicaraguan National Police, in coordination with the Ministry of Education, the Institute Against Alcoholism and Drug Addiction, rehabilitation centers, and other government institutions, provided drug prevention education for 12,167 youths in 164 schools in 2018. In 2018 the government reached only 5 percent of the 240,000 youth reached in 2017, and only 1 percent of the school age population. The Nicaraguan government also reported offering drug prevention activities for 19,201 young people with substance use disorders and 648 juvenile offenders, to include educational movie screenings, prevention talks, neighborhood meetings, as well as marches, sports, and cultural activities to raise awareness and to prevent violence and drug use.

The police have cooperation agreements with 14 of the 22 privately run drug rehabilitation centers, to which they refer substance abusers. In 2018, the government referred 134 youth to the 14 centers. According to administrators at private rehabilitation centers, as a result of the socio-political unrest, there is an exponential increase in requests for rehabilitation for young people between 15-25 years of age.

Private treatment centers in Nicaragua offer two models of patient service: outpatient and residential. Free treatment centers are scarce in Nicaragua, and some treatment centers charge a high monthly fee between \$2,000 and \$3,000 per patient. Non-governmental organizations continue efforts to prevent drug use and provide treatment to those suffering from substance abuse. The United States provides support to fund programs focused on citizen security, drug prevention, and life skills for at-risk youth, including a grant for a multi-media drug and violence prevention campaign that has reached more than one million people.

4. Corruption

The Government of Nicaragua does not, as a matter of government policy, encourage or facilitate illicit drug production or distribution, and there were no public indications that it is involved in laundering the proceeds of the sale of illicit drugs.

Nicaragua's close relationship with Venezuela, reports of institutional corruption at all levels, and international claims that officials in Nicaragua were complicit in money laundering are of

concern. In December 2017, the U.S. Department of Treasury sanctioned Roberto Rivas under Global Magnitsky authority for corruption. Rivas was serving as President of the Supreme Electoral Council. The Office of the Controller General of Nicaragua failed to investigate his corruption and the origin of his considerable personal wealth.

The head of a counterdrug patrol, who had been sentenced to an 11-year prison term for killing a woman and two children during a failed operation in July 2015, was promoted in September 2018 to the rank of Commissioner and decorated for “heroic actions” while supposedly in prison.

Although Nicaragua’s criminal law contains provisions against corruption such as bribery, abuse of authority, influence peddling, and embezzlement, the politicization of and corruption within the police and the judicial system hinder meaningful prosecution of serious crimes. There is also a law regarding the investigation and prosecution of organized crime (Law 735), but in 2018 it was used to criminalize government opponents. Law 735 provides for the establishment of a unit to administer seized assets; however, there is no public accountability in how seized assets are managed. In 2018, the government did not enforce criminal laws against corruption; instead, there was impunity for corrupt officials loyal to the ruling political party.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

Bilateral drug control cooperation between Nicaragua and the United States is limited and inconsistent. However, the Nicaraguan government has demonstrated some willingness to take action on information about drug-related activities provided by the U.S. Drug Enforcement Administration (DEA). Information provided by DEA to Nicaraguan authorities resulted in successful interdiction of 2.3 MT of cocaine and \$12.7 million in cash in 2018. The United States also supported the participation of two police officers at the International Drug Enforcement Conference in 2018 to strengthen regional interoperability, and continues to support the integration and active participation of Nicaragua into the Cooperative Situational and Information Integration System.

The United States cooperates with the Nicaraguan Navy to enhance maritime interdiction capacity. In 2018, the United States provided equipment to support drug interdiction, refurbished four boats and trailers, and provided parts for two additional boats at a total cost of \$600,753.

In 2018, consistent with U.S. policy to reduce the flow of illegal drugs to the United States and improve security in Central America, the United States assisted Nicaragua by funding drug demand reduction programs with non-governmental organizations. The programs are implemented in the North and South Caribbean Autonomous Regions, the Managua area, and some departments on the Pacific side of the country, where populations are vulnerable to drugs and violence. These grant projects have served to increase citizen security through drug prevention awareness campaigns, community development, youth leadership training, and alternative education intervention programs for at-risk youth in Nicaragua.

The United States maintains a bilateral agreement with Nicaragua to suppress illicit traffic by sea, which includes provisions regarding ship boarding, ship riders, pursuit, entry into territorial waters, overflight, order to land, and international maritime interdiction support. Nicaragua was a participant in the semi-annual Multilateral Maritime Counter Drug Summit held in May, which attracted 125 maritime counterdrug professionals from 26 countries and over 65 international agencies spanning North, Central, and South America and Europe.

D. Conclusion

The Government of Nicaragua has developed policies and programs to combat drug trafficking and reduce drug demand, but should improve its efforts to combat organized crime by expanding its capacity to monitor air, land, and maritime space within the vulnerable Caribbean Coast and Pacific border regions of the country. Productive and more transparent efforts to combat organized crime would require a change in government policy, a political commitment to fight corruption, and the professionalization of the police, as well as halting the counterproductive diversion of police resources to the repression of peaceful protesters.

Niger

Niger is a transit point for illicit drug trafficking and is also experiencing a rapidly expanding drug consumption problem. Instability stemming from ongoing violent extremist conflict in the country's southern and western regions, as well as instability in Libya to the North – all pose challenges to the government's drug interdiction efforts.

Illicit drug trafficking is concentrated along Niger's southern border with Nigeria, as well as within Northern Niger and the city of Agadez. The National Police of Niger have a dedicated counterdrug unit, the Central Office for the Suppression of Illicit Traffic in Narcotic Drugs, consisting of approximately 100 officers.

Transnational criminal organizations are involved in trafficking drugs through Niger. Illicit opioids and other pharmaceutical drugs are readily available, as are cannabis and hashish originating from Morocco. The Government of Niger and civil society leaders are increasingly concerned with growing illicit drug use among the population, primarily among youth. Consumption of methamphetamine, flunitrazepam, and the synthetic opioid tramadol is growing, fueled by high unemployment and low costs.

The director of the National Police and other security officials have identified illicit proceeds from the drug trade as corrosive to their respective organizations. The United States has several programs to assist the Government of Niger in addressing corruption, operational planning, and improving border management, through support to the border police known as the Directorate of Territorial Surveillance (Direction de la Surveillance du Territoire).

Nigeria

A. Introduction

Nigerian drug traffickers remain the preeminent international drug trafficking threat based in Africa. Nigerian trafficking networks operate in the United States as well as throughout Africa, South America, Europe, and Asia. Nigerian drug traffickers have strengthened partnerships with international cocaine and heroin distribution networks to procure and distribute significant quantities of drugs in the United States and other lucrative markets.

Nigeria is also experiencing an opioid epidemic. The most widely used opioid in Nigeria is tramadol, a pharmaceutical product originating mostly from India. Both legitimate Indian pharmaceutical companies and illicit clandestine labs mass-produce and ship tramadol and counterfeit tramadol tablets in 200, 225, and 250-milligram dosages for the Nigerian market. Members of the Nigerian Customs Service (NCS) regularly interdict container loads of tramadol at Apapa Port in Lagos based on intelligence from the National Drug Law Enforcement Agency (NDLEA). The NCS declines to release the tramadol to NDLEA for destruction, and NDLEA reports that NCS officers frequently sell seized tramadol back to its original owners. Codeine is also widely abused, particularly by women in northern Nigeria.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

During 2018, the NDLEA received a major boost in capacity following the complete refurbishment of the NDLEA Murtala Muhammed International Airport (MMIA) Command office building into a state-of-the-art complex, which is now the site of the newly formed Joint Border Task Force (JBTF). The \$10 million JBTF project is mostly funded and overseen by the United Kingdom's National Crime Agency (NCA). The JBTF is a multi-agency effort to target, interdict, disrupt, dismantle, and prosecute Nigerian-based transnational criminal organizations. The task force, a joint endeavor supported by both the United States and the United Kingdom, is comprised of fully vetted and well-trained Nigerian law enforcement investigators. MMIA is viewed as the gateway for Nigerian criminal organizations involved in drug smuggling, as well as the movement of unlawful proceeds; human trafficking/smuggling; wildlife trafficking; weapons trafficking; and an array of other illegal cross-border activity. The NDLEA is the lead agency at the JBTF, contributing 140 officers and investigators who receive mentoring and investigative assistance from U.S. and UK law enforcement professionals embedded within the unit. The task force is further comprised of 20 investigative officers from the National Agency for the Prohibition of Trafficking of Persons (NAPTIP), as well as six prosecutors.

2. Supply Reduction

In 2018, the United States continued to assist in transitioning the NDLEA from a reactive agency to an intelligence-driven one through mentoring and investigative support. During the first eight months of 2018, the NDLEA reported the arrests of 4,736 individuals on drug trafficking charges (4,395 men and 341 women). The agency seized approximately 59 metric tons (MT) of

cannabis; 119 kilograms (kg) of methamphetamine; 17 MT of tramadol; and approximately eight MT of codeine-infused cough syrup. The NDLEA reports that in 2018, the agency destroyed 267 MT of seized drugs overall.

In addition to these totals, the U.S.-supported NDLEA Sensitive Investigative Unit (SIU) is credited with seizing and destroying over 1,700 hectares of cannabis plantations; six-and-a-half MT of processed cannabis; four MT of tramadol; four kg of cocaine; and 250 kg of ephedrine. The SIU seized properties and financial instruments approximately totaling \$2 million and arrested 25 drug traffickers. Additionally, the SIU shared intelligence with counterparts in Benin and Japan that led to seizures of methamphetamine totaling 40 kg.

3. Public Information, Prevention, and Treatment

Consumption of illicit and misused drugs within Nigeria is increasing alarmingly. The United Nations Office on Drugs and Crime (UNODC) has called on the government of Nigeria to address the growing abuse of pharmaceuticals by many Nigerian youths.

While cocaine is not readily accessible to the middle and lower classes, drugs such as codeine, rohypnol, and tramadol are accessible and available from street vendors on the streets of every city and town in Nigeria.

The NDLEA's Demand Reduction Directorate nominally has programs that target youth, sex workers, community leaders, and transport workers. However, resources allocated for counseling and rehabilitation for substance use disorders are negligible.

4. Corruption

A large percentage of senior government officials are engaged, either directly or indirectly, in corrupt practices. In 2017 (the latest available data), the annual operating budget for the NDLEA was approximately \$25,450,000. Salaries alone for the 5,001 NDLEA personnel were estimated at approximately \$24,000,000, leaving the entire organization to operate on a meager \$1,450,000 per year. NDLEA is comprised of 42 commands that typically each receive approximately \$2,800 per month to fund their operations, to include fuel for vehicles and generators, utilities, travel, and various investigative expenses. In 2018, NDLEA staff from various commands reported that no funds were dispersed. This failure at both the institutional and federal government levels encourages NDLEA staff to supplement their salaries and enforcement activities through the acceptance of bribes and extortion.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The NDLEA's primary national goals for 2018 were the passage of a Drug Sentencing Bill requesting a mandatory minimum five-year sentence for drug possession, and an increase of 15,000 personnel. The sentencing bill remained pending before the National Assembly at the conclusion of 2018, and although President Muhammadu Buhari approved the agency's request for an increase in personnel in 2017, funding had not been allocated to begin recruitment.

D. Conclusion

The NDLEA provides a framework for the Government of Nigeria to pursue its drug control objectives and cooperate with international partners to achieve these goals. To increase the agency's effectiveness, the government of Nigeria will need to provide, and equitably distribute, increased funding and training to the NDLEA. The United States will continue to engage the Government of Nigeria to combat drug trafficking, corruption, money laundering, and other criminal issues. The institutional and societal factors that contribute to these criminal activities remain deeply rooted and will require a comprehensive and collaborative effort. Progress will require sustained Nigerian government efforts and an increased political will.

Pakistan

A. Introduction

Pakistan continues to be one of the world's top transit corridors for opiates and cannabis products, which are trafficked through the country's porous borders with Afghanistan and Iran. Once in Pakistan, illicit drugs are subsequently trafficked globally through Pakistan's seaports, airports, postal services, and unpatrolled coastal areas. The United Nations Office on Drugs and Crime (UNODC) estimates Pakistan is the destination and transit country for approximately 45 percent of the opiates produced in Afghanistan. Pakistan is also a major transit country for precursor chemicals used to produce heroin and methamphetamine, though Pakistan is only able to interdict a fraction of the chemicals funneled through the country.

Due to a lack of reliable data since 2016, it is difficult to estimate current levels of poppy cultivation. Most opium poppy cultivation continues to take place in Khyber Pakhtunkhwa (KP) province and the areas formerly known as the Federally Administered Tribal Areas (FATA), enabled by low levels of economic development and civilian security in these regions.

In 2018, Pakistan's law enforcement agencies reported to have disrupted 13 domestic and international drug trafficking organizations. Pakistan's Anti-Narcotics Force (ANF), the country's lead drug enforcement agency and staffed at senior levels by the Pakistani military, reported that during the first 10 months of 2018 it seized approximately 53 metric tons (MT) of morphine, heroin, opium, cocaine, and hashish – a two-thirds decrease from what was seized during the same period in 2017. The Government of Pakistan's budget limitations and, in some cases, lack of political will hindered drug control efforts. As poppy cultivation and opiate production increase in Afghanistan, Pakistan's limited resources and law enforcement capacity will be further strained.

Domestic drug consumption continues to be an area of concern. According to a 2013 UNODC nationwide survey, Pakistan is home to 6.7 million drug users, and approximately 20 MT of heroin is consumed within the country annually. Pakistan currently lacks the capacity to provide effective, non-residential treatment for substance use disorder and to incorporate an evidence-based approach systematically to drug prevention education.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

ANF is an agency within Pakistan's Ministry of Narcotics Control (MNC). In 2018, the MNC finalized a long-awaited revision of its national drug control policy, last amended in 2011. Formal publication of the policy is expected in early 2019. The Ministry also initiated a precursor control oversight mechanism, though such efforts were still nascent at the close of 2018.

ANF's 2018 budget was \$18.6 million, a 9 percent increase over 2017. The Government of Pakistan indicated that it plans to increase ANF's budget in 2019 to \$19.3 million. Nevertheless,

the funds are insufficient to support ANF's daunting mission and limit its capacity to perform key functions adequately, such as operational maintenance of vehicles and equipment. Over 60 percent of ANF's budget is used to pay the salaries of its 3,100 employees, who are thinly deployed across 40 stations and field offices. These posts span every province and territory, except the former FATA. ANF anticipates establishing a new coastal regional directorate with jurisdiction along the Makran Coast. The coastal directorate will more than double the agency's capacity in the province by adding 25 officers and 655 staff. However, due to budget constraints, personnel have not been hired yet. In 2018, the ANF Academy provided instruction to over 300 trainees across Pakistan's law enforcement community.

In 2018, ANF continued nominally to chair the Inter-Agency Task Force (IATF), comprising 27 Pakistani agencies and intended to enhance coordination and communication on drug control. However, the IATF's effectiveness is negligible and it did not meet in 2018.

ANF coordinated illicit drug investigations with multiple foreign counterparts in 2018, including the United States, United Kingdom, Canada, South Africa, Malaysia, Greece, Spain, Poland, Germany, and the United Arab Emirates. Pakistan hosts 39 foreign Drug Liaison Officers as part of its Paris Pact obligations. ANF also partnered with the U.S. Drug Enforcement Administration (DEA) and the United Kingdom's National Crime Agency to operate several Special Investigative Cells (SICs).

The United States and Pakistan do not have a bilateral mutual legal assistance treaty. Pakistan is a party to relevant multilateral law enforcement conventions that have mutual legal assistance provisions. The United States and Pakistan can also make and receive requests for assistance on the basis of domestic laws. Enforcement of the 1931 Extradition Treaty between the United States and the United Kingdom (adopted by Pakistan upon independence) has been problematic.

2. Supply Reduction

In 2018, Pakistan's law enforcement agencies reported multiple noteworthy seizures and claim to have disrupted 13 domestic and international drug trafficking organizations. ANF reported that during the first 10 months of 2018, it seized approximately five MT of morphine and heroin; four MT of opium; 2.5 kilograms of cocaine; and 41.5 MT of hashish. Overall 2018 seizure totals by ANF represent a two-thirds decrease from 2017, and the total volume of cocaine seized in 2018 was negligible. Twenty additional law enforcement agencies reported arresting nearly 36,000 individuals for drug trafficking. Those agencies reported seizing over 106 MT of morphine, heroin, opium, cocaine, and hashish, as compared to 51 MT seized during the same period in 2017.

According to a 2009 UNODC study, the most recent available, 160 to 200 MT of Afghan heroin and 350 to 400 MT of opium were trafficked from Afghanistan to Pakistan annually. Pakistan is only able to interdict a fraction of that traffic. The overwhelming majority of drugs trafficked through Pakistan are destined for global markets, while a minority is consumed within Pakistan. ANF represents less than one-half of 1 percent of Pakistan law enforcement personnel in the country. The rest of the nearly 700,000 police and paramilitary forces in Pakistan lack rigorous drug interdiction training, and most do not address it as part of their core mission.

Pakistan's main opium poppy growing areas are in the former FATA and Khyber Pakhtunkhwa (KP). Insecurity and extremist activity in these regions have prevented reliable ground surveying to determine precise cultivation levels. ANF reported 34 hectares (ha) of poppy were cultivated during the 2017-2018 growing season, all of which were reportedly eradicated. However, these figures are unreliable. The most recent U.S. government estimates from 2016 indicate that approximately 1,400 ha were under cultivation in traditional poppy growing areas. Alternative livelihood and development programs for farmers, including distribution of seeds, agricultural training, and construction of small-scale roads and irrigation projects, have discouraged poppy cultivation in some communities of KP. Pakistan depends heavily on foreign assistance to implement and monitor such programs. The United States government has provided over \$50 million since 1989 for these types of programs, benefitting over 1.2 million Pakistanis and contributing to an estimated 87 percent decrease in poppy cultivation since that time.

ANF is responsible for conducting complex drug investigations with a small staff, while working within a judicial system where prosecutors and judges are overworked, underpaid, and ill-prepared to prosecute cases that involve modern investigative techniques. Suspects arrested by ANF are tried in special drug courts that hear only those cases brought by ANF's own prosecutor corps. During the first 10 months of 2018, ANF registered 1,000 drug arrest cases. ANF reported that 96 percent of the total cases brought to trial resulted in convictions, with 20 percent of the convictions overturned on appeal. However, the vast majority of prosecuted cases were low-level possession or small quantity courier trafficking. Pakistan has a conspiracy law, but it is rarely pursued in drug cases, hindering prosecutions of high-value targets. Lengthy trial and appeal processes mean that suspects can spend years in pre-trial or under-trial detention before a final verdict is reached.

Though the ANF is a federal agency, Pakistan devolved considerable authority to its provinces under its 18th amendment in 2010 for responsibilities including health and social welfare. However, provincial drug control units are still in nascent stages of operation. Enhanced coordination between provincial and federal efforts would benefit overall drug control performance within the country, as would enhanced coordination between federal agencies through the IATF.

3. Public Information, Prevention, and Treatment

UNODC's 2013 nationwide drug use survey indicated that 6.7 million Pakistanis aged 15 to 64 had used drugs for non-medical purposes at least once in the previous 12 months. In total, the survey classified 4.25 million drug users aged 15 to 64 as suffering from substance use disorders. Cannabis and opioids were the most prevalent drugs consumed. The survey results also showed that for the 1.5 million female drug users, the majority reported misuse of opioid-based painkillers or synthetic tranquilizers and sedatives, rather than the cannabis, heroin, and opium used by male drug users.

In 2018, Pakistan continued efforts to raise public awareness about the dangers of illicit drug use. ANF conducted 245 public awareness-raising activities and lectured frequently at universities, colleges, and schools about drug awareness.

ANF opened two new drug treatment centers in 2018, adding 120 beds and increasing existing capacity by 62 percent. However, Pakistan could make better use of provincial-level institutions, such as hospitals and medical centers, to provide non-residential treatment options. Pakistan's drug treatment capacity, with fewer than 100 clinics operating nationwide, remains insufficient. Due to insufficient government resources, non-governmental organizations (NGOs) operate more than 90 percent of Pakistan's detoxification centers. Because Pakistan lacks the institutional capacity to serve women, the majority of drug users receiving treatment are men. Donor-funded "train-the-trainer" programs have increased the number of addiction centers that provide evidence-based treatment.

4. Corruption

The Government of Pakistan does not, as a matter of government policy, encourage or facilitate illicit drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. However, corruption remains a challenge, undermining the country's criminal justice system. The National Accountability Board (NAB) is Pakistan's anti-graft agency responsible for eliminating corruption. Since it was established more than 17 years ago, the NAB has recovered more than \$2 billion and has received and taken action on more than 370,000 complaints. Yet, the consequences for convicted perpetrators are rarely severe. Corruption corrodes the government's ability to address illicit drugs, as bribed public servants may facilitate movement of contraband or otherwise interfere with the arrest and prosecution of suspects.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States remains strongly committed to a comprehensive approach to drug control assistance in Pakistan. U.S. supply reduction assistance builds Pakistani capacity to interdict drug shipments and dismantle criminal organizations. The United States strives to help all relevant Pakistani law enforcement entities develop their capacity to conduct sophisticated operations, such as controlled deliveries, financial crime investigations, and container profiling. To counter illicit drug trafficking and transnational organized crime effectively, the United States aims to help Pakistan cultivate a model for collaborative, intelligence-driven, and corruption-free law enforcement by facilitating interagency, cross-border, and international coordination. The United States also provides alternative means for farmers to grow licit crops instead of poppy, including the distribution of seeds, the construction of small roads, and alternative livelihood irrigation projects.

Over the past five years, U.S. supply reduction assistance has mainly funded poppy reduction programs and ANF interdiction activities. In 2018, bilateral cooperation on interdiction programs between the United States and Pakistan shifted to a more strategic framework, including a focus on cross-border cooperation with Afghan counterparts and an emphasis on capacity building, rather than assistance for daily operating costs. The United States continued to strengthen and diversify cooperation with law enforcement agencies, including by signing a memorandum of understanding with a provincial drug control department for the first time.

To support demand reduction and recovery efforts, the United States funds various drug treatment and practitioner training programs. In 2018, the U.S. government continued its assistance to NGOs operating free-of-charge drug treatment centers and prevention activities, prioritizing the funding of projects benefitting women and children, and providing training for drug treatment professionals to improve evidence-based protocols. Working with the Colombo Plan and UNODC, the U.S. government funded 53 drug awareness campaigns in 2018, and provided free-of-cost residential treatment for nearly 500 patients with substance use disorders, including 28 women and 140 adolescents. The U.S. government also provided training to 330 youth leaders and teachers, as well as 65 drug treatment professionals. U.S. assistance continued to focus on evidence-based approaches to treatment and prevention.

D. Conclusion

Pakistan continues to face enormous economic and security challenges that often supersede drug trafficking in national security priorities, thus limiting attention and resources put toward drug control. Pakistan could reduce drug trafficking more effectively by encouraging its law enforcement agencies to better coordinate engagement, share information more readily, and expend limited resources more efficiently. There is also a need for greater investigative focus on the financial aspects of the drug trade, including better training to counter money laundering. Pakistan should also look to strengthen drug control cooperation with neighboring countries, do more to target high-level drug kingpins rather than low-level traffickers, and focus on maritime interdiction along the Makran Coast. Greater mobilization of provincial institutions could provide an important multiplier for interdiction, prevention, and service delivery.

Panama

A. Introduction

Panama is not a major producer of illicit drugs, but transnational criminal organizations take advantage of the country's transportation infrastructure, free trade zones, and the canal to smuggle cocaine to the United States and other international markets. Although Panama does not suffer from extensive domestic drug consumption, the increasing flow of drugs from Colombia makes greater domestic drug use a distinct possibility.

Panama is a regional leader in the fight against the international drug trade and transnational criminal organizations, and a trusted strategic U.S. partner in interdicting illicit drug shipments. The United States collaborates well with all of Panama's security services, which continue to make progress in developing their institutional capacity.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Developments

Panama continues to improve its security institutions, with U.S. assistance playing an important role. While the Ministry of Public Security increased its budget for the tenth consecutive year in 2018, Panamanian security institutions continue to face challenges with interagency cooperation, procurement management, and budget constraints hampering its ability to combat human and drug trafficking networks. Panama's security forces are often hampered by their inability to fund basic costs associated with core security and drug enforcement missions. In an attempt to overcome challenges in interagency operational coordination, the Ministry of Public Security has since created an interagency task force led by a former Minister of Public Security. The effectiveness of this task force on Panama's drug enforcement operations are to be determined.

Panama's National Police (PNP) continues to reform its training of Antinarcotics Police Officers. Through the National Public Safety Institute, basic and commissioned officers receive ongoing basic and advance training, including drug identification, overdose response, and tactical entries/takedowns, basic drug investigations, as well as undercover operations, complex conspiracy courses.

In 2018, the Government of Panama fully implemented Real Time Crime Centers (DACTERS in Spanish) throughout the country, providing data analytics that contributed to a significant reduction in major crimes including homicides and drug trafficking. The PNP uses comparative statistics (COMPSTAT) to analyze criminal trends, redistributing its resources and officers that resulted in greater success against gangs and drug trafficking in 2018.

In 2016, Panama fully implemented an accusatory justice system similar to the U.S. system to increase transparency, reduce pretrial detention, and adjudicate cases quicker. Since the transition to the accusatory justice system, the length of time required to resolve cases dropped from an average of 296 days to 42 days, according to a 2018 academic study. According to Panama's Office of Drug Prosecution, since 2016, Panama convictions of drug-related crimes

have been above 90 percent, achieving a 98 percent conviction rate in 2018. While the Government of Panama continues to demonstrate an increased capacity in drug prosecutions, there still remains challenges in the investigation and prosecution of complex cases.

The United States collaborates effectively with Panama's 27 district attorneys responsible for prosecuting drug trafficking crimes, especially those handling maritime interdiction cases in conjunction with the Panamanian Coast Guard (SENAN) and border force (SENAFRONT), which patrol rivers and coastal areas. Although the number of drug-related prosecutions increased in 2018, few leaders of drug trafficking organizations were successfully prosecuted. The justice sector continues to struggle with complex cases such as money laundering, organized crime, and criminal forfeiture cases, and official corruption remains a problem.

Panama has mutual assistance and extradition treaties with the United States, but Panama's constitution does not permit extradition of Panamanian nationals.

2. Supply Reduction

Panamanian authorities seized approximately 473.1 metric tons (MT) of illicit drugs in 2018. With U.S. assistance, SENAN routinely interdicted maritime narcotics shipments, often based on information provided by U.S. authorities or other Panamanian agencies. When provided intelligence by the United States or other international partners, SENAN acted upon 90 percent of reports and 20 percent of operations resulted in seizures. SENAN seized 22.5 MT of illicit drugs, mostly cocaine, and 28 vessels; 77 individuals were arrested in the course of these operations. In 2018, SENAN's interdiction success rate of targeted maritime vessels increased by eight percent as compared to 2017.

Panamanian units vetted by the U.S. government and working in partnership with U.S. law enforcement agencies conducted sensitive investigations and operations related to illicit drugs, money laundering, migrant smuggling, and other transnational crimes. In 2018, investigations and operations by these vetted units resulted in 568 arrests and the seizure of over 26 MT of cocaine and 202.7 MT of marijuana – increases of approximately 32 percent and 3,875 percent, respectively, from what was seized in 2017 and approximately \$5.53 million in cash. Approximately \$5.53 million in cash and counterfeit items with a street value of approximately \$1.86 million were also seized in 2018, demonstrating significant progress in the development of Panama's capabilities.

The United States provided state-of-the-art scanning equipment to the Tocumen international airport in 2018 to modernize the processing of more than 15 million passengers transiting this terminal per year. The equipment operates at a much lower x-ray spectrum, capable of producing full body images that enhances the detection of small quantities of drugs and other commonly smuggled items. The United States provided similar equipment at the Marcos A. Gelabert Airport, a secondary facility that handles direct flights to Colombia and Costa Rica.

3. Public Information, Prevention, and Treatment

Panama has not experienced high levels of drug usage or gang activity from transnational groups active in other Central American countries. Local gangs, operating primarily in the Caribbean coast, take part in a variety of criminal activities. Panamanian officials are increasingly concerned that instability in other countries in the region could eventually spill into Panama and lead to increased drug usage and gang activity. The increased flow of drugs from Colombia presents greater risks for domestic drug use as well. The government of Panama has not reported significant use of synthetic opioids, though synthetic drugs have reached the streets of Panama and likely transit the canal in container ships.

Panama has modest drug demand reduction programs in schools and the Ministry of Health supports a drug-counseling program. Panama has not conducted a drug-demand study since 2015 and has not updated its published strategy on demand reduction since 2007, making it difficult to assess current trends.

The United States partners with the PNP to implement programs such as the Drug Awareness and Resistance Education (DARE), and the Gang Resistance Education and Training Program (GREAT), as well as community policing initiatives, to help at-risk youth.

4. Corruption

The Government of Panama does not, as a matter of policy, encourage or facilitate illegal drug production or distribution, nor is it involved in laundering the proceeds of the sale of illicit drugs. However, transnational criminal organizations target the security services, customs, and justice sector to facilitate drug trafficking, raising concerns about official corruption at all levels. Panamanian authorities recognize the threat and actively investigate officials for corruption.

As part of this effort, the United States assisted SENAN in establishing an internal affairs unit in 2017. In 2018, this unit dramatically increased the number of pre-employment background investigations and polygraph examinations. As a result, SENAN rejected multiple individuals with criminal records or other derogatory information. An investigation from this unit also led to the arrest and conviction in 2018 of two crew members accused of providing locations of patrol vessels to drug traffickers. Panama will need to continue to institutionalize these aggressive steps to reduce the threat of drug trafficking-fueled corruption.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

Consistent with the U.S. Strategy for Central America and through the Central America Regional Security Initiative (CARSI), the United States supports citizen security, law enforcement, and rule-of-law programs in Panama to expand Panamanian capabilities to interdict, investigate, and prosecute drug trafficking, money laundering, and other transnational crimes while strengthening Panama's justice sector. The United States provides assistance to modernize and maintain SENAN, SENAFRONT, and PNP vessels, equipment, and facilities in support of interdiction efforts. U.S.-provided aviation assets have helped SENAN expand its ability to support joint drug enforcement operations. The United States supports trilateral cooperation with Panama and Colombia, whereby Colombian law enforcement, justice sector, and military experts train their Panamanian counterparts.

In April 2018, the United States and Panama, together with Costa Rica and Colombia, executed OPERATION KRAKEN II, a month-long multinational surge of interdiction operations modeled on a previous effort taken in 2017. During this operation, the combined forces seized 9.9 MT of cocaine, 1.7 MT of marijuana, and apprehended 59 individuals of various nationalities. This operation demonstrated Panama's ability to efficiently work with the United States and regional partners in complex environments.

The bilateral Salas-Becker Agreement to cooperate on maritime interdiction permits Panamanian security officers to accompany U.S. maritime patrol aircraft and vessels. The United States provides training to Panamanian authorities to improve implementation of the agreement and enhance interdiction operations. In May, the United States committed to send five experienced attorneys to Panama to assist in standardizing procedures for prosecuting maritime crime and mentoring prosecutors. The United States also established a new program in 2018 to provide expert guidance to help Panamanian authorities build maritime interdiction capacity, enhance investigative techniques, and apply best practices during preparation of maritime crime cases for prosecution. Bilateral U.S.-Panamanian engagement on security issues is facilitated by the High-Level Security Dialogue, an ongoing coordination mechanism initiated in 2017.

D. Conclusion

Panama has established itself as a regional leader in drug interdiction, and a strategic ally in U.S. efforts to fight transnational criminal organizations and the flow of drugs into the United States. The Panamanian government has made significant achievements in reforming its justice sector institutions and developing the capacity of its law enforcement agencies. Despite the Panamanian government's willingness to combat organized crime and drug trafficking, the increasing volume of drugs from Colombia and the spillover of criminality from neighboring countries exceeds the capabilities of Panama's security services to manage these challenges alone.

While Panama continues its efforts to lay the groundwork for systemic improvements, bureaucratic and institutional deficiencies prevent it from effectively dealing with transnational criminal organizations. The United States continues to support Panama's implementation of reforms and remains committed to partnering with the country's security services to conduct more effective and organized actions against transnational crime and drug trafficking.

Paraguay

Paraguay made progress in seizing cocaine shipments and improving interagency coordination against illicit drugs in 2018, but remains among the largest source countries for marijuana in the Western Hemisphere and a transit country for Andean cocaine. Traffickers exploit the country's porous borders, clandestine airstrips, lack of airspace control, extensive internal waterways, and under-resourced law enforcement and judicial officials to transit cocaine, mainly to Brazil or through Brazil to overseas markets, though rarely the United States. Transnational criminal organizations engage in drug trafficking and other illicit activities, aided by corruption and legal impunity. President Abdo Benitez took office on August 15, and his Administration has shown initiative in pursuing counterdrug activities.

During the first nine months of 2018, the National Anti-Drug Secretariat (SENAD) seized and destroyed 893 metric tons (MT) of processed marijuana and eradicated 1,222 hectares (ha) of cannabis. During the first 10 months of 2018, SENAD seized and destroyed 714 kilograms (kg) of cocaine. This included a 448 (kg) seizure, SENAD's single largest seizure since 2012. In September, SENAD also arrested Paraguayan alleged drug kingpin Reinaldo Javier "Cucho" Cabaña. During the first nine months of 2018, the Paraguayan National Police seized and destroyed 54 MT of processed marijuana, eradicated 874 ha of cannabis, and seized 99 kg of cocaine. There were 125 convictions on drug trafficking charges in 2018.

The United States and Paraguay are parties to a 2001 extradition treaty that remains in force. There is no bilateral mutual legal assistance treaty, though both countries are party to multilateral conventions providing for cooperation in criminal matters. In June, government representatives issued the 2017 – 2022 Paraguayan National Policy on Drugs. The National Civil Aviation Authority began installing a radar system in July to monitor illicit air travel and ultimately feed into law enforcement systems.

Paraguayan authorities report an increase in domestic drug consumption. Outpatient community-based drug treatment programs, supported by the United States and other donors, supplement the three main government-run drug treatment centers, including the Ministry of Health's 30-bed inpatient detoxification facility. Paraguay's 2017 asset forfeiture legislation allocates 50 percent of proceeds to demand reduction and crime prevention efforts.

U.S. law enforcement cooperation continues to help facilitate drug seizures, arrests, and prosecutions by Paraguayan authorities. Increased Paraguayan government efforts to enhance interagency coordination, improve the judicial system's ability to prosecute cases quickly and effectively, and reduce corruption would help further deter drug production and trafficking.

Peru

A. Introduction

Peru was the second-largest producer of cocaine and coca, with an estimated 49,800 hectares (ha) under cultivation in 2017, the most recent year for which data is available. Potential pure cocaine production in Peru increased to 491 metric tons (MT). Though the amount cultivated throughout much of Peru decreased in 2017, increased cultivation in the Valley of the Rivers Apurímac, Ene, and Mantaro (VRAEM) negated the successes realized in the remainder of the growing region. Eradication efforts in the VRAEM are complicated by limited access and significant security challenges that threaten the safety of eradicators. The areas of Apurímac and Puno account for two-thirds of the country's cultivation. Despite this, Peru has demonstrated great successes in alternative development and eradication programs as represented by the decreases in coca cultivation and cocaine production outside of the VRAEM.

Peruvian cocaine is trafficked throughout South America, traveling to Europe, East Asia, Mexico, and the United States. In addition to coca cultivation, Peru is a major importer of precursor chemicals for cocaine production. Following former President Pedro Pablo Kuczynski's resignation in March 2018, President Martín Vizcarra's government has maintained the commitment to implementing Peru's 2017-2021 drug control strategy eradication goals. During the first nine months of 2018, Peru's coca eradication force (CORAH) eradicated 20,843 ha, completing 83 percent of its annual goal of 25,000 ha. The military and the Peruvian National Police's (PNP) anti-drug unit (DIREJANDRO) conducted joint counter-drug operations in the VRAEM. Peru approved the VRAEM Strategy 2021, which involves heavy investment in development but does not include eradication operations in the region.

The terrorist group Sendero Luminoso (Shining Path), relying upon cocaine trafficking for funding, maintains a strong hold in the VRAEM. In 2018, the group killed four military personnel and four police officers, and continued to provide a safe haven for drug traffickers.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Peruvian government's 2017-2021 drug control strategy includes goals for eradication, interdiction, and alternative development. It also addresses the control of precursor chemicals, organized crime, money laundering, and the rule of law. In 2018, the Government of Peru allocated \$134 million towards implementation of this strategy, \$16.5 million less than 2017.^[1] Peru contributed \$21.2 million towards eradication efforts and concomitant aviation support in 2018, which is equivalent to its 2017 contribution.

^[1]Budget calculated from relevant budget line items in Peru's Ministry of Economy and Finance (MEF) website. The MEF's online budget contained a calculation error in previous years in which eradication numbers were duplicated on multiple lines. The correct counternarcotics strategy implementation budgets from previous years are as follows: \$150.8 million (2017), \$142 million (2016), and \$145.1 million (2015).

A 2015 law authorized the Peruvian Air Force to intercept suspicious aircraft entering Peruvian airspace without appropriate flight clearance authorization. The law includes a measure that allows for lethal force in the case of non-compliance. Though the “shoot down” policy is designed to be applied only as a last resort option, it is inconsistent with U.S. and international law prohibiting the use of lethal force against civil aircraft.

Peru published the 2018-2021 Anti-Money Laundering and Terrorist Financing National Plan in March, which includes prevention, detection, and sanctioning activities based on identified sectoral vulnerabilities. With U.S.-provided technical assistance, Peru passed legislation creating a civil asset forfeiture regime in August.

The Ministry of Justice is implementing the New Criminal Procedure Code (NCPC), which transitions the legal system from an inquisitorial to an accusatory system. In 2018, 31 of 34 judicial districts were operating under the NCPC, with 20 districts operating exclusively under the new system. All 34 judicial districts are required to adjudicate corruption and organized crime cases under the NCPC. Three districts in Lima, handling approximately 35 percent of the national caseload, will complete the transition by July 2020.

Peru and the United States have an international extradition treaty.

2. Supply Reduction

The U.S. government estimates that 49,800 ha of coca were under cultivation in Peru in 2017, a 13 percent increase from the 2016 estimate of 44,000 ha. The U.S. estimate for potential pure cocaine production increased from 410 MT in 2016 to 491 MT in 2017 due to coca yield and maturity.

As of September 30, CORAH eradicated 20,843 ha of its annual goal of 25,000 ha in Peru’s Ucayali, Pasco, Huánuco, and San Martín regions. On October 10, the Peruvian government approved the VRAEM Strategy 2021, which involves heavy investment in social and economic development, but does not include eradication operations for the region that accounts for an estimated 65 percent of Peru’s total potential pure cocaine production.

DIREJANDRO received a \$12.3 million budget in 2018, identical to its 2017 budget. During the first nine months of 2018, this unit seized 39.7 MT of narcotics, including 9.6 MT of cocaine base, 17.2 MT of cocaine hydrochloride, and 12.8 MT of marijuana. DIREJANDRO units destroyed 243 cocaine laboratories and seized 61.8 MT of coca leaf.

The movement of cocaine by small aircraft from Peru to Bolivia and Brazil remains a significant concern to the United States, even though the number of illicit drug flights remained constant in 2018. Illicit flights continue to originate from the areas of Ciudad Constitución and the Junín-Huancavelica border zone. Large cocaine seizures continue to occur in source zone areas and the coastal, northern border between Peru and Ecuador. Peruvian authorities continue to see high-THC Colombian marijuana (known locally as “cripy”) enter Peru across the country’s northern border with Ecuador, for distribution in Chile.

The police and military continued to destroy clandestine runways – 64 runways through September 30, 2018, compared to 78 runways in 2017.

Peruvian, Colombian, Mexican, and Eastern European traffickers maintain sophisticated networks to ship cocaine to Europe, East Asia, Mexico, the Caribbean, the United States, and other Western Hemisphere countries. Peru and the United States undertake joint maritime operations that permit U.S. authorities to board Peruvian-flagged vessels in international waters. In joint investigations with U.S. law enforcement, DIREJANDRO identified and disrupted major international cocaine trafficking organizations using maritime and air conveyances.

During the first nine months in 2018, PNP and Customs officials at Lima's International Airport and the Port of Callao seized 7.1 MT of cocaine, arresting 108 smugglers. These officials also seized 29 fraudulent passports at ports of entry. PNP and Customs officials registered 5,136 individuals in the Biometrics Identification Transnational Migration Alert Program (BITMAP). In May, DIREJANDRO's Sensitive Investigative Unit executed "Operation Empresario," which resulted in the seizure of 1.3 MT of cocaine and the arrest of 13 members of a Peruvian-Colombian drug trafficking organization that was shipping cocaine from the Port of Paita in Peru's north.

PNP investigations resulted in the seizure of financial assets. One case resulted in the seizure of \$15 million worth of properties from a money laundering organization tied to corruption and drug trafficking. In another case, the PNP seized \$3.6 million worth of gold bullion that was destined to Swiss company Metalor from the Puno-based Minerales Del Sur company, which had prior links to laundering drug trafficking proceeds. In July, the U.S. Drug Enforcement Administration (DEA) signed a cooperative agreement with several Peruvian law enforcement agencies to establish vetted investigative units handling money laundering cases linked to drug trafficking.

3. Public Information, Prevention, and Treatment

Peru's anti-drug agency (DEVIDA) estimates 200,000 Peruvians are addicted to illicit substances; 60,000 cocaine users, 130,000 marijuana users, and 10,000 users of other illicit substances. Use of inexpensive, highly addictive coca paste is increasing. Drug use is increasing along drug trafficking routes in midsize cities east of the Andes and in coastal transit cities.

DEVIDA's budget for drug abuse prevention and treatment increased from \$14.9 million in 2017 to \$15.2 million in 2018. Drug abuse counseling services reach over 30,000 people annually.

Public treatment facilities in Peru remain insufficient, with only 169 beds for patients. Less than 10 percent of female addicts seek and receive drug treatment. Mental health hospitals added 22 beds for inpatient drug treatment and mental disorder services for women, bringing the total number of beds for women to 42 nationwide. DEVIDA and the Ministry of Health (MINSA) operate 162 mental health and drug services facilities used by over 15,000 patients. Peru has approximately 400 privately run therapeutic community centers, but only 24 meet public health

legal standards. MINSA opened 55 community mental health centers, bringing the total to 77 nationwide. Of Peru's 66 prisons nationwide, few offer drug treatment and rehabilitation programs.

4. Corruption

The Government of Peru does not encourage or facilitate the illicit production or distribution of drugs. Corruption is widespread, eroding faith in Peru's institutions and damaging Peru's generally positive investment climate. According to October 2018 polling, 94 percent of Peruvians think there is high-level corruption in Congress, the Judiciary, the Attorney General's Office, regional governments, and the PNP. Corruption scandals have ensnared many of Peru's political figures, including former presidents, members of Congress, Supreme Court justices, National Magistrate's Council representatives, and ministry officials.

Peru approved the 2018-2021 National Plan on Integrity and Combating Corruption in April, which calls for the development of OECD-recommended activities to address public corruption. President Vizcarra approved measures to strengthen integrity and combat corruption, including the creation of the Public Integrity Secretariat, the implementation of centers to report corruption, and a requirement of high-level officials to issue sworn statements on conflicts of interest. In July, the Peruvian government passed a legislative decree that would bar public officials from holding government positions when they have committed certain crimes.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States funds projects to support Peru's drug control strategy through training, technical assistance, capacity-building, intelligence, and the targeted provision of equipment.

The United States and Peru jointly finance manual coca eradication and alternative development efforts. The United States provides aviation support to eradication and interdiction activities. While Peru has not made the decision to commence eradication operations in the VRAEM, the PNP has increased interdiction operations there with DEA assistance.

In communities where alternative development followed eradication, coca cultivation dropped by just less than 90 percent using 2016 data provided by the UN Office on Drugs and Crime. With technical and institutional assistance from the United States, DEVIDA invested \$29 million in 2018 towards alternative development. In 2018, U.S.-supported alternative development efforts generated an estimated 30,000 new jobs, assisted 41,439 families, and supported these families in the planting, maintenance, and improvement of 75,620 ha of cacao and coffee.

U.S. support to the PNP helped to enhance law enforcement capabilities and support citizen security. Interdiction programs increased seizures of illicit drugs and precursor chemicals. The U.S.-supported Model Police Station Program focuses on community policing in five Callao neighborhoods, and has led to a 39 percent reduction in crime since 2015. The United States is supporting the PNP's educational reform project by assisting with the establishment of a specialized criminal investigations academy, which will include a virtual shooting range, forensic laboratories, and a simulation courtroom.

The U.S.-supported Ports and Custom's Program worked with the PNP's Precursor Chemicals Investigation Divisions (DIVICDIQ) and the National Superintendence of Customs and Taxes (SUNAT) to establish a Joint Tactical Taskforce that processes interagency intelligence products to conduct viable checkpoint operations in high-risk areas, such as the VRAEM. The program provided capacity-building initiatives to enhance the operational effectiveness of PNP and SUNAT officials, including trainings on canine operations, drug concealment methods, imposter detection, and passenger risk analysis. The program continued its work with the Tactical Command Center, the Immigration Intelligence Unit, and BITMAP.

The United States continued to collaborate with the American Bar Association's Rule of Law Initiative in 2018 to support Peru's transition to the accusatory system with training to judicial operators. The United States also sponsored Peruvian judges to attend the Department of Justice's Judicial Studies Institute and provided specialized trainings on illegal mining and anticorruption investigations.

To support treatment and recovery for persons suffering from drug addiction, the United States sponsored the Guiding the Recovery of Women (GROW) Training Program to certify trainers on specialized drug treatment for female patients. In total, 1,200 healthcare professionals have received GROW training. To improve the quality of services for Peru's LGBTI community, the United States initiated the Sexual Orientation and Gender Identity specialized drug treatment training course in October for 45 healthcare professionals and civil society leaders. In coordination with the OAS and DEVIDA, the United States also initiated an adolescent drug treatment court pilot project and supported the launch of a school-based drug prevention project.

The United States continued a mentoring project in 2018 to assist Peru to increase asset forfeiture convictions. The project has led to 36 asset forfeiture convictions and sentences. The United States assisted specialized prosecutorial units on environmental crimes to strengthen their investigations into transnational criminal organizations' involvement in illegal mining and logging. The United States also supported the Public Ministry's Office of Strategic Criminal Analysis, which supports active organized crime cases.

D. Conclusion

President Vizcarra demonstrates the political will to address drug production and trafficking. In 2018, Peru increased resources to treat vulnerable populations afflicted by illegal substance abuse. The U.S. partnership with Peru to implement its drug control strategy remains critical; however, both sides should work toward implementing robust counterdrug efforts in the VRAEM, to include eradication, interdiction, and alternative development.

Philippines

A. Introduction

The Philippines remains a regional transit and destination point for illicit drug trafficking, particularly for methamphetamine and its precursors from China. “Shabu” (the local street name of methamphetamine hydrochloride) and marijuana rank respectively as the first and second most widely consumed drugs in the Philippines. Philippine President Rodrigo Duterte’s antidrug campaign continued to receive domestic and international scrutiny due to accusations of “extra-judicial killings” by police and vigilante groups. To date, more than 1.3 million individuals have surrendered to authorities, as key government entities have taken steps to intensify implementation of both supply and demand reduction programs. Nonetheless, drug trafficking remained a highly lucrative illicit business with limited risks due to systemic poverty, ineffective criminal justice institutions, outdated drug control laws, poorly controlled maritime borders, and public corruption.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Due to the administration’s prioritization of efforts to combat illicit drug production, trafficking, and use, multiple government agencies took steps to amplify drug control engagement in 2018. Limited financial, human, and technical resources and competing bureaucratic interests hampered effective policy coordination. The Comprehensive Dangerous Drugs Act of 2002 designates the Dangerous Drugs Board (DDB) under the Office of the President as the country’s lead policy and strategy-making body on drug control and prevention. During 2018, the DDB benefited from strong leadership that sought to implement a comprehensive, multi-sector approach to reduce both supply and demand. The Dangerous Drugs Act also created the Philippine Drug Enforcement Agency (PDEA) as the DDB’s implementing arm and lead law enforcement agency for drug control.

With an executive order issued by President Duterte in 2017, the Philippine Drug Enforcement Agency took over as chair of the Interagency Committee on Anti-Illegal Drugs, a newly established 21-agency body created to implement drug policy under four clusters: enforcement; justice; advocacy; and rehabilitation and reintegration. The PDEA effectively collaborated with the DDB on drug control and prevention in 2018. Other executive branch entities, the judiciary, and local government units played an increasingly important role in drug control policy, though these efforts were at times disjointed and uncoordinated. In order to bring together these multiple efforts under one comprehensive strategy, the Dangerous Drugs Board drafted a Philippine Anti-Drug Strategy, which was formally approved by President Duterte via executive order on October 29. Implementation on this strategy will begin in early 2019.

The use of plea bargains in drug cases resumed after the Supreme Court struck down as unconstitutional a 2002 provision barring their use in late 2017. However, inadequate coordination between the treatment facilities, law enforcement, and the judiciary have challenged the plea bargain’s effective implementation. Restrictions imposed by the 1965 Anti-Wiretapping

Act, which bars the use of intercepted criminal communications in court, remained in place. The Philippines are party to both an extradition treaty and a mutual legal assistance treaty with the United States, and regularly coordinates extradition and mutual legal assistance requests. Cooperation is excellent, although bureaucratic procedures slow execution of the requests. The Philippines maintains a cooperative relationship with international partners, including the United States, on transnational drug interdictions and demand reduction.

2. Supply Reduction

According to the PDEA, trafficking organizations use critical entry points (68 major seaports; 11 international airports; a 22,548-mile coastline; and the mail and parcel system) for both transshipment and drop-off points to smuggle drug shipments. Most high-volume drug smuggling cases involve foreign nationals. Chinese drug syndicates dominate the illegal drug trade through bulk smuggling via cargo ships and foreign-flagged fishing vessels, according to Philippine authorities. These organizations have also established clandestine laboratories and illegal chemical warehouses in key locations throughout the Philippines. Authorities also note evidence of drug syndicates operating from Africa and Latin America.

Philippine authorities have conducted operations against both international drug syndicates and local dealers. During the first 10 months of 2018, the PDEA conducted 25,467 counterdrug operations, which dismantled four clandestine methamphetamine laboratories and led to the arrest of 23,749 individuals. The government addresses the negligible cannabis cultivation through a pilot alternative development program in Cebu, La Union, and Kalinga.

Trafficking organizations commonly utilize multiple simultaneous shipments in the belief that authorities would catch some but not all of the illicit shipments. For example, on August 7, a joint Bureau of Customs and Philippine Drug Enforcement Agency operation seized 355 kilograms of shabu (with an estimated street value of \$63 million) from two magnetic scrap lifters originating from Malaysia at the Manila International Container Port (MICT). However, on August 8, authorities discovered four already empty identical lifters of the same origin suspected to have contained \$127 million in shabu. The Philippine Drug Enforcement Agency later issued a statement indicating that large amounts of shabu seized from between July and October contain the same “synthetic impurities” and “production methods” as the shipment interdicted at the MICT.

3. Public Information, Prevention, and Treatment

The government currently estimates that 4.7 million individuals are involved in either the use or trafficking of drugs. The DDB conducted the most recent nationwide survey of drug use in 2015, which revealed the majority of drug users are male, employed adults (18-59 years old) with a high school education. The top three drugs by use are methamphetamine, marijuana, and (to a lesser extent) cocaine. Injection continues to rise as a method of drug use increasing exposure to other risk factors such as Hepatitis C and HIV/AIDS.

In 2018, the government’s counterdrug strategy increasingly incorporated drug demand reduction programs. Key agencies in government, such as the DDB, the PDEA, the Departments

of Interior and Local Government, Health, Education, and Social Welfare, and local officials are working to incorporate drug treatment, prevention, and rehabilitation efforts that are evidence-based and appropriate in a local context. Civil society and the faith-based community are highly active in drug demand reduction in the Philippines and work with government and law enforcement officials, when appropriate, to develop solutions to address the country's drug problem. DDB's new antidrug strategy aims to bring these activities under one national approach.

4. Corruption

As a matter of public policy, the Government of the Philippines does not encourage or facilitate any illegal activity related to drug trafficking. However, endemic corruption is present at multiple levels of government and there are frequent allegations of public officials linked to drug trafficking. The Comprehensive Dangerous Drugs Act of 2002 imposes criminal penalties for government officials found to have benefited from drug trafficking proceeds.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

Cooperation between the Philippines and the United States related to drug policy strengthened in 2018 through ongoing transnational interdiction assistance efforts and a new bilateral agreement designed to increase Philippine capability to reduce drug use through prevention, treatment, and rehabilitation. With this assistance, the United States has supported Philippine government officials, including law enforcement, with developing evidence-based prevention and treatment protocols. U.S. assistance has supported the interdiction of methamphetamine shipments to the Philippines through parcel services from California in collaboration with PDEA's Airport Interagency Drug Interdiction Task Group. U.S. assistance is also working with the Philippine government to expand the provision and access to justice.

D. Conclusion

Complementing the surge in enforcement actions that took place in 2017, 2018 saw significant expansion in government drug demand reduction efforts. As these efforts continue to expand across multiple sectors, key government authorities will need to ensure these programs are complementary and evidence-based. Expansion in treatment accessibility, plea bargain agreements, and community-based services could provide an effective alternative to pretrial detention for low-level drug offenders in overcrowded detention facilities. Enforcement actions could be further complemented through better collaboration between law enforcement and prosecutors in order to identify, investigate, and prosecute transnational criminal organizations.

Russia

Russia remains a major destination country for heroin and other Afghan opiates. Smuggled opiates are primarily trafficked into Russia through Central Asian countries. Other illicit drugs, including cocaine, are typically smuggled into the country via St. Petersburg and Black Sea ports by drug couriers or concealed within maritime shipments originating largely in the Caribbean region and South America.

The Ministry of Internal Affairs (MVD) and the Federal Security Service (FSB) are Russia's two federal agencies responsible for drug-related investigations. In October 2017, the availability of synthetic drugs surpassed heroin in the Russian drug market. The MVD has reported targeting synthetic drugs sold via the internet and non-indexed internet sites ("Dark Web"). In September 2017, authorities effectively shut down the Russian Anonymous Marketplace, a Dark Web hub featuring over 1,300 websites selling illicit drugs. In 2017, the most recent year for which statistics are available, Russian law enforcement seized 24.4 metric tons (MT) of illicit drugs. Of this total amount, 977.3 kilograms were opiates; 5.6 MT were synthetic drugs; 14.3 MT were cannabis products; and 437.3 kilograms were psychotropic substances.

In 2016, the government disbanded the Federal Narcotics Control Service (FSKN) and assigned its functions largely to the MVD, which absorbed many of FSKN's employees. Since December 2016, Minister of Internal Affairs Vladimir Kolokoltsev has served as Chair of the State Anti-Drug Committee, which coordinates Russia's drug control policy. The Ministries of Health and Labor assumed responsibility for drug user rehabilitation and Ministries of Health and Education for prevention of drug use. In February 2018, President Putin introduced amendments to the National Anti-Drug Policy Strategy confirming the MVD's coordinating role. The MVD took over management of illicit drug statistical information, but released less data as compared with its predecessor.

According to the MVD State Anti-Drug Committee's report for 2017, there were 2.2 million drug users and 208,681 drug crimes registered in Russia. MVD detected 7,179 drug crimes committed through the internet in 2017. Drug addiction in Russia is typically not treated according to evidence-based modern protocols, and is often treated with antipsychotic drugs suited to treat schizophrenia. Experts from civil society have also criticized Russian addiction treatment and rehabilitation programs due to poor interagency and inter-sectoral cooperation, and for the lack of a cohesive national rehabilitation program.

In 2013, Russia terminated its letter of agreement with the United States that funded counterdrug capacity-building programs. The U.S. Drug Enforcement Administration has a well-established robust relationship with all host-country counterparts, including the MVD, FSB, Federal Customs Services, Moscow City Police, and General Prosecutor's Office.

Senegal

Historically, Senegal's location and transportation infrastructure have made it a transit point for the movement of illicit drugs from West Africa to Europe, mostly cocaine. International trafficking networks have utilized Senegalese fishing vessels to smuggle cocaine shipments into and through the country, according to law enforcement reports. In 2018, however, both maritime and land-based trafficking activity through Senegal appeared to diminish, perhaps due to an increase in direct maritime and aerial transshipment from South America to Europe.

Locally, cannabis is cultivated in the southern Casamance region for domestic use and to supply markets across West Africa. Seizures of multi-ton quantities of marijuana continued in 2018, but the bulk of these actions occurred in the northern part of Senegal and involved truck-borne cannabis shipments from southern Mali.

Senegal's 1997 Drug Law was amended in 2006 with tougher penalties for drug trafficking. Senegal's latest drug control plan, launched in 2017, aims to reduce the cultivation, production, and trafficking of illicit drugs, as well as to inform the population of the dangers of illicit drug use, and promote the rehabilitation of persons with substance use disorders. As of 2018, the effectiveness of the plan remains unproven. While Senegal continues to lack the resources to reliably identify and seize illicit drugs, the capacity and professionalism of Senegalese authorities are slowly improving, particularly with assistance from international partners.

Senegal collaborates with partners from the Economic Community of West African States (ECOWAS) to combat drug trafficking. For example, in September 2018, the Senegalese National Police and the Drug Law Enforcement Agency of The Gambia signed a memorandum of understanding to increase coordination and collaboration on drug enforcement issues. In 2018, the United States continued to provide assistance to strengthen the capacities of the Gendarmerie, the Marine Nationale, and the Senegalese National Police to monitor, detect, and interdict drug traffickers in Senegal's maritime approaches and territory.

The United States and Senegal do not currently have a bilateral mutual legal assistance treaty or an extradition treaty, but Senegalese government has asked that that treaties be negotiated in the future. Senegal is a party to multilateral law enforcement conventions that have mutual legal assistance provisions.

The Government of Senegal has the political will to fight drug trafficking, but limited infrastructure and funding impede its efforts. Incremental improvement is taking place, but continued support from the United States and other international partners remains critical.

Serbia

Serbia is not a significant source or consumer country of illicit drugs but remains a transit area for drugs smuggled through its territory to other European markets, including opiates originating in Afghanistan and cocaine originating in South America. Some small clandestine laboratories produce synthetic drugs within the country for local use, and cannabis is the most widely used illicit drug domestically.

Amphetamine-type stimulants and new psychoactive substances (NPS) are produced in small quantities in clandestine labs throughout Serbia (primarily synthetic cannabinoids). These drugs are mainly exported to Western Europe and the Middle East, but also supply a small but growing domestic market. In 2018, seizures of cocaine, marijuana, and amphetamines decreased, while seizures of heroin increased by 12 percent. The Ministry of Interior (MOI) reported that drugs continue to be trafficked along the “Balkan Route” into Europe, primarily entering Serbia from Kosovo and Albania, with Serbian drug trafficking groups facilitating logistics. While Serbian authorities believe heroin and MDMA (ecstasy) use is declining within the country, NPS use is believed to be rising. According to the Ministry of Interior’s (MOI) Counter-Narcotics Unit, fentanyl, fentanyl analogues, and ketamine have not been detected in Serbia, and precursor chemical diversion through the country has not been significant. To better monitor the importation of possible precursor chemicals, Serbia’s 2005 Law on Precursor Drugs is being amended to require more stringent licenses and permits to better track the use of the chemicals.

Serbia established the MOI Service for Abuse of Drugs and Drug Trafficking in 2014, which is responsible for drug-related investigations and addiction prevention programs. Treatment and prevention of drug addiction is mainly the responsibility of the Ministry of Health, but nongovernmental organizations also provide services. Bigger cities such as Belgrade, Nis, and Novi Sad have police units dedicated to curbing the use of illicit drugs and investigating drug-related crimes. Serbian law enforcement has been shifting to a more centralized approach by creating a database of criminals and investigations that can be accessed by all 27 departments throughout the country.

The United States provides ongoing assistance to the MOI to support criminal justice capacity building. The Serbian government also seeks to amplify its cooperation with regional partners to address drug trafficking throughout the Western Balkans, in line with European Union standards.

Spain

Spain is a leading transit point in Europe for cocaine originating from South America and for hashish from Morocco. Cocaine arrives in Spain in large containerized shipments and in lower-volume shipments via recreational boats, sailboats, and within parasitic devices attached to cargo ships. Transnational criminal organizations frequently traffic cocaine mixed within cargo to avoid detection. Domestic illicit drug production is minor, although there are a small number of indoor cannabis cultivation operations and clandestine labs involved in cutting, mixing, and reconstituting cocaine and heroin.

The drug control efforts of Spanish authorities have resulted in record-breaking drug seizures, utilizing strong border control and coastal monitoring; sophisticated geospatial detection technology; domestic police action; internal affairs investigations; and international cooperation. In 2017, the most recent year for which data is available, Spain seized and destroyed a record 477 metric tons (MT) of illicit drugs. The volume of seized cocaine more than doubled from 2016, totaling 40.96 MT in 2017. Heroin seizures more than doubled to 524 kilograms. In April 2018, Spanish authorities seized nearly nine MT of cocaine at the port of Algeciras, hidden in a shipment of bananas. This was the largest cocaine seizure in European history. In July 2018, Spain arrested 10 Algeciras stevedores who were working with drug cartels to facilitate trafficking through the port.

In February 2018, the Spanish government approved a 2017-24 national strategy to fight drug addiction. The strategy prioritizes equal access to treatment for minors, women, and the elderly. Spanish authorities estimate that 9.5 percent of Spaniards consume cannabis and two percent consume cocaine.

Spain continued to enjoy excellent bilateral and multilateral law enforcement cooperation with international partners in 2018. Cooperation on EU operations in the Mediterranean continued, and U.S. law enforcement agencies maintained strong working relationships with Spanish police and customs authorities, leading to significant drug seizures and arrests. November 2018, Spain's parliament approved new legislation to ban certain small high-speed watercraft from Spanish waters. The law provides for the creation of a registry for exempted boats of this type – which are frequently used to smuggle illicit drugs, especially in the vicinity of the Strait of Gibraltar – and permits Spanish customs to seize unregistered ships regardless of whether drugs or other contraband are found onboard.

Suriname

A. Introduction

Suriname is a transit zone for South American cocaine en route to Europe, Africa, and, to a lesser extent, the United States. Cargo containers carry most illicit drugs smuggled through Suriname, but smaller fishing vessels, commercial and private air transport, and human couriers also conceal cocaine. Suriname's sparsely populated coastal region and isolated jungle interior, together with weak border controls and infrastructure, make illicit drug detection and interdiction efforts difficult. There is little evidence of illicit drug production within Suriname.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Government of Suriname is officially opposed to illicit drug trafficking, but Suriname's practical ability to apprehend and prosecute drug traffickers remains inhibited by drug-related corruption, bureaucratic hurdles, and the lack of financial and material resources. The Suriname Police Force (KPS) is responsible for detecting and combating drug-related activities with five units having specific drug control responsibilities. The KPS Narcotics Unit investigates and arrests individuals involved in trafficking illicit drugs, and the Narcotics Intelligence Unit gathers intelligence related to illegal drug trafficking. At the country's major international airport, the Combating International Drug Trafficking Unit (BID) screens passengers on outbound flights. The BID team receives training from international experts, and is assisted by a canine unit for inspecting luggage.

The Container Control Unit (CCP) is the fifth unit with specific drug control responsibilities. It uses risk analysis and other proactive techniques to systematically target high-risk containers. The government replaced all members of the U.S.-funded, UN-implemented Container Control Unit at the Terminal of Jules Sedney Haven (Port of Paramaribo) in August 2018. The Unit's operating protocol requires permission and oversight of Surinamese Customs authorities during inspections.

The Ministry of Justice and Police included the creation of an Integrated Security Plan in the 2019 draft budget. Under the plan, police, military, and the Directorate of National Security would intensify cooperation on a variety of security issues, including combatting the trafficking of illicit drugs and strengthening technical investigation skills.

Drug prevention and control activities are coordinated by Suriname's National Drug Master Plan, developed under the aegis of the National Antidrug Board. This document is supposed to be developed every five years, but the most recent plan expired in 2015. The Government of Suriname reported that a new plan for the period 2018-2022 was near completion at the end of 2018.

Suriname is a party to the Inter-American Convention against Corruption and Migrant Smuggling and the Inter-American Convention on Mutual Assistance in Criminal Matters. Since

1976, Suriname has shared drug-related information with the Netherlands as part of a mutual legal assistance agreement among former Dutch colonies to exchange crime-related data. Suriname has also signed bilateral agreements to combat drug trafficking with Brazil, Venezuela, and Colombia. A comprehensive bilateral maritime counterdrug enforcement agreement between the United States and Suriname has been in force since 1999. Suriname does not have a mutual legal assistance agreement or extradition treaty in place with the United States.

2. Supply Reduction

Suriname is not a source country for illicit drugs or precursor chemicals, but it continues to be a transshipment point for illicit drugs. During the first nine months of 2018, Surinamese authorities seized approximately 648 kilograms (kg) of cocaine; 16.4 liters of liquid cocaine; 569.1 kg of marijuana; 875 grams of hashish; 524 grams of MDMA (ecstasy) powder; and 504 MDMA tablets. Authorities seized less cocaine, but more marijuana and MDMA compared to the first three quarters of 2017. With support from U.S. authorities, Surinamese law enforcement agencies seized a self-propelled semi-submersible vessel in Saramacca on March 1, 2018, the first ever seized in Suriname. Local authorities seized a Cessna 210 aircraft containing 488 kg of cocaine two weeks later. The Attorney General's Office received 139 drug-related cases from police for additional investigation and brought 71 cases to court.

3. Public Information, Prevention, and Treatment

Illicit drug use is relatively rare in Suriname, with marijuana being the primary drug consumed locally. Police have warned of growing use of MDMA in powder form (locally called "sukru") as a party drug. There is one government-run detoxification center, and other treatment centers are run by non-governmental organizations. The government's National Antidrug Board (NAR) continued awareness activities including meeting with drug prevention and treatment stakeholders.

4. Corruption

As a policy matter, the Government of Suriname does not encourage or facilitate illegal activity associated with drug trafficking. However, widespread and credible allegations suggest that corruption pervades many government offices and that corruption has influenced the government's investigation of some cases. The National Parliament passed an anti-corruption law in September 2017. President Desire Bouterse had not signed the act into force as of October 2018. The Minister of Justice and Police announced his intention to create an integrity commission after 10 police officers were arrested, five on narcotics-related charges, in a span of three weeks.

Local criminal investigations and prosecutions of alleged corrupt acts are rare. However, in October a court convicted and sentenced a customs officer to nine months in prison and a customs broker to two months in prison in one of the largest drug trafficking cases of 2017, an attempt to smuggle 395 kg by shipping container. Courts in the Netherlands, France, and the United States convicted senior government officials of drug trafficking in previous reporting periods.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States supports a range of efforts designed to address crime and violence in Suriname, primarily through the Caribbean Basin Security Initiative (CBSI). CBSI is a security partnership between the United States and Caribbean nations that seeks to substantially reduce illicit trafficking, advance public safety and citizen security, and promote justice. CBSI support to Suriname includes training and equipment, primarily to the KPS and justice sector actors, to prevent and interdict drug trafficking, enhance border enforcement capabilities, and combat money laundering. Recent changes to weaken the structure of KPS support for drug control efforts, if not remedied, will complicate U.S.-Suriname bilateral efforts.

D. Conclusion

Suriname continues to be a transit country for illicit drugs originating in South America. The United States encourages the Government of Suriname to combat corruption and take further steps to increase the effectiveness of drug interdiction efforts within the country, as well as subsequent investigations and prosecutions.

Tajikistan

A. Introduction

Tajikistan sits astride one of several illicit drug trafficking routes for opiates and cannabis leaving Afghanistan en route to markets in Russia and Eastern Europe, and to a lesser extent, Central Asia. Known as the “Northern Route,” a 2018 United Nations Office on Drugs and Crime report estimates that between 2011 and 2015, 44 to 74 metric tons of heroin transited the route annually, the bulk of which is believed to have transited Tajikistan to the Kyrgyz Republic and Uzbekistan. During the same period, Tajikistan accounted for 34 percent of all opiate seizures in Central Asia. However, the actual amounts seized compared to the estimated flows trafficked through the country were strikingly low.

After several years of decline, the first nine months of 2018 saw an increase in opiate seizures in Tajikistan. It remains unclear whether the increase is directly linked to an increase in heroin production resulting from the record opium crop in Afghanistan in 2017.

As in past years, the number of registered drug users in the country (primarily heroin users) remains relatively unchanged; however, that may be more a result of the way individuals are enrolled in the program than indicative of a stable drug-use population. Anecdotal information indicates the price of street-level heroin increased substantially in 2018 as availability may have declined.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Tajikistan’s drug investigative and interdiction agencies are capable and have the needed legislative tools. U.S. law enforcement authorities cooperate well with their Tajik counterparts on drug cases, but Tajikistan’s focus appears to be on the domestic market rather than interdicting drugs transiting to foreign markets. This issue is exacerbated by a lack of feedback and information sharing by other international partners.

In 2018, U.S. government drug control assistance focused on Tajikistan’s Drug Control Agency under the President of Tajikistan (DCA) and supported training, equipment and infrastructure projects.

Tajikistan does not have an extradition or mutual legal assistance treaty with the United States, though Tajikistan is party to multilateral conventions that enable law enforcement cooperation.

2. Supply Reduction

According to statistics provided by the DCA, the total volume of all illicit drug seized during the first nine months of 2018 was approximately 3.27 metric tons, a three percent decrease from the same period in 2017. The decline is attributed to a 42 percent decline in the amount of hashish and cannabis interdicted. However, opiate seizures increased overall by 42 percent, with 201

kilograms (kg) and 1,313 kg of heroin and opium seized, respectively. When compared to the same period in 2017, heroin seizures increased by 74 percent, while seized opium increased by 38 percent. The reason given for the increase in opiate seizures according to government officials was the large opium crop in Afghanistan, which they believed resulted in an increase in heroin manufacture and export. All agencies involved in drug interdiction or investigation saw increases in opiate seizures, while simultaneously seeing a decline in cannabis seizures. During the first nine months of 2018, over 15,500 MDMA (ecstasy) tablets were seized, a significant increase compared to 2017.

Tajik authorities estimated that the street price per kilogram of heroin from January to July increased from \$7,000 to \$8,000, while the kilogram price of opium during that period declined from \$1,600 to \$1,200.

There were 266 kg of the precursor chemical acetic anhydride seized in 2018. Historically, the Northern Route has not been a conduit for precursors entering Afghanistan, the ultimate destination for the chemical.

3. Public Information, Prevention, and Treatment

There are 6,888 registered persons with substance use disorders in Tajikistan, down slightly from the 6,930 in 2017. Individuals can elect to register for five years, which means their number remains relatively stable year to year. Being registered is a last resort for most users, since it denies the use government employment, a driver's license and, because a marriage permit requires a drug test, the ability to marry. However, if they elect to, registration allows intravenous drug users to receive methadone through internationally funded HIV prevention projects.

A recent U.S. government funded survey estimated there were between 29,000 and 50,000 intravenous drug users in Tajikistan. Anecdotal information indicates that street-level heroin was harder to obtain in 2018, with the dosage-unit price increasing substantially in the past year, forcing low-income addicts to find other drugs, generally less expensive and easily obtained prescription pain killers. Opium is abused more than heroin. Crystal methamphetamine is available, but its higher price limits its use to the wealthy. New psychoactive substances have yet to make an impact on the local drug market.

4. Corruption

In stated policy, the Government of Tajikistan does not encourage or facilitate illegal activity associated with drug trafficking. In April 2018, the deputy head of the Ministry of Internal Affairs drug investigation section was arrested for soliciting a bribe. Under a 2016 law, he was convicted in October, fined \$8,700, released, and ordered by the court to return the approximately \$19,700 bribe he received. That law was amended in mid-2018, making imprisonment mandatory for future cases. Extremely low salaries for state workers, the profitability of illegal drugs, and the dearth of other profitable business options all contribute to corruption within the country's counterdrug forces.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

During the first nine months of 2018, the U.S. government contributed or dedicated \$4.9 million in assistance to Tajikistan's drug control efforts. The aid consisted of training, buildings, equipment and other expenses. Most of the assistance focused on the DCA, the principal drug enforcement organization in the country. The U.S. government has a strong relationship with the DCA.

D. Conclusion

After years of decline, increased seizures are a positive indicator of effort, but seizures still remain very low as a percentage of the estimated amount of drugs transiting Tajikistan. The increase in price and drop in availability of heroin at the street level may result from increased effectiveness of law enforcement conducting local investigations. However, there may be other factors influencing availability.

Tanzania

Tanzania is a significant transit country for illicit drugs. Domestic drug use is also increasing. Tanzania-based trafficking organizations and courier networks operate globally, and play a prominent role in the Southwest Asian heroin trade. In 2018, Tanzanian courts convicted and upheld convictions of numerous drug traffickers. During the year, Tanzanian authorities demonstrated increased interdiction capacity with several seizures resulting from authorities' quick response to real time intelligence. In several incidents, Tanzanian citizens were arrested for narcotics trafficking in various African and Asian countries.

Tanzania's geographical location, prevalence of corruption, and porous borders present considerable challenges to drug interdiction. Traffickers exploit Tanzania's 854 mile coastline and inadequate security at Tanzanian seaports. Southwest Asian heroin is transported in multi-hundred kilogram quantities by small vessels to Zanzibar and the Tanzanian coastline. Large quantities of heroin transit Tanzania's land border with Kenya for transshipment to Europe and North America. Smaller amounts (three to five kilograms) are trafficked to Europe, India, and North America from Dar es Salaam via commercial flights and air cargo. South American cocaine is trafficked into Tanzania by air for further international distribution. Tanzania produces cannabis and khat for domestic consumption and regional distribution.

The Tanzanian Drug Control and Enforcement Authority (DCEA), the Tanzania Intelligence and Security Service (TISS), the Tanzanian Police Service's Anti-Narcotics Unit, the Tanzanian Peoples Defence Force (TPDF), and Tanzanian Maritime Police contribute to Tanzania's fight against illicit drug trafficking. These agencies work with U.S. and other international law enforcement partners. Regional cooperation on drug interdiction is improving.

Extradition between Tanzania and the United States is governed by the 1931 U.S.-U.K. Extradition Treaty. There is no bilateral mutual legal assistance treaty between Tanzania and the United States, though both countries are parties to various multilateral conventions with provisions for assistance.

The Government of Tanzania does not encourage or facilitate the production or trafficking of illicit drugs as a matter of policy, but corruption remains a barrier to effective enforcement. Drug traffickers use their considerable financial resources to influence politicians, law enforcement officers, and others in positions of power.

The United States promotes improved interdiction operations through law enforcement cooperation and by encouraging a strong Tanzanian government commitment to drug interdiction, combatting corruption, and improving criminal justice and rule of law.

Thailand

A. Introduction

Thailand remains a drug transit route for trafficking to international markets, and domestic drug use is a significant challenge. Thailand does not cultivate or produce any significant quantities of opiates, methamphetamine, or other illicit drugs. Various transnational criminal organizations continue to exploit Thailand as a destination and transit country for heroin and amphetamine-type stimulants (ATS) originating from Myanmar, specifically methamphetamine.

According to the United Nations Office on Drugs and Crime, the Thai government has not reported eradicating opium poppy since 2013. However, in 2017, the Thai Office of Narcotics Control Board (ONCB) reported that approximately 1.97 metric tons (MT) of opium poppy plants were seized during the first six months of 2017, compared to 662.2 kilograms (kg) during all of 2016. Heroin seizures have increased in Thailand since a significant drop in 2015, and methamphetamine seizures have also increased since 2016.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

The Narcotics Act 2522 (1979) and the Psychotropic Substances Act 2518 (1975) are the primary laws relating to drug offenses in Thailand. The Narcotics Control Board (NCB) has overall responsibility for the prevention and suppression of illegal drug use. The Act on Measures for the Suppression of Offenders in an Offence Relating to Narcotics 2534 (1991) provides for asset seizure related to drug trafficking cases. Criminal penalties vary by narcotics classification, generally ranging from the imposition of fines to life imprisonment. Thai law provides for capital punishment for those convicted of possession of more than 20 grams of Schedule I substances with “intent to sell” though the death penalty is not commonly imposed; the last reported execution of a drug offender was in 2009.

Thailand has bilateral extradition and mutual legal assistance treaties with the United States. Thailand is an effective and cooperative partner, with U.S. assistance facilitating and enhancing that cooperation.

2. Supply Reduction

Methamphetamine production and trafficking by non-state armed groups and other regional producers in neighboring Burma remains a serious challenge for Thailand. Thai authorities estimate that 90 percent of the crystal methamphetamine smuggled into Thailand enters across the Burma border. While a portion of the methamphetamine is intended for the domestic Thai market, most of it is trafficked to other Asian markets. A notable amount is trafficked south from Thailand into Malaysia. Seizures were at record levels in 2018. Between January and September, Thailand seized approximately 12.97 MT of crystal methamphetamine, compared to a total of 7.61 MT total during all of 2017. Thailand is similarly on track to surpass record high seizure totals of methamphetamine tablets (“yaba”) from 2017. As of September 2018, Thailand

had seized 222 million yaba tablets compared to 239.9 million total tablets during all of 2017. Despite the uptick in seizures, the price of yaba has decreased by approximately 40-50 percent in the Bangkok metropolitan area, suggesting an expansion in supply.

Similar to the methamphetamine trade, heroin supplies trafficked through Thailand also originates largely from Burma. Thai authorities report the involvement of West African crime syndicates that use Thai nationals (generally females) to carry drugs onward to China, Malaysia, and other regional markets. Heroin seizures remained largely stable in 2018. During the first nine months of 2018, Thai authorities reported seizing 570 kg of heroin, compared to 593 kg during same period in 2017.

MDMA (known locally as “ya-E” or “ecstasy”) is typically smuggled into Thailand from Malaysia. Domestic use is trending upward, but is largely confined to Bangkok and other tourist areas. Tablets remain relatively expensive with a street price ranging from \$12-18. As of September 2018, Thai authorities had seized 187,163 tablets.

Cocaine trafficking and abuse remains limited in the domestic market. Annual cocaine seizures are generally around 50 kg and have never exceeded 70 kg. During the first nine months of 2018, Thai authorities seized approximately 22 kg of cocaine. Thai authorities attribute most cocaine trafficking to West African crime syndicates, which largely smuggle cocaine from South America via air transport.

Marijuana continues to be readily available throughout Thailand and the region. Though limited quantities of cannabis are cultivated domestically, most of the marijuana seized in Thailand originates from Laos. Marijuana seizures are trending downward. Through September 2018, Thai authorities had seized a total of 13.19 MT, compared to an average of 30 MT in previous years.

3. Public Information, Prevention, and Treatment

Substance abuse has been a high-profile social and public health problem in Thailand for decades. According to press reporting and academic studies, an estimated three million people between the ages of 12-65 years old, or 5.8 percent of the total population, have used at least one illegal addictive substance at some point in their lives. Thailand carries out comprehensive demand reduction programs, combining drug use prevention programs with treatment for those suffering from substance use disorders. Drug treatment and rehabilitation is offered at hospitals, as well as some military camps, temples, and mosques. Methadone use is approved for detoxification treatment under the national health coverage.

4. Corruption

Official corruption remains a challenge in Thailand and the sale of illicit drugs is sometimes facilitated by complicit law enforcement officers. As a matter of policy, though, the Thai government does not permit, encourage, or facilitate illicit production or distribution of narcotic/psychotropic drugs or other controlled substances, or the laundering of drug proceeds, by individuals or government agencies. Thai authorities frequently prosecute corrupt officials.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States and Thailand enjoy a strong cooperative relationship on law enforcement matters. The U.S. Drug Enforcement Administration (DEA) and other federal law enforcement agencies continued to work closely with their Thai counterparts on coordinated investigations in 2018. Thailand is one of several countries in which DEA maintains Sensitive Investigative Units (SIUs). Thai SIU participants receive specialized training and undergo a rigorous vetting process.

Additionally, the United States provides a stream of training and assistance to Thai law enforcement and criminal justice entities specific to drug trafficking. Through the International Law Enforcement Academy and other programs, the United States and Thailand are working to enhance regional cooperation to combat transnational crime. The United States also provides training and other assistance to Thai customs officials, Thai Maritime Police, and other law enforcement authorities to improve border protection and investigation skills. Thailand uses U.S.-developed curriculum to support training and professionalization of its substance treatment workforce. With U.S. support, the program is establishing a cadre of national trainers who will disseminate the training throughout the country.

D. Conclusion

The U.S. government enjoys a particularly close and collaborative relationship with Thai law enforcement. The United States will continue to assist the Thai government to promote greater cooperation between its police and prosecutors, prevent corruption, and further advance regional drug control cooperation.

Trinidad and Tobago

A. Introduction

Trinidad and Tobago is a twin-island nation in the Southern Caribbean. The country's close proximity to Venezuela, porous borders, and direct transportation routes to Europe, the United States, and Canada make it an ideal location for illicit drug transshipment. While there is some local marijuana production, the majority of marijuana consumed domestically is imported from other islands in the Caribbean and South America. Cocaine and other illicit drugs also transit the country or remain on the islands for domestic consumption.

The Trinidad and Tobago government continues to make incremental progress in its ability to investigate drug cases, but remains challenged by insufficient resources and capacity. Law enforcement seized more marijuana and cocaine in 2018 compared to 2017. The government remains committed to drug demand reduction, though treatment capacity is under-resourced and there is a lack of comprehensive data regarding domestic drug use.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Trinidad and Tobago demonstrates continued commitment to drug control through bilateral cooperation with the United States and other countries. Trinidad and Tobago's drug control institutions, however, remain challenged by deficiencies in staffing and funding. There are ongoing efforts to break down existing silos within Trinidad and Tobago's intelligence community, the military, law enforcement, and other agencies, though distrust continues to impede coordination.

In May, Trinidad and Tobago's Parliament passed an Anti-Gang Act, now in effect, that criminalizes gang membership and otherwise aims to suppress criminal gang activity, which are viewed by the country's authorities as among the primary drivers of drug trafficking and violent crime. In August, the government named a new Minister of National Security, and appointed its first permanent Commissioner of Police since 2012. Though the government's draft 2019 budget proposes a slight decrease overall for national security matters, there are a number of initiatives to enhance police effectiveness, including a broad restructuring of the police service, which could improve drug control efforts.

Trinidad and Tobago, in collaboration with the Organization of American States' Inter-American Drug Abuse Control Commission, also continues to expand a Regional Counterdrug Intelligence Training School to serve the English-speaking member states in the Caribbean.

Trinidad and Tobago has mutual legal assistance treaties with the United States, Canada, and the United Kingdom. The country is also party with the United States to a drug control and law enforcement letter of agreement; a maritime law enforcement agreement that enables the United States to patrol Trinidad and Tobago's waters and detain vessels suspected of trafficking drugs; a shiprider agreement that allows U.S. Coast Guard law enforcement detachments aboard Trinidad

and Tobago Coast Guard vessels to board suspected ships in Trinidad and Tobago waters; and a customs mutual assistance agreement, which allows for the exchange of information to assist in the prevention and investigation of customs offenses.

The United States also maintains an extradition treaty with Trinidad and Tobago, and the Trinidad and Tobago government is largely cooperative with respect to extradition and mutual legal assistance matters.

2. Supply Reduction

Marijuana is the only known locally produced illicit drug in Trinidad and Tobago. Production is concentrated in small farms in heavily forested, mountainous regions. Traditionally, local producers compete with imports from St. Vincent and the Grenadines, Jamaica, and Guyana that are perceived to be of a higher quality. Law enforcement information suggests that marijuana continues to enter the country via Venezuela, as part of a trend of increased trade of both licit and illicit goods between the two countries.

Other illicit drugs, primarily cocaine, are trafficked through the country by local and transnational organized crime groups, exploiting its close proximity to Venezuela, porous coastlines, and vulnerabilities at ports of entry. The main destination for these drugs continues to be the European market, often via Africa, but some also reach the United States and Canada. Criminal groups utilize commercial airlines, cargo ships, and small, privately owned boats and yachts to transport illicit drugs. Anecdotal reports continue to suggest that small amounts of ketamine originating from Asia are also trafficked through the country.

Trinidad and Tobago law enforcement entities seized approximately 1.34 metric tons of marijuana and 325 kilograms (kg) of cocaine within the country during the first nine months of 2018, compared to seizures totaling approximately 956 kg and 47 kg, respectively, for the same period in 2017. Robust crop, seedling, and cured plant eradications continued in 2018.

3. Public Information, Prevention, and Treatment

Information on drug-use trends in Trinidad and Tobago is largely anecdotal given the lack of comprehensive data. The primary drug used is marijuana, followed by cocaine. Drug treatment professionals assess that drug usage continues to increase among youth. There are a number of drug treatment programs in Trinidad and Tobago supported by the government, non-governmental organizations, religious groups, and hospitals.

Trinidad and Tobago's 2014 National Drug Policy and its companion Operational Plan for Drug Control in Trinidad and Tobago 2014-2018 aim to reduce both the supply of and demand for illegal drugs. Drug prevention efforts include school-based education programs, training for educators, anti-drug media campaigns, and special outreach events. The United States supported adolescent drug intervention training in 2018, including for police, prison, and probation officers. The United States also supported a Juvenile Court Project, which established two children's courts, promoted innovative youth peer resolution mechanisms, and introduced a restorative

justice approach to managing youth in conflict with the law, including with respect to drug matters.

4. Corruption

The Government of Trinidad and Tobago neither directly encourages nor facilitates the illicit production or distribution of drugs nor the laundering of proceeds from the sale of illicit drugs. No charges of drug-related corruption were filed against senior government officials in 2018. Media and anecdotal reports of drug-related corruption in the ranks of the Police Service, Prison Service, Defense Force, Customs and Excise Division, and port employees are common.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

The United States supports a wide range of efforts designed to address crime and violence affecting citizens in Trinidad and Tobago, primarily through the Caribbean Basin Security Initiative (CBSI). CBSI is a security partnership between the United States and Caribbean nations that seeks to substantially reduce illicit drug trafficking, advance public safety and citizen security, and promote justice. The Trinidad and Tobago government is an active partner in CBSI programs.

Through CBSI, the United States continues to provide training and support to law enforcement and security agencies responsible for drug control, including the Police Service, Transnational Organized Crime Unit, Customs and Excise Division, Prison Service, and Coast Guard. This support, together with joint law enforcement cooperation on drug trafficking investigations, resulted in a number of substantial drug seizures in 2018. In May, for example, the Trinidad and Tobago Police Service's Organized Crime and Intelligence Unit arrested and charged five airport personnel for attempting to smuggle 86.8 kg of cocaine – with an estimated street value of approximately \$34 million – bound for New York from Trinidad's Piarco International Airport.

The United States maintains a bilateral agreement with Trinidad and Tobago to suppress illicit traffic by sea and air. This agreement includes provisions for ship boarding, shipriders, pursuit, entry to investigate, and over flight of territorial seas.

D. Conclusion

The United States and Trinidad and Tobago enjoy a cooperative relationship against drug trafficking and transnational organized crime. The individuals and units working to combat drug trafficking in Trinidad and Tobago, however, continue to face considerable institutional challenges. The Trinidad and Tobago government should continue to implement reforms to improve the capacity of its law enforcement and criminal justice institutions to detect drug trafficking and effectively investigate, arrest, and prosecute suspected drug traffickers in a timely manner.

Turkey

Turkey remains a transit country for illicit drug trafficking. Heroin, opium, and cocaine are generally trafficked through Turkey to European markets, and amphetamine-type stimulants (ATS) are trafficked to markets in the Middle East and Southeast Asia. Turkish authorities continue to seize large amounts of opiates and hashish in Turkey. Cooperation is inhibited by the Government of Turkey's detention of a U.S. Drug Enforcement Administration (DEA) local staff member for more than a year without charge.

The Turkish National Police Counter Narcotics Department is the country's most proactive counterdrug force. DEA works with the Counter Narcotics Department. Components of the Ministry of Interior, also have some drug control responsibilities, and the Ministry of Health is responsible for regulating pharmaceutical products and the importation of chemicals for legitimate use. The United States offers regional training opportunities to Turkish officials to provide additional skills to combat the illicit drug trade, although no Turkish official participated in trainings in 2018.

Most heroin trafficked via Turkey is destined for Western Europe. Turkey is also a transit route for opiates smuggled from Afghanistan via Iran. Turkish smugglers are frequently involved in both heroin sales and transport, as well as production and smuggling of synthetic drugs. Transnational criminal networks reportedly have interests in heroin conversion laboratories operating in Iran near the Turkish border. The government strictly controls licit opium poppy cultivation and pharmaceutical morphine production, with no apparent diversion into the illicit market.

Turkey is a transit route for methamphetamine smuggled from Iran and bound for Southeast Asia, as well as amphetamine-type stimulants from Eastern Europe destined for the Middle East. Cocaine is trafficked from South America through Turkey to Europe. Hashish is imported or grown domestically for local consumption.

According to Turkish authorities, during the first 10 months of 2018, Turkish authorities seized more than 71 metric tons (MT) of marijuana; nearly 15 MT of heroin; more than one MT of cocaine; nearly 300 kilograms (kg) of opium; nearly 400 kg of methamphetamine; seven million MDMA (ecstasy) tablets; and 16 million fenethylline tablets.

Illegal drug use in Turkey is relatively low, compared to other countries in the region, but there seems to be an increase in the number of people seeking treatment. Turkey does not encourage or facilitate illicit production or distribution of narcotics or other controlled substances, or the laundering of proceeds from illegal drug transactions. No senior-level government official is alleged to have participated in such activities in 2018.

Ukraine

Although Ukraine is not a major drug source country, its location astride several important drug trafficking routes into Western Europe leaves it vulnerable as an important transit country. Ukraine's numerous ports on the Black and Azov seas, its extensive river routes, and its porous northern and eastern borders make Ukraine an attractive route for drug traffickers into the European Union's (EU) illicit drug market.

Heroin from Afghanistan is trafficked through Russia, the Caucasus, and Turkey, before passing through Ukraine. Latin American cocaine is moved through Ukrainian seaports and airports for both domestic use and further transit to EU countries. Ukrainian law enforcement occasionally interdicts large shipments of drugs in commercial shipments transiting southern ports. Usually, however, drugs are found in small quantities, ranging from several grams to several hundred grams. Russian aggression in eastern Ukraine, including arming, training, and fighting alongside separatists, has created a new vulnerability for drug transit through the region.

The use of synthetic drugs and psychotropic substances, especially amphetamine-type stimulants, has been rapidly increasing in Ukraine over the past decade, following international trends. Synthetic drugs are trafficked to Ukraine primarily from Poland, Lithuania, and the Netherlands, but they are also produced locally in small clandestine labs.

Most domestic drug abuse, however, continues to be focused on drugs made from illicit drug crops (cannabis and opium poppy) grown in the region. These account for more than 90 percent of the total drug market in Ukraine. In most instances, these drugs are either locally produced or supplied from Russia and Moldova.

During the first 10 months of 2018, Ukrainian law enforcement agencies (National Police of Ukraine, or NPU) reportedly detected and disrupted 37 international drug trafficking routes, dismantled 115 clandestine labs, and eliminated 63 organized criminal drug trafficking groups. Approximately 3.89 metric tons of narcotics, psychotropic drugs, and other controlled substances were seized, including 38.9 kilograms (kg) of cocaine and 32 kg of psychotropic drugs.

The United States is providing assistance to help Ukraine bring its law enforcement institutions up to European standards, facilitating Ukraine's integration into Euro-Atlantic institutions. The U.S. Drug Enforcement Administration has established good working relationships across the Ukrainian law enforcement sector, and ongoing training programs have deepened these relationships. Through a variety of projects, the United States also assists the NPU in developing its capacities while simultaneously strengthening the Border Guards capability to control Ukraine's 3,490 mile-long border.

United Kingdom

Although the United Kingdom of Great Britain and Northern Ireland (UK) is not a source country for illicit drugs, it faces a serious domestic drug problem and is a major consumer and transshipment country. Transnational criminal organizations continue to engage in drug trafficking within the UK, as well as additional criminal activity to include violent and financial crimes. Demand in the UK for all common forms of illicit drugs is high. The country's consumption rates for cocaine and heroin are among the highest in Europe. There are significant seizures of cannabis at UK borders, and UK authorities regularly disrupt domestic cannabis growth, varying from as few as 10 plants to warehouse quantities. "Crack" cocaine use has increased, particularly in rural and coastal towns. Crack cocaine has been linked to drug-trafficking networks active in England, Wales, and Scotland.

Fentanyl and fentanyl analogues are also present in the UK, though not on the scale seen in North America. Although testing limitations prevent UK authorities from fully ascertaining the scale of the problem, 122 fentanyl-related deaths were recorded from between 2017 and March 2018. Most fentanyl and fentanyl-related analogues available in the UK are manufactured in China and purchased on restricted internet sites, the so-called "Dark Web." In 2018, the National Crime Agency reported its first conviction for trafficking in fentanyl. Unlike the United States, where historic widespread availability of prescription medicine was a driving force for opioid abuse and the use of fentanyl, there is far less prescription opioid abuse in the UK. As the illicit online trade grows, the UK is among the largest global purchasers of drugs on the Dark Web, and a survey taken in 2018 showed that more than a quarter of British drug users bought substances on the Dark Web paying with cryptocurrency.

The United States and the United Kingdom enjoy an excellent bilateral relationship and cooperate closely on multilateral drug enforcement efforts. U.S. authorities continue to conduct coordinated drug trafficking and money laundering investigations with the UK National Crime Agency and Metropolitan Police Service, as well as Police Scotland, the Police Services of Northern Ireland, and other UK law enforcement agencies. U.S. authorities also regularly provide lead information on drug shipments bound for the UK, including couriers, parcels, and containerized cargo.

Uzbekistan

A. Introduction

Sharing an 85-mile border with Afghanistan, Uzbekistan remains a significant transit country for Afghan opiates. Traffickers exploit the country's shared borders with Afghanistan and Tajikistan to smuggle illicit drugs through Uzbekistan primarily to Russia and Europe. Criminals capitalize on Uzbekistan's good infrastructure, corruption, and rugged border terrain to traffic drugs. Uzbekistan's long, poorly protected border with Tajikistan presents the country's biggest challenge to interdicting illicit drugs. Ten border crossing points along the Tajik-Uzbek border re-opened in 2018 after having been closed for more than a decade, increasing the risk of drug trafficking.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

Uzbekistan's drug control strategy is detailed in the "Program of Complex Measures on Counteracting Drug Abuse and Illicit Trafficking for 2016-2020." The strategy outlines government agency responsibilities to restrict illicit drug trafficking, reduce demand, prevent abuse, improve enforcement-related legislation, and cooperate with international partners. The Ministry of Interior, the State Security Service, the State Border Protection Committee, and the State Customs Committee are responsible for combatting narcotics trafficking, while the National Information and Analytical Center for Drug Control (NCDC) oversees policy coordination, data collection, and capacity development, but does not have an operational role. An NCDC-led interagency working group is drafting a law to amend the Criminal Code and relevant regulations to include provisions for new psychoactive substances (NPS).

Uzbekistan shares drug enforcement information with its neighbors through the Central Asia Regional Information and Coordination Center (CARICC) and has two law enforcement professionals working on the CARICC staff in Almaty, Kazakhstan. Uzbekistan also participates in several regional programs implemented by the United Nations Office on Drugs and Crime (UNODC), including the Container Control and Border Liaison Office programs, as well as the Central Asia and South Caucasus Mutual Legal Assistance Network. Uzbekistan has signed cooperation agreements with other Central Asian countries, Russia, Latvia, the Czech Republic, Japan, and China. Cooperation is generally focused on programs rather than operational activities.

Uzbekistan has neither an extradition treaty nor mutual legal assistance agreement with the United States. The U.S. Drug Enforcement Administration (DEA) has Memoranda of Understanding (MOUs) in place for joint investigative activities and intelligence exchanges with the Ministry of Interior and the Office of the Prosecutor General's Financial Intelligence Unit dedicated to money laundering investigations. The DEA also has an MOU with the NCDC, facilitating information sharing and joint training.

2. Supply Reduction

Uzbekistan is not a significant source country of illicit drugs. Although Uzbek officials identify the country's poorly protected border with Tajikistan as the biggest challenge to interdicting smuggled drugs, it is likely that significant quantities also enter the country through official border crossing points, primarily from Tajikistan and Kyrgyzstan.

On an annual basis, Uzbekistan conducts a "Black Poppy" eradication campaign to destroy illicitly cultivated opium poppy and cannabis. In 2017, the last year for which information is available, Uzbek authorities uncovered 895 cases of illegal drug cultivation – a 16 percent decrease from 2016 – and eradicated an aggregate cultivated area of 0.33 hectares. During the first six months of 2018, Uzbek authorities registered 2,332 drug-related offenses – a 22 percent drop from the same period in 2017 – and detained 1,751 persons. Also during the first six months of 2018, the government reported seizing 188.1 kilograms (kg) of marijuana; 179.1 kg of opium; 33 kg of hashish; and 14.9 kg of heroin. Opium seizures have dropped considerably since 2016, declining 44.8 percent by volume in 2017 and again by 76.6 percent during the first six months of 2018 in comparison to the same period in 2017. The NCDC attributes this decline to enhanced deterrence due to interdiction efforts at the country's borders, as well as to changing patterns of drug trafficking from Afghanistan that might be reducing the flow of drugs through Uzbekistan. The United States lacks sufficient information to verify these claims.

By volume, reported NPS seizures in 2017 fell to 361 grams from 579 grams in 2016. However, the NCDC believes that drug use within Uzbekistan is shifting away from Afghan-sourced opioids to NPS and synthetic drugs, particularly Iranian-sourced methamphetamine and synthetic cannabinoids known locally as "spice" from China. During the first six months of 2018, the authorities seized 247 NPS substances.

3. Public Information, Prevention, and Treatment

Official data on domestic drug consumption is unreliable. According to the latest available official statistics from 2017, the number of registered drug users declined by 23 percent from 2016 to 8,036. Of this population, heroin users constituted 32.6 percent, and cannabis users 32.2 percent. UNODC estimates that only 2.3 percent of drug users are female. The last study of drug use prevalence in Uzbekistan was conducted in 2006 by UNODC.

Uzbekistan administers demand reduction and treatment programs. The government regularly organizes outreach to school administrators on addiction prevention and support to persons with substance use disorders. The EU is training local government representatives in prevention techniques. With U.S. and UNODC support, Uzbekistan is implementing a long-term continuing education project to professionalize all substance use treatment staff in the country. In 2018, UNODC conducted a series of trainings for 136 doctors on treatment and care for intravenous drug users. In 2017, 2,202 patients – including 1,485 in-patients – received treatment. Over 95 percent of such patients were male. Drug treatment institutions also support phone "hotline" consultations, but these efforts likely reach only a small proportion of those suffering from substance use disorders. Furthermore, as Uzbekistan prohibits opioid substitution therapy, treatment options are limited.

4. Corruption

Uzbekistan is implementing a National Anti-Corruption Action Plan and does not encourage or facilitate illegal activity associated with drug trafficking. However, there is evidence of corruption at multiple levels of government, which confounds national drug control efforts. Some government officials have reportedly been convicted on corruption charges. Although most cases target low to mid-level officers, there are occasional high-profile cases, such as Uzbekistan's former prosecutor general, who is under investigation for alleged extortion, bribery, and abuse of office.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

Uzbekistan's drug control strategy seeks to increase the institutional capacity of the country's law enforcement and criminal justice institutions through training. In 2018, the U.S. government provided training and equipment to assist the Uzbek government to modernize its border crossing checkpoints, improve forensic capabilities, develop judicial capacity, and enhance the effectiveness of law enforcement agencies. However, the agreements between the DEA and Uzbek agencies have not translated into significant operational cooperation. Since closing its office in Uzbekistan in 2017, the DEA maintains liaison relationship from the regional DEA office in Almaty, Kazakhstan.

D. Conclusion

Drug control cooperation between the United States and Uzbekistan continued to grow slowly in 2018. Uzbekistan made progress in regional cooperation and data sharing with CARICC members and the United States. However, given the lack of independent data on drug use and trafficking within the country, it is difficult to estimate the true extent of the problem and whether Uzbekistan's low seizure statistics accurately reflect law enforcement efficacy. Sustainable anti-corruption practices, an independent drug use study, and increased exposure to international best practices could promote sustainable improvements in Uzbekistan's ability to combat transnational drug trafficking.

Venezuela

A. Introduction

Venezuela continues to be a major drug-transit country and is one of the preferred trafficking routes in the Western Hemisphere for illegal drugs, predominately cocaine. In 2018, Venezuela's porous border with Colombia, weak judicial system, almost nonexistent international drug control cooperation, and permissive and corrupt environment provided ideal conditions for drug trafficking operations and associated violence.

There is insufficient data to determine current drug consumption trends in Venezuela. The Venezuelan National Anti-Narcotics Office (ONA) has not published any statistics since 2015. In 2018, under the government of former President Nicolás Maduro, the country's porous borders offered a permissive environment to known terrorist groups involved in drug trafficking, including the Revolutionary Armed Forces of Colombia (FARC) and the National Liberation Army (ELN). The Maduro government took no action against individuals and companies designated as Specially Designated Narcotics Traffickers by the U.S. Department of Treasury for playing a significant role in international drug trafficking.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

In 2013, the Venezuelan National Anti-Narcotics Office (ONA) developed a National Anti-Drug Plan for 2015-2019 that sought to reduce drug consumption and increase prevention activities. ONA reported working closely with civil society to provide anti-drug education training and athletic programming in different areas around the country to increase awareness and prevent consumption.

In May 2014, Venezuela signed an international agreement with Russia to cooperate in the fight against drugs. Venezuela announced joint operations between the Russian Federal Drug Control Service and ONA. The 2010 Organic Law on Drugs increased the penalties for drug trafficking and gave ONA the authority to seize the assets of individuals connected with drug trafficking.

Conflicting statistics make it difficult to assess 2018 seizures. On February 4, ONA reported that since 2005 it had seized 658 metric tons (MT) of drugs, destroyed 284 laboratories, seized 37 planes, and closed 481 illegal landing strips. Additionally, on September 28, ONA President Juan Grillo told the media that ONA had seized more than 22 MT of drugs in 2018, and added that the government seized 35 percent more marijuana compared to 2017. However, during an October 25 press conference, OFAC-sanctioned Attorney General Tarek William Saab shared that since August 2017, the government had seized almost 20 MT of drugs (7.2 MT of cocaine, 12 MT of marijuana and other illicit substances). Saab also claimed that Venezuela had seized 23 planes, closed 14 illegal landing strips, and arrested 49 people linked to drug trafficking.

2. Supply Reduction

Venezuela remains a major transit country for cocaine shipments via aerial, terrestrial, and maritime routes. Most flights suspected of trafficking drugs depart from Venezuelan states bordering Colombia, mainly from Zulia state. Trafficking by maritime conveyance includes the use of large cargo containers, fishing vessels, and “go-fast” boats.

The vast majority of illicit drugs that transited Venezuela in 2018 were destined for the Caribbean, Central America, the United States, West Africa, and Europe. Colombian drug-trafficking organizations – including the FARC, ELN, and other criminal groups – facilitate the shipment of illicit drugs through Venezuela.

The Venezuelan government occasionally reports drug seizures, arrests, and destruction of drugs and airstrips to the public. Venezuela is not a member of the Cooperative Situational Information Integration System through which countries predetermine information to share automatically with the United States. Venezuelan authorities similarly do not share evidence about destruction of illicit drugs with U.S. officials.

3. Public Information, Prevention, and Treatment

The consumption of illicit drugs within Venezuela, especially cannabis and cocaine, remained a problem in 2018, but recent statistical data is unavailable. ONA implemented a National Treatment System in 2013 as part of a nationwide program to treat substance use disorder. The system uses professional care for detoxification and social reinsertion of those suffering from substance use disorders through a three-level program that includes the Center of Family Guidance, the Specialized Center for Prevention and Comprehensive Assistance, and the Socialist Therapeutic Community.

4. Corruption

Although the Venezuelan government under former President Maduro did not officially encourage or facilitate illicit drug production or distribution as a matter of stated policy, public corruption was a major problem that made it easier for drug-trafficking organizations to move and smuggle illicit drugs.

Two nephews of former Venezuelan first lady Cilia Flores, Efraín Campo Flores and Francisco Flores de Freitas, were arrested in Port-au-Prince, Haiti, in November 2015 and expelled to the United States. In December 2017, a U.S. federal court sentenced both nephews to 18 years in prison following their convictions on drug trafficking charges.

The Treasury Department has imposed sanctions on at least 22 individuals and 27 companies by designating them as Specially Designated Narcotics Traffickers pursuant to the Foreign Narcotics Kingpin Designation Act. These designations include current or former Venezuelan officials: in 2008, General Hugo Carvajal, General Henry Rangel Silva, and Ramón Rodríguez Chacín; in 2011, Freddy Bernal Rosales and Amilcar Jesús Figueroa, Major General Cliver Alcalá Cordones, and Ramón Isidro Madriz; in 2017, then Vice President Tareck El Aissami and front man Samarak López, and; in 2018, Pedro Luís Martín and two of his associates. The Maduro government failed to take action against these or other government and military officials

with known links to the FARC or the Mexican cartels in 2018. The government called the sanctions designation a “foreign plot to destabilize our government.”

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

Drug control cooperation between Venezuela and the United States has been limited and inconsistent since 2005, when Venezuela refused to sign a negotiated addendum to the Memorandum of Understanding (MOU) to improve anti-drug cooperation. The United States and Venezuela continue to exercise a 1991 maritime bilateral agreement allowing each country to board vessels of the opposite flag suspected of illicit drug trafficking in international waters.

D. Conclusion

In 2018, the Venezuelan government failed to make demonstrable efforts to combat illegal drug activity and prosecute corrupt officials or suspected drug traffickers, including those sanctioned by the United States government. The Maduro administration demonstrated a complete lack of will to make much-needed policy changes to enforce existing laws. This created an extreme level of impunity exacerbated by lack of transparency and high levels of corruption.

Vietnam

A. Introduction

Vietnam is not a significant source or transit country for illegal drugs entering the United States, but remains a significant transshipment point for international criminal organizations that traffic heroin, amphetamine-type stimulants (ATS), and cocaine to markets throughout East Asia and the Pacific. Historically, the cultivation and production of illegal drugs within Vietnam has been uncommon, and the Vietnamese police did not conduct any investigations in 2018 targeting ATS production in the country.

The Government of Vietnam reports that approximately 90 percent of the illicit drugs seized in the country originate in Laos, Cambodia, Burma, Thailand, and China and are smuggled into the country via overland routes. Lesser volumes of illegal drugs are smuggled through Vietnam via sea and air routes by use of human couriers, sea freight, and commercial cargo services. Vietnam's drug interdiction capacities are limited by poor equipment and training, as well as the rugged and remote terrain that defines much of the country's borders.

Heroin remains the most commonly trafficked and abused illegal drug in the country, with persons addicted to heroin accounting for approximately 85 percent of the country's registered users. ATS is commonly available in both pill form and as crystal methamphetamine and is the second most commonly trafficked and used drug. From 2017 to 2018, the cost of crystal methamphetamine in Vietnam continued to decline, signifying increasing availability. Cocaine trafficking is also increasing in Vietnam, and 2018 saw the largest cocaine seizure on record in Vietnam.

B. Drug Control Accomplishments, Policies, and Trends

1. Institutional Development

In 2017, Vietnam's government allocated \$95 million through 2020 to support drug control and drug prevention, and the country continued to implement its 2011 comprehensive anti-drug strategy. Vietnam works with neighboring countries to carry out interdiction operations, with border liaison offices situated along the country's borders with Laos and Cambodia. The United States promotes counterdrug information sharing, coordination of operations, and capacity building with Vietnam's Ministry of Public Security.

Despite this, several factors still significantly inhibit Vietnam's ability to investigate and prosecute drug trafficking organizations effectively. Vietnam's counterdrug police receive little to no formal training, and lack the resources necessary to conduct complex investigations. Furthermore, Vietnam's penal code lacks a conspiracy statute and prohibits the introduction of many types of evidence normally used to prosecute complex organized crime cases.

Vietnam does not have a mutual legal assistance or an extradition treaty with the United States. The decision to engage bilaterally with the United States on international drug trafficking investigations is made on a case-by-case basis in accordance with a memorandum of

understanding between the U.S. Drug Enforcement Administration (DEA) and Vietnam's Ministry of Public Security.

2. Supply Reduction

According to the Government of Vietnam, in 2017, Vietnamese police investigated approximately 22,346 drug related cases and arrested 34,494 people involved in drug related crimes. According to official Government of Vietnam statistics, during the first six months of 2018, Vietnamese police investigated approximately 12,863 drug related cases and arrested 18,472 people involved in drug related crimes, representing an approximate 9 percent increase in investigations and a 5 percent increase in arrests over the same period in 2017. During this same six-month period, Vietnamese police seized 880 kilograms (kg) of heroin, twice the amount of heroin seized during 2017; 81 kg of opium; 1,090 kg of cannabis; 414 kg of ATS and other synthetic drugs; 485,000 ATS tablets; 100 kg of cocaine; and 2.5 metric tons of khat.

Synthetic drug production is rare in Vietnam, as there is a ready supply of synthetic drugs entering Vietnam from neighboring countries. In April 2017, the Vietnamese police dismantled a nation-wide drug trafficking organization that operated 13 clandestine ATS laboratories throughout southern Vietnam, but they did not identify any other clandestine ATS laboratories for the remainder of 2017 or the first half of 2018.

3. Public Information, Prevention, and Treatment

The Government of Vietnam promotes and funds drug abuse and awareness programs as part of its comprehensive anti-drug strategy. However, the willingness of Vietnamese citizens to seek drug abuse treatment is limited by the fear of involuntary incarceration in “drug rehabilitation centers,” which, in reality, are no different from prisons and provide minimal actual treatment for addiction.

In 2017, the United States budgeted \$1.4 million to provide technical support for medication assisted therapy and other programming to address the substance abuse issues that drive HIV transmission, including intravenous drug abuse. The Government of Vietnam reports that the total number of registered heroin and ATS users is 224,690 people, which represents a less than one percent increase from the previous year. The Government of Vietnam also estimates that approximately 25 percent of new HIV infections in 2017 resulted from intravenous drug abuse.

4. Corruption

Corruption is endemic in Vietnam and plagues almost every sector of the government. However, Vietnam's Ministry of Public Security and other agencies involved in drug control operations continue to pursue an aggressive drug control agenda, as is evidenced by the year-to-year increases in drug-related investigations, arrests, and seizures.

C. National Goals, Bilateral Cooperation, and U.S. Policy Initiatives

Vietnamese police continued to expand their cooperation with foreign governments in 2018 to combat regional drug trafficking, particularly with China, Laos, and Cambodia. The Vietnamese police also collaborate closely with Australian and U.S. law enforcement authorities to target international drug trafficking organizations. In 2016, Vietnam's Ministry of Public Security renewed its memorandum of understanding with DEA. As a result, in 2017 and 2018, information-sharing expanded dramatically between DEA and Vietnam's law enforcement authorities, and the number of joint U.S.-Vietnamese investigations increased significantly.

In 2017, the United States began a comprehensive, four-year assistance program intended to strengthen the capacity of Vietnam's counternarcotics police. The program is designed to create a cadre of 100 subject matter experts on drug trafficking investigations within the Vietnamese police force. This program continued through 2018, and remains on track for completion in 2020.

D. Conclusion

Vietnam continues to struggle with controlling drug trafficking and abuse, but maintains an aggressive posture against drug trafficking organizations. Senior law enforcement officers continue to maintain support for increased engagement with the United States on both investigations and capacity building. Barring any significant policy shifts, Vietnam's law enforcement capacity is poised to continue to grow and professionalize with international support. The United States encourages the Government of Vietnam to consider taking additional steps to modernize and expand its capacity to provide treatment and rehabilitation programs for those suffering from substance use disorders.



United States Department of State

**Bureau of International Narcotics and Law
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**International
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Common Abbreviations

1988 UN Drug Convention	1988 United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances
AML	Anti-Money Laundering
APG	Asia/Pacific Group on Money Laundering
ARS	Alternative Remittance System
BMPE	Black Market Peso Exchange
CBP	Customs and Border Protection
CDD	Customer Due Diligence
CFATF	Caribbean Financial Action Task Force
CFT	Combating the Financing of Terrorism
CTR	Currency Transaction Report
DEA	Drug Enforcement Administration
DHS	Department of Homeland Security
DHS/HSI	Department of Homeland Security/Homeland Security Investigations
DNFBP	Designated Non-Financial Businesses and Professions
DOJ	Department of Justice
DOS	Department of State
EAG	Eurasian Group to Combat Money Laundering and Terrorist Financing
EC	European Commission
ECOWAS	Economic Community of West African States
EO	Executive Order
ESAAMLG	Eastern and Southern Africa Anti-Money Laundering Group
EU	European Union
FATF	Financial Action Task Force
FBI	Federal Bureau of Investigation
FinCEN	Department of the Treasury's Financial Crimes Enforcement Network
FIU	Financial Intelligence Unit
FTZ	Free Trade Zone
GABAC	Action Group against Money Laundering in Central Africa
GAFILAT	Financial Action Task Force of Latin America

GDP	Gross Domestic Product
GIABA	Inter Governmental Action Group against Money Laundering
IBC	International Business Company
ILEA	International Law Enforcement Academy
IMF	International Monetary Fund
INCSR	International Narcotics Control Strategy Report
INL	Bureau of International Narcotics and Law Enforcement Affairs
IRS	Internal Revenue Service
IRS-CI	Internal Revenue Service, Criminal Investigations
ISIL	Islamic State of Iraq and the Levant
KYC	Know-Your-Customer
MENAFATF	Middle East and North Africa Financial Action Task Force
MER	Mutual Evaluation Report
MLAT	Mutual Legal Assistance Treaty
MONEYVAL	Committee of Experts on the Evaluation of Anti-Money Laundering Measures and the Financing of Terrorism
MOU	Memorandum of Understanding
MSB	Money Service Business
MVTS	Money or Value Transfer Service
NGO	Non-Governmental Organization
NPO	Non-Profit Organization
OAS	Organization of American States
OAS/CICAD	OAS Inter-American Drug Abuse Control Commission
OECD	Organization for Economic Cooperation and Development
OFAC	Office of Foreign Assets Control
OPDAT	Office of Overseas Prosecutorial Development, Assistance and Training
OTA	Office of Technical Assistance
PEP	Politically Exposed Person
SAR	Suspicious Activity Report
STR	Suspicious Transaction Report
TBML	Trade-Based Money Laundering
TTU	Trade Transparency Unit

UNCAC	United Nations Convention against Corruption
UNGPML	United Nations Global Programme against Money Laundering
UNODC	United Nations Office on Drugs and Crime
UNSCR	United Nations Security Council Resolution
UNTOC	United Nations Convention against Transnational Organized Crime
USAID	United States Agency for International Development

Definitions

419 Fraud Scheme: An advanced fee fraud scheme, known as “419 fraud” in reference to the fraud section in Nigeria’s criminal code. This specific type of scam is generally referred to as the Nigerian scam because of its prevalence in the country. Such schemes typically involve promising the victim a significant share of a large sum of money, in return for a small up-front payment, which the fraudster claims to require in order to cover the cost of documentation, transfers, etc. Frequently, the sum is said to be lottery proceeds or personal/family funds being moved out of a country by a victim of an oppressive government, although many types of scenarios have been used. This scheme is perpetrated globally through email, fax, or mail.

Anti-Money Laundering/Combating the Financing of Terrorism (AML/CFT): Collective term used to describe the overall legal, procedural, and enforcement regime countries must implement to fight the threats of money laundering and terrorism financing.

Bearer Share: A bearer share is an equity security that is solely owned by whoever holds the physical stock certificate. The company that issues the bearer shares does not register the owner of the stock nor does it track transfers of ownership. The company issues dividends to bearer shareholders when a physical coupon is presented.

Black Market Peso Exchange (BMPE): One of the most pernicious money laundering schemes in the Western Hemisphere. It is also one of the largest, processing billions of dollars’ worth of drug proceeds a year from Colombia alone via TBML, “smurfing,” cash smuggling, and other schemes. BMPE-like methodologies are also found outside the Western Hemisphere. There are variations on the schemes involved, but generally drug traffickers repatriate and exchange illicit profits obtained in the United States without moving funds across borders. In a simple BMPE scheme, a money launderer collaborates with a merchant operating in Colombia or Venezuela to provide him, at a discounted rate, U.S. dollars in the United States. These funds, usually drug proceeds, are used to purchase merchandise in the United States for export to the merchant. In return, the merchant who import the goods provides the money launderer with local-denominated funds (pesos) in Colombia or Venezuela. The broker takes a cut and passes along the remainder to the responsible drug cartel.

Bulk Cash Smuggling: Bulk cash refers to the large amounts of currency notes criminals accumulate as a result of various types of criminal activity. Smuggling, in the context of bulk cash, refers to criminals’ subsequent attempts to physically transport the money from one country to another.

Cross-border currency reporting: Per FATF recommendation, countries should establish a currency declaration system that applies to all incoming and outgoing physical transportation of cash and other negotiable monetary instruments.

Counter-valuation: Often employed in settling debts between hawaladars or traders. One of the parties over-or-undervalues a commodity or trade item such as gold, thereby transferring value to another party and/or offsetting debt owed.

Currency Transaction Report (CTR): Financial institutions in some jurisdictions are required to file a CTR whenever they process a currency transaction exceeding a certain amount. In the United States, for example, the reporting threshold is \$10,000. The amount varies per jurisdiction. These reports include important identifying information about account holders and the transactions. The reports are generally transmitted to the country's FIU.

Customer Due Diligence/Know Your Customer (CDD/KYC): The first step financial institutions must take to detect, deter, and prevent money laundering and terrorism financing, namely, maintaining adequate knowledge and data about customers and their financial activities.

Egmont Group of FIUs: The international standard-setter for FIUs. The organization was created with the goal of serving as a center to overcome the obstacles preventing cross-border information sharing between FIUs.

FATF-Style Regional Body (FSRB): These bodies – which are modeled on FATF and are granted certain rights by that organization – serve as regional centers for matters related to AML/CFT. Their primary purpose is to promote a member jurisdiction's implementation of comprehensive AML/CFT regimes and implement the FATF recommendations.

Financial Action Task Force (FATF): FATF was created by the G7 leaders in 1989 in order to address increased alarm about money laundering's threat to the international financial system. This intergovernmental policy making body was given the mandate of examining money laundering techniques and trends and setting international standards for combating money laundering and terrorist financing.

Financial Intelligence Unit (FIU): In many countries, a central national agency responsible for receiving, requesting, analyzing, and/or disseminating disclosures of financial information to the competent authorities, primarily concerning suspected proceeds of crime and potential financing of terrorism. An FIU's mandate is backed up by national legislation or regulation. The Financial Crimes Enforcement Network (FinCEN) is the U.S. financial intelligence unit.

Free Trade Zone (FTZ): A special commercial and/or industrial area where foreign and domestic merchandise may be brought in without being subject to the payment of usual customs duties, taxes, and/or fees. Merchandise, including raw materials, components, and finished goods, may be stored, sold, exhibited, repacked, assembled, sorted, or otherwise manipulated prior to re-export or entry into the area of the country covered by customs. Duties are imposed on the merchandise (or items manufactured from the merchandise) only when the goods pass from the zone into an area of the country subject to customs. FTZs may also be called special economic zones, free ports, duty-free zones, or bonded warehouses.

Funnel Account: An individual or business account in one geographic area that receives multiple cash deposits, often in amounts below the cash reporting threshold, and from which the funds are withdrawn in a different geographic area with little time elapsing between the deposits and withdrawals.

Hawala: A centuries-old broker system based on trust, found throughout South Asia, the Arab world, and parts of Africa, Europe, and the Americas. It allows customers and brokers (called hawaladars) to transfer money or value without physically moving it, often in areas of the world where banks and other formal institutions have little or no presence. It is used by many different cultures, but under different names; “hawala” is used often as a catchall term for such systems in discussions of terrorism financing and related issues.

Hawaladar: A broker in a hawala or hawala-type network.

International Business Company (IBC): Firms registered in an offshore jurisdiction by a non-resident that are precluded from doing business with residents in the jurisdiction. Offshore entities may facilitate hiding behind proxies and complicated business structures. IBCs are frequently used in the “layering” stage of money laundering.

Integration: The last stage of the money laundering process. The laundered money is introduced into the economy through methods that make it appear to be normal business activity, to include real estate purchases, investing in the stock market, and buying automobiles, gold, and other high-value items.

Kimberly Process (KP): The Kimberly Process was initiated by the UN to keep “conflict” or “blood” diamonds out of international commerce, thereby drying up the funds that sometimes fuel armed conflicts in Africa’s diamond producing regions.

Layering: This is the second stage of the money laundering process. The purpose of this stage is to make it more difficult for law enforcement to detect or follow the trail of illegal proceeds. Methods include converting cash into monetary instruments, wire transferring money between bank accounts, etc.

Legal Person: A company, or other entity that has legal rights and is subject to obligations. In the FATF Recommendations, a legal person refers to a partnership, corporation, association, or other established entity that can conduct business or own property, as opposed to a human being.

Mutual Evaluation (ME): All FATF and FSRB members have committed to undergoing periodic multilateral monitoring and peer review to assess their compliance with FATF’s recommendations. Mutual evaluations are one of the FATF’s/FSRB’s primary instruments for determining the effectiveness of a country’s AML/CFT regime.

Mutual Evaluation Report (MER): At the end of the FATF/FSRB mutual evaluation process, the assessment team issues a report that describes the country’s AML/CFT regime and rates its effectiveness and compliance with the FATF Recommendations.

Mobile Payments or M-Payments: An umbrella term that generally refers to the growing use of cell phones to credit, send, receive, and transfer money and virtual value.

Natural Person: In jurisprudence, a natural person is a real human being, as opposed to a legal person (see above). In many cases, fundamental human rights are implicitly granted only to natural persons.

Offshore Financial Center: Usually a low-tax jurisdiction that provides financial and investment services to non-resident companies and individuals. Generally, companies doing business in offshore centers are prohibited from having clients or customers who are resident in the jurisdiction. Such centers may have strong secrecy provisions or minimal identification requirements.

Over-invoicing: When money launderers and those involved with value transfer, trade-fraud, and illicit finance misrepresent goods or services on an invoice by indicating they cost more than they are actually worth. This allows one party in the transaction to transfer money to the other under the guise of legitimate trade.

Politically Exposed Person (PEP): A term describing someone who has been entrusted with a prominent public function, or an individual who is closely related to such a person.

Placement: This is the first stage of the money laundering process. Illicit money is disguised or misrepresented, then placed into circulation through financial institutions, casinos, shops, and other businesses, both local and abroad. A variety of methods can be used for this purpose, including currency smuggling, bank transactions, currency exchanges, securities purchases, structuring transactions, and blending illicit with licit funds.

Shell Company: An incorporated company with no significant operations, established for the sole purpose of holding or transferring funds, often for money laundering purposes. As the name implies, shell companies have only a name, address, and bank accounts; clever money launderers often attempt to make them look more like real businesses by maintaining fake financial records and other elements. Shell companies are often incorporated as IBCs.

Smurfing/Structuring: A money laundering technique that involves splitting a large bank deposit into smaller deposits to evade financial transparency reporting requirements.

Suspicious Transaction Report/Suspicious Activity Report (STR/SAR): If a financial institution suspects or has reasonable grounds to suspect that the funds involved in a given transaction derive from criminal or terrorist activity, it is obligated to file a report with its national FIU containing key information about the transaction. In the United States, SAR is the most common term for such a report, though STR is used in most other jurisdictions.

Tipping Off: The disclosure of the reporting of suspicious or unusual activity to an individual who is the subject of such a report, or to a third party. The FATF Recommendations call for such an action to be criminalized.

Trade-Based Money Laundering (TBML): The process of disguising the proceeds of crime and moving value via trade transactions in an attempt to legitimize their illicit origin.

Trade Transparency Unit (TTU): TTUs examine trade between countries by comparing, for example, the export records from Country A and the corresponding import records from Country B. Allowing for some recognized variables, the data should match. Any wide discrepancies could be indicative of trade fraud (including TBML), corruption, or the back door to underground remittance systems and informal value transfer systems, such as hawala.

Under-invoicing: When money launderers and those involved with value transfer, trade fraud, and illicit finance misrepresent goods or services on an invoice by indicating they cost less than they are actually worth. This allows the traders to settle debts between each other in the form of goods or services.

Unexplained Wealth Order (UWO): A type of court order to compel someone to reveal the sources of their unexplained wealth. UWOs require the owner of an asset to explain how he or she was able to afford that asset. Persons who fail to provide a response may have assets seized or may be subject to other sanctions.

UNSCR 1267: UN Security Council Resolution 1267 and subsequent resolutions require all member states to take specific measures against individuals and entities associated with the Taliban and al-Qaida. The “1267 Committee” maintains a public list of these individuals and entities, and countries are encouraged to submit potential names to the committee for designation.

UNSCR 1373: UN Security Council Resolution 1373 requires states to freeze without delay the assets of individuals and entities associated with any global terrorist organization. This is significant because it goes beyond the scope of Resolution 1267 and requires member states to impose sanctions against all terrorist entities.

Virtual Currency: Virtual currency is an internet-based form of currency or medium of exchange, distinct from physical currencies or forms of value such as banknotes, coins, and gold. It is electronically created and stored. Some forms are encrypted. They allow for instantaneous transactions and borderless transfer of ownership. Virtual currencies generally can be purchased, traded, and exchanged among user groups and can be used to buy physical goods and services, but can also be limited or restricted to certain online communities, such as a given social network or internet game. Virtual currencies are purchased directly or indirectly with genuine money at a given exchange rate and can generally be remotely redeemed for genuine monetary credit or cash. According to the U.S. Department of Treasury, virtual currency operates like traditional currency, but does not have all the same attributes; i.e., it does not have legal tender status.

Zakat: One of the five pillars of Islam, translated as “alms giving.” It involves giving a percentage of one’s possessions to charity. Often compared to tithing, *zakat* is intended to help poor and deprived Muslims. The Muslim community is obligated to both collect *zakat* and distribute it fairly.

Legislative Basis and Methodology for the INCSR

The 2019 volume on *Money Laundering* is a legislatively-mandated section of the annual International Narcotics Control Strategy Report (INCSR), in accordance with section 489 of the Foreign Assistance Act of 1961, as amended (the “FAA,” 22 U.S.C. § 2291).¹

The FAA requires the State Department to produce a report on the extent to which each country or entity that received assistance under chapter 8 of Part I of the Foreign Assistance Act in the past two fiscal years has “met the goals and objectives of the United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances” (“1988 UN Drug Convention”) (FAA § 489(a)(1)(A)).

In addition to identifying countries in relation to illicit narcotics, the INCSR is mandated to identify “major money laundering countries” (FAA §489(a)(3)(C)). The INCSR also is required to report findings on each country’s adoption of laws and regulations to prevent narcotics-related money laundering (FAA §489(a)(7)(C)). This volume is the section of the INCSR that reports on money laundering and country efforts to address it.

The statute defines a “major money laundering country” as one “whose financial institutions engage in currency transactions involving significant amounts of proceeds from international narcotics trafficking” (FAA § 481(e)(7)). The determination is derived from the list of countries included in INCSR Volume I (which focuses on narcotics) and other countries proposed by U.S. government experts based on indicia of significant drug-related money laundering activities. Given money laundering activity trends, the activities of non-financial businesses and professions or other value transfer systems are given due consideration.

Inclusion in Volume II is not an indication that a jurisdiction is not making strong efforts to combat money laundering or that it has not fully met relevant international standards. The INCSR is not a “black list” of jurisdictions, nor are there sanctions associated with it. The U.S. Department of State regularly reaches out to counterparts to request updates on money laundering and AML efforts, and it welcomes information.

The following countries/jurisdictions have been identified this year:

Major Money Laundering Jurisdictions in 2018:

Afghanistan, Albania, Algeria, Antigua and Barbuda, Argentina, Armenia, Aruba, Azerbaijan, Bahamas, Barbados, Belgium, Belize, Benin, Bolivia, Bosnia and Herzegovina, Brazil, British Virgin Islands, Burma, Cabo Verde, Canada, Cayman Islands, China, Colombia, Costa Rica, Cuba, Curacao, Cyprus, Dominica, Dominican Republic, Ecuador, El Salvador, Georgia, Ghana, Guatemala, Guyana, Haiti, Honduras, Hong Kong, India, Indonesia, Iran, Italy, Jamaica, Kazakhstan, Kenya, Laos, Liberia, Macau, Malaysia, Mexico, Morocco, Mozambique,

¹ This 2019 report on Money Laundering is based upon the contributions of numerous U.S. government agencies and international sources. Specifically, the U.S. Treasury Department’s Office of Terrorist Financing and Financial Crimes, Financial Crimes Enforcement Network, Internal Revenue Service, Office of the Comptroller of the Currency, and Office of Technical Assistance; Department of Homeland Security’s Immigration and Customs Enforcement and Customs and Border Protection; Department of Justice’s Money Laundering and Asset Recovery Section, National Security Division, Office of International Affairs, Drug Enforcement Administration, Federal Bureau of Investigation, and Office for Overseas Prosecutorial Development, Assistance, and Training. Also providing information on training and technical assistance is the independent Board of Governors of the Federal Reserve System.

Netherlands, Nicaragua, Nigeria, Pakistan, Panama, Paraguay, Peru, Philippines, Russia, St. Kitts and Nevis, St. Lucia, St. Vincent and the Grenadines, Senegal, Serbia, Sint Maarten, Spain, Suriname, Tajikistan, Tanzania, Thailand, Trinidad and Tobago, Turkey, Ukraine, United Arab Emirates, United Kingdom, United States, Uzbekistan, Venezuela, and Vietnam.

Overview

Money laundering, both at the country and multilateral levels, remains a significant crime issue despite robust, multifaceted efforts to address it. While arriving at a precise figure for the amount of criminal proceeds laundered is impossible, some studies by relevant international organizations estimate it may constitute 2-5 percent of global GDP. It is a seemingly ubiquitous criminal phenomenon: money laundering facilitates many other crimes and has become an indispensable tool of drug traffickers, transnational criminal organizations, and terrorist groups around the world. Its nefarious impact is considerable: it contributes to the breakdown of the rule of law, corruption of public officials, and destabilization of economies, and it threatens political stability, democracy, and free markets around the globe.

For these reasons, the development and implementation of effective AML regimes consistent with international standards and the ability to meet evolving challenges is clearly vital to the maintenance of solvent, secure, and reliable financial, commercial, and trade systems. Reducing money laundering's threat to U.S. interests is a national security priority reflected in the 2018 National Security Strategy and the 2017 Executive Order 13773, Enforcing Federal Law with Respect to Transnational Criminal Organizations and Preventing International Trafficking. To that end, the United States, a founding member of FATF, has worked within the organization, and with partner countries and FATF-style regional bodies, to promote compliance with the 49 Recommendations. It has also supported, through technical assistance and other means, the development and implementation of robust national-level AML regimes in jurisdictions around the world.

The 2019 edition of the Congressionally-mandated *International Narcotics Control Strategy Report, Volume II: Money Laundering* focuses on the exposure to this threat – in the specific context of narcotics-related money laundering – of jurisdictions around the world. As with past reports, it provides a review of the AML legal and institutional infrastructure of each jurisdiction, highlights the most significant steps each has taken to improve its AML regime, describes key vulnerabilities, and identifies each jurisdiction's capacity to share information and cooperate in international investigations. The report also highlights the United States government's provision of AML-related technical assistance.

This year's report highlights that the issues reflected in the FATF Recommendations remain among the key challenges in this field. In view of the experience of jurisdictions included in the 2019 report, identification and reporting of suspicious transactions, identification of the true beneficial owners of legal entities and transactions, and frameworks and practices for international cooperation on money laundering investigations and prosecutions remain as germane today as when the FATF was created.

As new technologies come into use, various crimes, including money laundering, continue to evolve and pose new challenges for societies, governments, and law enforcement. New technologies create opportunities for exploitation by criminals and terrorists. For example, in Africa, South Asia, and some other parts of the world, use of mobile telephony to send and receive money or credit has outstripped owning a bank account. The rapid growth of global mobile payments (m-payments) and virtual currencies demands particular attention in the AML

sphere. The risk that criminal and terrorist organizations will co-opt m-payment services is real, particularly as the services can manifest less than optimal financial transparency. Similarly, virtual currencies are growing in popularity and expanding their reach. For example, key MSBs are exploring how to incorporate virtual or crypto currency (blockchain platform) payments to expedite remittances to locations around the world. Regulators and law enforcement are beginning, in some jurisdictions, to respond to the use of such anonymous e-payment methodologies, but their rapid development poses challenges on the policy, legal, and enforcement levels. Mexico and China have added virtual currency platforms and dealers as covered entities for AML supervision purposes, while Cayman Islands is among the jurisdictions taking action to develop legislation to address their use, and the British Virgin Islands issued a public advisory regarding the risk of investing in virtual currencies. Although virtual currencies are currently illegal in India, the government is exploring a regulatory regime for their use.

Corruption is both a significant by-product and a facilitating crime of the international drug trade and transnational organized crime. While corruption risks occur in any country, the risks are particularly high in countries where political will may be weak, institutions ineffective, or the country's AML infrastructure deficient. Encouragingly, the 2019 Report again highlights action several governments are taking to more effectively address corruption and its links to money laundering. As with money laundering, while legislative and institutional reforms are an important foundation, robust and consistent enforcement is also key, though often lacking. Jamaica, Senegal, Serbia, and Uzbekistan all enacted legislation to address corruption and/or PEPs. Sint Maarten charged a member of parliament with bribery, tax evasion, and money laundering. Argentina and Ecuador continue to investigate and prosecute corruption cases. Malaysia's new government has taken action to prosecute a number of former government officials, including a former prime minister, who allegedly were involved in misappropriations from the state-owned development fund.

The transparency of beneficial ownership remains a central focus for AML, arising in the discussions of multilateral fora such as FATF as well as in coverage of some recent high-level corruption allegations. Shell companies are used by drug traffickers, organized criminal organizations, corrupt officials, and some regimes to launder money and evade sanctions. "Off-the shelf" IBCs, purchased via the internet, remain a significant concern, by creating a vehicle through which nominee directors from a different country may effectively provide anonymity to the true beneficial owners. While the 2019 Report reflects that beneficial ownership transparency remains a vulnerability in many jurisdictions, the report also highlights significant steps taken by various jurisdictions on the issue. Cyprus issued circulars to banking, credit, payment, and virtual money institutions advising them to be extra vigilant against shell companies and to avoid doing business with them. To increase the transparency of company ownership, Peru enacted legislation to mandate the disclosure of beneficial ownership. Cyprus and Serbia have new laws addressing centralized records of beneficial owners. Additionally, in an effort to increase transparency, increasing numbers of jurisdictions, such as Argentina and Curacao, are concluding tax information sharing agreements. Others, such as Pakistan, Panama, and Russia are beginning to share financial information under the OECD's Multilateral Competent Authority Agreement. Here in the United States, on May 11, 2018, a new Treasury Department rule on beneficial ownership went into effect, requiring covered entities to identify and verify the identities of beneficial owners of legal entities.

The year 2018 saw increasing scrutiny at the international level of economic citizenship programs, which are also vulnerable to money laundering activity and must be closely monitored and regulated to prevent their abuse by criminals. U.S. law enforcement remains highly concerned about the expansion of these programs due to the visa-free travel and ability to open bank accounts accorded to participating individuals; other vulnerabilities, as well as good practices in countermeasures, have been analyzed in the various 2018 studies and publications on the issue. While Turkey eased its requirements for economic citizenship, St. Kitts and Nevis now uses a regional central clearing house under the auspices of the Caribbean Community to properly vet candidates. Antigua and Barbuda and St. Lucia have established their own vetting units.

Although new technologies are gaining popularity, money launderers continue to use offshore centers, FTZs, and gaming enterprises to launder illicit funds. These sectors can offer convenience and, often, anonymity to those wishing to hide or launder the proceeds of narcotics trafficking and other serious crimes. While the appeal of these institutions translates into their continued appearance across many of the jurisdictions that appear in the 2019 INCSR, many jurisdictions are taking measures to reduce vulnerabilities. In recent years, Dominica revoked the licenses of eight offshore banks. Macau is taking a more stringent approach toward the licensing and supervision of gaming junket promoters. Bahamian gaming authorities can observe operations, including account transactions, in real time from remote locations. In its second criminal prosecution involving money laundering charges, Vietnam prosecuted over 90 defendants associated with a prohibited online gaming enterprise.

To help address these issues, in 2018, the United States continued to mobilize government experts from relevant agencies to deliver a range of training programs, mentoring, and other capacity building support. U.S. government agencies also, in many cases, provided financial support to other entities to engage in complementary capacity-building activities, leveraging those organizations' unique expertise and reach. These U.S.-supported efforts build capacity to fight not only money laundering but also other crimes facilitated by money laundering, including narcotics trafficking, in partner jurisdictions. Depending on the jurisdiction, supervisory, law enforcement, prosecutorial, customs, FIU personnel, and private sector entities benefitted from the U.S.-supported programs. As the 2019 INCSR reflects, these efforts are resulting in an increase in investigations, prosecutions, and convictions, more robust institutions, and stronger compliance with international standards, in addition to raising awareness of cutting edge, emerging issues, such as abuse of new technologies, and sharing good practices to address them.

Looking ahead, FATF's recent focus on the identification of the methodologies currently used by human trafficking networks and terrorist financing and recruiting efforts will likely lead members of FATF and the FATF style-regional bodies to emphasize their endeavors in these areas. FATF notes the continued use of bulk cash smuggling and MVTs transactions in these areas, while crowdfunding is a new source of funding for small terrorist cells or lone wolves.

While the 2019 INCSR reflects the continued vulnerability to narcotics trafficking-related money laundering around the world, including in the United States, it also demonstrates the seriousness with which many jurisdictions are tackling the issue and the significant efforts many have

undertaken. Though the impact of the aforementioned efforts manifests through increased enforcement, there is much more to be done in that regard – the gap between de jure progress and implementation and enforcement in some jurisdictions is one of the most concerning observations of the report. The Department of State, working with our U.S. and international partners, will continue to support foreign assistance activities, diplomatic engagement, and law enforcement partnerships to promote compliance with international norms and strengthen capacity to combat money laundering, drug trafficking, and transnational organized crime.

Training Activities

During 2018, U.S. law enforcement and regulatory agencies provided training and technical assistance on money laundering countermeasures, financial investigations, and related issues to their counterparts around the globe. The programs provided the necessary tools to recognize, investigate, and prosecute money laundering, financial crimes, terrorist financing, and related criminal activity. U.S. agencies supported courses in the United States as well as in the jurisdictions of the program beneficiaries. Depending on circumstances, U.S. agencies provided instruction directly or through other agencies or implementing partners, unilaterally or in collaboration with foreign counterparts, and with either a bilateral recipient or in multijurisdictional training exercises. The following is a representative, but not necessarily exhaustive, overview of the capacity building provided and organized by sponsoring agencies.

Board of Governors of the Federal Reserve System (FRB)

The FRB conducts a Bank Secrecy Act (BSA) and OFAC compliance program review as part of its regular safety-and-soundness examination. These examinations are an important component in the United States' efforts to detect and deter money laundering and terrorist financing. The FRB monitors its supervised financial institutions' conduct for BSA and OFAC compliance. Internationally, during 2018, the FRB conducted training and provided technical assistance to banking supervisors on AML topics during four seminars: one in Sao Paulo, Brazil; one in Cairo, Egypt; one in Washington, D.C.; and one in Abuja, Nigeria. Countries participating in these FRB initiatives were Armenia, Brazil, Cote d'Ivoire, Egypt, Ghana, Hong Kong, India, Kenya, Korea, Lebanon, Lesotho, Liechtenstein, Mexico, Mongolia, Nigeria, Pakistan, Singapore, Sri Lanka, Sudan, Uganda, and Zimbabwe.

Department of Homeland Security

Customs and Border Patrol (CBP)

The Trade and Cargo Academy provided two hours of money laundering training to 69 graduates of Basic Import Specialist Training in calendar year 2018.

At the Border Patrol Academy, the Office of Chief Counsel taught a one-hour block on currency and monetary instrument reporting violations and unlicensed money transmitters.

CBP conducted a bulk cash smuggling program in Peru in December 2018.

Immigration and Customs Enforcement (ICE)

U.S. Immigration and Customs Enforcement

In Fiscal Year 2018, the ICE Homeland Security Investigations Illicit Finance and Proceeds of Crime Unit (IFPCU) conducted AML trainings focused on typologies, methodologies, and approaches to combat illicit finance. IFPCU provided technical training and presentations to representatives from the following foreign law enforcement partners: Canada, Colombia, France, Germany, South Korea, Europol, INTERPOL, the World Customs Organization, the Five Eyes Law Enforcement Group, and the FATF. In an effort to support the anticorruption efforts of the Government of Ecuador, in December 2018, ICE provided anticorruption training to members of the Ecuadorian National Police, Attorney General's Office, and the Ecuadorian Customs Service.

Trade Transparency Units (TTU)

The TTU, housed within the ICE National Targeting Center, provides critical exchange of trade data with numerous countries. The TTU has information sharing agreements with 14 countries to facilitate the identification of transnational criminal organizations utilizing TBML schemes to repatriate proceeds generated from multiple illegal activities, including drug and human smuggling, customs fraud, and intellectual property rights violations. The TTU methodology, which provides U.S. law enforcement and international partners with subject matter expertise, training, and investigative tools to combat TBML and third-party money launderers, is internationally recognized as a best practice to address TBML.

ICE continues to expand the network of operational TTUs, which now includes Argentina, Australia, Brazil, Chile, Colombia, Dominican Republic, Ecuador, France, Guatemala, Mexico, Panama, Paraguay, Peru, Philippines, UK, and Uruguay. The U.S. TTU is actively engaged with several countries in Asia and Southeast Asia regarding MOU discussions to establish a TTU.

Department of Justice

Drug Enforcement Administration (DEA)

The Office of Global Enforcement, Financial Investigations Section (OGF) at DEA Headquarters serves as DEA's lead body for coordinating DEA's efforts across domestic and foreign offices with respect to the targeting of the financial aspects of drug trafficking organizations (DTO). OGF works in conjunction with DEA field offices, foreign counterparts, and the interagency community to provide guidance and to support a variety of investigative tools, as well as to provide oversight on DEA's undercover financial investigations. OGF facilitates cooperation between countries, resulting in the identification and prosecution of money laundering organizations operating on behalf of DTOs, as well as the seizure of assets and denial of revenue around the world. OGF regularly briefs and educates United States government officials and diplomats, foreign government officials, and military and law enforcement counterparts regarding the latest trends in money laundering, narcoterrorism financing, international banking, offshore corporations, international wire transfer of funds, and financial investigative tools.

In conjunction with the DEA Office of International Training, OGF conducts training for DEA field offices, as well as foreign counterparts, in order to share strategic ideas and promote effective techniques in financial investigations. During 2018, OGF participated in and led a number of workshops and strategy sessions focused on money laundering trends, engagement with financial institutions, guidance and overview on undercover money laundering operations, virtual currency, and investigative case coordination.

DEA has prioritized a financial component in its investigations and has made this component a key element of Priority Target Operations, the Domestic Cartel Initiative, and Organized Crime Drug Enforcement Task Force investigations. DEA has dedicated financial investigative teams across its domestic offices as well as foreign-based DEA teams in Mexico, Peru, and Colombia that have conducted local training programs. For example, in 2018, DEA offered a one-day money laundering course for Ecuadorian National Police officers/commanders, prosecutors, and personnel from the FIU.

Federal Bureau of Investigation (FBI)

The Federal Bureau of Investigation (FBI) provides training and/or technical assistance to national law enforcement personnel globally. Training and technical assistance programs enhance host country law enforcement's capacity to investigate and prosecute narcotics-related money laundering crimes. The FBI has provided workshops introducing high-level money laundering techniques used by criminal and terrorist organizations. The training may focus on topics such as a foundational understanding of drug trafficking investigative and analytical techniques and tactics, money laundering and public corruption, or terrorism financing crimes and their relationship to drug trafficking as a support for terrorism activities.

Office of Overseas Prosecutorial Development, Assistance and Training (OPDAT)

With funding from INL, OPDAT provided training and mentoring to counterparts throughout the world to combat money laundering consistent with international standards and in furtherance of U.S. national security.

Africa

OPDAT Ghana, in coordination with the FBI, provided regular money laundering and asset forfeiture training and mentoring to investigators and prosecutors. This engagement led to investigations and prosecutions of cases with U.S. victims, including a successful extradition to the United States of the perpetrators in a major fraud case. OPDAT, in coordination with DHS, assisted The Gambia regarding financial investigations, including money laundering, to retrieve money illicitly laundered by former President Yahya Jammeh, who fled the country in 2017 after 22 years in power.

Asia and the Pacific

OPDAT conducted AML training programs in Bangladesh, Indonesia, Malaysia, Nepal, and Timor-Leste. OPDAT Philippines supported the continuing rollout of its 2012 Amendment to the Anti-Money Laundering Act by conducting four AML programs. OPDAT Burma conducted an AML workshop as part of its nationwide Transnational Crime Program.

Europe

Through regional and bilateral workshops, OPDAT developed the forensic accounting skills of police and prosecutors throughout the Western Balkans, including Albania, Bosnia and Herzegovina, Kosovo, Macedonia, Montenegro, and Serbia. Additionally, OPDAT provided skills development training to prosecutors, investigators, and FIU officials in Romania and Latvia on net worth analysis and international legal cooperation in financial investigations.

Western Hemisphere

OPDAT Mexico continued to build Mexico's capacity to combat money laundering and seize assets for forfeiture through specialized programs as well as technical advice on active money laundering and asset forfeiture matters. OPDAT Honduras helped counterparts develop and implement an AML regime compliant with international standards. OPDAT Guatemala provided regular money laundering and asset forfeiture assistance and mentoring to prosecutors. In El Salvador, OPDAT provided technical assistance to money laundering and asset forfeiture units as well as case-based mentoring to investigators and prosecutors. OPDAT's Judicial Studies Institute, based in Puerto Rico, offered the second iteration of the Special Course on Asset Forfeiture attended by judges from Colombia, Costa Rica, Dominican Republic, El Salvador, Guatemala, Honduras, Mexico, Panama, and Peru.

Department of State

The DOS' INL strengthens criminal justice systems and law enforcement agencies around the world. Through its international programs, as well as in coordination with other DOS bureaus, U.S. government agencies, and multilateral organizations, INL addresses a broad range of law enforcement and criminal justice areas.

INL training programs focus on both bilateral and multilateral efforts. INL and its partners design programs and provide training and technical assistance to countries that demonstrate the political will to develop viable AML regimes. INL funds many of the regional training and technical assistance programs offered by U.S. law enforcement agencies, including those provided at the INL-managed International Law Enforcement Academies.

Examples of INL sponsored programs include:

Afghanistan: An Afghan delegation participated in an information exchange tour with Sri Lankan counterparts in Colombo to build Afghan and Sri Lankan capacity in financial investigations of corruption, narcotrafficking, and terrorism. The Afghan delegation included senior-level prosecutors from the Attorney General's Office (AGO) and FIU officials. The three-day, INL-funded event facilitated a series of expert-level conversations about comparative issues in AML/CFT enforcement. The information exchange involved fundamental technical discussions that could result in productive changes in each country. Examples include improved prosecutorial coordination, enhanced investigative techniques, and increased use/protection of FIU products. The operational and theoretical themes raised in the workshop were comprehensive and underscored the complex issues each country faces. INL and DOJ are assisting the AGO and FIU to continue building their capacities to address these issues within the Afghan system.

Eastern Caribbean: The Saint Vincent and the Grenadines High Court granted a recovery order forfeiting approximately U.S. \$33,000 (\$100,000 Eastern Caribbean dollars) in a fraud and money laundering case. The recovery order is the first granted in the Eastern Caribbean under the Proceeds of Crime Act (POCA), and sets the stage for further civil recovery actions against assets belonging to serious organized criminals. This order is the culmination of more than six years of INL-assisted reform, technical assistance, and training efforts in the Eastern Caribbean led by INL's Caribbean Financial Crimes Advisor. INL assisted in the drafting and passage of the POCA; helped establish a Civil Asset Recovery Division (CARD) within the St. Vincent and the Grenadines FIU; provided training for investigators, attorneys, and the judiciary; and mentored the CARD throughout this case. As mandated by the POCA, the government will use recovered funds to support criminal justice agencies in Saint Vincent and the Grenadines.

Honduras: INL Tax Crimes Advisors deliver regular workshops on best practices for money laundering and terrorist financing investigations, in coordination with the Tax Administration Service's Interagency Commission for the Prevention of Money Laundering and Terrorist Financing (SAR-CIPLAFT). Some of the topics include: International Perspective of AML Systems; PEPs; Money Laundering Typologies, Investigations, and Sanctions; Tax Liens on Seized Assets; and SAR Requirements. The training sessions include practical case scenarios

and group discussions to reinforce the importance of financial and money laundering investigations. A total of 60 Tax Administration Service officials (tax specialists, attorneys, appeals specialists, and the General Secretary) participated in the training in 2018.

Kazakhstan: A pool of certified financial investigations instructors regularly deliver training programs to law enforcement and state officials through the INL-funded National Financial Investigations and Asset Recovery Program.

Laos: The U.S. Embassy in Laos and international partners have ongoing projects aimed at enhancing Laos' ability to prosecute money laundering cases and to build the capacity of law enforcement officials.

Latvia: INL and DOJ have partnered to support Latvian government efforts to reform its AML/CFT regime with a focus on enforcement efforts. In 2018, DOJ conducted two workshops for the Prosecutor General's Office, FIU, judges, and law enforcement institutions focused on prosecuting and investigation complex financial crimes.

Mexico: Under the North American Drug Dialogue, INL supported FBI training on money laundering threats from the Dark Web and virtual currencies presented to the Mexican Attorney General's Office (PGR). INL developed an AML and asset forfeiture course, which it launched in 2018. Trainees included members of PGR, the Mexican Tax Administration Service, the National Commission for the Retirement Savings System, and the Mexican Navy.

Serbia: The U.S. Embassy in Serbia provided training and workshops to prosecutors and law enforcement officials that supported the significantly increased number of convictions in 2018.

Department of the Treasury

Internal Revenue Service, Criminal Investigations (IRS-CI)

The IRS-CI provides training and technical assistance to international law enforcement officers in detecting and investigating financial crimes related to taxes, money laundering, terrorist financing, and public corruption. With funding provided by the U.S. DOS, DOJ, and other sources, IRS-CI delivers training through agency and multiagency technical assistance programs.

IRS-CI participates in training at the INL-funded ILEAs located in Bangkok, Thailand; Budapest, Hungary; Gaborone, Botswana; Accra, Ghana; and San Salvador, El Salvador. Programs include Financial Investigative Techniques training, Financial Investigations for Public Corruption, and support for the Law Enforcement Leadership Development courses.

Office of the Comptroller of the Currency (OCC)

The U.S. Department of Treasury's OCC charters, regulates, and supervises all national banks and federal savings associations in the U.S. The OCC's goal is to ensure these institutions operate in a safe and sound manner and comply with all laws and regulations, including the Bank Secrecy Act, as well as consumer protection laws and implementing regulations. The OCC sponsored several initiatives to provide AML/CFT training to foreign banking supervisors. These initiatives include its annual AML/CFT School, which is designed specifically for foreign banking supervisors to increase their knowledge of money laundering and terrorism financing typologies and improve their ability to examine and enforce compliance with national laws. The 2018 AML School was attended by foreign supervisors from Afghanistan, Aruba, Canada, Eastern Caribbean, Hong Kong, India, Israel, Latvia, Malaysia, Netherlands, Philippines, South Africa, and South Korea. In addition, the OCC sponsored an AML/CFT school for the Association of Supervisors of the Americas in the Bahamas attended by foreign supervisors from Aruba, Bahamas, Barbados, Costa Rica, Curacao, El Salvador, Guatemala, Panama, Suriname, Trinidad and Tobago, Turks and Caicos, and Uruguay.

OCC officials met with representatives from foreign law enforcement authorities, FIUs, and AML/CFT supervisory agencies to discuss the U.S. AML/CFT regime, the agencies' risk-based approach to AML/CFT supervision, examination techniques and procedures, and enforcement actions. Additionally, OCC officials, through the U.S. Department of Treasury's OTA, provided support and direct outreach to one country to help evaluate the country's AML regime.

Office of Technical Assistance (OTA)

Each of OTA's five teams – Revenue Policy and Administration, Budget and Financial Accountability, Government Debt and Infrastructure Finance, Banking and Financial Services,

and Economic Crimes – focuses on particular areas to establish strong financial sectors and sound public financial management in developing and transition countries. OTA works side-by-side with counterparts through mentoring and on-the-job training, accomplished through co-location at a relevant government agency. OTA's activities are funded by a direct appropriation from the U.S. Congress as well as transfers from other U.S. agencies, notably the DOS and USAID.

The OTA Economic Crimes Team (ECT) provides technical assistance to help foreign governments develop and implement internationally compliant AML/CFT regimes. In this context, the ECT also addresses underlying predicate crimes, including corruption and organized crime. ECT engagements are predicated on express requests from foreign government counterparts and the results of an onsite assessment by ECT management, which considers the willingness of the counterparts to engage in an active partnership with the ECT to address recognized deficiencies.

An ECT engagement, tailored to the specific conditions of the jurisdiction, may involve placement of a resident advisor and/or utilization of intermittent advisors under the coordination of a team lead. The scope of ECT technical assistance is broad and can include awareness-raising aimed at a range of AML/CFT stakeholders; improvements to an AML/CFT legal framework, such as legislation, regulations, and formal guidance; and improvement of the technical competence of stakeholders. The range of on-the-job and classroom training provided by ECT is equally broad and includes, among other topics, supervisory techniques for relevant regulatory areas; analytic and financial investigative techniques; cross-border currency movement and TBML; asset seizure, forfeiture, and management; and the use of interagency financial crimes working groups.

The ECT delivered technical assistance to Argentina, Belize, Burma, Cabo Verde, Dominican Republic, the Eastern Caribbean Central Bank, Iraq, Liberia, Mongolia, Paraguay, Peru, Sierra Leone, Sri Lanka, St. Vincent and the Grenadines, Trinidad and Tobago, and Uruguay.

Comparative Table Key

The comparative table that follows the Glossary of Terms below identifies the broad range of actions, effective as of December 31, 2018, that jurisdictions have, or have not, taken to combat drug money laundering. This reference table provides a comparison of elements that include legislative activity and other identifying characteristics that can have a relationship to a jurisdiction's money laundering vulnerability. **For those questions relating to legislative or regulatory issues, "Y" is meant to indicate legislation has been enacted to address the captioned items. It does not imply full compliance with international standards.**

Glossary of Terms

- “Criminalized Drug Money Laundering”: The jurisdiction has enacted laws criminalizing the offense of money laundering related to illicit proceeds generated by the drug trade.
- “Know-Your-Customer Provisions”: By law or regulation, the government requires banks and/or other covered entities to adopt and implement Know-Your-Customer/Customer Due Diligence (KYC/CDD) programs for their customers or clientele.
- “Report Suspicious Transactions”: By law or regulation, banks and/or other covered entities are required to report suspicious or unusual transactions (STRs) to designated authorities. On the Comparative Table the letter “Y” signifies mandatory reporting; “V” signifies reporting is not required but rather is voluntary or optional; “N” signifies no reporting regime.
- “Maintain Records over Time”: By law or regulation, banks and/or other covered entities are required to keep records, especially of large or unusual transactions, for a specified period of time, e.g., five years.
- “Cross-Border Transportation of Currency”: By law or regulation, the jurisdiction has established a declaration or disclosure system for persons transiting the jurisdiction's borders, either inbound or outbound, and carrying currency or monetary instruments above a specified threshold.
- “Financial Intelligence Unit”: The jurisdiction has established an operative central, national agency responsible for receiving (and, as permitted, requesting), analyzing, and disseminating to the competent authorities disclosures of financial information in order to counter drug money laundering. An asterisk (*) reflects those jurisdictions whose FIUs are not members of the Egmont Group of FIUs.
- “International Law Enforcement Cooperation”: No known legal impediments to international cooperation exist in current law. Jurisdiction cooperates with authorized investigations involving or initiated by third party jurisdictions, including sharing of records or other financial data, upon request.
- “System for Identifying and Forfeiting Assets”: The jurisdiction has established a legally authorized system for the tracing, freezing, seizure, and forfeiture of assets identified as relating to or generated by drug money laundering activities.

- “Arrangements for Asset Sharing”: By law, regulation, or bilateral agreement, the jurisdiction permits sharing of seized assets with foreign jurisdictions that assisted in the conduct of the underlying investigation. No known legal impediments to sharing assets with other jurisdictions exist in current law.
- “Information Exchange Agreements with Non-U.S. Governments”: The country/jurisdiction is a member of the Egmont Group of FIUs or has in place treaties, MOUs, or other agreements with other governments to share information related to drug-related money laundering.
- “States Party to 1988 UN Drug Convention”: States party to the 1988 United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances, or a territorial entity to which the application of the Convention has been extended by a party to the Convention.
- “States Party to the UN Convention against Transnational Organized Crime”: States party to the United Nations Convention against Transnational Organized Crime (UNTOC), or a territorial entity to which the application of the Convention has been extended by a party to the Convention.
- “States Party to the UN Convention against Corruption”: States party to the United Nations Convention against Corruption (UNCAC), or a territorial entity to which the application of the Convention has been extended by a party to the Convention.
- “Financial Institutions Transact in Proceeds from International Drug Trafficking That Significantly Affects the U.S.”: The jurisdiction’s financial institutions engage in currency transactions involving international narcotics trafficking proceeds that include significant amounts of U.S. currency; currency derived from illegal drug sales in the U.S.; or illegal drug sales that otherwise significantly affect the United States.

Comparative Table

“Y” is meant to indicate that legislation has been enacted to address the captioned items. It does not imply full compliance with international standards. Please see the individual country reports for information on any deficiencies in the adopted laws/regulations.

Actions by Governments	Criminalized Drug Money Laundering	Know-Your-Customer Provisions	Report Suspicious Transactions (Y/N)	Maintain Records Over Time	Cross-Border Transportation of Currency	Financial Intelligence Unit (*)	Intl Law Enforcement Cooperation	System for Identifying/Forfeiting Assets	Arrangements for Asset Sharing	Information exchange agreements with non-U.S. govts	States Party to 1988 UN Drug Convention	States Party to UNTOC	States Party to UNCAC	Financial Institutions transact in proceeds from international drug trafficking that significantly affects the U.S.
Govt/Jurisdiction														
Afghanistan	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
Albania	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Algeria	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Antigua and Barbuda	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Argentina	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Armenia	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Aruba²	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N
Azerbaijan	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Bahamas	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Barbados	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N
Belgium	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Belize	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Benin	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N

² The Netherlands extended its application of the 1988 UN Drug Convention to Aruba, Curacao, and Sint Maarten and the UN Convention against Transnational Organized Crime to Aruba.

Actions by Governments	Criminalized Drug Money Laundering	Know-Your-Customer Provisions	Report Suspicious Transactions (YPN)	Maintain Records Over Time	Cross-Border Transportation of Currency	Financial Intelligence Unit (*)	Intl Law Enforcement Cooperation	System for Identifying/Forfeiting Assets	Arrangements for Asset Sharing	Information exchange agreements with non-U.S. govts	States Party to 1988 UN Drug Convention	States Party to UNTOC	States Party to UNCAC	Financial Institutions transact in proceeds from international drug trafficking that significantly affects the U.S.
Govt/Jurisdiction														
Bolivia	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	N
Bosnia & Herzegovina	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Brazil	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
British Virgin Islands³	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Burma	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N
Cabo Verde	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Canada	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Cayman Islands³	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N
China	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N
Colombia	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Costa Rica	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
Cuba	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Curacao²	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N
Cyprus⁴	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N

³ The UK extended its application of the 1988 UN Drug Convention to British Virgin Islands and Cayman Islands. The UNCAC has been extended to British Virgin Islands. The UNTOC has been extended to British Virgin Islands and Cayman Islands.

⁴

Area administered by Turkish Cypriots	Y	Y	Y	Y	Y	Y*	N	Y	N	N/A	N/A	N/A	N/A	N
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Actions by Governments	Criminalized Drug Money Laundering	Know-Your-Customer Provisions	Report Suspicious Transactions (YPN)	Maintain Records Over Time	Cross-Border Transportation of Currency	Financial Intelligence Unit (*)	Intl Law Enforcement Cooperation	System for Identifying/Forfeiting Assets	Arrangements for Asset Sharing	Information exchange agreements with non-U.S. govts	States Party to 1988 UN Drug Convention	States Party to UNTOC	States Party to UNCAC	Financial Institutions transact in proceeds from international drug trafficking that significantly affects the U.S.
Govt/Jurisdiction														
Dominica	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Dominican Republic	Y	Y	Y	Y	Y	Y*	Y	Y	Y	Y	Y	Y	Y	Y
Ecuador	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
El Salvador	Y	Y	Y	Y	Y	Y*	Y	Y	Y	Y	Y	Y	Y	Y
Georgia	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Ghana	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Guatemala	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
Guyana	Y	Y	Y	Y	Y	Y*	Y	Y	Y	Y	Y	Y	Y	Y
Haiti	Y	Y	Y	Y	N	Y*	Y	Y	Y	Y	Y	Y	Y	N
Honduras	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Hong Kong⁵	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
India	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Indonesia	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Iran	Y	Y	Y	Y	Y	Y*	N	Y	N	Y	Y	N	Y	N/A
Italy	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Jamaica	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Kazakhstan	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N

⁵ The People's Republic of China extended the 1988 UN Drug Convention, the UNTOC, and the UNCAC to the special administrative region of Hong Kong.

Actions by Governments	Criminalized Drug Money Laundering	Know-Your-Customer Provisions	Report Suspicious Transactions (YPN)	Maintain Records Over Time	Cross-Border Transportation of Currency	Financial Intelligence Unit (*)	Intl Law Enforcement Cooperation	System for Identifying/Forfeiting Assets	Arrangements for Asset Sharing	Information exchange agreements with non-U.S. govts	States Party to 1988 UN Drug Convention	States Party to UNTOC	States Party to UNCAC	Financial Institutions transact in proceeds from international drug trafficking that significantly affects the U.S.
Govt/Jurisdiction														
Kenya	Y	Y	Y	Y	Y	Y*	Y	Y	Y	Y	Y	Y	Y	Y
Laos	Y	Y	Y	Y	Y	Y*	Y	N	N	Y	Y	Y	Y	N
Liberia	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N
Macau⁵	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Malaysia	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Mexico	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Morocco	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Mozambique	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N
Netherlands	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Nicaragua	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	N
Nigeria	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
Pakistan	Y	Y	Y	Y	Y	Y*	Y	N	N	Y	Y	Y	Y	Y
Panama	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Paraguay	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
Peru	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Philippines	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	Y
Russia	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
St. Kitts and Nevis	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
St. Lucia	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
St. Vincent and the Grenadines	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N

Actions by Governments	Criminalized Drug Money Laundering	Know-Your-Customer Provisions	Report Suspicious Transactions (YPN)	Maintain Records Over Time	Cross-Border Transportation of Currency	Financial Intelligence Unit (*)	Intl Law Enforcement Cooperation	System for Identifying/Forfeiting Assets	Arrangements for Asset Sharing	Information exchange agreements with non-U.S. govts	States Party to 1988 UN Drug Convention	States Party to UNTOC	States Party to UNCAC	Financial Institutions transact in proceeds from international drug trafficking that significantly affects the U.S.
Govt/Jurisdiction														
Senegal	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Serbia	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Sint Maarten²	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N
Spain	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Suriname	Y	Y	Y	Y	Y	Y*	Y	Y	Y	Y	Y	Y	N	N
Tajikistan	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Tanzania	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Thailand	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Trinidad and Tobago	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Turkey	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Ukraine	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
United Arab Emirates	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
United Kingdom	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N
Uzbekistan	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N
Venezuela	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Vietnam	Y	Y	Y	Y	Y	Y*	Y	Y	N	Y	Y	Y	Y	Y

* FIU is not a member of the Egmont Group of FIUs

Afghanistan

OVERVIEW

Terrorist and insurgent financing, money laundering, bulk cash smuggling, abuse of informal value transfer systems, and other illicit activities that finance criminal activity continue to threaten Afghanistan's security and development. Afghanistan remains the world's largest opium producer and exporter. Corruption remains a major obstacle to the nation's progress. The National Unity Government (NUG) has enacted laws and regulations to combat financial crimes, but faces significant challenges in implementing and enforcing existing laws and regulations.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The illicit narcotics trade, corruption, illegal mineral extraction, and fraud are major sources of illicit revenue. Afghanistan's underdeveloped banking sector faces significant enforcement and regulatory challenges. Traditional payment systems, particularly hawala networks, provide a range of financial and non-financial business services in local, regional, and international markets and are used to circumvent government oversight. The Afghanistan-Pakistan and Afghanistan-Iran borders are porous, enabling smugglers to cross with relative ease.

KEY AML LAWS AND REGULATIONS

Afghanistan has a comprehensive AML law. Significant provisions in Afghanistan's AML laws include an adequate legal basis to criminalize money laundering; KYC and STR provisions; establishment of the Financial Transactions and Reports Analysis Center of Afghanistan (FinTRACA), Afghanistan's FIU; and provisions providing the authority to confiscate funds or property, to dispose of such property, and to hold seized assets in an asset recovery/sharing fund. Fit and Proper Regulations help ensure financial institutions are well managed and persons who own or control them are competent and meet certain criteria. Cash Courier Regulations establish a cross-border currency reporting requirement and ensure that seizure or restraint of funds is authorized when money laundering is suspected.

Although Afghanistan's Law on Extradition of the Accused, Convicted Individuals, and Legal Cooperation allows for extradition based upon multilateral arrangements, such as the 1988 UN Drug Convention, Article 28 of the Afghan Constitution requires reciprocal agreements between Afghanistan and the requesting country. The United States does not have an extradition treaty with Afghanistan and cannot reciprocate under the multilateral treaties. There is no bilateral MLAT between the United States and Afghanistan, but both countries are parties to multilateral conventions that provide a legal basis for assistance.

Afghanistan is a member of the APG, a FATF-style regional body. Its most recent MER is available at: <http://www.apgml.org/members-and-observers/members/member-documents.aspx?m=69810087-f8c2-47b2-b027-63ad5f6470c1>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Afghanistan should fully apply market manipulation and counterfeiting as predicates for money laundering and strengthen supervision of financial institutions and DNFBPs, to ensure their compliance with AML regulations.

While FinTRACA has made progress in regulating and requiring reporting from hawalas, regulatory bodies should continue to seek to expand supervision and implementation of the MSB/hawala licensing program. The central bank should continue to enhance its AML/CFT supervision capabilities for bank and non-bank financial institutions. The central bank should improve its outreach program to hawala operators about licensing and reporting requirements.

Despite their status as covered entities under the AML laws, precious metals and stones dealers, lawyers, accountants, and real estate agents are not supervised for AML compliance. Afghanistan should be supervising these sectors consistently with their AML risk profile and national legislation.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The poor security environment limits central bank supervision and FIU regulation of MSBs and money exchanges. Regulators and enforcement officers need adequate security and resources to supervise the financial sector and investigate financial crimes.

Afghanistan's Attorney General's Office (AGO) and law enforcement authorities are hampered by limited resources, lack of technical expertise, poor coordination with counterpart agencies, lack of full independence, and poor infrastructure.

Many hawalas use the formal banking sector for day-to-day operations and to settle balances with other hawalas both domestically and abroad. However, hawalas generally fail to file STRs because they believe it is the responsibility of the bank, an issue FinTRACA asserts it is addressing. Insurance companies and securities dealers are also required to file STRs, but the government does not fully enforce this requirement.

When working with the AGO, FinTRACA often faces administrative hurdles regarding prosecution, some of them likely due to corruption, which limit further cooperation. The AGO's management team, seated in the second half of 2016, has yet to effectively grapple with weak prosecutorial capacity to pursue money laundering cases and asset seizures. Furthermore, the Afghan government has yet to implement fully a recovery mechanism for the value of assets seized, and, therefore, no entity, including the police and courts, has responsibility for post-conviction asset recovery or for the use or equitable sharing of the assets.

In 2018, requests for FinTRACA products increased 30 percent over 2017, and compliance fines surpassed the 2017 total. FinTRACA also continues to conduct surveys of hawalas, a process that began in 2017. FinTRACA, along with interagency counterparts, looks for unregistered hawalas and reviews the books of registered hawalas for evidence of AML compliance. FinTRACA continues to create and propose new MOUs with partner Afghan government agencies to help strengthen the country's AML/CFT regime.

Kabul International Airport lacks effective currency controls for all passengers and cargo. Afghanistan should strengthen inspection controls and enforcement of the currency declaration regime at airports.

Law enforcement officers, prosecutors, and judges need continued training on effective, lawful asset seizure. The GNU should continue to improve seizure and confiscation procedures in cases involving narcotics and drug trafficking and should work with international partners to implement procedures for money laundering seizures.

Albania

OVERVIEW

The Government of Albania made no significant progress toward thwarting money laundering and financial crimes in 2018. Albania remains vulnerable to money laundering due to corruption, growing organized crime networks, and weak legal and government institutions. The country has a large cash economy and informal sector, with significant money inflows from abroad in the form of remittances. Major proceeds-generating crimes in Albania include drug trafficking, tax evasion, and smuggling. Other significant predicates include counterfeiting, arms smuggling, and human trafficking. Smuggling is facilitated by weak border controls and customs enforcement. Albania serves as a base of operations for organized crime organizations operating in the United States, Europe, the Middle East, and South America. Recent justice reforms, vetting of judges and prosecutors for corruption and ties to organized crime, and the creation of a police task force targeting organized crime activities have created a positive trajectory for Albania to address money laundering and financial crimes. These efforts, however, are still challenged by pervasive corruption.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Narcotics trafficking or smuggling and illegal business dealings of organized crime gangs are the major sources of illicit funds. Albania's proximity to Western Europe, its location along heroin smuggling routes, and the presence of Albanian organized crime in Western Europe and South America have elevated the country's risk for money laundering.

Real estate, business development projects, and gaming are among the most prevalent methods of hiding illicit proceeds. In 2018, Albania passed a law to ban sports betting, online casinos, and bookmakers and to limit brick and mortar casinos. This legal change is expected to restrict criminals' ability to hide illicit funds.

KEY AML LAWS AND REGULATIONS

There was no new AML legislation in 2018. Albania has KYC and STR requirements in place. In 2016 and 2017, the Albanian Parliament passed several significant constitutional and legal reforms aimed at tackling corruption and organized crime, including reforms of the justice system, vetting of judges and prosecutors for unexplained wealth, and a revamped law governing

asset forfeiture. Nearly half of the vetted judges and prosecutors to date have failed vetting as a result of unexplained wealth. The Albanian State Police has a dedicated Economic Crime Unit tasked with AML efforts.

Albanian law requires annual asset disclosure by public officials. The law was strengthened in 2017 to require officials to declare preferential treatment and beneficial ownership of assets. Provisions prohibiting officials from keeping substantial cash outside of the banking system also exist.

Albania and the United States do not have a MLAT, but cooperation is possible through multilateral conventions.

Albania is a member of MONEYVAL, a FATF-style regional body. Its most recent MER is available at <https://www.coe.int/en/web/moneyval/jurisdictions/albania>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The substantial criminal code reforms of 2016 and 2017 are meant to build a more effective system, but implementation of these reforms is still ongoing. Albanian courts often refuse to convict for money laundering absent a conviction for a predicate offense, even though this is not specifically required by law.

In 2017, Albanian law was amended to improve non-conviction-based forfeiture and empower prosecutors to pursue asset forfeiture. Despite these legal changes, there has not been a significant increase in forfeiture. A new policy, which took effect in 2018, requires all prosecutors to conduct financial investigations and confiscate criminal assets. If implemented properly, the legal and policy changes should result in better outcomes in money laundering and financial crime cases.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Albania has a substantial black market for smuggled goods that is facilitated by weak border controls and customs enforcement. Albania must implement the laws effectively and continue to develop the capacity of its police and prosecutors to focus on corruption, money laundering, and economic crimes.

Despite a sizeable number of money laundering investigations in recent years, the number of related prosecutions remains low. The most recent statistics from the Prosecutor General's Office, reflecting 2017 data, list a total of 320 proceedings for money laundering and related crimes, with 52 defendants sent to trial and 35 convicted. A specialized prosecution office and investigative agency to counter organized crime and corruption is expected to be operational in 2019.

The government has taken steps to combat official corruption. The Serious Crimes Prosecution Office convicted four judges, including a Supreme Court judge, while four other judges still await trial. In the 2017 case of the Supreme Court judge, prosecutors seized approximately

\$57,000 (€50,000) from a bank account using, for the first time, Albania's legal provision allowing the confiscation of assets of corresponding value equivalent to criminal proceeds. In other cases, a prosecutor, a prison official, and a mayor have been convicted of corruption offenses. In 2018, prosecutors sequestered land belonging to the former prosecutor general, pending an investigation into suspected criminal activity. In the context of ongoing EU accession efforts, political will to investigate high-level officials may be strengthening.

Algeria

OVERVIEW

The extent of money laundering through Algeria's formal financial system is understood to be minimal due to stringent regulations and a banking sector dominated by state-owned banks. Algerian authorities monitor the banking system closely. The system is highly bureaucratic and provides for numerous checks on all money transfers. The continued prevalence of archaic, paper-based systems and banking officials not trained to function in the modern international financial system further deter money launderers who are more likely to use sophisticated transactions. However, a large informal, cash-based economy, estimated at 40 percent of GDP, is vulnerable to abuse by criminals. The real estate market is particularly vulnerable to money laundering. Notable criminal activity includes trafficking, particularly of drugs, cigarettes, arms, and stolen vehicles; theft; extortion; and embezzlement. Public corruption and terrorism remain serious concerns. Additionally, porous borders allow smuggling to flourish.

The country is generally making progress in its efforts to combat money laundering and financial crimes. Over the past several years, the government has updated its criminal laws on terrorist financing and issued new guidelines for the Bank of Algeria and the Ministry of Finance's Financial Intelligence Processing Unit (CTRF), Algeria's FIU.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The restricted convertibility of the Algerian dinar enables the Central Bank of Algeria to monitor all international financial operations carried out by banking institutions. Money laundering in Algeria occurs primarily outside of the formal financial system through, for example, abuse of real estate transactions and commercial invoice fraud. Algerian authorities are increasingly concerned by cases of customs fraud, use of offshore havens for tax evasion or to hide stolen assets, and incidences of TBML. The sprawl of the informal economy and extensive use of cash heighten the risk of financial crimes.

Al-Qaida in the Islamic Maghreb, which operates in parts of Algeria, is known to raise money through drug trafficking as well as extortion and taxes imposed on smugglers.

KEY AML LAWS AND REGULATIONS

There were no legislative changes noted in 2018. The following laws are applicable to money laundering in Algeria: Executive Decree no. 06-05, addressing STR requirements; Executive

Decree no. 13-157 on the creation, organization, and functioning of the CTRF; Executive Decree no. 15-153, fixing the thresholds for payments that must be made through the banking and financial systems; and Law no. 16-02, establishing rules for the application of the penal code to AML/CFT. AML provisions in Algeria impose data collection and due diligence requirements on financial institutions processing wire transfers, with stricter requirements for cooperation with law enforcement authorities, upon request, for transfers exceeding \$1,000. In addition, all payments for certain purchases in excess of approximately \$44,200 for real estate or approximately \$8,800 for goods and services must be completed via the banking system. Noncompliance with these provisions could result in sanctions against the individual and/or financial institution.

The United States-Algeria MLAT, signed in April 2010, was ratified by the United States and Algeria and entered into force on April 20, 2017.

Algeria is a member of the MENAFATF, a FATF-style regional body. Its most recent MER is available at: <http://menafatf.org/information-center/menafatf-publications/mutual-evaluation-report-peoples-democratic-republic>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Challenges remain in implementation of Algeria's AML regime. A self-analysis by the CTRF continues to identify a need to increase the quality of banks' reporting, although CTRF has noted an improvement in the last two years. While the CTRF has provided some information on the number of cases it is processing, additional information would be needed to evaluate implementation.

Only foreign PEPs are covered under enhanced due diligence requirements.

No information is available on money laundering prosecutions or convictions.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The CTRF actively analyzes STRs, compiles and disseminates AML-related information to banks, and engages in some level of quantitative and qualitative self-analysis. A CTRF report for the first half of 2018 indicated that STR filings were up slightly from 2017 after a sharp decline from 2016. Officials at the CTRF explained the earlier decline was due to the implementation of reforms in reporting procedures at banks as well as newly applied technology allowing banks to more efficiently determine whether transactions may be related to money laundering.

Antigua and Barbuda

OVERVIEW

Antigua and Barbuda has improved its AML regime. The country finalized a National Risk

Assessment (NRA) in 2018, but has yet to implement all of the recommendations. As of June 2017, the financial sector includes six domestic banks, 12 international banks (offshore banks), 20 insurance companies, one international insurance company, four MSBs, and six credit unions. As of December 2016, the offshore sector hosted 5,102 IBCs, of which 3,635 were active.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Antigua and Barbuda reports the major sources of illicit funds as corruption, drug trafficking, and fraud. The majority of corruption cases addressed by law enforcement are responsive to Letters of Request received from foreign jurisdictions. Front operations, wire transfers, and structuring deposits are the main means of money laundering.

Antigua and Barbuda has one small FTZ that authorities do not believe is involved in money laundering activity. AML experts identify international banks, MSBs, and the insurance sector as the most vulnerable sectors. In October 2018, the government reported a decline in international gaming companies from four to three, the number of active IBCs is less than 1,300, and international banks have declined to nine. The country reports that international banks contribute less than 0.5 percent of GDP.

Following legislative changes in 2017, corporate management and trust service providers are now submitting to supervisors annual attestations of changes to beneficial ownership, including ultimate beneficial owners (natural persons) of IBCs.

The Citizenship by Investment (CBI) Unit receives citizenship applications through local licensed agents. Agents must be citizens of Antigua and Barbuda, resident in-country for at least seven years, and hold a place of business in Antigua and Barbuda. The Money Laundering (Prevention) Act 1996 (MLPA) covers agents as financial institutions; therefore, agents are subject to AML obligations. Authorized representatives, based locally and abroad, market the CBI program and may be the first point of contact for applicants. Authorized representatives do not have the same citizenship and residency requirements as authorized agents.

Applicants for citizenship undergo a vetting process, including due diligence background checks. Citizens of Afghanistan, Iraq, Iran, Libya, North Korea, Sudan, and Yemen are not eligible unless they lawfully demonstrate their possession of permanent residency for at least ten years in the United Kingdom, the United States, Canada, the United Arab Emirates, New Zealand, Saudi Arabia, or Australia. Applicants must also demonstrate they no longer maintain economic ties with the restricted country.

KEY AML LAWS AND REGULATIONS

The MLPA, the Money Laundering (Prevention) Regulations 2017, and the Money Laundering & Financing of Terrorism Guidelines form the legal AML framework of the country. This framework imposes obligations on financial institutions and DNFBPs to create AML policies and internal controls; to implement KYC, record keeping, and STR reporting procedures; and to develop staff vetting and training programs. The statutes also create the framework for law enforcement measures to include investigations, seizures, forfeitures, and confiscations. The

country has enhanced due diligence for PEPs.

In 2018, the MLPA was amended to appoint the Eastern Caribbean Central Bank as Supervisory Authority for all financial institutions licensed under the Banking Act.

Antigua and Barbuda has a MLAT and a Tax Information Exchange Agreement with the United States.

Antigua and Barbuda is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/4th-round-meal-reports>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

AML legislation covers legal persons, but the penalties for noncompliance have not been strong deterrents. Amending the legislation to strengthen the sanctions for noncompliance would deter illegal activity.

The supervision of DNFBPs is inconsistent and not risk-based. Except for procedures during the initial licensing of DNFBPs, there are no formal fit and proper arrangements to prevent criminals from holding a management function in certain DNFBPs. Furthermore, not all DNFBPs have been applying the enhanced due diligence criteria for PEPs. The country created a training series for DNFBPs regarding this issue.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The government has developed a national action plan to address the issues noted in the NRA. Officials report the National Anti-Money Laundering Oversight Committee and other relevant agencies are also amending their policies and procedures accordingly.

There are specialized units with primary roles for the investigation of money laundering, financial crimes, and specific predicate offenses for money laundering. For the period of 2017-2018, there were 45 money laundering cases. Four resulted in convictions and 41 are still in the prosecution stage. Currently, there are 12 ongoing investigations, four of which involve foreign jurisdictions. Communication between intelligence agencies, the FIU, and law enforcement is being improved through increased meetings at the coordinating and operational levels.

The country is exercising its powers under the Proceeds of Crime Act. Authorities have been actively and successfully freezing and forfeiting assets over the last several years.

Antigua and Barbuda implemented a mandatory risk-based approach to AML for financial institutions; however, many DNFBPs continue to be subject to rules-based supervision.

The police force uses polygraphing for all new recruits and senior staff.

Argentina

OVERVIEW

Argentina faces many of the same challenges confronted throughout the region, including stemming the tide of illicit proceeds from narcotics trafficking and public corruption. The Tri-Border Area (TBA) shared with Brazil and Paraguay is one of the principal routes into Argentina for multi-billion dollar counterfeiting, drug trafficking, TBML, and other smuggling offenses. The terrorist organization Hizballah has significant financing operations in the TBA. Although moving in the right direction, Argentina has important progress to make in implementing adequate mechanisms to effectively prevent, detect, investigate, and prosecute money laundering and related crimes.

Under President Macri, Argentina has taken significant steps to strengthen its AML/CFT regime. In 2018, the government advanced several high-profile anti-corruption prosecutions that have boosted public confidence in AML/CFT enforcement in the country. Despite these positive steps, limited regulatory and criminal enforcement capabilities continue to raise concerns about the government's ability to significantly reduce the flow of illicit proceeds and combat the predicate offenses that generate them.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Contraband smuggling, including narcotics trafficking, and public corruption are significant sources of illicit proceeds. Drug-related crimes have increased in Argentina in the last decade, and Argentina is not only a transit country but also a consumer and exporter of narcotics and precursors. Tax evasion and the sale of counterfeit goods also generate significant amounts of revenue. TBML schemes also have been detected.

Various sectors of the economy are vulnerable to exploitation due, in part, to the lack of effective regulatory oversight. Financial institutions, both state and private, MVTs businesses, exchange houses, real estate, and gaming are particularly susceptible. Unregulated exchange houses still operate, although Argentina abolished its official exchange rate, making the unofficial rate offered less attractive. Argentina also lacks adequate controls at points of entry to prevent cross-border transport of contraband and bulk cash. Its cash-intensive economy and large informal sector create additional opportunities for criminals to inject illicit proceeds. Criminal operations often utilize offshore jurisdictions and establish legal entities in other countries to launder illicit proceeds internationally.

KEY AML LAWS AND REGULATIONS

In 2018, under a new law, the government significantly increased the use of cooperating witnesses in anticorruption cases. This approach helped accelerate the pace of prosecutions in one of the country's largest-ever corruption investigations. Argentina has negotiated tax information exchange agreements with several countries, including the United States, which facilitates increased transparency of offshore assets held by Argentine nationals.

Foreign and domestic PEPs are subject to enhanced due diligence.

Argentina is a member of the FATF and of the GAFILAT, a FATF-style regional body. Its most recent MER is available, in Spanish only, at: <http://www.gafilat.org/index.php/es/biblioteca-virtual/miembros/argentina/evaluaciones-mtuas/8-argentina-3a-ronda-2010>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Despite recent reforms and clear political will to effect change, effective implementation of the AML regime continues to be a significant challenge for the government. Argentina is in the process of conducting separate national risk assessments for money laundering and terrorist financing, but has not completed the exercises yet. No national AML/CFT strategy currently exists. Many DNFBPs have no sectoral regulator, and the FIU does not have the resources to adequately supervise them for AML compliance. Full implementation of the CTR requirement and use of a risk-based approach will likely take years.

Argentina lacks an adequate legal framework to control contraband and bulk cash smuggling. It also lacks a full legal framework to seize, manage, and forfeit illicit assets. Bulk cash smuggling presents a significant challenge given inadequate border controls and lack of resources for outbound enforcement of customs laws.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Since December 2015, Argentina has made a strengthened and professional FIU central to its AML/CFT strategy, and the FIU made significant upgrades to improve its operational effectiveness. The FIU has an outsized role in the AML regime, largely in response to both a lack of law enforcement capacity and an absence of clear AML strategies by other stakeholders. The FIU participates as a party to criminal cases, strengthening otherwise weak interagency coordination on AML cases. The compartmentalization of information and inadequate coordination between the FIU and security forces present a significant challenge.

Argentina and the United States have a MLAT in place. The United States and Argentina participate in the Argentina-U.S. Dialogue on Illicit Finance (AUDIF), a bilateral initiative to identify shared money laundering and terror financing threats and vulnerabilities and implement counter-strategies. In 2018, the FIU took decisive action against a transnational criminal organization operating in the TBA, which, among other things, is suspected of financing Hizballah, smuggling, and laundering money through a TBA casino. The United States provided assistance to the FIU, as the target entity, Clan Barakat, is listed by the U.S. Treasury Department's Office of Foreign Assets Control as a Specially Designated Global Terrorist.

Argentina has implemented reforms to allow enhanced use of informants, undercover officers, and cooperating witnesses in drug trafficking investigations. Widespread use of these measures has not yet occurred, partly because investigators, prosecutors, and judges are inexperienced in their use.

Notwithstanding several high-profile corruption-related prosecutions in 2018, regime effectiveness, as measured by convictions, asset forfeiture, and regulatory enforcement, has been limited. Systemic deficiencies in Argentina's criminal justice system persist, including lengthy delays, a lack of judicial and prosecutorial independence, and inexperience among judges and prosecutors in investigating financial crimes.

Armenia

OVERVIEW

Armenia is gradually strengthening its money laundering legislation to match international standards, but deficiencies remain. There were four money laundering convictions in 2017. Money laundering crimes in Armenia likely continue to go unreported and undetected.

The April-May 2018 "Velvet Revolution" brought a new government to power that has made fighting corruption, including money laundering, a top reform priority. The government has discussed with U.S. law enforcement how to improve legislation to facilitate investigations into money laundering and other forms of financial crime.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Armenia is located on a trade route between narcotics source countries and European and Russian markets. Armenia maintains control over law enforcement, prosecution, and judiciary functions. However, Russian border guards staff the land borders with Turkey and Iran and provide immigration staff at international airports in Yerevan and Gyumri.

The new government has been outspoken about fighting corruption and narcotics trafficking, although smuggling, the shadow economy, significant inflows of remittances from abroad, the hiding of assets within the real estate sector, and the use of cash remain widespread and constitute vulnerabilities. Casinos are legal and regulated by the Ministry of Finance.

Armenia has produced relatively few criminal convictions pertaining to money laundering, which is a function of broad weaknesses in the rule of law and judicial independence.

KEY AML LAWS AND REGULATIONS

Article 190 of Armenia's Criminal Code criminalizes money laundering. The Central Bank of Armenia regulates the financial sector, including the banks that account for about 90 percent of all financial system assets. The financial sector is required to implement KYC provisions and report suspicious transactions to the Financial Monitoring Center (FMC), Armenia's FIU.

Amendments in 2018 to AML legislation strengthen Armenia's sanctions regime with regard to proliferation of weapons of mass destruction. Armenia has an interagency action plan that reassesses major categories of threats and vulnerabilities.

Requirements concerning KYC, STRs, and enhanced due diligence for PEPs are stipulated in Armenia's AML/CFT Law and the Regulation on Minimum Requirements to Reporting Entities. The identity of beneficial owners must be disclosed to the State Register.

There is no mutual legal assistance treaty with the United States.

Armenia is a member of the MONEYVAL, a FATF-style regional body. Its most recent MER is available at: [http://www.fatf-gafi.org/media/fatf/documents/reports/mer-fsrb/MONEYVAL\(2015\)34_5thR_MER_Armenia.pdf](http://www.fatf-gafi.org/media/fatf/documents/reports/mer-fsrb/MONEYVAL(2015)34_5thR_MER_Armenia.pdf).

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Legal persons are not subject to criminal penalties for money laundering.

Asset forfeiture is not normally included as part of money laundering investigations and prosecutions. There is no single authority responsible for administering seized assets. Non-conviction based forfeiture has been discussed by the government, which concluded this type of confiscation would contradict the fundamental principles of Armenian law.

DNFBPs are not adequately supervised and compliance with CDD, record keeping and reporting measures is haphazard. Domestic PEPs are not subject to enhanced due diligence.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Armenian courts handed down four convictions in 2017 that involved elements of money laundering, including one conviction for a stand-alone money laundering offense. The FMC stated in October 2018 that law enforcement efforts involving elements of money laundering have substantially intensified since the May change of government.

As part of these efforts to prosecute money laundering-related crimes, Armenia should provide criminal penalties for legal persons involved in money laundering; enhance the capacities and independence of enforcement authorities to effectively identify, trace, and seize assets at all stages of investigations; criminalize tipping off of individuals under investigation; ensure all reporting sectors provide mandated financial intelligence reports; criminalize misrepresentation; and create vetting mechanisms to prevent corrupt criminal actors from serving as owners or managers of DNFBPs. Armenian authorities should also review informal transfer systems from the large Armenian migrant worker population in Russia that may pose money laundering vulnerabilities.

Aruba

OVERVIEW

Aruba is not considered a regional financial center. Because of its location, Aruba is a transshipment point for drugs from South America bound for the United States and Europe, and for currency flowing in the opposite direction.

Aruba is an autonomous country within the Kingdom of the Netherlands (Kingdom). The Kingdom retains responsibility for foreign policy and defense, including signing international conventions. In 2016, Aruba, Sint Maarten, the Netherlands, and Curacao signed an MOU with the United States for joint training activities and sharing of information in the area of criminal investigation and law enforcement. One priority area is interdicting money laundering operations. The MOU activities are ongoing.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Bulk cash smuggling represents a risk due to the location of Aruba between North and South America. Money laundering is primarily related to proceeds from illegal narcotics trafficked by criminal organizations and occurs through gold transfers, real estate purchases, and international tax shelters. Real estate firms and tax trust companies are subject to KYC provisions and FIU reporting obligations. There is no significant black market for smuggled goods on Aruba.

The Free Zone Aruba NV (FZA) is a government-owned limited liability company that manages and develops the free zones. Service companies can set up business outside of the designated customs-controlled free zones. All companies with free zone status are reviewed and controlled by the FZA, which has an integrity system in place to deter illegal activities, including smuggling and money laundering. Financial services, banks, and insurance companies are not permitted to operate in the free zones. There are 13 casinos and online gaming is allowed, subject to KYC and FIU reporting requirements.

KEY AML LAWS AND REGULATIONS

Fraud is a crime and counterfeiting and piracy of products are predicate offenses to money laundering. Licensing is now required for a variety of businesses. KYC laws cover banks, life insurance companies and insurance brokers, money transfer companies, investment companies and brokers, factoring and leasing companies, trust and company service providers, car dealers, casinos, lawyers, civil notaries, accountants, tax advisors, realtors, and dealers in precious metals, stones, and other high-value objects.

The Kingdom may extend international conventions to the autonomous countries within the Kingdom, though the respective parliaments must approve the conventions for them to become law. The Kingdom extended the application to Aruba of the 1988 UN Drug Convention in 1999 and the UNTOC in 2007. With the Kingdom's agreement, each autonomous country can be assigned a status of its own within international or regional organizations, subject to the organization's agreement. The individual countries may conclude MOUs in areas in which they

have autonomy, as long as these MOUs do not infringe on the foreign policy of the Kingdom as a whole.

The 2004 U.S.-Netherlands MLAT, incorporating specific U.S.-EU provisions, was not extended to Aruba.

Aruba is a member of the CFATF, a FATF-style regional body, and, through the Kingdom, the FATF. Its most recent MER is available at: <https://www.cfatf-gafig.org/index.php/documents/cfatf-mutual-evaluation-reports/aruba-2>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The Kingdom has not yet extended the application of the UNCAC to Aruba.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Aruba is a member of the Global Forum on Transparency and Exchange of Information for Tax Purposes. Aruba does not have a STR system but rather a broader unusual transaction reporting system. Service providers are required to report large cash transactions of \$14,000 or more, wire transactions of \$278,000 or more, other unusual transactions, and transactions suspected to be related to money laundering or terrorist financing.

The 1983 MLAT between the Kingdom and the United States applies to Aruba and is regularly used by U.S. and Dutch law enforcement agencies for international drug trafficking and money laundering investigations. Aruba has adopted the Agreement Regarding Mutual Cooperation in the Tracing, Freezing, Seizure and Forfeiture of the Proceeds and Instrumentalities of Crime and the Sharing of Forfeited Assets, which was signed by the Kingdom in 1994.

The State Ordinance for the Prevention of and Combating Money Laundering and Terrorist Financing (AML/CFT State Ordinance) includes rules for the identification and verification of clients and the reporting of unusual transactions to prevent and combat money laundering when providing certain services. Non-regulated financial service providers (including investment brokers and factoring and leasing companies) and DNFBPs must also comply with the requirements of the AML/CFT State Ordinance and must register with the Central Bank of Aruba.

In the reporting period, there were numerous investigations and prosecutions for money laundering, including an ongoing investigation into a former politician. An Aruban court sentenced four suspects to prison for illegal underground banking, money laundering, cash transfers, and for not complying with the KYC rule. The judge ruled the men used the underground bank as a conduit for money laundering by criminal organizations. The men transferred money from Aruba to China and from Aruba to Sint Maarten and Anguilla. The main suspect also coordinated money transfers for people from Suriname, Colombia, and Venezuela to China and Aruba. An Aruban official residing in Florida pleaded guilty to money laundering charges in connection with his role in a scheme to arrange and receive corrupt

payments to influence the awarding of contracts with an Aruban state-owned telecommunications corporation.

The FIU held awareness-raising events for regulated entities.

Azerbaijan

OVERVIEW

Azerbaijan is both a transit point between the East and West, given its geographic location, and a conduit for illicit funding, given its economic difficulties. The majority of foreign investment and international trade in Azerbaijan continues to be in the energy sector. Azerbaijan's government is working to diversify the economy away from energy by prioritizing investments in agriculture, tourism, trade logistics, telecommunications, and information technology. The economic realities of a weak currency and a poorly supervised financial sector, coupled with Azerbaijan's physical location between Iran and Russia, create an environment conducive to the transit of illicit funds.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The major source of criminal proceeds in Azerbaijan continues to be public corruption across all sectors and agencies within the government. In addition, the Afghan drug trade generates significant illicit funds, some of which transit Azerbaijan. Robbery, tax evasion, smuggling, trafficking, and organized crime also generate illicit funds. Money laundering likely occurs in the financial sector, including in non-bank financial entities and alternative remittance systems. Azerbaijan also possesses a significant black market for smuggled goods for sale domestically and is a transit point for smuggled cargo.

KEY AML LAWS AND REGULATIONS

The key Azerbaijani AML law is the 2009 "Law on the Prevention of Legalization of Criminally Obtained Funds or Other Property and the Financing of Terrorism" (AML/CFT Law). Subsequently in 2009, in order to bring existing legislation into compliance with this law, the "Law of the Republic of Azerbaijan on Changes and Amendments to Some Legislative Acts of the Republic of Azerbaijan in Connection with Implementation of the AML/CFT Law" was adopted. In 2010, the "Law of the Republic of Azerbaijan on Amendments to Individual Legislative Acts of the Republic of Azerbaijan to Enhance the Prevention of the Legalization of Criminally Obtained Funds or Other Property and the Financing of Terrorism" was adopted, amending the Criminal Code and the AML/CFT Law. Amendments to the AML/CFT Law in July 2018 name the Financial Monitoring Service (FMS), the FIU, as the supervisor of pawnshops and persons providing intermediary services for the purchase and sale of real estate.

The FMS was established as a new independent FIU on May 25, 2018. The FIU structure was further clarified in July 2018 via amendments to Azerbaijan's AML/CFT Law. Previously, FMS had been part of the Financial Markets Supervisory Authority (FMSA).

In 2018, the new FMS succeeded its predecessor as a member of the Egmont Group. The FMS and the FIUs of Moldova, Belarus, Turkey, Macedonia, Russia, and Iran have signed AML/CFT information sharing agreements. Azerbaijan is in the process of developing MOUs for AML cooperation between the FMS and the FIUs of several other countries.

Azerbaijan is a member of MONEYVAL, a FATF-style regional body. Its most recent MER can be found at: <https://www.coe.int/en/web/moneyval/jurisdictions/azerbaijan>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Legal persons are not criminally liable for money laundering, and the acquisition, possession, and use of property obtained with illicit funds is criminalized only for “significant amounts.” While Azerbaijan’s regulators are working to address recognized deficiencies, at present, banks are not legislatively required to share customer information with correspondent banks, and sanctions pertaining to financial institutions are not effective, proportionate, or dissuasive. Furthermore, loopholes exist inhibiting proper identification of PEPs.

The AML law excludes dealers of arts, antiques, and other high-value consumer goods; entities dealing with jewelry and precious metals; travel agencies; and auto dealers from the list of covered entities. These entities are not required to maintain customer information or report suspicious activity.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

In November 2016, the president signed a decree approving the Action Plan for 2017–2019 on the “Fight against Legalization of Criminally Obtained Funds and Other Properties and Financing of Terrorism.” Azerbaijan’s FMS subsequently placed an affirmative obligation on financial institutions to report money laundering activities, including designation and placement of an offending party on the FMS website as a “designated person.” As a result of this designation, FMS, through the relevant government ministries, is able to freeze the assets of the named individual/entity.

Though implementing ministries are required to submit annual reports and action plans to the Cabinet of Ministers and the Commission on Combating Corruption, these reports are not publicly available.

Bahamas

OVERVIEW

Due to its proximity to Florida, the Bahamas remains a transit point for trafficking in illegal drugs, firearms, and persons to and from the United States. Money may be laundered through purchase of real estate and precious metals and stones. In addition, as an international financial

center, the country is vulnerable to money laundering through financial service companies. In 2018, the Bahamas took significant steps toward strengthening identified AML deficiencies.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The Bahamas' proximity to Florida makes the country a transit point for drugs heading to the United States. Proceeds from facilitating drug transit, particularly bulk cash payments to local individuals and criminal gangs, are a key concern. Other sources of laundered proceeds include firearms trafficking, human smuggling and trafficking, and fraudulent commercial transactions, including tax fraud.

The Bahamas is an international business and financial center with an open economy. The high volume of large, cross-border asset transactions enhances the risk of money laundering through private banks, trust services, insurance companies, and corporate service providers. Other money laundering methodologies may include purchase of real estate and precious metals and stones.

Current information on the extent of offshore activities is not available. At yearend 2014, total assets of the banking industry were U.S. \$279.2 billion, approximately 44 times the country's GDP, with 96 percent of assets in the offshore sector. There are 67 investment fund administrators holding U.S. \$134.6 billion under administration and 849 investment funds. Additionally, there were 105 private trust companies, 310 financial corporate service providers, 694 registered foundations and 173,907 registered IBCs. IBCs can be formed in one to two days. The Bahamas does not maintain official records of company beneficial ownership, or require resident paying agents to tell the domestic tax authorities about payments to non-residents.

The Bahamas has three large casinos, including the Caribbean's largest casino (the U.S. \$3.5 billion Chinese Export-Import Bank-funded Baha Mar megaresort). Casino gaming is restricted to foreign visitors. Bahamian citizens and permanent residents may engage in pari-mutuel betting on U.S. lotteries and sporting events through "web shops," which are licensed by the Gaming Board and are subject to AML and STR requirements. The Gaming Board retains the ability to observe operations, including account transactions, in real time from remote locations.

The country's only FTZ is the city of Freeport, Grand Bahama, administered and managed by a private entity, the Grand Bahama Port Authority. The FTZ serves primarily as a manufacturing and transshipment hub with stringent container screening measures.

KEY AML LAWS AND REGULATIONS

In 2018, the Bahamas took significant steps to strengthen its AML regime, notably by passing an enhanced Financial Transactions Reporting Act strengthening KYC rules, STR procedures, risk assessment obligations for financial institutions and DNFBPs, and CDD regarding beneficial owners and PEPs. In addition, an enhanced Proceeds of Crime Act introduces unexplained wealth orders and non-conviction-based forfeiture, while a comprehensive Anti-Terrorism Act addresses terrorist financing and proliferation.

In August 2018, financial regulators issued several Guidance Notes related to prevention of money laundering and proliferation financing, as well as financial crime risk management. Finally, the government passed a strengthened Travelers' Currency Declaration Act. Additional legislation awaiting Parliamentary approval include a Beneficial Ownership Register Bill that requires declaration of beneficial ownership information to a designated authority, and a Non-Profit Bill to regulate and supervise non-profits.

The Bahamas is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/media/fatf/documents/reports/mer4/cfatf-4meval-bahamas.pdf>.

The Bahamas exchanges records in connection with narcotics investigations or proceedings pursuant to a bilateral treaty on mutual assistance in criminal matters.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The Bahamas needs to address recognized deficiencies in its AML/CFT regime by demonstrating risk-based supervision of non-bank financial institutions and ensuring timely access to adequate beneficial ownership information. Increasing the quality of the FIU's products would better assist law enforcement to investigate and prosecute all types of money laundering, lead to successful forfeiture proceedings related to AML cases, and address gaps in terrorism and proliferation financing frameworks.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The Bahamas began implementing the OECD's Common Reporting Standard for tax information exchange in September 2018.

Considering the size and character of the international financial sector, the number of filed STRs is low. In 2018, the FIU received only 332 STRs from both domestic and offshore entities, down from 446 in 2017.

The National Anti-Money Laundering Task Force held 25 meetings in 2018. As provided for in the amended Proceeds of Crime Act, as of August 2018 the task force has been reconstituted as the Identified Risk Framework Steering Committee.

In 2018, 32 investigations resulted in 34 persons being charged with money laundering offenses. There were 13 convictions in the same period. In 2017, there was only one prosecution.

Barbados

OVERVIEW

Barbados has made limited progress improving its AML regime. Barbados has completed an initial risk assessment identifying drug trafficking as the main source of money laundering in the country and is in the process of completing a more comprehensive National Risk Assessment (NRA) amid concerns the NRA may not have been sufficient to identify significant national money laundering risks and vulnerabilities. Barbados has an active international financial services sector. It does not have FTZs or an economic citizenship program.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Barbados reports the major source of illicit funds is drug trafficking. National measures taken to address this risk include targeted controls at the points of entry, increases in maritime patrols in the waters around Barbados, and the use of intelligence by competent authorities. The extensive use of cash in routine business transactions and the comingling of illicit and legitimate funds in the financial system pose additional money laundering challenges.

The Central Bank of Barbados (CBB) licenses commercial banks and holding companies, trusts, and merchant banks. There are 28 international banks, 16 of which engage in third-party business, including such activities as trust and portfolio/investment management. As of December 31, 2015, (the most recent available data) total assets reported by international banks were approximately \$41 billion (82 billion Barbadian dollars). Four banks were managing third-party assets ranging from approximately \$150 million (300 million Barbadian dollars) to approximately \$2.5 billion (5.5 billion Barbadian dollars) at the end of 2015.

The Financial Services Unit (IBFSU) of the Ministry of International Business and Industry is responsible for establishing the legislative/supervisory framework for international business and financial services, including international trust and corporate service providers. There are no clear statistics available on the IBC sector.

The high volume of U.S. currency in circulation in Barbados relates primarily to tourism. Barbados government authorities and U.S. government law enforcement representatives assess that a substantial quantity of these dollars do not come from illicit activity. Barbados does not have any offshore banks or other institutions that would put it at higher risk than its Eastern Caribbean counterparts.

KEY AML LAWS AND REGULATIONS

The primary legislation is the Money Laundering and Financing of Terrorism (Prevention and Control) Act, 2011-23 (MLFTA). It includes KYC and STR regulations and covers the international financial services sector. Barbados has a Proceeds of Crime Act (POCA) that is currently under review.

Barbados has a Double Taxation Treaty and a Tax Information Exchange Agreement with the United States.

Barbados is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/cfatf-documents/mutual-evaluation->

[reports/barbados-1/9145-barbados-4th-round-mer/file.](#)

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The POCA does not include an explicit provision for cash seizures, so Barbados has used its Exchange Control Act for forfeitures. Barbados recognizes this practice is insufficient and is drafting new legislation to address this issue. Additionally, a new NRA is still underway and could identify additional deficiencies.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

There are several areas Barbados should address in order to align with international best practices, including completing a new NRA, improving the monitoring process of PEPs, correcting technical deficiencies in the enforcement of sanctions, fostering national cooperation, confiscation and asset forfeiture, transparency, and international cooperation.

Gaming entities are not subject to regulation or supervision for AML purposes and supervision of DNFBPs appears to be haphazard.

The Financial Services Commission (FSC) is responsible for the licensing, regulation, and supervision of credit unions and non-bank financial institutions. The Anti-Money Laundering Authority (AMLA) is in charge of the supervision of certain DNFBPs listed in the MLFTA. The AMLA and the IBFSU are not able to independently supervise the sectors for which they have supervisory responsibility due to resource and knowledge issues. Through MOUs, both the IBFSU and the AMLA have delegated their supervisory functions to the FSC, which could compromise the FSC's ability to carry out its own supervisory responsibilities.

The new government in Barbados, with the support of donors, is exploring the establishment of a civil asset recovery division.

Barbados has signed but not ratified the UNCAC.

Belgium

OVERVIEW

Belgium's location and considerable port facilities have supported the development of an internationally integrated banking industry. Belgium's Port of Antwerp is the second busiest port in Europe by gross tonnage and, together with the ports of Rotterdam and Hamburg, handles the bulk of European maritime trade. With this large volume of legitimate trade inevitably comes the trade in illicit goods. Antwerp is the primary entry point of cocaine into Europe from South American ports. Cocaine valued at \$1.25 billion was seized in Belgium in 2017.

According to the Financial Information Processing Unit (CTIF), Belgium's FIU, 11 percent of its referrals to Belgian police are drug-related, but Belgian police services are investigating drug

money laundering activity to a much greater degree than that statistic reflects. Most of the criminal proceeds laundered in Belgium are derived from foreign criminal activity but are heavily associated with the recent boom in cocaine importations at the Port of Antwerp. Bulk cash smugglers, the principal money laundering concerns of law enforcement, move European drug proceeds out of the region. For the most part, the bulk cash only transits Belgium but is not deposited due to strong banking controls. Illicit funds, however, do enter the banking system. The National Bank of Belgium estimates the total amount of illicit funds currently in circulation at \$2.80 billion.

Belgium is a leader in the diamond trade. Officials note that the high value and easy transport of diamonds makes them highly vulnerable to money laundering through both illicit sales and as a means of storing and transmitting value. Diamonds are an ideal vehicle for TBML due to the lack of a set market value.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Large amounts of illicit funds generated by the cocaine trade fuel a shadow economy in Belgium. Drug trafficking through the Port of Antwerp generates proceeds that are laundered from Belgium through intermediary points such as the United States, UAE, or Hong Kong. Legitimate businesses, such as real estate, restaurants, diamonds, and retail businesses are used to launder drug proceeds.

Difficulties in monitoring movements in the Port of Antwerp and limited investigations into passengers repeatedly declaring more than approximately \$10,925 (€10,000) at the main airport of Zaventem facilitate the movement of cash. Bulk cash smugglers move European drug proceeds out of the region, primarily using hawala networks in conjunction with currency exchange houses located throughout the world.

Drug proceeds are occasionally laundered by the purchase of loose diamonds and/or diamond jewelry, which couriers then take out of Belgium. The opaque and closed nature of the Antwerp diamond industry inhibits money laundering investigations and provides a cover for some individuals to launder illicit funds through pre-existing, pseudo-legitimate networks.

Virtual currencies, such as bitcoin, are increasingly used by criminal networks to facilitate illegal activity in Belgium. Fueled primarily by the sale of synthetic drugs via the dark web, investigations involving virtual currency are becoming more common among Belgian police authorities.

The total number of licensed casinos is limited to nine. There continues to be steady growth in internet gaming. The extent of internet gaming activity is unknown.

KEY AML LAWS AND REGULATIONS

Belgium has comprehensive KYC rules and STR requirements. On September 18, 2017, Belgium published implementing legislation for the EU Fourth AML directive, which addresses enhanced due diligence for domestic PEPs.

Belgium is a member of the FATF. Its most recent MER is available at: <http://www.fatf-gafi.org/countries/a-c/belgium/>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

There are very few reported instances of bulk cash transported out of the Port of Antwerp via cargo container; however, the Port of Antwerp's large size and difficulty in effectively analyzing the contents of 10.5 million container-equivalent units that move through the port each year may help facilitate the movement of illicit funds and the transfer of illicit value. More strict control over the ability of port workers to access and transport merchandise could discourage the transport of bulk cash and access to illicit shipments.

Increased supervision of the diamond industry, considering its size and vulnerability to money laundering activity, including efforts to promote more STRs from diamond dealers, should be encouraged. Authorities should also prioritize the detection of cases of illegal diamond trafficking and large-scale tax fraud involving diamond dealers. More specific oversight of the actual individuals operating within the diamond industry is needed to gain intelligence to determine those individuals and businesses involved in moving illicit funds via hawala networks and TBML.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Resources, both human and IT, should be allocated to the services responsible for countering money laundering, to enable a more proactive approach. After the terrorist attacks in Paris and Brussels, CTIF reported an increase in terrorist financing cases and increased its staff accordingly.

The number of STRs from diamond dealers remains low: in 2017, the CTIF received only 11 STRs from an estimated 1,600 diamond traders.

With regard to new financial technologies and virtual currencies, the CTIF is working with regional and international partners to address the need for surveillance and control.

Belize

OVERVIEW

Belize's geographical location, porous borders, poverty, and limited material and personnel resources leave it vulnerable to illicit trafficking, illegal migration, transnational criminal organizations, and corruption. Its sources of money laundering are drug trafficking, tax evasion, securities fraud, and conventional structuring schemes. The government is taking steps to close those vulnerabilities. Belize has an active offshore financial sector but is not a key regional financial player. There are two relatively unmonitored FTZs that are used to move money internationally.

Belize is building its FIU's capacity and, with donor assistance, developed a multi-agency Financial Crime Working Group. Belize is still primarily a cash economy with declining numbers of businesses using the formal sector.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Belize is primarily a cash economy and efforts to formalize are hampered by foreign banks' AML/CFT de-risking phenomenon. Domestic banks lost 90 percent of their correspondent banking relationships in 2015-2016. Although new relationships developed, they come with higher business costs, and Belizean entities struggle to implement AML/CFT requirements. As a result, many businesses are moving back to cash transactions.

The Government of Belize is working to regulate financial activities that are vulnerable to money laundering, including offshore banks, insurance companies, trust service providers, mutual fund companies, and IBCs. As of December 2018, the IBC Registry has 42,640 registered, active IBCs; 2,165 trusts are registered at the International Trust Registry; and 248 foundations are active. One IBC with an online gaming license can operate in the offshore sector. With the exception of the four international banks regulated by the Central Bank of Belize, the International Financial Services Commission (IFSC) supervises offshore entities. The new director general of the IFSC has significantly improved its overall effectiveness. Fit and proper and due diligence requirements have been addressed.

Belize's two FTZs are managed entirely by the private sector, deal in cash, and are an entry and dissemination point for contraband. The non-existence of a MOU between the Belizean and Guatemalan FIUs exacerbates the situation.

There are six casinos operating in Belize with annual revenues estimated at \$30 million. Additionally, there are 32 paid gaming establishments and one online gaming license. The FIU supervises the gaming sector for AML compliance.

KEY AML LAWS AND REGULATIONS

The National Anti-Money Laundering Committee (NAMLC) advises the Minister of Finance on policies and activities to combat money laundering, terrorist financing, and financing proliferation of weapons of mass destruction.

Major amendments to the Money Laundering and Terrorism Act, the Financial Intelligence Unit Act, the Criminal Code, the International Financial Services Commission, the Interception of Communications Act, and the Customs Regulations Act came into effect in 2018. Amendments to the International Business Companies Act, the Export Processing Zone Act, and the Income and Business Tax Act are being presented to the House of Representatives in Belize in mid-December 2018.

Belize has comprehensive CDD and STR regulations and PEPs are subject to enhanced due diligence. CDD-covered entities include domestic and offshore banks; venture risk capital;

money brokers, exchanges, and transmission services; moneylenders and pawnshops; insurance entities; real estate intermediaries; credit unions; casinos; motor vehicle dealers; international financial service providers; public notaries, attorneys, accountants, and auditors; FTZ businesses; and NGOs.

The FIU maintains formal and informal alliances with local and international law enforcement and exchanges information without formal mechanisms. It has signed MOUs with the Jamaican and St. Vincentian FIUs. Response time has significantly improved, including to INTERPOL requests.

Belize is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/cfatf-mutual-evaluation-reports/belize-2>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The FIU has adopted a three-year strategic plan that includes resource augmentation. A Legal Officer was contracted for supervision duties and assistance with prosecutions. The Director of Public Prosecutions assigned a prosecutor to assist in financial crimes cases.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Belize's National Risk Assessment is scheduled for completion in early 2019, and the FIU houses a permanent National Risk Assessment Coordinator. Banking sector AML supervision is improving; the central bank revoked one license in 2018 for failure to comply. The FIU is completing standard operating procedures for financial analysis. All analysts are working towards accreditation.

As of September 2018, two persons have been charged with money laundering offenses and several investigations are underway. Fraud is the most commonly classified suspicious activity shown on filed STRs.

Belize's FIU improvises local solutions, including a Request for Information database, to ensure it meets request for information obligations. Local database limitations, especially at the Companies Registry and the Immigration and Lands Departments, contribute to occasional delinquency.

International cybercriminal activities continue to plague Belize, including phishing and ATM harvesting scams. The slow development of both a national cybersecurity policy and technical expertise constrains response in this area. The FIU's associated capabilities are limited. Key agencies and offices involved in enforcement and monitoring, such as the FIU, Police Department, and Customs and Excise Department face various challenges including political interference, corruption, and human resource and capacity limitations.

Benin

OVERVIEW

The port of Cotonou is a transportation hub for the sub-region, serving Nigeria and land-locked countries in the Sahel. Criminal networks exploit the volume of goods and people moving through Benin.

Benin is a transit point for a significant volume of drugs and precursors moving from South America, Pakistan, and Nigeria into Europe, Southeast Asia, and South Africa. It is difficult to estimate the extent of drug-related money laundering in Benin, believed to be done through the purchase or construction of real estate for rent or re-sale, casinos, bulk cash smuggling, and payments to officials.

Benin took significant steps in 2018 to counter financial crimes through passage of stronger legislation and efforts to facilitate information exchange. Parliament passed a new AML/CFT law in June to comply with a 2015 directive from the West Africa Economic and Monetary Union (UEMOA). Benin also created a specialized trial court with a broad mandate covering drug, terrorism, and financial crimes.

In September 2018, Benin was welcomed into the Egmont Group after five years of observer status.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Open borders, the prevalence of cash transactions, and the informal economy facilitate money laundering in Benin.

Benin is vulnerable to drug-related money laundering. Cases linked to Benin include the proceeds of narcotics trafficking comingled with revenue from the sale of imported used cars for customers in neighboring countries. In recent years, Benin was implicated in large international schemes in which Lebanese financial institutions linked to Hizballah were used to launder and move criminal proceeds through West Africa and back into Lebanon. As part of the schemes, funds were wired from Lebanon to the United States to buy used cars that were then shipped to Benin and sold throughout West Africa. Profits from the sale of these cars were combined with drug proceeds from Europe and subsequently sent to Lebanon via bulk cash smuggling and deposited into the Lebanese financial system. Hizballah, which the U.S. Department of State has designated as a Foreign Terrorist Organization, reportedly received financial support from this network.

KEY AML LAWS AND REGULATIONS

The 2018 UEMOA-drafted uniform law helps standardize AML/CFT legislation among member countries. In Benin, the uniform law (Act 2018-17) replaces 1997 and 2016 laws criminalizing money laundering and the 2012 financing of terrorism law by combining their provisions into a single law. The uniform law also addresses deficiencies in earlier legislation by introducing new

investigative authorities; requiring attorneys, notaries, banks, and certain non-governmental and religious organizations to report large cash transactions; and the designation of additional money laundering predicate offenses.

Benin is a member of the GIABA, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/publications/mutualevaluations/documents/mutualevaluationofbenin.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Draft implementing guidelines for the new uniform law are awaiting finalization. Act 2018-13 passed on May 18, 2018 to create the Economic Crimes and Terrorism Court (CRIET), a specialized court for economic and financial crime, does not enumerate the particular offenses under the court's jurisdiction. CRIET's jurisdiction is broadly defined, which may result in a lack of clarity in the appropriate trial court for certain crimes or a case backlog in the future if investigative capacity increases.

The Minister of Finance has not signed a draft ministerial decree specifying the powers, organization, and function of the Advisory Committee on the Freezing of Assets.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Beninese officials have limited capacity to effectively track financial flows, inhibiting their ability to investigate and prosecute individuals or groups under the country's legal regime.

The West African Central Bank (BCEAO), which regulates the common West African CFA franc currency, sets a requirement for declaration of bulk cash crossing the border to Nigeria (a non-UEMOA member country) at approximately \$8,750 (CFA franc 5,000,000) or more. Benin customs authorities lack training to evaluate cross-border currency declarations for money laundering purposes.

The National Financial Intelligence Processing Unit (CENTIF), Benin's FIU, is under-resourced and agents within this office and other law enforcement offices are often reassigned to new jurisdictions and new disciplines after training investments by donors. Insufficient funding for day-to-day operations hinders travel to conduct investigations. CENTIF has requested support from donors to implement recommendations by international AML experts. CENTIF has limited funds for international travel to Egmont meetings and foresees challenges with English language proceedings.

On the judicial side, investigative judges lack specialized training in complex financial schemes and cases sit unattended. Out of 728 statements of suspicion recorded between 2017-2018, 17 were presented to the court and are still pending. Benin has had no successful money laundering prosecutions to date.

There is no MLAT between Benin and the United States. Benin is a party to multilateral conventions that support international cooperation on money laundering cases.

Bolivia

OVERVIEW

Bolivia is not a regional financial center, but remains vulnerable to money laundering. Criminal proceeds laundered in Bolivia are derived primarily from smuggling contraband and the drug trade. In recent years, Bolivia has enacted several laws and regulations that, taken together, should help the country more actively fight money laundering. Bolivia should continue its implementation of its laws and regulations with the goal of identifying criminal activity that results in investigations, criminal prosecutions, and convictions.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Major sources of illicit funds in Bolivia include cocaine trafficking, smuggled goods, corruption, illegal gold mining, and informal currency exchanges. Chile and Peru are the primary entry points for illicit products, which are then sold domestically or informally exported.

The latest White House Office of National Drug Control Policy report found that Bolivia had the potential to produce 249 metric tons of cocaine in 2017, a significant source of illicit profits. Informal gold mining also has grown in recent years. Although informal currency exchange businesses and non-registered currency exchanges are illegal, many still operate. Corruption is common in informal commercial markets and money laundering activity is likely.

The Bolivian justice system is hindered by corruption and political interference, both of which impede the fight against narcotics-related money laundering. The lack of well-trained prosecutors and police officers has also been a problem, leading to ineffective criminal investigations.

Bolivia has 13 FTZs for commercial and industrial use in El Alto, Cochabamba, Santa Cruz, Oruro, Puerto Aguirre, Desaguadero, and Cobija. Lack of regulatory oversight of these FTZs increases money laundering vulnerabilities.

A few legal casinos pay a hefty percentage to the government in order to run card games, roulette, slots, and bingo. Many illegal casinos operate in the informal market.

KEY AML LAWS AND REGULATIONS

Bolivia passed several laws that control the entry and exit of foreign exchange and which criminalize illicit gains. In 2012, Bolivia created the National Council to Combat Illicit Laundering of Profits to issue guidelines and policies to combat money laundering. In 2013, Bolivia created new regulatory procedures that allow for freezing and confiscation of funds and other assets related to money laundering.

All financial institutions in Bolivia are required by the Financial Investigative Unit (UIF), Bolivia's FIU, and banking regulations to report all transactions above \$3,000 (or transactions above \$10,000 for banks).

Bolivia has KYC regulations. All transactions conducted through the financial system require valid photo identification in addition to other required information. Financial intermediaries must register this information into their systems, regardless of the transaction amount or whether the transaction is a deposit or a withdrawal. Private banks follow KYC international standards.

Bolivia does not have a mutual legal assistance treaty with the United States; however, various multilateral conventions to which both countries are signatories are used for requesting mutual legal assistance. U.S. Customs and Border Protection, U.S. Immigration and Customs Enforcement, and Bolivian National Customs signed a Customs Mutual Assistance Agreement (CMAA) in 2017 that expands cooperation and information sharing, including in the area of money laundering. The CMAA provides for the sharing of forfeited assets.

Bolivia is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available in Spanish only at: <http://www.gafilat.org/index.php/es/biblioteca-virtual/miembros/bolivia/evaluaciones-mutuas-1/1950-informe-de-evaluacion-mutua-de-bolivia-3a-ronda/file>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Lack of personnel in the UIF, combined with inadequate resources and weaknesses in Bolivia's legal and regulatory framework, limit the UIF's reach and effectiveness. Compliance with UIF's reporting requirements is extremely low. Information exchange between the UIF and police investigative entities improved in the last year, and the UIF maintains a database of suspect persons that financial entities must check before conducting business with clients. In 2017, the Attorney General created a special unit dedicated to investigating and prosecuting money laundering.

Bolivia is in the process of including notaries under the supervision of UIF and is working to address other noted deficiencies, including vehicle dealers, real estate businesses, and jewelry stores, as well as virtual currency, mobile device payments, and financial outflows.

In 2017, the Central Bank of Bolivia prohibited the use of bitcoin and 11 other virtual currencies. The regulation bans the use of any digital currency not regulated by a country or economic zone.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The Bolivian criminal courts have jurisdiction over crimes related to narcotics, terrorism, and money laundering. With a legal order, courts can request information from banks for investigative purposes.

Bolivia has an extradition treaty with the United States. In some instances, the Bolivian government has been cooperative with U.S. law enforcement. However, overall there is little law enforcement cooperation between Bolivia and the United States.

According to available data, there were approximately 51 money laundering-related prosecutions in 2018. Conviction data is not available.

Banks are actively enforcing all regulations to control money laundering or any other suspicious transaction.

Bosnia and Herzegovina

OVERVIEW

Bosnia and Herzegovina (BiH) has a primarily cash-based economy and is not an international or regional financial center. BiH is in the middle of the Balkans and has open borders with Croatia, Serbia, and Montenegro. A Visa Liberalization Agreement with the EU enables easy transit from Eastern Europe and the Balkans region to countries in Western Europe. BiH is a market and transit point for smuggled commodities, including cigarettes, firearms, counterfeit goods, lumber, and fuel oil.

BiH recently has made substantial progress, not only strengthening its AML regime, but harmonizing its laws across its numerous legal systems, including laws related to money laundering and asset forfeiture. BiH has a complex legal and regulatory framework with criminal codes and financial sector laws at the state and entity levels (Federation of BiH (FBiH) and Republika Srpska (RS)), and in the Brčko District (BD).

BiH completed its National Risk Assessment of Money Laundering and Terrorist Financing in the Period 2018-2022 (NRA) in September 2018, which identifies notaries and real estate agencies as the highest-risk sectors.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The majority of STRs are connected to tax evasion and corruption. A smaller amount involve concealing the proceeds of illegal activities, including human trafficking and smuggling, narcotics trafficking, and organized crime. Individuals frequently withdraw funds under the guise of legitimate business, but transactions are later found to be fabricated. Banks make up 87 percent of the financial sector and STRs from banks show that, by number of transactions, fraud and identity theft are increasing, as are identity card counterfeiting and credit card fraud. Money laundering through real estate development also is a problem.

There are four active FTZs in BiH. Companies working in these zones are primarily producing automobile parts, forestry and wood products, and textiles. The Ministry of Foreign Trade and Economic Relations is responsible for monitoring FTZs; there have been no reports that these areas are used for money laundering.

KEY AML LAWS AND REGULATIONS

The main legislation defining BiH's AML regime includes the Law on AML/CFT, the four criminal codes and criminal procedure codes of the multiple jurisdictional levels, and various sectoral laws (e.g., addressing insurance, the securities market, banks, associations, and foundations), some of which have been amended in the last two years. The country has KYC and STR regulations and applies due diligence measures. BiH has mechanisms in place for records exchange.

BiH is a member of MONEYVAL, a FATF-style regional body. Its most recent MER is available at: <https://www.coe.int/en/web/moneyval/jurisdictions/bosnia>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Corruption is endemic, affecting all levels of the economy and society.

BiH has made significant technical improvements to its AML/CFT regime, including with regard to confiscation measures; CDD and STR procedures; financial institution regulation and supervision; regulation of DNFBPs and NPOs; transparency of legal persons and beneficial owners; targeted financial sanctions; statistical data and public reporting by the FIU; cross-border cash declarations; and national-level cooperation. Actual implementation of these reforms has begun, but achievements in terms of money laundering investigations, prosecutions, and convictions, as well as other measures of progress, need to be confirmed.

The four criminal codes and criminal procedure codes now contain similar money laundering offenses. The criminal codes of the entities and BD include specific provisions on some aspects of confiscation and forfeiture of income or other benefits, commingled property, and instrumentalities. The two entity governments have special laws on the confiscation of assets, in addition to the provisions of the criminal procedure codes.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

While BiH's political structure and ethnic politics hinder the effectiveness of its AML regime, coordination of law enforcement AML efforts among the multiple jurisdictional levels in BiH is improving.

There are agencies in FBiH, RS, and the BD that manage confiscated assets. There is no such agency on the state level. The state level investigates money laundering crimes with an international or inter-entity element, while the entities and BD deal with localized money laundering. The jurisdictions maintain separate bank supervision and enforcement/regulatory bodies.

There are concerns about the effectiveness of controls relating to the cross-border transportation of currency and bearer negotiable instruments at the maritime border and land crossings. BiH law enforcement is improving its actions to combat TBML in the country.

BiH has implemented the 1988 UN Drug Convention (mainly through the Law on Suppression of Abuse of Narcotic Drugs) and other applicable agreements. BiH has not refused to cooperate with foreign governments.

In the period from January 2018-October 2018, according to information from the High Judicial and Prosecutorial Council of BiH, the courts handed down six convictions related to money laundering pertaining to nine persons. In 2017, indictments for money laundering were up 14 percent over 2016.

Brazil

OVERVIEW

Brazil's economy was the second largest in the Western Hemisphere in 2018 and among the 10 largest in the world. Brazil is a major drug transit country, as well as one of the world's largest drug consumers. Transnational criminal organizations operate throughout Brazil and launder proceeds from trafficking operations and human smuggling. A multi-billion dollar contraband trade occurs in the Tri-Border Area (TBA) where Brazil shares borders with Paraguay and Argentina. Networks in the TBA provide financial support to Hizballah, a U.S. Department of State-designated Foreign Terrorist Organization. Public corruption is law enforcement's primary money laundering priority, followed by narcotics trafficking.

A June 2018 FATF statement notes Brazil risks suspension if it fails to remedy remaining CFT deficiencies related to the implementation of targeted sanctions for terrorist financiers designated by the UN Security Council.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Public corruption, human smuggling, and trafficking of drugs, weapons, and counterfeit goods are the primary sources of illicit funds. Money laundering methods include the use of banks, real estate, and financial asset markets; remittance networks; shell companies; phantom accounts; illegal gaming; informal financial networks; and the sale of cars, cattle, racehorses, artwork, and other luxury goods. Criminals also use foreign tax havens to launder illicit gains. Drug trafficking organizations are linked to black market money exchange operators. In large urban centers, laundering techniques often involve foreign bank accounts, shell companies, and financial assets; while in rural areas, promissory notes and factoring operations are more common.

Some high-priced goods in the TBA are paid for in U.S. dollars, and cross-border bulk cash smuggling is a concern. Large sums of U.S. dollars generated from licit and suspected illicit commercial activity are transported physically from Paraguay into Brazil. From there, the money may make its way to banking centers in the United States. However, Brazil maintains some control of capital flows and requires disclosure of corporate ownership.

Recent reporting and Brazilian law enforcement information suggests the nation's largest criminal organization, Primeiro Comando da Capital (PCC), is making a push into money laundering and other less visible criminal enterprises and corrupting public officials and police. The PCC is currently attempting to evolve into a sophisticated transnational criminal organization, with ties to several countries in the Western Hemisphere and Europe, and sees money laundering and other associated financial crimes as part of its evolution.

Since 2014, "Operation Car Wash" has uncovered a complex web of corruption, money laundering, and tax evasion spanning the Americas, leading to arrests and convictions of the former president, former and then-current ministers, members of Congress, political party operatives, employees at Petrobras and other parastatals, and executives at major private construction firms throughout the region. Corruption-related money laundering is associated with fraudulent contracts, bribery and influence-peddling, antitrust violations, public pension fund investments, and undeclared or illegal campaign donations. According to the Ministry of Justice, more than \$100 million of illicit funds emanating from "Operation Car Wash" have been blocked overseas; Brazil has recovered \$20 million thus far.

Brazil's Manaus FTZ is composed of five free trade areas. Brazil also has a number of export processing zones.

KEY AML LAWS AND REGULATIONS

Brazil's money laundering legal framework was last updated in 2012. The framework facilitates the discovery, freezing, and forfeiture of illicit assets. Brazil has comprehensive KYC and STR regulations.

Brazil and the United States have a MLAT. Brazil regularly exchanges records with the United States and other jurisdictions.

Brazil is a member of the FATF and the GAFILAT, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/countries/a-c/brazil/documents/mutualevaluationreportofbrazil.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Legal entities cannot be criminally charged under Brazil's money laundering statute, but are subject to reporting requirements if they are covered entities under the AML law. Legal entities in violation of the reporting requirements can face fines and suspension of operation, and managers can face criminal sanctions.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

From January through September 2018, the Council for Financial Activities Control (COAF), Brazil's FIU, initiated 54 money laundering administrative actions and referred 4,967 cases to law enforcement for potential investigation. Comprehensive data on criminal investigations and convictions are not yet available.

Brazilian law enforcement has successfully seized millions in multiple currencies in highway seizures and served arrest warrants throughout Brazil, especially on the border with Paraguay (State of Parana).

The lack of a central de-confliction database, coupled with the stove-piping of intelligence by multiple Brazilian law enforcement agencies, makes it difficult to fully identify the means through which criminal groups launder money. Coordination between civilian security agencies, law enforcement agencies, and the Brazilian military is hindered by inter-service rivalries.

Brazil made significant strides in strengthening its legal framework, building capacity to investigate and prosecute financial crimes through specialized police units and courts, and fostering interagency cooperation and civil society input on prospective reforms. Nonetheless, challenges remain. Judicial delays often lead to cases expiring before judgment due to strict statutes of limitations. Brazil will benefit from expanded use of the task-force model and cooperative agreements that facilitated recent major anticorruption breakthroughs, an increased information exchange on best practices for financial market fraud, government contract oversight, and collaboration and leniency agreements.

British Virgin Islands

OVERVIEW

The British Virgin Islands (BVI) is a UK overseas territory. Its economy is dependent on tourism and financial services. The BVI is a well-established, sophisticated financial center offering accounting, banking and legal services, captive insurance, company incorporations, mutual funds administration, trust formation, and shipping registration. At the close of September 2017, the commercial banking sector had assets valued at approximately \$2.3 billion. Potential misuse of BVI corporate vehicles remains a concern, but the government has put in place frameworks to guard against such abuse. Criminal proceeds laundered in the BVI derive primarily from domestic criminal activity and narcotics trafficking.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The BVI has a favorable corporate tax and no wealth, capital gains, or estate tax. Significant money laundering risks include exploitation of financial services, and a unique share structure that does not require a statement of authorized capital. The BVI is a favored destination for incorporating new companies and registering shell companies, which can be established for little money in a short amount of time. Multiple reports indicate a substantial percentage of BVI's offshore business comes from China.

Financial services account for over half of government revenues. The Financial Services Commission's (FSC) December 2017 statistical bulletin notes there are 389,459 active

companies. Of these, 1,089 are private trust companies. There are six commercially licensed banks and 1,499 registered mutual funds.

The BVI's proximity to the U.S. Virgin Islands and its use of the U.S. dollar as its currency pose additional risk factors for money laundering. The BVI, similar to other jurisdictions in the Eastern Caribbean, is a major target for drug traffickers, who use the area as a gateway to the United States. BVI authorities work with regional and U.S. law enforcement agencies to help mitigate these threats.

KEY AML LAWS AND REGULATIONS

Money laundering is criminalized, as are all money laundering predicate offenses, in line with international standards. Maximum criminal penalties for money laundering and money laundering-related offenses are \$500,000 and 14 years in prison. Administrative penalties are a maximum of \$100,000. Maximum penalties under the Anti-Money Laundering Regulations are \$150,000.

The FSC is the sole supervisory authority responsible for the licensing and supervision of financial institutions. KYC and STR requirements cover banks, MSBs, insurance companies, investment businesses, insolvency practitioners, trust and company service providers, attorneys, notaries public, accountants, auditors, yacht and auto dealers, real estate agents, dealers in precious stones and metals, dealers in other high-value goods, and NPOs.

The BVI applies enhanced due diligence procedures to PEPs. Part III of the Anti-Money Laundering and Terrorist Financing Code of Practice, 2008 outlines the CDD procedures that licensees should follow to ensure proper verification of clients.

The BVI is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/mutual-evaluation-reports/virgin-islands-1>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

International experts have criticized the BVI's AML supervision, particularly of the company formation sector, and its sanctions regime, though recent improvements have earned positive marks. In 2017, the BVI Enforcement Committee reviewed 382 enforcement cases, resulting in 17 administrative penalties, six cease and desist orders, one advisory, 63 license revocations, and six warning letters.

ENFORCEMENT/IMPLEMENTATION ISSUES AND COMMENTS

The UK is responsible for the BVI's international affairs, save those matters that may be delegated under the Virgin Islands Constitution Order 2007. The UK arranged for the extension to the BVI of the 1988 UN Drug Convention in 1995, the UNCAC in 2006, and the UNTOC in 2012.

Between January 1 and October 31, 2016, there were two money laundering-related prosecutions and no money laundering-related convictions. There have been 15 money laundering convictions since 2008. This low volume of prosecutions and convictions is not commensurate with the size and complexity of the BVI's financial sector.

The BVI has implemented a register which provides authorized BVI authorities direct and immediate beneficial ownership information; this registry is not publicly available. Beneficial ownership information must be shared with the UK government within 24 hours of a request. The UK Sanctions and Anti-Money Laundering Act 2018 requires the BVI establish a publicly accessible register of the beneficial ownership of companies registered in its jurisdiction by December 2020.

The government is currently engaged in amending legislation to enable the Financial Investigation Agency (FIA) to take enforcement actions against DNFBPs that are non-compliant with their AML legal responsibilities. Such amendments will allow the FIA to enforce administrative penalties against non-compliant DNFBPs.

Burma

OVERVIEW

Burma's economy and financial sector are underdeveloped, and most currency is still held outside of the formal banking system. Burma has porous borders and significant natural resources, many of which are in parts of the country that the government does not fully control. Burma is also one of the largest source countries of methamphetamine and opiates. The lack of financial transparency and understanding of AML standards, the low risk of enforcement and prosecution, and the large illicit economy foster criminal activity.

The Burmese government has made some progress in addressing international AML concerns. Burma is designated as a jurisdiction of "primary money laundering concern" under Section 311 of the USA PATRIOT Act, but the U.S. Department of Treasury began waiving the legal ramifications in 2012 and issued an administrative exception in 2016, allowing U.S. financial institutions to provide correspondence services to Burmese banks.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Burma is the world's second largest cultivator of illicit opium and a major manufacturer and exporter of heroin. Burma has also emerged as one of the world's largest sources of amphetamines and amphetamine-type stimulants (ATS). The country's narcotics cultivation and production occur in territory controlled by non-state armed groups, particularly along Burma's eastern borders, which complicates efforts to control the drug trade. Trafficking in persons and wildlife and illegal trading in gems and timber also generate illicit proceeds and fuel public corruption.

Many people in Burma rely on informal money transfer mechanisms, known as *hundi*, as the formal financial system is underdeveloped and has limited connectivity with international banks. *Hundi* dealers use Burmese banks at major border crossings to transfer money from workers abroad throughout Burma, but the banks do not apply KYC regulations to the source of the money. The Burmese Central Bank has been working to draft regulations for these money services for years.

Many business deals and real estate transactions are conducted in cash. In Burma, access by adults to at least one formal regulated financial service increased from 30 percent in 2013 to 48 percent in 2018; however, Burma is still a largely cash-based economy, which makes it difficult for authorities to detect illicit financial flows.

Despite gaming currently being illegal, casinos target foreigners in border towns, especially near China and Thailand. Little information is available about the scale of these enterprises. There is a draft law in Parliament to legalize casinos.

KEY AML LAWS AND REGULATIONS

Burma passed its Anti-Money Laundering Law in 2014. The law criminalizes money laundering, defines predicate offenses, and includes CDD requirements for all reporting entities. Regulations to implement the AML law were issued in 2015. Burma has made progress in improving its legal and regulatory framework in line with international AML standards, though many problems remain.

Burma does not have a bilateral MLAT with the United States, but high-level law enforcement officials have stated they are willing to engage in an MOU. In December 2016, the Burmese Attorney General (AG) identified the AG Deputy Director General as the central authority for mutual legal assistance requests, although this channel remains untested between the United States and Burma.

Burma is a member of the APG, a FATF-style regional body. Its most recent MER is available at: <http://www.apgml.org/members-and-observers/members/member-documents.aspx?m=e0e77e5e-c50f-4cac-a24f-7fe1ce72ec62>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Burma's AML deficiencies mainly pertain to logistical challenges, such as insufficient technologies and limited government capacity and coordination, key areas where improvement is necessary. Financial institutions rely on paper-based record keeping and, when computers are available, on manual data entry. The government, in cooperation with international donors, is increasing the automation and processing of electronic reporting and phasing-out of paper-based records.

The FIU relies on the cooperation of 25 entities, from customs to the central bank to law enforcement bodies, but these groups' understanding of AML issues and procedures is limited,

and coordination between the bodies is poor. Oversight of non-conventional financial services in Burma, such as money transfer services, microfinance institutions, and securities firms, is in the initial phases, and the central bank provides limited AML oversight of state-owned banks.

In November 2003, the United States identified Burma as a jurisdiction of “primary money laundering concern,” pursuant to Section 311 of the USA PATRIOT Act, which prohibits U.S. financial institutions from establishing or maintaining correspondent accounts with Burma. While the Section 311 findings remain in place, Treasury began easing restrictions in 2012 on corresponding banking relationships with certain banks, and in October 2016 issued a blanket administrative exception which permits U.S. financial institutions to maintain correspondent banking relationships under certain conditions. Burma applied to join the Egmont Group in March 2017.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Burma continues to work on full implementation of the 1988 UN Drug Convention. Despite enacting an AML law, Burma’s implementation of AML reforms is weak. Between July 2016 and June 2018, Burma’s FIU investigated 12 money laundering cases. Of them, six cases were related to drug trafficking, three cases came from SARs, and three cases from police stations’ reports and other sources. Six of the cases were prosecuted, two were closed, and four are still under investigation.

Cabo Verde

OVERVIEW

Cabo Verde’s location, approximately 400 miles off the coast of West Africa, and its land-to-water ratio make it vulnerable to narcotics trafficking between West Africa, the Americas, and Europe. Its financial system is primarily composed of the banking sector.

Although Cabo Verde’s AML regime has flaws, the government has revised its laws, policies, and regulations in an attempt to create the tools to curb illicit financial activities. The AML framework, established initially in 2009, has led to improved port container monitoring and information sharing between Cabo Verde’s domestic and international airports. Cabo Verde continues to receive international support in its fight against drug trafficking, money laundering, and other crimes. This support includes support to its FIU.

VUNLERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Approximately 30 percent of Cabo Verde’s economy is in the informal sector, creating a lack of transparency and contributing to vulnerability to money laundering. The biggest money laundering risk in Cabo Verde is likely related to narcotics trafficking, largely due to its location at the Atlantic crossroads, along major trade routes, and to its limited capacity to patrol its large maritime territory. Narcotics transit Cabo Verde by commercial aircraft and maritime vessels,

including private yachts. Domestic consumption of consumer drugs – namely marijuana, cocaine, crack cocaine, and synthetic drugs – is increasing.

Public corruption is limited in Cabo Verde and is unlikely to be a major element facilitating money laundering. Although the formal financial sector is well regarded, it may still offer niches to money launderers as a safe haven, in spite of the ongoing development of the country's AML regime.

KEY AML LAWS AND REGULATIONS

The Central Bank of Cabo Verde (BCV) regulates and supervises the financial sector, and commercial banks generally are thought to comply with its rules. Financial institutions reportedly exercise due diligence beyond the requirements of the law for both domestic and foreign PEPs. Cabo Verde has taken steps to implement a cross-border currency declaration regime, but implementation at the ports of entry remains inconsistent.

Cabo Verde has somewhat operationalized its framework for national cooperation and coordination. The Ministry of Justice recruited eight public prosecutors to be stationed around the archipelago, and the BCV recruited six agents for its supervision department. Two of the latter will specifically support the AML supervision of financial institutions. Cabo Verde's General Inspectorate of Economic Affairs serves as the supervisory body for dealers in luxury cars, antiques, and illicit gaming.

Cabo Verde is a member of the GIABA, a FATF-style regional body. Its most recent MER is available at: <http://www.giaba.org/reports/mutual-evaluation/Cabo%20Verde.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Information is limited about the degree to which the BCV conducts AML compliance examinations of the financial institutions that fall within its jurisdiction, including whether the BCV has applied administrative sanctions for non-compliance with requirements. Cabo Verde still needs to strengthen its AML supervision mechanisms for financial institutions, capital markets, and DNFBPs, including the gaming sector.

The FIU continues to take steps to improve its efficiency and effectiveness, including by availing itself of donor assistance. Work remains to be done to develop a record of tangible outcomes across the range of AML stakeholders, including administrative enforcement actions by financial and non-financial sector regulators, consistent application of financial investigative techniques in all law enforcement investigations involving crimes generating illicit profits, and successful financial crimes prosecutions including asset forfeiture.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Although Cabo Verde has taken steps to create the legal framework for its AML regime, it still needs to close important gaps. Among those are the development of a fully and broadly functioning cross-border currency declaration system and a record of tangible outcomes.

Implementation and enforcement of the laws remain weak, although 23 AML cases were processed in the 2017-2018 judicial year. Government agencies appear unaware of their own responsibilities under the AML regime or are not motivated to meet them.

The United States and Cabo Verde do not have a bilateral MLAT or an extradition treaty. Cabo Verde is party to relevant multilateral law enforcement conventions that have mutual legal assistance provisions. The United States and Cabo Verde can also make and receive requests for assistance on the basis of domestic laws.

Canada

OVERVIEW

Money laundering activities in Canada involve the proceeds of illegal drug trafficking, fraud, corruption, counterfeiting and piracy, and tobacco smuggling and trafficking, among others. Foreign-generated proceeds of crime are laundered in Canada, and professional, third-party money laundering is a key concern. Transnational organized crime groups and professional money launderers are key threat actors.

Although the legislative framework does not allow law enforcement to have direct access to Canada's FIU databases, financial intelligence is received and disclosed effectively. The government should take steps to increase enforcement and prosecution.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Money is laundered via several mediums, including bulk cash smuggling, MSBs/currency exchanges, casinos, real estate, wire transfers, offshore corporations, credit cards, foreign accounts, funnel accounts, hawala networks, and the use of digital currency.

The illicit drug market is the largest criminal market in Canada. Transnational organized crime groups represent the most threatening and sophisticated actors in the market, given their access to professional money launderers and facilitators and their use of various money laundering methods to shield their illicit activity from detection by authorities.

KEY AML LAWS AND REGULATIONS

Amendments to the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) that strengthen Canada's AML regime and improve compliance came into force in June 2017. These amendments expand the ability of the Financial Transactions and Reports Analysis Centre (FINTRAC), Canada's FIU, to disclose information to police, the Canada Border Services Agency, and provincial securities regulators. They also mandate AML measures for provincially-operated online casinos.

Entities subject to KYC and STR requirements include banks and credit unions; life insurance companies, brokers, and agents; securities dealers; casinos; real estate brokers and agents; agents

of the Crown (certain government agencies); MSBs; accountants and accountancy firms; precious metals and stones dealers; and notaries in Quebec and British Columbia. A second package of regulatory amendments that will close other gaps in Canada's AML regime, such as the lack of AML compliance measures for foreign MSBs and virtual currency dealers, is being finalized for publication in 2019.

The PCMLTFA provisions cover foreign and domestic PEPs and heads of international organizations (HIO). The PCMLTFA requires reporting entities to determine whether a client is a foreign PEP, a domestic PEP, an HIO, or an associate or family member of any such person.

The government published its national AML/CFT risk assessment in July 2015 and is currently updating this assessment. Parliament began a statutory review of the administration and implementation of the PCMLTFA in February 2018. A review is required every five years.

The 2015 Security of Canada Information Sharing Act facilitates information sharing among government agencies regarding activity that undermines national security.

Canada has records exchange mechanisms with the United States and other governments. Canada has strong AML cooperation with the United States and Mexico through, inter alia, the AML workshops falling under the annual North American Drug Dialogue.

Canada is a member of the FATF and the APG, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/media/fatf/documents/reports/mer4/MER-Canada-2016.pdf>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

AML regulation of attorneys was overturned by the Canadian Supreme Court in 2015 as an unconstitutional breach of attorney-client privilege. Trust and company service providers, with the exception of trust companies, also are not subject to preventative measures.

Canada's legislative framework does not allow law enforcement agencies access to FINTRAC's databases; however, when FINTRAC has determined there are reasonable grounds to suspect that information received from reporting entities would be relevant to an investigation or prosecution of a money laundering offense, the FIU is required to make financial intelligence disclosures to appropriate authorities. Information may be sent to multiple authorities if links to parallel investigations are suspected.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Canada has a rigorous detection and monitoring process in place but should further enhance its enforcement and prosecutorial capabilities. As noted by international experts, when the magnitude of the identified money laundering risks are taken into account, Canada's money laundering conviction rate appears to be low; from 2010-2014 (most recent data available), only 169 trials on charges of money laundering led to a conviction. In addition to the offense of laundering the proceeds of crime, the possession of proceeds of crime (PPOC) is also a criminal

offense. The same penalties apply to both laundering and PPOC convictions involving more than approximately U.S. \$3,740 (\$5,000 Canadian). Of PPOC charges brought in 2014, 17,191 resulted in a conviction on at least one charge.

Canada adopted legislation regulating virtual currencies in 2014 that, when it comes into force, will subject persons and entities to the same reporting requirements as MSBs. The law will not come into force until a second package of regulatory amendments is completed, which is expected in 2019. Digital currency exchanges will have to register with FINTRAC. Financial institutions will be prohibited from establishing and maintaining accounts for virtual currency businesses not registered with FINTRAC.

Cayman Islands

OVERVIEW

The Cayman Islands, a UK overseas territory, is an international financial center that provides a wide range of services, including banking, structured finance, investment funds, trusts, and company formation and management. As of June 2018, the banking sector had U.S. \$934 billion in international assets. There are 147 banks, 146 trust company licenses, 139 licenses for company management and corporate service providers, 821 insurance-related licenses, and five MSBs. There are 103,759 companies incorporated or registered in the Cayman Islands and 10,708 licensed/registered mutual funds.

The government has adopted and implemented a risk-based approach to combating money laundering. Population of a centralized beneficial ownership platform was completed in June 2018.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The Cayman Islands has an indirect tax regime. Its susceptibility to money laundering is primarily due to foreign criminal activity and may involve fraud, tax evasion, or drug trafficking. The offshore sector may be used to layer or place funds into the Cayman Islands' financial system. The Cayman Islands' network of tax information exchange mechanisms extends to over 112 treaty partners. The Cayman Islands adheres to the Common Reporting Standards of the OECD.

Gaming is illegal and the government does not permit registration of offshore gaming entities. Cayman Enterprise City, a Special Economic Zone, was established in 2011 for knowledge-based industries. Of 49 businesses in the Commodities & Derivatives Park as of June 2018, 15 were registered with the Cayman Islands Monetary Authority (CIMA) under the Securities and Investment Law.

In April 2018, CIMA issued a public advisory regarding the potential risks of investments in Initial Coin Offerings and all forms of virtual currency. The Cayman Islands is developing a

“Digital Assets Legislative Framework” to address future threats and vulnerabilities associated with virtual or electronic currencies, while monitoring developments in global standards.

KEY AML LAWS AND REGULATIONS

Shell banks, anonymous accounts, and the use of bearer shares are prohibited.

The Terrorism Law (2018 Revision), a consolidation of the Terrorism Law (2017 Revision) and the Terrorism (Amendment) Law 2017, enhances the territory’s AML/CFT efforts in that property is given a wider definition and terrorist financing is now a predicate offense for money laundering.

The Penal Code (2018 Revision), a consolidation of previous penal legislation, codifies tax evasion as a predicate offense.

CDD and STR requirements cover banks, trust companies, investment funds, fund administrators, securities and investment businesses, insurance companies and managers, MSBs, lawyers, accountants, corporate and trust service providers, money transmitters, dealers of precious metals and stones, the real estate industry, and other relevant financial business as defined in the Proceeds of Crime Law (2018 Revision).

The Anti-Money Laundering Regulations (AMLRs) 2018 require designated entities to use a risk-based approach, to include the application of enhanced due diligence procedures for high-risk clients such as PEPs.

The Cayman Islands is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/mutual-evaluation-reports/cayman-islands-1>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The Cayman Islands has enhanced its AML supervision of real estate agents, accountants, and entities that trade or store precious metals, precious stones, or financial derivatives in order to mitigate the risk posed by commodities and derivatives trading in the jurisdiction.

The UNCAC has not yet been extended to the Cayman Islands; however, the Articles of that convention have been implemented via domestic legislation.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The UK is constitutionally responsible for the Cayman Islands’ international relations. The UK arranged for ratification of the 1988 UN Drug Convention and the UNTOC to be extended to the Cayman Islands in 1995 and 2012, respectively.

The Mutual Legal Assistance Treaty (MLAT) between the United States and the United Kingdom, which allows for assistance in criminal matters, has been extended to the Cayman Islands.

During the first half of 2018, the government conducted 59 money laundering investigations and investigated 52 individuals, resulting in the arrest of 50 people and the initiation of seven civil forfeiture cases. As of June 2018, there have been six money laundering-related prosecutions. All six cases are still active. There have been two money laundering-related convictions.

An amendment of Regulation 31 of the Monetary Authority (Administrative Fines) Regulations, 2017 to enhance the administrative fines regime came into effect on March 13, 2018.

The AMLRs require all financial service providers to collect and maintain beneficial ownership information. The Registrar of Companies stores this information in a centralized platform, which facilitates instantaneous access to beneficial ownership information for law enforcement and competent authorities. The UK Sanctions and Anti-Money Laundering Act 2018 requires the Cayman Islands to establish a publicly accessible register of the beneficial ownership of companies registered in its jurisdiction by December 2020.

China, People's Republic of

OVERVIEW

Chinese authorities identify illegal fundraising; cross-border telecommunications fraud; weapons of mass destruction, proliferation finance, and other illicit finance activity linked to North Korea; and corruption in the banking, securities, and transportation sectors as ongoing money laundering challenges.

In 2018, China continued its anti-corruption campaign and increased regulatory scrutiny of the financial sector. While China has taken steps to improve its AML regime, there are significant shortcomings in implementing laws and regulations effectively and transparently, especially in the context of international cooperation. China should cooperate with international law enforcement in investigations regarding indigenous Chinese underground financial systems, virtual currencies, shell companies, and trade-based value transfers that may be used for illicit funds transfers.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The primary sources of criminal proceeds are corruption, drug and human trafficking, smuggling, economic crimes, intellectual property theft, counterfeit goods, property crimes, and tax evasion. Criminal proceeds often are laundered via bulk cash smuggling; TBML; shell companies; purchasing valuable assets, such as real estate and gold; investing illicit funds in lawful sectors; gaming; and exploiting formal and underground financial systems and third-party payment systems. Corruption in China often involves state-owned enterprises, including those in the financial sector.

China has multiple Special Economic Zones (SEZs) and other designated development zones at the national, provincial, and local levels, including SEZs in at least 19 coastal cities and areas. Additionally, China has four FTZs.

KEY AML LAWS AND REGULATIONS

There are seven categories of predicate crimes for money laundering in China's Criminal Code, including illegal narcotics, gangs, terrorism, smuggling, corruption, disruption of financial regulatory orders, and financial fraud. A 2006 Anti-Money Laundering Law imposes legal liability on financial institutions for regulatory violations and grants law enforcement power and international cooperation authority to the State Council.

The People's Bank of China (PBOC), China Banking and Insurance Regulatory Commission (CBIRC), and China Securities Regulatory Commission jointly issued the provisional "Measures for Administration of Anti-Money Laundering and Counter Terrorist Financing in Internet Financial Institutions" on October 10, 2018, scheduled to take effect on January 1, 2019. The measures set AML/CFT requirements for internet financial institutions, including online payment providers, lenders, and consumer finance companies; online fund sellers and financing information intermediaries; and equity crowdfunding, insurance, and trust platforms. The National Internet Finance Association of China (NIFA) is tasked with issuing implementation rules as well as operating and maintaining the PBOC-established internet monitoring platform. Internet financial institutions are required to establish internal control and monitoring systems to effectively check client identifications, file CTRs and STRs, and maintain client information and transaction records. They are additionally required to report any single or daily cumulative cash transaction of approximately \$7,200 (RMB 50,000) or \$10,000 equivalent of foreign currency.

On October 26, 2018, the CBIRC issued for comment for 30 days the draft "Measures on Administration of Anti-Money Laundering and Counter Terrorist Financing of Banking Financial Institutions." The draft defines the AML/CFT responsibilities of financial institutions, including a comprehensive risk management system covering compliance management, internal controls, and procedures covering all products and services.

China has comprehensive KYC and STR regulations, and financial institutions are required to determine and monitor the risk levels of customers and accounts, including foreign PEPs. High-risk accounts must be subject to re-verification at least every six months. If an existing customer has become a PEP, senior management approval must be obtained to continue that relationship.

China is a member of the FATF and two FATF-style regional bodies, the APG and the EAG. Its most recent MER is available at: <http://www.fatf-gafi.org/countries/a-c/china/documents/mutualevaluationofchina.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Domestic PEPs are not subject to enhanced due diligence procedures.

Although China's courts are required by law to systematically confiscate criminal proceeds, enforcement is inconsistent and no legislation authorizes the seizure/confiscation of substitute assets of equivalent value. Improvements should be made to address the rights of bona fide third parties and the availability of substitute assets in seizure/confiscation actions.

China's FIU is not a member of the Egmont Group.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Since late 2017 the PBOC has intensified its AML enforcement. The PBOC's actions are a positive step; however, China should continue to enhance coordination among its financial regulators and law enforcement bodies and with international partners. China's Ministry of Public Security should continue efforts to better understand how AML tools can be used in a transparent fashion to support the investigation and prosecution of a wide range of criminal activity.

The United States and China are parties to the Agreement on Mutual Legal Assistance in Criminal Matters. China's recently passed Mutual Legal Assistance (MLA) Law authorizing Chinese law enforcement agencies to comply with MLA requests, including foreign freezing and seizure requests and forfeiture judgments. However, the newly enacted MLA law is untested and it remains to be seen as to how the Chinese authorities will scrutinize these cases. Additionally, although China's courts are required by law to systematically confiscate criminal proceeds in domestic cases, enforcement historically has been inconsistent and no legislation authorizes the seizure/confiscation of substitute assets of equivalent value.

U.S. agencies consistently seek to expand cooperation with Chinese counterparts on AML matters; however, they note China has not cooperated sufficiently on financial investigations and does not provide adequate responses to requests for information.

Colombia

OVERVIEW

Colombia has one of Latin America's most rigorous AML systems, but money laundering exists throughout its economy, especially involving proceeds from drug trafficking, illegal mining, extortion, and corruption. In August 2018, President Ivan Duque's Administration announced it would target money laundering as one of its "top ten" priority crimes and increase the use of asset forfeiture. Colombia has an impressive ability to detect money laundering and should continue to improve interdiction, prosecution, and interagency cooperation in order to implement an effective and efficient AML regime.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Colombian officials say illicit funds are most commonly laundered by way of bulk cash smuggling and TBML. The 114 FTZs in Colombia are vulnerable to TBML due to inadequate

regulation, supervision, and transparency. Other techniques and commodities used to launder illicit funds include: real estate transactions; wire transfers; remittances; casinos, gaming, and lotteries; cattle; illegal mining; prepaid debit cards; and the use of cryptocurrency.

In TBML, purchased goods are either smuggled into Colombia via neighboring countries or brought directly into Colombia's customs warehouses, avoiding taxes, tariffs, and customs duties. Invoice-related TBML schemes are also used to transfer value. According to Colombian government officials, corrupt customs authorities facilitate evasion of the normal customs charges. Criminal organizations occasionally launder illicit proceeds through the formal financial system, but primarily use less regulated mechanisms such as the non-bank financial system and black market peso exchange. Money brokers often facilitate these transactions with extensive networks to conduct the exchanges.

There are documented cases of money laundering involving cryptocurrency, but they represent a tiny fraction of the number of cases and amount of funds laundered via traditional methods discussed above. The Attorney General's Office (AGO) and Ministry of Justice officials intend to investigate this emerging challenge.

KEY AML LAWS AND REGULATIONS

The AML legal regime and regulatory structure in Colombia generally meet international standards, and Colombia has enacted CDD and STR regulations. Enhanced due diligence for PEPs (public employees who manage public money) is required.

President Duque announced a series of planned justice reforms that include proposals for expanded asset forfeiture capabilities. If passed, the new laws would allow the Colombian Inspector General's Office (*Procuraduría*) to seize illicitly-earned assets in cases of public corruption, providing a deterrent and another source of funding for the Colombian government's law enforcement activities.

Colombian and U.S. law enforcement authorities cooperate closely in money laundering and asset forfeiture investigations, and exchange of information occurs regularly.

Colombia is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available at: <http://www.gafilat.org/index.php/es/biblioteca-virtual/miembros/colombia>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Colombia has a rigorous AML legal, policy, and regulatory framework. While the Colombian government's regulation of the financial sector is robust, its regulation of other sectors (in particular trade, money exchange businesses, and private unions) is inconsistent. The financial sector regulator is working to expand its risk-based approach to AML regulation to other sectors.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Key impediments to an effective AML regime continue to be limited interdiction capability, uneven interagency cooperation, and inadequate expertise and resources for investigating and prosecuting complex financial crimes. Although interagency cooperation is increasing following a restructuring of the AGO, bureaucratic stove piping and inadequate information sharing still limit the effectiveness of Colombia's AML regime.

Colombia's FIU relies on STRs and SARs from financial institutions, but a significant portion of money laundering is detected through investigations into narcotics trafficking and other criminal activity. The Colombian government's ability to detect TBML is limited due to the complex networks used to smuggle goods, lax enforcement and corruption by customs officials, and a lack of coordination between the customs administration and customs police. Colombian officials' expertise in complex financial crimes is challenged by the sophistication and adaptation of the informal networks used by money launderers. This affects all levels of the justice system, from investigators to prosecutors and the judiciary.

The government body that manages seized assets, the Special Assets Entity, has struggled to sell and manage efficiently the vast quantity and wide range of seized illicit goods, including vehicles, real estate, and livestock. Its limited capacity to quickly liquidate assets has increased management expenses. Additionally, there are only 11 asset forfeiture judges in all of Colombia, prolonging some cases for more than 30 years.

Colombia has one of the strongest AML regimes in the region. Still, its ability to grow its capacity is dependent upon liquidation of seized assets – currently valued in excess of \$1 billion – and improved interdiction, prosecution, and interagency cooperation. President Duque's Administration recognizes this challenge and has publicly indicated its intent to improve its asset forfeiture and investigation/prosecution of financial crimes.

Costa Rica

OVERVIEW

Transnational criminal organizations employ Costa Rica as a base for financial crimes due to enforcement challenges and its location on a key transit route for narcotics trafficking. Costa Rica improved its legal framework for supervision and enforcement and is steadily advancing implementation of new legislation and money laundering prevention mechanisms. Gaps remain, however, and additional resources for key units, stand-alone asset forfeiture legislation, and enhanced penalties for financial crimes could mitigate current challenges.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Narcotics trafficking continues to represent the largest source of laundered assets. Human trafficking, fraud, corruption, and contraband smuggling also generate illicit revenue. The construction and real estate sectors remain areas of concern, due to the number of high-value projects and significant foreign investment. Extortionate money lending operations are a favored

mechanism for criminal organizations to generate and launder illicit funds. Bulk cash smuggling, particularly at airports, and smurfing are additional favored typologies.

Online gaming is legal in Costa Rica, and sportsbook enterprises are suspected of laundering millions of dollars. Financial institutions remain vulnerable to money laundering, and the 2017 “Cementazo” scandal revealed corruption-related vulnerabilities at state banks.

Costa Rica does not regulate virtual currencies despite increased popular interest in cryptocurrencies and the presence of two bitcoin ATMs in Costa Rica.

KEY AML LAWS AND REGULATIONS

Costa Rica has KYC and STR requirements that have broadened since 2017 changes to legislation, which established reporting and supervision requirements for DNFBPs. Entities subject to reporting and supervision requirements include banks; savings and loan cooperatives; pension funds; insurance companies and intermediaries; money exchangers; securities brokers/dealers; credit issuers and sellers/redeemers of traveler’s checks and money orders; trust administrators; financial intermediaries and asset managers; real estate developers/agents; manufacturers, sellers, and distributors of weapons; art, jewelry, and precious metals dealers; pawnshops; automotive dealers; casinos and electronic gaming entities; NGOs that receive funds from high-risk jurisdictions; lawyers; notaries public; and accountants. The impact of these changes became clear in 2018 as STRs increased 40 percent over the same period in 2017, with 2018 STRs valued at over \$3.4 billion.

Costa Rica and the United States do not have an MLAT, nor is one under negotiation at this time. Costa Rica cooperates effectively with U.S. law enforcement through international cooperation offices at key institutions and is party to several inter-American agreements on criminal matters and UN conventions. Costa Rica provided assistance on over 40 international AML investigations in 2018.

Costa Rica is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/publications/mutualevaluations/documents/mer-costa-rica-2015.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Costa Rican law does not attribute criminal responsibility to legal entities; however, legislation to correct this gap is being developed.

Despite years of effort, Costa Rica has not established a stand-alone framework for non-conviction-based asset forfeiture, forcing reliance on two articles of the existing asset forfeiture law, which lack provisions for asset sharing or international cooperation. Despite vocal opposition from special interest groups and concerns over property rights, political will to pass asset forfeiture legislation remains strong.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Costa Rica continues to improve implementation deficiencies. After nine years of limited sanctions, regulators fined a Costa Rican bank \$2 million for accepting funds linked to bribery. The supervision platform for DNFBPs continues to advance, and DNFBP's are regularly reporting suspicious transactions, although the banking sector continues to generate over 80 percent of STRs. In 2018, authorities added additional positions to the FIU and Special Prosecutor Office for Money Laundering (SPOML), although capacity remains below target levels. Costa Rica's new attorney general largely reorganized Costa Rica's Specialized Prosecutor Offices, which may generate greater efficiencies in investigations.

From January to September 2018, the FIU referred 42 STRs to the Special Prosecutor Office for further investigation. Money laundering investigations remain a complex endeavor, as prosecutors must prove a direct link between the predicate offense and illicit assets. Cases linked to non-narcotics offenses are less common, and prosecutions typically arise from bulk cash discoveries at ports of entry. In October 2018, Costa Rican prosecutors had over 200 open money laundering cases, the majority in the SPOML; nine were tried between January and October 2018, resulting in eight convictions. The number of trials decreased slightly, although the conviction rate increased to 88 percent versus approximately 50 percent the prior year.

Cuba

OVERVIEW

Cuba is not a regional financial center. Cuban financial practices and U.S. sanctions continue to prevent Cuba's banking system from fully integrating into the international financial system.

The government-controlled banking sector, low internet and cell phone usage rates, and lack of government and legal transparency render Cuba an unattractive location for money laundering through financial institutions. The centrally-planned economy allows for little, and extremely regulated, private activity. A significant black market operates parallel to the heavily subsidized and rationed formal market dominated by the state.

The Government of Cuba does not identify money laundering as a major problem. Cuba should increase the transparency of its financial sector and continue to increase its engagement with the regional and international AML/CFT communities to expand its capacity to fight illegal activities. Cuba should increase the transparency of criminal investigations and prosecutions.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Cuba's geographic location puts it between drug-supplying and drug-consuming countries. Cuba has little foreign investment, a small international business presence, and no offshore casinos or internet gaming sites. Cuba's first special economic development zone at the port of Mariel in northwestern Cuba was established in November 2013 and is still under development. Brazilian construction giant Odebrecht has investments in Cuba, specifically at the Mariel Special Economic Development Zone. While the Cuban government's direct participation in

Odebrecht's money laundering operation is not evident, the Cuban government's economic practices are opaque and difficult to account for. Additionally, a high-level Brazilian official recently expressed concern the Cuban government laundered money through Odebrecht and stated his government's intention to investigate possible wrongdoing. There are no known issues with or abuse of NPOs, ARS, offshore sectors, FTZs, bearer shares, or other specific sectors or situations.

KEY AML LAWS AND REGULATIONS

Cuba claims to take into account international AML/CFT standards. Legislation released in 2013 outlines regulations regarding enhanced CDD for foreign PEPs, although it continues to exempt domestic PEPs from the reach of the legislation.

The United States and Cuba have developed a mutual legal assistance relationship through the legal cooperation technical working group established by the Law Enforcement Dialogue. The DEA established direct communication with its Cuban counterpart to focus on counternarcotics cooperation. Cuba has bilateral agreements with a number of countries related to combating drug trafficking.

Cuba is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/countries/a-c/cuba/documents/mer-cuba-2015.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Although the risk of money laundering is low, Cuba has a number of strategic deficiencies in its AML regime. These include a lack of SAR reporting to its FIU by financial institutions and DNFBPs, and weak supervision and enforcement of its DNFBP and NPO sectors.

These deficiencies stem from Cuba's opaque national banking system, which hampers efforts to monitor the effectiveness and progress of Cuba's AML efforts. Cuba should increase the transparency of its financial sector and increase its engagement with the regional and international AML communities. Cuba should ensure its CDD measures and STR requirements include domestic PEPs, all DNFBPs, and the NPO sector, and create appropriate laws and procedures to enhance international cooperation and mutual legal assistance. Cuba should increase the transparency of criminal investigations and prosecutions.

The U.S. government issued the Cuban Assets Control Regulations in 1963, under the Trading with the Enemy Act. The embargo remains in place and restricts tourist travel and most investment and prohibits the import of most products of Cuban origin. With some notable exceptions, including agricultural products, medicines and medical devices, telecommunications equipment, and consumer communications devices, most exports from the United States to Cuba require a license. Additionally, a number of U.S.-based assets of the Cuban government or Cuban nationals are frozen.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Several years ago the government ran high-profile campaigns against corruption and investigated and prosecuted Cuban officials and foreign business people. Cuba released no reports of prosecutions or convictions for money laundering in 2018; the last reported case occurred in August 2011.

Cuba agreed to discuss with the United States the establishment of mechanisms to combat terrorism, drug-trafficking, trafficking in persons, money laundering, smuggling, cybercrime, and other transnational crimes. The United States and Cuba established the Law Enforcement Dialogue, with working groups on counternarcotics, money laundering, counterterrorism, human smuggling, trafficking in persons, trade security, and legal cooperation.

Curacao

OVERVIEW

Curacao's prominent position as a regional financial center is declining, but it is still considered a transshipment point for drugs and gold from South America. Money laundering occurs through the sale of illegal narcotics, unlicensed money lenders, online gaming, and the transfer of gold from South America.

Curacao is an autonomous entity within the Kingdom of the Netherlands (Kingdom). The Kingdom retains responsibility for foreign policy and defense, including entering into international conventions, with the approval of the local Parliament. In 2016, Aruba, Sint Maarten, the Netherlands, and Curacao signed an MOU with the United States for joint training activities and sharing of information in the area of criminal investigation and law enforcement. One priority area is interdicting money laundering operations. The MOU activities are ongoing.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Money laundering organizations may try to take advantage of the availability of U.S. dollars, offshore banking and incorporation systems, two FTZs, a shipping container terminal with the largest oil transshipment center in the Caribbean, Curacao-based online gaming sites, and resorts/casinos to place, layer, and integrate illegal proceeds. Money laundering occurs through real estate purchases, international tax shelters, gold transactions, and through wire transfers and cash transport among Curacao, the Netherlands, and other Dutch Caribbean islands. Given its proximity and economic ties to Venezuela, the risk of Curacao being used to launder the proceeds of crimes emanating from Venezuela is substantial. However, the number of Venezuelans who could take advantage of access to U.S. dollars and euros has significantly declined since the humanitarian crisis in Venezuela erupted and U.S. sanctions made it harder for Venezuelans to launder their money.

KEY AML LAWS AND REGULATIONS

The Kingdom may extend the applicability of international conventions to the autonomous countries in the Kingdom. The Kingdom extended to Curacao the 1988 UN Drug Convention

and the UNTOC (as a successor to the Netherland Antilles). With the Kingdom's agreement, each autonomous entity can be assigned a status of its own within international or regional organizations, subject to the organization's agreement. The individual countries may conclude MOUs in areas in which they have autonomy, as long as they do not infringe on the foreign policy of the Kingdom.

The financial sector consists of trust and company service providers, administrators, and self-administered investment institutions providing trust services and administrative services. Curacao continues to sign Tax Information Exchange Agreements (TIEAs) and double taxation agreements with other jurisdictions.

The following types of service providers are obligated by AML legislation to file unusual transaction reports (UTRs) with the FIU and are covered by the KYC laws: accountants and accounting firms, auditors and auditing firms, auto/car dealers, credit unions, credit card companies, building societies, insurance companies, financial leasing companies, money remitters, real estate agents, securities brokers/dealers, banks, casinos, credit associations, financial advisors, lotteries, money exchanges (only domestic banks are permitted to provide the service of exchanging foreign currencies), notaries, pawn shops, dealers in precious stones and metals, lawyers, pension funds, online betting lotteries, trust companies, construction material dealers, and administrative services providers. Money transfer/cash courier companies must be licensed and supervised by the Central Bank of Curacao and Sint Maarten. Curacao is a member of the OECD Global Forum on Transparency and Exchange of Information for Tax Purposes. The parliament recently approved tax law changes to meet OECD standards.

Curacao is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/mutual-evaluation-reports/curacao/640-curacao-mer-final?highlight=WyJjdXJhXHUwMGU3YW8iXQ>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Curacao has drafted a supervisory law for internet gaming (currently the Ministry of Justice is the supervisory authority), which will be submitted to Parliament in 2019. Curacao has started conducting a national money laundering risk assessment.

The Kingdom has not extended the UNCAC to Curacao.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Curacao utilizes a UTR reporting system, a broader reporting mechanism than a STR scheme. Pursuant to local legislation, the reporting entities file UTRs with the FIU. The FIU analyzes the UTR and determines if it should be classified as a STR.

The 1983 MLAT between the Kingdom and the United States applies to Curacao and is regularly used by U.S. and Dutch law enforcement agencies for international drug trafficking and money laundering investigations. The 2004 U.S.-Netherlands Mutual Legal Assistance Agreement,

incorporating specific U.S.-EU provisions, was not extended to Curacao. Additionally, Curacao has a tax information exchange agreement with the United States.

Curacao has adopted the Agreement Regarding Mutual Cooperation in the Tracing, Freezing, Seizure and Forfeiture of the Proceeds and Instrumentalities of Crime and the Sharing of Forfeited Assets, which was signed by the Kingdom in 1994.

Curacao recently conducted a number of high-profile money laundering investigations, and numerous former officials were investigated, charged, or convicted. Curacao continues with two multi-year money laundering prosecutions. In 2018, the Supreme Court in the Netherlands upheld money laundering and corruption-related convictions against a former prime minister of Curacao. Also in 2018, an international bank with an office on Curacao severed ties with a Venezuelan company allegedly involved in money laundering. On September 4, 2018, Dutch prosecutors reached a settlement requiring multinational bank ING to pay approximately \$888 million (€775 million) for AML compliance failings, including allegations it facilitated money laundering by Curacao-based clients.

Cyprus

OVERVIEW

Since 1974, the southern part of Cyprus has been under the control of the government of the Republic of Cyprus. The northern part of Cyprus, administered by Turkish Cypriots, proclaimed itself the “Turkish Republic of Northern Cyprus” (“TRNC”) in 1983. The United States does not recognize the “TRNC,” nor does any country other than Turkey. A buffer zone, or “Green Line,” patrolled by the UN Peacekeeping Force in Cyprus, separates the two sides. The Republic of Cyprus and the area administrated by Turkish Cypriots are discussed separately below.

Cyprus has an established AML legal framework, which it continues to upgrade. As a regional financial center, Cyprus has a significant number of nonresident businesses. At the end of 2017, a total of 217,588 companies were registered in Cyprus, many owned by nonresidents. By law, all companies registered in Cyprus must disclose their ultimate beneficial owners to the authorities.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The Cypriot financial system is vulnerable to money laundering by domestic and foreign criminal enterprises and individuals, although proceeds generated abroad pose a greater threat. Despite legal requirements to identify beneficial owners to government authorities, some Cypriot law and accounting firms help construct layered corporate entities to mask the identities of financial beneficiaries. The main criminal sources of illicit proceeds are investment fraud, corruption, advance fee fraud, tax evasion, illegal drugs, tobacco smuggling, and human trafficking. Additionally, cybercrime cases, especially e-mail hacking, phishing, and the use of ransomware, continue to increase. Organized criminal groups and others have reportedly used Cypriot banks to launder proceeds, particularly from Russian and Ukrainian illicit activity. The

gaming sector may pose new, potential vulnerabilities as the Cypriot authorities adjust to supervising casino-based activity. After a competitive bidding process, the government recently awarded an exclusive license to a casino operator. A multi-million euro casino resort is under construction, with completion expected in 2021. In the interim, the operator was authorized to open five “pop up” casinos.

Cyprus’ investor citizenship program allows foreign investors to apply for Cypriot (and, accordingly, EU) citizenship after investing more than \$2.2 million in Cyprus. This program generated \$5.7 billion from 2008 to the end of 2017. The program requires investments in any combination of real estate, land development, and infrastructure projects; companies with a proven physical presence in Cyprus; or licensed financial assets of Cypriot companies. Following pressure from the EC, Cyprus’ Council of Ministers decided in May 2018 to limit the number of naturalizations of investors to 700 per year as of 2018. Cyprus screens applicants using a two-tier background check; applicants who make it to the second tier face a more extensive investigation, which takes up to six months to complete. Additionally, the Committee of Supervision and Control for the Cyprus Investment Program — which includes representatives from the Ministry of Finance, the Ministry of Interior, and the Cyprus Investment Promotion Agency (CIPA) — established in 2018 a Register of Service Practitioners. Those practitioners are authorized to provide residency/citizenship services to investors who meet certain criteria designed to increase accountability, such as abiding by a code of conduct, having no criminal record, etc.

KEY AML LAWS AND REGULATIONS

The Unit for Combating Money Laundering (MOKAS) is Cyprus’ FIU. Cyprus has several supervisory authorities for AML compliance, including the Central Bank of Cyprus (CBC), the Cyprus Securities and Exchange Commission (CySEC), the Cyprus Bar Association, the Institute of Certified Public Accountants of Cyprus, and the Cyprus Casino Gaming Commission. All of the supervisors can issue directives to their respective supervised entities and have developed onsite and offsite tools for risk-based supervision.

The provisions of the Fourth EU AML Directive were enacted in domestic regulation and published in the Official Gazette in April 2018. One of the key provisions mandates creation of a national registry listing all beneficial owners of legal entities in Cyprus. The government aims to have the registry operational by 2020.

The AML law contains provisions allowing for the registration and enforcement of foreign court orders. Cypriot authorities maintain close cooperation with foreign supervisory authorities, including U.S. agencies. Cypriot legislation covers both foreign and domestic PEPs.

Cyprus is a member of MONEYVAL, a FATF-style regional body. Its most recent MER is available at: <https://www.coe.int/en/web/moneyval/jurisdictions/cyprus>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Cyprus continues to upgrade its AML legal framework. Cypriot authorities finalized their first AML/CFT national risk assessment (NRA) on November 30, 2018. The NRA assesses the money laundering threat as high to the Cypriot banking sector and medium-high to trust and company service providers, lawyers and accounting firms. The NRA identifies numerous areas for improvement, including more effective implementation of AML laws and regulations, enhanced capacity building and awareness training in all sectors, and specialized training for prosecutors, investigators, and the judiciary.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Cyprus implements applicable international conventions. Relevant legislation makes adherence to UNSCR and EU sanctions compulsory. Additionally, there is a bilateral MLAT between the United States and Cyprus.

In 2016, Cypriot authorities convicted 28 persons for money laundering offenses, six of whom were prosecuted in cases filed before 2016. In 2017, Cypriot authorities convicted 33 persons for money laundering offenses, 22 of whom were prosecuted in cases filed before 2017. Statistics for 2018 are not yet available.

On June 14, 2018, the CBC issued a circular to banks, advising them to be extra vigilant against shell companies and letter-box companies, and to avoid doing business with them. A refined version of this circular was issued November 2, 2018, to all credit, payment, and virtual money institutions. The circular defines shell companies and requires covered entities to review their client bases for such clients, assess the future of the business relationship, and inform the CBC of the review outcome. The circular has resulted in banks closing noncompliant accounts and refusing to open new accounts that fail to meet specified thresholds in the circular. The circular will be incorporated in a legally binding CBC directive, expected to be issued in early 2019.

Supervisory authorities are legally empowered to take a range of measures under the AML law against noncompliant entities. In an effort to “name and shame” offenders, and following specific legal provisions, both the CBC and CySEC post information on their websites on the imposition of such fines.

Area Administered by Turkish Cypriots

OVERVIEW

The area administered by Turkish Cypriots lacks the legal and institutional framework necessary to prevent and combat money laundering. Nevertheless, Turkish Cypriot authorities have taken steps to address some of the major deficiencies, although “laws” are not sufficiently enforced to effectively prevent money laundering. The casino sector and the offshore banking sector remain of concern for money laundering abuse.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

As of November 2018, there are 34 casinos in the Turkish Cypriot-administered area. Local experts agree the ongoing shortage of law enforcement resources and expertise leaves the casino and gaming/entertainment sector poorly regulated, and, consequently, vulnerable to money laundering. The unregulated money lenders and currency exchange houses are also areas of concern.

The offshore banking sector poses a money laundering risk. As of November 2017, it consists of seven offshore banks regulated by the “central bank” and 411 offshore companies. Turkish Cypriots only permit banks licensed by OECD-member countries to operate an offshore branch locally.

In the area administered by Turkish Cypriots, there is one “free port and zone” in Famagusta, which is regulated by the “Free-Ports and Free Zones Law.” Operations and activities permitted include industry, manufacturing, and production; storage and export of goods; assembly and repair of goods; building, repair, and assembly of ships; and banking and insurance services.

There have been reports of smuggling of people, illegal drugs, tobacco, alcohol, meat, and fresh produce across the UN buffer zone. Additionally, intellectual property rights violations are common; a legislative framework is lacking and pirated materials, such as sunglasses, clothing, shoes, and DVDs/CDs are freely available for sale.

KEY AML LAWS AND REGULATIONS

Turkish Cypriot authorities passed AML “legislation” in 2008.

Financial institutions and DNFBPs are required to submit STRs to the “FIU.” Following receipt, the “FIU” forwards STRs to the five-member “Anti-Money Laundering Committee,” which decides whether to refer suspicious cases to the “Attorney General’s Office,” and then, if necessary, to the “police” for further investigation. The committee is composed of representatives of the “Ministry of Economy,” “Money and Exchange Bureau,” “central bank,” “police,” and “customs.”

Draft AML “legislation” incorporating international standards and elements of the then-proposed EU Fourth AML Directive has been pending approval in “Parliament” since 2014.

The area administrated by Turkish Cypriots does not have a records-exchange mechanism with the United States. It is not a member of any FATF-style regional body, and, thus, is not subject to AML peer evaluation.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The area administrated by Turkish Cypriots lacks the legal and institutional framework necessary to prevent and combat money laundering. Inadequate legislation and a lack of expertise among members of the enforcement, regulatory, and financial communities restrict regulatory capabilities.

The area does have in place “regulations” requiring enhanced due diligence for both foreign and domestic PEPs, but compliance is lacking.

According to local experts, the “criminal code” needs to be updated to aid money laundering-related prosecutions.

The area administrated by Turkish Cypriots is not a member of the Egmont Group.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

While progress has been made in recent years with the passage of “laws” better regulating the onshore and offshore banking sectors and casinos, these “statutes” are not sufficiently enforced.

The “central bank” oversees and regulates local, foreign, and private banks. There are 22 banks in the area administrated by Turkish Cypriots, of which 17 are Turkish Cypriot-owned banks, and five are branches of banks in Turkey.

Between January and November 2018, the “FIU” reported receiving 2,389 STRs, compared to 515 for the same period in 2017, and participated in 40 money laundering-related prosecutions.

The EU provides technical assistance to the Turkish Cypriots to combat money laundering because of the area’s money laundering and terrorist finance risks.

Dominica

OVERVIEW

Despite the devastation of Hurricane Irma, Dominica made some progress in its AML regime in 2018. With the assistance of a donor, Dominica has begun a National Risk Assessment (NRA). The findings of the NRA will provide a roadmap for the future. Dominica reports there are currently 13 offshore banks regulated by the Financial Services Unit (FSU), which also licenses and supervises credit unions, insurance companies, internet gaming companies, and the country’s economic citizenship program.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The government indicates that narcotics and cybercrime are the major sources of illicit funds. The country’s geographical location and porous borders raise risks for narcotics trafficking. Additionally, foreign nationals from Europe, South America, and Asia have used automated teller machines in Dominica to skim money from European bank accounts by exploiting security deficiencies.

The preliminary vulnerabilities identified by the NRA are inadequate AML training for the judiciary and the prosecutorial authorities, lack of awareness of new AML/CFT procedures by key law enforcement agencies, and ineffective supervision of DNFBPs.

Dominica's offshore sector hosts two internet gaming companies, 13 offshore banks, and an unknown number of insurance entities, trusts, and IBCs. (As of 2015, the number of IBCs was close to 19,000.) Bearer shares are permitted, but beneficiaries of the bearer shares must be disclosed to financial institutions as part of their KYC programs.

Under Dominica's citizenship by investment (CBI) program, individuals can obtain citizenship through a donation to the government's Economic Diversification Fund of U.S. \$100,000 for an individual or U.S. \$200,000 for a family of four, or through an investment in real estate valued at a minimum of U.S. \$200,000. The real estate option incurs fees ranging from U.S. \$25,000 to U.S. \$70,000 depending on family size. Authorized agents, based both domestically and abroad, market the CBI program and are typically the first point of contact for applicants. An application for economic citizenship must be made through a government-approved local agent and requires a fee for due diligence or background check purposes. There is no mandatory interview process; however, the government may require interviews in particular cases. Applicants must make a source of funds declaration and provide evidence supporting the declaration. The government established a Citizenship by Investment Unit (CBIU) to manage the screening and application process. Due diligence has been lax. Dominica does not consistently use available regional mechanisms, such as the Joint Regional Communications Center (JRCC), to properly vet candidates. The CBIU does not always deny citizenship to those who are red flagged or given negative dispositions from the JRCC and other institutions. There are also increasing concerns about the expansion of these programs due to the visa-free travel and the ability to open bank accounts accorded these individuals.

KEY AML LAWS AND REGULATIONS

Dominica has extensive AML laws and regulations including the Money Laundering Prevention (Amendment) Act (MPLA) of 2016, the 2013 Financial Services Unit (Amendment) Act, and the 2013 Proceeds of Crime (Amendment) Act. In March 2018, the Chief Justice made statutory rules under section 223 of the Magistrate's Code of Procedure Act to clarify the forms and procedures used in the application for detention and forfeiture of cash.

Dominica has KYC and STR regulations. The AML/CFT Code of Practice covers legal persons and provides for enhanced due diligence for PEPs. The registering agents of IBCs are mandated to keep proper beneficial ownership records.

Dominica has a MLAT with the United States.

Dominica is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/cfatf-documents/mutual-evaluation-reports/dominica-1/63-dominica-3rd-round-mer/file>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Dominica has no major deficiencies in legislation. Because Dominica has numerous pieces of amended legislation, the government should consider a legislation review to identify any conflicts or to determine which pieces of legislation could be consolidated into one MLPA.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Dominica reports that the FSU remains understaffed.

From 2016 to 2018, Dominica revoked the licenses of eight offshore banks.

In 2018, Dominica created a quick response unit, the Anti-Crime Task Force, to work in conjunction with the drug unit to fight illicit activities in the country.

From 2017 to 2018, Dominica prosecuted six money laundering cases.

Dominican Republic

OVERVIEW

The Dominican Republic (DR) is a major transshipment point for illicit narcotics destined for the United States and Europe. The eight international airports, 16 seaports, and a large porous frontier with Haiti present Dominican authorities with serious challenges. The DR is not a major regional financial center, despite having one of the largest economies in the Caribbean.

Corruption within the government and the private sector, the presence of international illicit trafficking cartels, a large informal economy, and weak financial controls make the DR vulnerable to money laundering threats. Financial institutions in the DR engage in currency transactions involving international narcotics trafficking proceeds that include significant amounts of U.S. currency or currency derived from illegal drug sales in the United States.

Following its expulsion in 2006, the DR is not currently a member of the Egmont Group. The Dominican government officially requested readmission to Egmont in 2015 and is working with the Egmont Group to complete reinstatement in 2019.

The government should take steps to rectify continuing weaknesses regarding PEPs, pass legislation to provide safe harbor protection for STR filers, and criminalize tipping off. The government should better regulate casinos, non-bank businesses, professions, real estate companies, and betting and lottery parlors, and strengthen regulations for financial cooperatives and insurance companies.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The major sources of laundered proceeds stem from illicit trafficking activities, tax evasion, public corruption, and fraudulent financial activities, particularly transactions with forged credit cards. Networks smuggling weapons into the DR from the United States remain active. Car

dealerships, the precious metals sector, casinos, tourism agencies, and real estate and construction companies contribute to money laundering activities in the DR. Bulk cash smuggling by couriers and the use of wire transfer remittances are the primary methods for moving illicit funds from the United States into the Dominican Republic. Once in the DR, currency exchange houses, money remittance companies, real estate and construction companies, and casinos facilitate the laundering of these illicit funds.

While the DR has passed a law creating an international FTZ, implementing regulations have not been issued and there are presently no operational FTZs.

KEY AML LAWS AND REGULATIONS

Law 155-17 was updated in 2017 to strengthen penalties and broaden the scope of crimes covered under the legislation, among other changes. The DR has comprehensive KYC and STR regulations.

The United States and the DR do not have a bilateral MLAT but do use a similar process via multilateral law enforcement conventions to exchange data for judicial proceedings on a case-by-case basis.

The Dominican Republic is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available at: <https://www.gafilat.org/index.php/es/biblioteca-virtual/miembros/republica-dominicana/evaluaciones-mtuas-15/2976-merd-fourth-round/file>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The DR has a mechanism (Law 155-17) for sharing and requesting information related to money laundering; however, that mechanism is not in force due to the exclusion of the DR from the Egmont Group. Following its expulsion in 2006, the Dominican government improved the functionality of its AML institutions, but it was only in 2014 that the Congress approved legislative changes to bring the country into compliance with Egmont Group rules by eliminating a second FIU-like organization. The DR officially requested readmission to the Egmont Group in 2015 and is working with the group towards readmission in 2019.

The definition and procedural requirements regarding PEPs are not consistent across sectors. Additionally, the DR has no legislation providing safe harbor protection for STR filers and does not criminalize tipping off. The government also needs to strengthen regulation of casinos and non-bank actors and is exploring methodologies to do so.

The DR's weak asset forfeiture regime is improving but does not cover confiscation of instrumentalities intended for use in the commission of money laundering offenses; property of corresponding value; and income, profits, or other benefits from the proceeds of crime. The Congress of the Dominican Republic continues to review legislation that would institute non-conviction-based forfeiture and align the asset forfeiture regime with international standards.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The DR continues to work on areas where it is non-compliant with international AML standards, and the national money laundering working group has publicly reaffirmed the government's commitment to reaching compliance.

The Attorney General's Office reports there were 12 convictions in calendar year 2018 for money laundering as well as 38 active trials currently underway. The Financial Analysis Unit, the FIU, reports it is investigating an additional 50 cases. The Attorney General's Criminal Investigations Unit has also begun working on sensitive cases involving, among other issues, money laundering and corruption.

Ecuador

OVERVIEW

Ecuador is a major drug transit country. A U.S. dollar-based economy and geographic location between two major drug-producing countries make Ecuador highly vulnerable to money laundering. Economic informality and a prevalence of cash transactions also complicate AML efforts. Approximately 55 percent of people do not have bank accounts, and 60 percent of small businesses do not have tax identification numbers or bank accounts. Money laundering occurs through trade, commercial activity, and cash couriers. The transit of illicit cash is a significant activity, and bulk cash smuggling and structuring are common problems.

Bureaucratic stove-piping, corruption, lax immigration laws, and lack of international information sharing and specialized AML expertise in the judiciary, law enforcement, and banking regulatory agencies hamper efforts to improve AML enforcement and prosecutions.

Rooting out public corruption remains a top priority for the current government. The government has investigated and prosecuted high-level government officials from the previous administration for bribery, embezzlement, illicit enrichment, and organized crime. The Attorney General's Office (AGO) continues to investigate allegations of financial crimes related to state oil company PetroEcuador and the Brazilian construction company Odebrecht.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Narcotrafficking is a significant source of illicit proceeds, and criminals continue to use commercial and trade mechanisms to launder funds. Persistent money laundering problems relate to government corruption, real estate transactions, embezzlement, tax evasion and fraud, illegal mining and gold smuggling, bulk cash smuggling, and TBML, particularly cross-border commercial activities with Colombia.

Additionally, officials indicate the SUCRE – a quasi-cryptocurrency for transaction settlements between Venezuela, Ecuador, and Bolivia – is a possible channel for money laundering.

With the assistance of donors, the Ecuadorian FIU is undertaking a national risk assessment to identify vulnerabilities and typologies.

KEY AML LAWS AND REGULATIONS

Ecuador did not implement new AML regulations in 2018. The 2017 General Regulation to the 2016 Organic Law of Prevention, Detection, and Eradication of Money Laundering and Financial Crimes (2017 General Regulation) and subsequent 2017 banking regulations strengthen STR requirements and risk management for covered entities. The Ecuadorian legislature continues to debate legislative measures to strengthen the country's ability to freeze, seize, and recover assets in money laundering cases.

Ecuador has enhanced due diligence for PEPs. Additionally, public officials are prohibited from maintaining assets in countries designated as tax havens.

Ecuador uses various conventions to ensure adequate records are available to the United States and other governments in connection with drug investigations and proceedings.

Ecuador is a member of the GAFILAT, a FATF-style regional body. Ecuador's most recent MER is available in Spanish only at: <http://www.gafilat.info/index.php/es/biblioteca-virtual/miembros/ecuador/evaluaciones-mutuas-7/131-ecuador-3era-ronda-2011>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Corruption, deficient law enforcement and judicial training, and frequent misinterpretation of the law are primary AML deficiencies. Judges are susceptible to bribery from prosecutors and defendants and frequently hinder the fight against narcotics-related money laundering. The prosecutorial office handling money laundering, the Transparency and Anti-Corruption Unit (AGO/TACU), suffers from reputational deficiencies and reportedly is subject to political pressure to shelve cases. Authorities note a lack of coordination and trust among law enforcement, the AGO, and financial regulators that impedes information sharing and prosecutions.

In money laundering cases, state prosecutors are required to inform a suspect s/he is under investigation, which, according to authorities, often results in key evidence disappearing.

The Superintendence of the Popular and Solidarity Economy (SEPS) loosely regulates approximately 850 credit unions. SEPS lacks sufficient resources and has difficulty exercising oversight over the institutions. In addition, private banks, in practice, do not always monitor PEPs effectively.

The FIU can apply administrative sanctions to reporting entities only for missing monthly reporting deadlines. If a reporting entity fails to report or otherwise act on a suspicious transaction, the FIU must rely on the AGO to initiate an investigation.

Bulk cash smuggling is not criminalized. Authorities can pursue money laundering charges against bulk cash smugglers but are given only 30 days to investigate and must prove the money came from illicit activity. Failure to declare cash/currency at a port of entry is punishable by an administrative fine; the law does not address other financial instruments.

Ecuador's 2008 Constitution permits trials in absentia and voids the statute of limitations for government officials charged with embezzlement, bribery, extortion, or illicit enrichment but does not address money laundering. Consequently, officials under investigation for money laundering frequently flee Ecuador until the statute of limitations expires, hindering prosecutions. A proposed anticorruption law would allow for asset forfeiture in absentia and lengthen the time afforded for investigations of money laundering cases involving public corruption.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

In 2018, Ecuador pursued money laundering charges against several former government officials, including a former Secretary of Communications and a former Minister of Social and Economic Inclusion. Authorities report they have provided information on 12 possible cases of money laundering – more than half related to public corruption – to the AGO since February 2018, but have not seen prosecutorial action on most.

Officials note the supervision components of the 2017 General Regulation have not been fully implemented. Coordination between the Superintendence of Banks and the FIU in supervisory activities appears to be limited. The FIU and the Superintendence separately are working to adopt risk-based approaches to analysis and supervision.

Cooperation with U.S. law enforcement agencies on money laundering is nascent. The government does not make publicly available summary statistics on money laundering-related prosecutions and convictions.

El Salvador

OVERVIEW

El Salvador's main money laundering vulnerability is the FIU's recent suspension from the Egmont Group in late September 2018 based on the government's lack of progress in demonstrating the FIU's operational independence.

Current capacity building efforts are improving El Salvador's ability to investigate and prosecute complex money laundering schemes, with a major success in the recent conviction of an ex-president and several associates for money laundering and embezzlement.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

El Salvador is geographically vulnerable to the transit of South American cocaine destined for the United States. This, and the existence of some close business and political relationships with Venezuela, make its financial institutions vulnerable to money laundering activity.

Organized crime groups launder money through the use of front companies, travel agencies, remittances, the import and export of goods, and cargo transportation. Illicit activity includes the use of smurfing operations, whereby small amounts of money are transferred in a specific pattern to avoid detection. Many of these funds come from narcotics activities in Guatemala. It is not uncommon for officials at San Salvador's international airport to intercept multiple subjects on the same flight traveling with amounts of money just under \$10,000.

The U.S. dollar is the official currency in El Salvador, and the country's dollarized economy and geographic location make it a potential haven for transnational organized crime groups, including human smuggling and drug trafficking organizations. Money laundering is primarily related to proceeds from illegal narcotics and organized crime.

The Central America Four Agreement among El Salvador, Guatemala, Honduras, and Nicaragua allows for the free movement of their citizens across the respective borders. Several trade-based and black market currency schemes have been identified in El Salvador as a result of lax border/customs security.

As of December 2017, there were 17 FTZs operating in El Salvador. The FTZs are comprised of more than 200 companies operating in areas such as textiles, clothing, distribution centers, call centers, business process outsourcing, agribusiness, agriculture, electronics, and metallurgy.

KEY AML LAWS AND REGULATIONS

The regulatory institutions charged with AML supervision are weak and lack human resources and sufficient regulatory powers. The Superintendent of the Financial System supervises banks and remitters and only accountants and auditors with a relationship to a bank or bank holding company.

On July 18, 2017, the legislature amended the asset forfeiture law to provide substantial exceptions for public officials. The Supreme Court enjoined these changes and struck down the majority of the provisions that would have impeded the seizure of assets from illicit and corrupt activities.

The asset forfeiture legislation allows the government to sell property seized in criminal investigations and, at the end of the year, distribute it to agencies specified in the law. The AGO and the Ministry of Justice and Security are entitled to each receive 35 percent of the distribution. Yearly distributions to these two agencies are steadily increasing, with the distributions growing from \$92,700 in 2015 to \$259,700 in 2017. As the agency in charge of distributions develops, with donor support, its capacity to monetize assets, distributions in 2018 are expected to be substantially higher.

El Salvador is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/cfatf-mutual-evaluation-reports/el-salvador-1>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Information sharing between the Salvadoran FIU and FinCEN, the U.S. FIU, was frozen in 2014, following an unauthorized disclosure of information. Politicization of the Salvadoran FIU was addressed following a change in administration at the AGO, but the FIU remains barred from accessing FinCEN, impeding the FIU's ability to investigate transactions with a U.S. nexus.

In late September 2018, the FIU was suspended from the Egmont Group, which will be a substantial impediment to information sharing. Despite substantial technical improvements, the president's veto of an amendment to the organic law establishing the FIU as "operationally independent" from the AGO was the main cause of the suspension. The legislature overrode the veto in October 2018; however, the change will not take effect until the Constitutional Chamber of the Salvadoran Supreme Court reviews the law.

Despite the suspension from Egmont, the FIU maintains bilateral agreements with neighboring countries and is seeking to expand them during the suspension period, which will be reviewed by Egmont in July 2019.

Because of the lack of regulation, independent accountants and auditors and non-bank entities, such as casinos, pawn shops, and other DNFBPs, do not file SARs. Donors are supporting the government's development of comprehensive legislation governing these institutions.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Authorities are currently working on legislation to improve regulation of DNFBPs to better comply with international standards.

According to the Attorney General's Office (AGO), authorities seized assets worth \$18,034,500 in 2018, while the specialized court finalized the forfeiture of \$329,700 in 2018. In 2018, the asset forfeiture unit opened 181 cases and received final judgments in 16.

El Salvador's major money laundering convictions to date relate to ex-president Saca and his associates who, during his term (2004-09), diverted approximately \$260 million of government funds into secret accounts, then through businesses owned by himself or co-conspirators. As part of a plea agreement, the AGO will be able to forfeit approximately \$25 million in properties, businesses, vehicles, and cash that were proceeds of the fraud.

Georgia

OVERVIEW

Much of the illegal income in Georgia derives from banking fraud, cybercrime, and misappropriation of funds. Although authorities have started to conduct parallel financial investigations in drug cases, there is little hard evidence to suggest a significant volume of illegal narcotics proceeds is laundered through the formal financial system. However, because Georgia is located in a significant and well-established trafficking corridor, bulk cash smuggling and money laundering are highly likely. The Russian-occupied territories of South Ossetia and Abkhazia fall outside the control of Georgian authorities and are not subject to monitoring.

Georgian prosecutors and law enforcement authorities should put more emphasis on pursuing links between organized crime and money laundering. Georgian law enforcement should develop a task-force approach to facilitate greater exchange of information and cooperation among the relevant bodies, pulling together intelligence and resources to attack financial crimes. Georgia also should take steps to supervise its gaming industry.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Illicit income is mainly generated from fraud and cybercrime, either domestically or abroad. Social engineering schemes are most commonly used to commit mass marketing fraud. Banking systems and money transfer services are the primary means to move funds and, often, Georgia is just one link in an international criminal chain. Georgian banking institutions are used to transfer funds from one jurisdiction to another.

According to the Financial Monitoring Service (FMS) January 2018 Annual Report, there are 416 lotteries and gaming institutions registered in Georgia and 31 casinos. The AML obligations of gaming establishments are identical or substantively similar to the requirements placed on other covered entities. The Ministry of Finance supervises lottery organizations, gaming institutions, and casinos for AML compliance. A new casino is being built on the border with Russia that may provide a vehicle for the laundering of proceeds from organized crime.

In 2017, the FMS, Georgia's FIU, identified possible attempts to avoid Iranian sanctions by non-Georgian residents of Iranian origin, or with ties to Iran, who established legal companies in Georgia to conduct financial transactions with third countries.

The FMS also examined the financial transactions of a number of Georgians who sent money through remittance services to a small group of individuals in a neighboring country. The examination showed most of the Georgians involved in these transactions had criminal records for drug crimes.

KEY AML LAWS AND REGULATIONS

Georgia's Law on Combating Legalization of Illicit Income is regularly updated to enable authorities to confront emerging money laundering trends. Georgia's Civil Procedure Code

permits civil forfeiture of any undocumented property in the possession of persons convicted for money laundering or other designated offenses.

The Prosecution Service of Georgia (PSG) has a specialized department with investigative and prosecutorial units that handle money laundering crimes. The FMS operates as an independent agency accountable to the Government Cabinet. The FMS shares operational information with its colleagues on a regular basis.

Georgia's national money laundering and terrorism financing risk assessment (NRA) is expected to be fully completed in 2019.

Georgia is a member of MONEYVAL, a FATF-style regional body. Its most recent mutual evaluation report is available at: <https://www.coe.int/en/web/moneyval/jurisdictions/georgia>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Enhanced due diligence measures are applicable only to foreign PEPs. Draft legislative amendments would extend enhanced due diligence measures to domestic PEPs and the heads of international (intergovernmental) organizations.

Bitcoin and other virtual currencies are becoming extremely popular in Georgia. Recent international investigations reveal Georgia is a popular virtual currency mining location. Georgia does not have experienced cybercrime labs and has only a handful of qualified and competent digital forensic analysts. Training and capacity-building efforts need to be directed toward establishing state-of-the-art cybercrime labs, improving analyst capabilities, and improving legislation on collecting and analyzing digital evidence.

The growth of the gaming industry, including internet gaming, is concerning. In 2017, casinos and gaming institutions filed over 500 CTRs but zero STRs. No STRs by the gaming industry in past years raises questions about their compliance with existing regulations and the effectiveness of supervision.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The PSG multi-year strategy and action plan, adopted in February 2017, calls for an increase in the effectiveness of money laundering investigations and prosecutions and focuses on capacity development and skill-based training for prosecutors.

About one-third of STR referrals from the FMS to law enforcement agencies has resulted in criminal investigations. Between October 1, 2017 and October 1, 2018, eight money laundering prosecutions were initiated, compared to 31 during the first nine months of 2017. During the same period, 18 people, including a legal entity, were convicted of money laundering.

Investigations into narcotics, extortion, weapons of mass destruction, human trafficking, prostitution, and smuggling rarely disclose financial components. Despite a domestic market for illegal drugs and international drug trafficking through Georgia, narcotics trafficking is rarely

investigated as a predicate offense for money laundering. The PSG has guidelines recommending a task-force approach to money laundering investigations.

Ghana

OVERVIEW

Ghana's AML laws are largely in line with international standards, and the country is working to actualize its AML regime across all sectors and institutions. However, Ghana has no comprehensive AML/CFT policy.

Ghana is consolidating its banking and financial sector, with new capital requirements reducing the number of banks operating in Ghana. This, along with improved banking supervision, could simplify oversight but should not affect the filing of STRs and CTRs adversely.

NPOs and DNFBPs continue to represent the largest gaps in Ghana's AML regime, both in terms of the legal framework and risk. To address these and other money laundering issues, the government of Ghana should allocate adequate funding to fight money laundering, effectively implement relevant asset forfeiture laws and regulations, and sanction institutions that do not file STRs and CTRs, as required by Ghanaian law. Ghanaian authorities are drafting a trust bill and real estate bill that they hope will address issues in the non-profit and real estate sectors. They have also conducted outreach to improve awareness of AML issues within Ghana's DNFBPs.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Fraud, theft, tax evasion, corruption, and drug trafficking are the most prevalent predicate crimes for money laundering offenses in Ghana. Advanced fee fraud is the most commonly committed offense. Other predicate offenses that pose medium money laundering threats include human trafficking, migrant smuggling, organized crime, arms trafficking, counterfeiting of currency, counterfeiting and piracy of products, environmental crime, and forgery.

DNFBPs, which include real estate agencies, casinos, dealers in precious metals, accountants, lawyers, notaries, car dealers, NPOs, trust and company service providers, and remittance companies, are particularly vulnerable to money laundering. Major vulnerabilities are the lack of enforcement and ineffective adherence to customer due diligence or KYC requirements by most DNFBPs. Ghana is working towards, but has not finalized, sector-specific AML guidelines, and lacks a robust risk assessment methodology for the DNFBP sector. Few STRs are filed by DNFBPs despite the high money laundering risk that sector faces.

Ghana is a cash-dominant economy, and bulk cash smuggling is the preferred money laundering scheme. No banks in Ghana provide offshore banking services. Ghana has designated four FTZ areas, but only one is active. Ghana also licenses factories outside the FTZ areas as free zone companies; most produce garments and processed foods.

KEY AML LAWS AND REGULATIONS

Ghana's principal AML legislation is the Anti-Money Laundering Act, 2008, as amended by the Anti-Money Laundering Amendment, 2014. It defines money laundering as the conversion, concealment, disguise, or transfer of property which is or forms part of the proceeds of crime; the concealment and disguise of the unlawful origin of the property; and the acquisition, use, or possession of the property. Parliament additionally passed or amended another 12 acts and two executive instruments to strengthen Ghana's AML regime. In January 2018, the government revised its AML guidelines.

Ghana has comprehensive KYC and STR regulations and legal persons are covered. In 2016, parliament amended Ghana's Companies Act, 1963 to establish a beneficial ownership register in the country. An additional amendment to the Act making beneficial ownership and PEP data publicly available is pending approval in Parliament.

Ghana and the United States do not have a MLAT, but records can be exchanged through other mechanisms such as the Egmont Group or as parties to the UNCAC and UNTOC. Moreover, mutual legal assistance can be provided on a reciprocal basis through letters of request.

Ghana is a member of the GIABA, a FATF-style regional body. Its most recent MER is available at: <http://www.giaba.org/reports/mutual-evaluation/Ghana.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Banks and insurance companies are required to identify high-risk clients such as PEPs, but there is a lack of effective identification and monitoring of PEPs and their associates. For example, recent onsite inspections of capital market operators showed many were unable to produce their PEP lists.

There is no organized national response in the NPO sector to combat possible money laundering or terrorist financing abuse, and submission of annual financial statements and records of operation of NPOs remains a challenge.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Ghana is implementing a single national identity card. Identification of customers for purposes of KYC remains challenging, as many of the publicly owned identity verification databases (such as the Electoral Commission and Immigration database) are not available online, and those that are available online are not updated regularly.

Financial crimes are prosecuted by attorneys from the Attorney General's Office and by non-attorney police prosecutors. Few investigators and prosecutors have received specialized AML training. Ghana has no certified financial crime investigators trained in asset forfeiture.

Ghana's Financial Intelligence Center (FIC), its FIU, and international partners trained law enforcement agencies and other stakeholders. Covered institutions across the banking, insurance, and capital market sectors also receive AML/CFT awareness training. Ghana is

working toward compliance with international AML standards and there are no known refusals to cooperate with the United States or other governments on ML issues. Several agencies maintain combined statistics on convictions; separate data on money laundering convictions is not readily available. The FIC referred 133 cases to authorities for investigation and prosecution in 2018.

Guatemala

OVERVIEW

Guatemala is a transshipment route for narcotics to the United States and cash returning to South America. Though the government has challenges in addressing money laundering and financial crimes related to narcotics trafficking, they have seen improvements. Guatemala continues to progress in investigating and prosecuting corruption, money laundering, and other financial crimes. The Public Ministry (MP) has improved coordination between prosecutors and agencies so that predicate crimes, such as extortion, corruption, and drug trafficking, are pursued as part of money laundering investigations.

Issues to be addressed include greater communications between the Special Verification Agency (IVE), Guatemala's FIU, and the MP; improved coordination among financial supervision entities, including various parts of the Superintendent of Banking; and institutionalization of coordination between the MP and the National Secretariat for Administration of Forfeited Property (SENABED), the entity in charge of seized asset administration. Additional challenges include continued development of internal capacity for financial crime investigations at the MP; enhancement of a dedicated unit of investigators within the National Civil Police to support the MP; greater autonomy for SENABED; and insufficient staffing of key agencies.

In order to maximize effectiveness and decrease inefficiencies in addressing money laundering, Guatemala should continue to use vetting and counter-corruption mechanisms to identify and eliminate actors in the legal system who hinder trust and communication within and among relevant agencies.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

In addition to narcotics trafficking, institutional corruption, tax evasion, extortion, human trafficking, and commerce in illicit goods are additional sources of illicit proceeds. Money is often laundered through small transactions below the \$10,000 reporting requirement, either in small banks along the Guatemala-Mexico border or by travelers carrying cash to other countries. Guatemala does not prohibit structuring of deposits to avoid reporting requirements.

The Central America Four Border Control Agreement among El Salvador, Guatemala, Honduras, and Nicaragua allows free movement of their citizens across their borders without being required to declare cash amounts greater than \$10,000. Money is also commonly laundered through real estate transactions, ranching, and the gaming industry. Additionally, a category of "offshore"

banks exists in Guatemala where the customers' money is legally considered to be deposited in the foreign country where the bank is headquartered.

Guatemalan authorities and agencies increasingly conduct sound investigations of financial crimes. This year, prosecutors charged a military official with laundering money on behalf of MS-13, one of the first times the anti-extortion authorities have charged a financial crime relating to proceeds of gang extortions. Additionally, after several years of investigations, both a former vice president of Guatemala and a former minister of government were convicted this year on corruption charges, including fraud, trafficking in influence, and conspiracy, and received sentences of 15 years and eight years in prison, respectively.

Guatemala has 11 active FTZs, mainly used to import duty-free goods used in the manufacturing of products or provision of services for exportation. There are no known cases or allegations that indicate FTZs are hubs of money laundering or drug trafficking activity.

KEY AML LAWS AND REGULATIONS

Despite an adequate AML legal framework, a lack of coordination among agencies and institutions and limited human resources have led to less than optimal application of KYC procedures and enforcement of AML and SAR regulations. However, most money laundering cases prosecuted by the MP begin from SARs the banks file with the IVE, which the IVE then sends to the MP. The MP uses the SARs fairly effectively.

Guatemala and the United States do not have a mutual legal assistance treaty but use other mechanisms, such as multilateral treaties, to exchange relevant information.

Guatemala is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/4th-round-meal-reports/7462-guatemala-4th-round-mer/file>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Despite Guatemala's improved AML legal framework and efforts to exercise due diligence for PEPs, specific deficiencies have been detected. DNFBPs such as attorneys, notaries, and, in particular, casinos or video lotteries have been identified as being at high risk for use as money laundering mechanisms. The financial sector proposed a law to regulate casinos and other DNFBPs; it has been pending in Congress for years. Casinos and games of chance operate both on- and offshore and are currently unregulated.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Although Guatemala's improved legal framework and IVE and MP's enhanced AML investigative abilities are positive, effective implementation is inhibited due to procedural inefficiencies, staffing shortages, and ongoing lack of collaboration among relevant offices and prosecutors based on lack of trust due to widespread corruption.

From January 1 through October 15, 2018, the MP office in charge of money laundering prosecutions received 151 complaints, filed charges in 113 cases, and obtained 63 convictions. Also, other offices may have included money laundering charges in other indictments, as noted in the MS-13 example.

Guyana

OVERVIEW

Guyana is a transit country for South American cocaine destined for Europe, West Africa, the United States, Canada, and the Caribbean. Cocaine is concealed in legitimate commodities and smuggled via commercial maritime vessels, air transport, human couriers, or the postal services.

Guyana's National Risk Assessment 2017 found that it has a medium-to-high money laundering risk. Unregulated currency exchange houses and dealers in precious metals and stones pose a risk to Guyana's AML/CFT system. Other sectoral vulnerabilities include the banking industry and unregulated attorneys, real estate agents, used car dealers, and charities. Guyana has made significant progress on the AML front, but more investigations and successful prosecutions are needed.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Historically, the primary sources of laundered funds are narcotics trafficking and real estate fraud. However, other illicit activities, including human trafficking, gold smuggling, contraband, and tax evasion, are also sources. The licensing policies and procedures of Guyana's unsophisticated banking and financial institutions increase the risk of drug money laundering.

Guyana does not have FTZs, offshore financial centers, cyber currencies, or economic citizenship programs. Guyana, however, permits gaming. A gaming authority regulates and supervises all gaming activities.

Common money laundering typologies include large cash deposits using fake agreements of sale for non-existing precious minerals, cross-border transport of concealed precious metals to avoid payment of the relevant taxes and duties, and wire transfer fraud using compromised email accounts.

KEY AML LAWS AND REGULATIONS

The Government of Guyana's Anti-Money Laundering and Countering the Financing of Terrorism Act 2009, Interception of Communications Act 2008, and Criminal Law Procedure Act serve as its primary AML legislative regime. The government passed the State Assets Recovery Act, Protected Disclosures Act, and the National Payments Systems Act in 2018 to bolster its legislative response. The State Assets Recovery Act provides for asset sharing arrangements. Guyana amended its AML/CFT law and the Guyana Gold Board legislation, and established the National Coordination Committee to be responsible for overall AML policy. The

National Coordination Committee will develop a national AML action plan. The National Payments Systems Act establishes payment and oversight mechanisms. The other provisions of the amended law seek to curb suspicious financial transactions.

Guyana has comprehensive KYC and STR regulations. There are also records exchange mechanisms in place with the United States and other governments.

Guyana sought to strengthen its institutional response to money laundering through training and capacity building. The government trained 500 financial-sector personnel on AML best practices. The Bank of Guyana reviewed its supervisory policies and procedures for financial institutions and developed standard AML/CFT guidelines for money transfer agencies and currency exchange houses.

Guyana is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/member-countries/guyana>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Guyana has strong legislation relating to money laundering. Its AML legislation covers legal persons and provides enhanced due diligence for PEPs.

Guyana lacks standardized provisions for secure electronic communications and transactions. The government also lacks a national strategic plan for combating money laundering and terrorist financing.

The Guyanese FIU applied for Egmont Group membership in 2011 and, in 2012, received two sponsors. The application is still pending due to amended sponsor requirements. Guyana is working with regional representatives to identify new sponsors who meet the requirements.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The major agencies involved in anti-drug and AML efforts are the Guyana Police Force, Guyana Revenue Authority (GRA), Customs Anti-Narcotics Unit, Special Organized Crimes Unit (SOCU), Bank of Guyana, Ministry of Finance, FIU, State Asset Recovery Agency (SARA), and National Anti-Narcotic Agency.

The FIU referred 21 cases to SOCU for investigation in 2018. SOCU launched investigations into these and other reports of suspicious transactions, but there have not been any convictions to date. The authorities report non-cooperation by stakeholders with SOCU and lack of capacity within SOCU hinder its success at prosecutions.

Guyana has shown strong political will to combat money laundering and has made progress on the AML front. The government still needs to train the judiciary on matters pertaining to the investigation and prosecution of financial crimes. A national strategic plan for combating money laundering should be developed and implemented, and legislation enacted for the facilitation and regulation of secure electronic communications and transactions. Reporting and investigating

entities should also improve their interagency coordination, and the GRA should report suspicious transactions to SOCU and SARA.

Haiti

OVERVIEW

Haitian gangs are engaged in international drug trafficking and other criminal and fraudulent activity. While Haiti itself is not a major financial center, regional narcotics and money laundering enterprises utilize Haitian couriers, primarily via maritime routes. Much of the drug trafficking in Haiti, and related money laundering, has a connection to the United States.

Haiti adopted important legislation over the past several years, in particular anticorruption and AML laws. The weakness of the Haitian judicial system, impunity, and a lack of political interest leave the country vulnerable to corruption and money laundering.

On June 8, 2016, the CFATF issued a public statement asking its members to consider the risks arising from the deficiencies in Haiti's AML/CFT regime. The statement followed CFATF's acknowledgement that Haiti had not made sufficient progress to fulfill its action plan to address serious AML deficiencies, including legislative reforms. On May 31, 2018, noting Haiti's continued progress, the CFATF removed Haiti from its public statement.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Most of the identified money laundering schemes involve significant amounts of U.S. currency held in financial institutions outside of Haiti or non-financial entities in Haiti, such as restaurants and construction companies, as well as small businesses. A majority of property confiscated in Haiti belonged to Haitians convicted of drug trafficking in the United States. Illicit proceeds are also generated from corruption, embezzlement of government funds, smuggling, counterfeiting, kidnappings for ransom, illegal emigration and associated activities, and tax fraud.

Haiti has nine operational FTZs licensed and regulated by the Free Zones National Council, a public-private enterprise. It is unknown if FTZs are subject to AML obligations.

Haiti has 157 licensed casinos and many unlicensed casinos. Gaming entities are subject to AML requirements. Haiti also has established the Haitian State Lottery under the auspices of the Ministry of Economy and Finance. Online gaming is illegal.

KEY AML LAWS AND REGULATIONS

Amendments in 2016 further strengthened Haiti's 2013 AML legislation, and in 2014, the Executive signed a long-delayed anticorruption bill. Foreign currencies represent 63 percent of Haiti's bank deposits as of October 2016.

In May 2017, the government adopted a new law that restructured the Central Financial Intelligence Unit (UCREF), Haiti's FIU.

Haiti is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/cfatf-mutual-evaluation-reports/haiti-2>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The weaknesses of the Haitian judicial system and prosecutorial mechanisms continue to leave the country vulnerable to corruption and money laundering. Haiti is not a member of the Egmont Group, but is currently working with sponsors and applying for membership.

In 2016, the National Assembly added missing elements to the AML/CFT law to bring it up to international standards. For Haiti to comply fully, however, the penal code will have to be updated. The government remains hampered by ineffective and outdated penal and criminal procedural codes, and by the inability or unwillingness of prosecutors to refer cases to the judiciary and of judges to adjudicate cases. The government presented draft penal and criminal procedure codes to Parliament in April 2017, however, Parliament has yet to vote on the draft legislation.

The government should continue to devote resources to building an effective AML regime, to include continued support to units charged with investigating financial crimes and the development of an information technology system. The amended AML/CFT law, despite strengthening the AML regulatory framework, undermines UCREF's independence and effectiveness.

Haiti should take steps to establish a program to identify and report the cross-border movement of currency and financial instruments. Casinos and other forms of gaming should be better regulated and monitored by appropriate authorities, and the government should take steps to combat pervasive corruption at all levels of government.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The government continues to take steps, such as training staff and coordinating with the nation's banks, to implement a better AML regime.

After years of delay, in a positive step to try to address public corruption, Haiti passed the 2014 anticorruption law. However, the law is not implemented effectively, as evidenced by frequent changes in leadership, fear of reprisal at the working level, rumored intervention from the Executive, and the failure of judges to follow through by investigating, scheduling, and referring cases to prosecutors.

UCREF has continued to build its internal capabilities, but the May 2017 UCREF law led to the replacement of the UCREF director general and the movement of UCREF under the control of the Executive branch, thereby reducing UCREF's independence. UCREF forwarded six cases to the chief prosecutor in 2017, and six cases in 2018. Once a case is received, an investigative judge has three months from the arrest date to compile evidence, but there is no limit to the

timeframe to schedule court dates, communicate with investigating agencies and prosecutors, or track financial data. The chief prosecutor also can decide not to forward the case to the judiciary for prosecution. There were no convictions or prosecutions for money laundering in 2017 or 2018.

Honduras

OVERVIEW

Honduras is not a regional or offshore financial center. Money laundering in Honduras stems primarily from narcotics trafficking by organized criminal groups. Human smuggling, extortion, kidnapping, and public corruption also generate illicit proceeds, with human smuggling fees regularly paid via MSBs.

Honduras has not completely implemented its 2015 AML and DNFBP laws. Honduras lacks a national AML strategy, but has focused on high-priority offenses, such as money laundering linked to organized crime.

Lack of coordination among units within the National Banking and Insurance Commission (CNBS) limits the operation of the AML regulatory system. The Interagency Commission for the Prevention of Money Laundering and Terrorist Financing (CIPLAFT) was not active during 2018. The Tax Administration Service was the only Honduran agency with an active CIPLAFT unit meeting Honduran legal requirements.

The general lack of investigative capacity in complex financial transactions contributes to a favorable money laundering climate. Mediocre interagency coordination impedes progress towards prosecution of money laundering or other financial crimes. However, Honduras has been able to achieve some results in money laundering and corruption cases and has sought international cooperation.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Money laundering in Honduras derives from domestic and foreign criminal activity. Local drug trafficking organizations and organized crime syndicates control most illicit proceeds, which pass through both the formal banking system and the underground economy. The automobile and real estate sectors, remittance companies, currency exchange houses, credit unions, the construction sector, and other trade-based businesses are all used to launder funds.

The Central America Four Agreement and the Regional Customs Agreement between El Salvador, Guatemala, and Honduras allow free movement of citizens between these countries, although citizens can be subject to immigration or customs inspections. This leaves each country vulnerable to the cross-border movement of contraband and cash. In October 2018, Honduras announced Nicaraguans would no longer benefit from this free movement.

KEY AML LAWS AND REGULATIONS

Honduras has comprehensive KYC and STR regulations but additional procedures are necessary for full implementation of the 2015 AML law. Honduras can exchange information in connection with narcotics investigations and proceedings with the United States under appropriate treaties and conventions.

Honduras is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/media/fatf/documents/reports/mer-fsrb/GAFILAT-MER-Honduras-2016-English.pdf>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Honduras lacks a comprehensive national AML/CFT strategy and its AML national risk assessment (NRA) results are not fully reflected in the allocation of resources or by the supervisory policies and procedures. Honduras is taking steps to implement a new risk-based focus, although the NRA has not been made public. Outreach to DNFBPs continues to be necessary. During 2017, the CNBS began registering DNFBPs, but to date, CNBS is still finalizing internal policies and regulations to implement the revisions to the AML law, but lacks the capacity to finalize the process.

The Honduran financial system suspends individuals under investigation and limits their access to the banking system, but poor information flow between the Public Ministry (PM) and the FIU has left cleared individuals on the financial risk list unnecessarily.

Bearer shares are still legal and there is no access to quality beneficial ownership information for Honduran companies.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

FIU staff and PM financial analysts require training on financial institution products, international standards, financial analysis, report writing, relevant Honduran laws, and STR and CTR analysis. The FIU needs to develop feedback mechanisms to improve the quality of filed reports. An STR review task force was created within the FIU in 2018.

Although the Public Records Office has initiated file digitalization at a national level, most public property records remain in hard copy and poorly organized. This situation obstructs and slows effective investigation.

The disconnect between the judicial branch, regulatory agencies, and PM regarding the application of money laundering and asset forfeiture statutes has a negative impact on investigations. The PM and other law enforcement agencies often execute warrants before financial investigations can be completed and seize assets with tax liens before determining if other charges are applicable.

The Honduran National Congress (HNC) amended the Asset Forfeiture Law (AFL), but the amendment did not address known deficiencies and made it easier for public officials to avoid

seizure, jeopardizing law enforcement's use of forfeiture in organized crime and money laundering investigations. President Hernandez vetoed the amendment. In September 2018, the Interagency Commission for Criminal Justice issued an opinion stating Honduran law enforcement entities have misinterpreted the legal concept of freezing and seizing assets. The proposed AFL remains with the HNC.

Persons linked to Honduran public officials have been convicted in the United States in recent years, including former president Lobo's son (drug trafficking), the former minister of social services' brother (money laundering linked to bribery), and the brother of President Hernandez (charged with drug trafficking). Corruption within Honduran law enforcement remains a concern.

FIU leadership may not be operating in a transparent manner. Financial information is at times shared with individuals and entities not authorized by law to receive it or without required subpoenas. The FIU currently serves as a middleman between the PM and financial institutions instead of preparing financial analyses and identifying emerging money laundering trends and typologies.

Hong Kong

OVERVIEW

Hong Kong, a Special Administrative Region (SAR) of the People's Republic of China, is a major international financial and trading center. The world's sixth largest banking center in terms of external transactions and the fifth largest foreign exchange trading center, Hong Kong does not differentiate between offshore and onshore entities for licensing and supervisory purposes and has its own U.S. dollar interbank clearing system for settling transactions.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Hong Kong's low tax rates and simplified tax regime, coupled with its sophisticated banking system, shell company formation agents, free port status, and the absence of currency and exchange controls present vulnerabilities for money laundering, including TBML and underground finance. Hong Kong shell companies can be exploited by a variety of suspect actors, including North Korea and Iran, to launder money, facilitate illicit trade, and gain access to the international financial system.

Government of Hong Kong officials indicate the primary sources of laundered funds are from local and overseas criminal activity, fraud and financial crimes, illegal gaming, loan sharking, smuggling, and vice. Groups involved in money laundering range from local street organizations to sophisticated international syndicates, including Asian triads involved in assorted criminal activities, including drug trafficking. Horse races, a local lottery, and soccer betting are the only legal gaming activities, all under the direction of the Hong Kong Jockey Club, an NPO that collaborates with law enforcement to disrupt illegal gaming outlets.

KEY AML LAWS AND REGULATIONS

Hong Kong has AML legislation allowing the tracing and confiscation of proceeds derived from drug-trafficking (Drug Trafficking (Recovery of Proceeds) Ordinance) and organized crime (Organized and Serious Crimes Ordinance). These two ordinances improve the authorities' capabilities to detect and identify criminals, including drug traffickers, using Hong Kong financial institutions to launder or retain illicit profits. Hong Kong's Anti-Money Laundering and Counter-Terrorist Financing (Financial Institutions) Ordinance (AMLO) details authorized institutions' compliance obligations regarding legal and supervisory requirements.

Under the AMLO, where payment-related information is exchanged or intended to be exchanged, authorized institutions need to carry out CDD procedures. The AMLO and the Hong Kong Monetary Authority's (HKMA) Transactions Guidance Paper direct that STRs should be filed in a timely manner with Hong Kong's Joint Financial Intelligence Unit, which is jointly run by staff of the Hong Kong Police Force (HKPF) and the Hong Kong Customs & Excise Department. The AMLO was amended in early 2018 to require DNFBPs, including trust company and service providers (TCSPs), to abide by the same set of CDD and record-keeping requirements as covered institutions. An amendment to Hong Kong's Companies Ordinance further requires TCSPs to pass a fit and proper test and obtain a license from the Companies Registry. The amended Companies Ordinance requires all companies incorporated in Hong Kong to maintain beneficial ownership information.

In July 2018, a declaration and disclosure system to detect the movement of large quantities of physical currency and bearer negotiable instruments valued over approximately U.S. \$15,400 (120,000 Hong Kong dollars) into and out of Hong Kong came into operation.

Hong Kong is a member of the FATF and the APG, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/publications/mutualevaluations/documents/mutualevaluationofhongkongchina.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

In view of increasing cross-border flows of trade, finance, and banking activities, Hong Kong regulatory authorities should strengthen cooperation with its counterparts in other jurisdictions, where cases may be connected with corruption, tax evasion, and other predicate offenses.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Over the last two years, financial regulators, most notably the HKMA, conducted extensive outreach to stress the importance of robust AML controls and highlight potential criminal sanctions implications for failure to fulfill legal obligations under the AMLO.

In May 2018, the Hong Kong government granted the Fraud and Money Laundering Intelligence Taskforce (FMLIT) a six-month extension to its 12-month trial status. FMLIT, which aims to enhance the detection, prevention, and disruption of serious financial crime and money laundering threats, is a collaboration between law enforcement, the HKMA, a number of banks,

and the Hong Kong Association of Banks under the leadership of the HKPF. Metrics to determine FMLIT's effectiveness, if any, have yet to be stated or reported to the law enforcement community.

The United States and Hong Kong are parties to the Agreement Between the Government of the United States of America and the Government of Hong Kong on Mutual Legal Assistance in Criminal Affairs, which entered into force in 2000. As a SAR of China, Hong Kong cannot sign or ratify international agreements, as China is responsible for Hong Kong's international affairs. China may extend the application of any ratified agreement or convention to Hong Kong. The 1988 Drug Convention was extended to Hong Kong in 1997, and the UNCAC and UNTOC were extended to Hong Kong in 2006.

From January 1 through September 30, 2018, there were 72 money laundering convictions. Assets restrained totaled U.S. \$60.3 million.

India

OVERVIEW

India's AML activities followed a positive trajectory in 2018, with India's Prime Minister Modi continuing to make progress in curtailing illicit financial activity, including tax evasion and money laundering. The government continues to focus on monitoring the 2016 demonetization initiative's outcomes and implementing the 2017 Goods and Services Tax (GST) to, in part, formalize and digitize India's financial system. Despite this positive trend, India continues to face vulnerabilities, including informal financial networks; complex onshore and offshore corporate structures; and enforcement capacity constraints. The Reserve Bank of India's (RBI) August 2018 Annual Report reveals 99 percent of the high-denomination banknotes cancelled during the demonetization program were deposited or exchanged for new currency, meaning the "black money" that authorities expected to purge found its way back into the system. Analysts suggest that while demonetization met the objective of bringing transactions into the formal economy, the objective of identifying tax evaders and criminals attempting to exchange excessive high-denomination currency was less successful.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

India has licensed eight offshore banking units to operate in Special Economic Zones (SEZs). As of July 31, 2018, India had approved 420 SEZs, 223 of which are operational. India has licensed eight offshore banking units to operate in the SEZs.

The most common money laundering methods in India include buying gold and real estate, opening multiple bank accounts, intermingling criminal and legitimate proceeds, purchasing bank checks with cash, routing funds through employees' accounts, and creating complex legal structures. Transnational criminal organizations use offshore corporations and TBML to disguise the origins of funds, and companies use TBML to evade capital controls. Illicit funds are also laundered through educational programs, charities, and election campaigns. Individuals

typically obtain laundered funds through tax avoidance and economic crimes, corruption, narcotics trafficking, trafficking in persons, and illegal trade.

The hawala system is used extensively in India to evade transaction charges and to conduct both legitimate remittances and money laundering. Hawala's informal nature makes this method attractive for criminals, money launderers, and terrorists.

KEY AML LAWS AND REGULATIONS

The government continues to implement the GST. In part, GST is meant to reduce vulnerabilities and illicit financial flows by significantly shrinking the informal economy. Adjustments in 2018 affected processing, rates, and rules governing particular sectors.

In April 2018, the RBI mandated that all bank account holders link their biometric identifications (*Aadhaar*) to their accounts by December 31 and that banks check the original identifications for large cash transactions. A September Supreme Court decision prohibits private entities from mandating *Aadhaar*'s use as a means of identification, allowing individuals the option to use other forms of ID. However, individuals may continue to use *Aadhaar* for banking and other purposes.

Cryptocurrencies are formally prohibited in India under an April 2018 RBI rule banning regulated entities from dealing in or providing services to anyone dealing in cryptocurrencies. The rule has since been appealed by the Internet and Mobile Association of India but remains in force, with a final Supreme Court verdict pending. Additionally, the Ministry of Finance has convened a committee to establish a virtual currencies regulatory framework; recommendations were anticipated by December 2018.

India has comprehensive KYC and STR requirements and uses enhanced due diligence for PEPs. Legal persons are covered by criminal and civil AML laws.

India is a member of the FATF and two FATF-style regional bodies, the APG and the EAG. India's most recent MER is available at: <http://www.fatf-gafi.org/countries/d-i/india/documents/mutualevaluationofindia.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

India's current safe harbor provision only protects principal and compliance officers of institutions that file STRs, not all employees. The government prioritizes crimes of tax evasion and counterfeit currency, while AML is a lower priority.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Given that demonetized funds were deposited into legitimate bank accounts, analysts question whether demonetization enabled criminals to launder illicit funds into the banking system. India is still investigating 1.8 million bank accounts and 200 individuals associated with unusual deposits during demonetization. On August 7, the government directed stock exchanges to

restrict trading and audit 162 suspected shell companies on the basis of suspiciously large deposits.

India has taken steps to implement an effective AML regime, but deficiencies remain. Observers and law enforcement professionals express concern about implementation and enforcement of current laws, especially regarding criminal prosecutions. Authorities believe India has insufficient investigators to analyze the enormous amount of potential money laundering data identified during demonetization.

U.S. investigators have had limited success in coordinating seizures of illicit proceeds with Indian counterparts. While U.S. law enforcement authorities' intelligence and investigative information has led to numerous seizures, a lack of follow-through on investigative leads has prevented a more comprehensive offensive against violators. India is demonstrating an increasing ability to act on mutual legal assistance requests but continues to struggle with institutional challenges.

India should address noted shortcomings in the criminalization of money laundering and in its domestic framework for confiscation and provisional measures. The government should ensure all relevant DNFBPs comply with AML regulations. Additionally, India should extend its safe harbor provision to cover all employees. Finally, India should use data and analytics to detect trade anomalies, possibly indicating customs fraud, TBML, and counter-valuation in informal financial networks.

Indonesia

OVERVIEW

Widely regarded as the financial capital of Southeast Asia, Indonesia remains vulnerable to money laundering due to gaps in financial system legislation and regulation, a cash-based economy, weak rule of law, and partially ineffective law enforcement institutions. Most money laundering in Indonesia is connected mainly to corruption cases, followed by drug trafficking and other criminal activity such as tax crimes, illegal logging, wildlife trafficking, theft, bank fraud, embezzlement, credit card fraud, and the sale of counterfeit goods.

Indonesia is making progress in identifying and addressing money laundering vulnerabilities. Authorities continue to release regulations geared towards a risk-based approach. The primary areas for improvement are greater analytical training for law enforcement, raising the judicial authorities' awareness of the money laundering offense, increased capacity and focus by investigators and prosecutors on conducting financial investigations as a routine component of criminal cases, and more education for financial services sector personnel.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Indonesia has a long history of vulnerability related to the smuggling of illicit goods and bulk cash, made easier by unpatrolled coastlines, sporadic and lax law enforcement, and poor customs

infrastructure. Proceeds from illicit activities are easily moved offshore and repatriated for commercial and personal use. Endemic corruption remains of concern, and implementation of the AML regime remains challenging.

FTZs are not a particular concern for money laundering in Indonesia. Indonesia offers many opportunities for narcotics smuggling and cross-border transfer of illegally-earned cash without needing to rely on FTZs.

KEY AML LAWS AND REGULATIONS

KYC requirements have been part of Indonesia's AML regime since 2001. PEPs are subject to enhanced due diligence.

In January 2012, the Indonesian government established an interagency National Coordinating Committee on the Prevention and Combating of Money Laundering (AML Committee) to coordinate Indonesia's AML efforts. The Coordinating Minister for Political, Legal, and Security chairs the Committee; the Deputy Coordinating Minister for Economic Affairs and the Head of Indonesia's FIU, the Indonesian Financial Transaction Reports and Analysis Center (PPATK), serve as Committee secretaries.

PPATK coordinates Indonesia's AML efforts and programs; it reports directly to the president, and submits implementation reports every six months to the president and legislature. Much of PPATK's AML activities are tied to its efforts to identify and combat terrorist financing.

In May 2017, President Joko Widodo issued Government Regulation in Lieu of Law No. 1 of 2017 Concerning Access to Financial Information for Tax Interests. The executive order permits Indonesian tax authorities to access financial accountholder data without a court order. It gives Indonesian authorities legal cover to exchange accountholder data under the OECD's Global Forum Automatic Exchange of Information (AEOI); exchange of information between relevant jurisdictions will begin in 2019.

Indonesia is a member of the APG, a FATF-style regional body. Its most recent MER is available at:

<http://www.apgml.org/documents/search-results.aspx?keywords=Indonesia>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The primary factors hindering the fight against narcotics-related money laundering are the lack of analytical training for law enforcement personnel and insufficient training on money laundering detection and reporting for lower-level workers in the financial services sector.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

In 2015, Indonesia conducted a national AML/CFT risk assessment.

Indonesia is taking steps to implement applicable agreements and conventions. Combating narcotics abuse is a priority for the current administration, and Indonesia recognizes the need for international cooperation to stem this transnational threat.

PPATK publishes a monthly report summarizing reporting activity. In addition to CTR and STR data, PPATK and the Ministry of Finance's Directorate General of Customs and Excise jointly publish a Cash Carry Report to track physical cross-border transfers of cash. PPATK also invites the public to report any suspicious transactions. For the period January-June 2018, PPATK referred 201 Results of Analysis STRs, reports that follow-up on the initial notifications provided by financial institutions, to investigators – a 12 percent increase year over year. Most were alleged corruption cases. For the period January-June 2018, PPATK produced six Examination Reports (ERs), the final assessment after full analysis and evaluation of an STR. Year over year, for the period January-June 2017, the number of ERs filed has increased 33 percent.

There were three money laundering convictions for the period January-September 2018. The Indonesian government lacks sufficient practices or procedures to collect high-quality prosecution and conviction statistics; therefore, this figure may not capture all convictions.

Iran

OVERVIEW

In 2018, the United States ceased its participation in the Joint Comprehensive Plan of Action (JCPOA), and directed the re-imposition of all U.S. sanctions lifted or waived in connection with the JCPOA.

Iran has a large underground economy, spurred by uneven taxation, widespread smuggling, sanctions evasion, currency exchange controls, and a large Iranian expatriate community. Pervasive corruption continues within Iran's ruling and religious elite, government ministries, and government-controlled business enterprises.

Iran remains a major transit route for opiates smuggled from Afghanistan through Pakistan to the Persian Gulf, Turkey, Russia, and Europe. At least 40 percent of opiates leaving Afghanistan enter or transit Iran. Most opiates and hashish are smuggled into Iran across its land borders with Afghanistan and Pakistan, although maritime smuggling has increased as traffickers seek to avoid Iranian border interdiction efforts. In 2015, Iran's minister of interior estimated the combined value of narcotics trafficking and sales in Iran at \$6 billion annually.

In 2011, the U.S. government identified Iran as a state of primary money laundering concern pursuant to Section 311 of the USA PATRIOT Act. Additionally, the FATF has repeatedly warned of the risk of terrorist financing posed by Iran and the threat this presents to the international financial system, in the past urging jurisdictions worldwide to impose countermeasures to protect their financial sectors from illicit finance emanating from Iran. In June 2016, Iran made a high-level political commitment to the FATF to implement an action plan to address deficiencies. Although it has made some progress, Iran has not yet completed its

action plan; all plan deadlines have now expired. In October 2018, FATF renewed its public statement on Iran.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Iran's merchant community makes active use of MVTS, including hawaladars and moneylenders. Leveraging the worldwide hawala network, Iranians make money transfers globally. Counter-valuation in hawala transactions is often accomplished via trade; thus TBML is a prevalent form of money laundering.

In 1984, the Department of State designated Iran as a State Sponsor of Terrorism. Iran continues to provide material support, including resources and guidance, to multiple terrorist organizations and other groups that undermine the stability of the Middle East and Central Asia.

KEY AML LAWS AND REGULATIONS

Iran has criminalized money laundering and has adopted KYC and STR requirements.

Iran has a declaration system for the cross-border transportation of currency. Its 2017 directive purportedly allows the restraint of currency and bearer negotiable instruments on suspicion of money laundering, terrorist financing, or predicate offenses. The declaration system is applicable at 14 points of entry, applies to amounts over approximately \$11,500 (€10,000), and requires Iranian Bank Melli, which is designated by the Treasury Department for its link to the Islamic Revolutionary Guard Corps-Quods Force, to take temporary custody of the currency until it is cleared for passage in or out of Iran.

Iran is not a member of a FATF-style regional body, but it is an observer to the EAG. Its FIU is not a member of the Egmont Group.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

In October 2007, the FATF issued its first public statement expressing concern over Iran's lack of a comprehensive AML/CFT framework. Beginning in 2009, the FATF urged all jurisdictions to apply effective countermeasures to protect their financial sectors from the money laundering/terrorist financing risks emanating from Iran. In June 2016, Iran made a high-level commitment to the FATF to implement an action plan to address strategic AML/CFT deficiencies. As a result, although the FATF continued to include Iran on its Public Statement, it suspended its call for countermeasures for 12 months while Iran implemented its plan; this suspension has been extended multiple times. Despite its commitment to the FATF, Iran has yet to meet the requirements of its action plan. As of year-end 2018, the Iranian parliament continues to consider several pieces of legislation intended to facilitate Iran's adherence to the AML/CFT measures specified in the action plan, but the Iranian government remains internally divided about these measures. In October 2018, the FATF renewed its public statement and extended its suspension of countermeasures to February 2019, urging Iran to complete its action plan.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

For nearly two decades, the United States has undertaken targeted financial actions, including legislation and more than a dozen EOs, against key Iranian financial institutions, entities, and individuals.

Iran has an asset forfeiture system, but it is not fully compliant with international standards. Although there is no information sharing agreement with the United States, Iran cooperates with other jurisdictions on money laundering matters.

On November 5, 2018, the United States re-imposed all U.S. nuclear-related sanctions that were lifted or waived in connection with the JCPOA. The sanctions target critical sectors of Iran's economy, such as energy and shipping, and transactions involving insurance providers, the Central Bank of Iran, and designated Iranian financial institutions. These include sanctions on transactions between foreign financial institutions and the central bank or designated Iranian financial institutions and on the provision of specialized financial messaging services to the central bank and Iranian financial institutions. Also on November 5, 2018, OFAC placed more than 700 individuals, entities, aircraft, and vessels on the list of Specially Designated Nationals and Blocked Persons.

Italy

OVERVIEW

Italy's economy is the ninth-largest in the world and the third-largest in the Eurozone. Italy has a sophisticated AML regime and legal framework, but there is a continued risk of money laundering stemming from activities associated with organized crime and the large, unregulated shadow economy. According to the Italian National Statistics Institute, the black market economy accounts for 11.5 percent of GDP or approximately \$220 billion. Tax crimes also represent a significant risk and have been identified by Italy's national risk assessment (NRA) as accounting for 75 percent of all proceeds-generating crime in Italy.

Although improving, CDD and reporting remain weak among non-bank financial sectors, and regulations are inconsistent. Money laundering statistics, including the number of STRs received by the Bank of Italy's (BOI) Financial Information Unit (UIF), show roughly the same level of activity in 2018 as 2017. The new government, formed June 2018, has yet to clearly indicate its policy regarding money laundering, but Italian government institutions have a long history of combating organized crime and associated money laundering.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Drug trafficking is a primary source of income for Italy's organized crime groups, which exploit Italy's strategic geographic location in order to do business with foreign criminal organizations in Eastern Europe, China, South America, and Africa. Other major sources of laundered money are proceeds from tax evasion and value-added tax fraud, smuggling and sale of counterfeit

goods, extortion, corruption, illegal gaming, illegally disposing of hazardous waste, and loan sharking.

In 2018, the UIF identified private banking, real estate transactions, gaming, the art trade, NPOs, the large proportion of small cash businesses, as well as more recent trends, including new financial technologies and crowd-funding, as the primary avenues for money laundering.

KEY AML LAWS AND REGULATIONS

The Ministry of Economy and Finance is host to the Financial Security Directorate, which establishes policy regarding financial transactions and AML efforts. The directorate published Italy's most recent NRA in July 2014. The UIF is the government's main mechanism for collecting data on financial flows. The BOI continues to issue guidance on CDD measures to support banks and financial intermediaries with the development of their CDD policies. In late 2017, the UIF signed protocols with regional district attorney offices in Milan, Rome, Naples, and Florence to formally define information-sharing procedures. Legislative Decree N. 92, which entered into effect on July 5, 2017, extends financial oversight into the precious metal trade, building on other efforts to better monitor online money exchanges and online gaming sites.

Italy has a MLAT with the United States and is party to the U.S.-EU MLAT.

Italy is a member of the FATF. Its most recent MER is available at: <http://www.fatf-gafi.org/media/fatf/documents/reports/mer4/MER-Italy-2016.pdf>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Regulations require financial institutions to apply enhanced CDD measures for transactions with both domestic and foreign PEPs. However, DNFBPs are not required to apply enhanced CDD when dealing with domestic PEPs. DNFBPs also are not legally required to file a STR when the beneficial owner is not identified in a business transaction. Although the overall reported STR data was positive, the overall percentage of STRs reported by DNFBPs decreased by half, and 21 percent of the reports were voluntary disclosures. The government plans to continue to implement measures that will significantly increase the number of STRs from DNFBPs.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The criminalization of self-money laundering, which allows for expanded legal authority to prosecute individuals for money laundering, has increased convictions and has acted as a deterrent to some extent. However, penalties applied to persons convicted of money laundering may not be sufficiently dissuasive as there are numerous repeat offenders.

In November 2017, the UIF launched a new information-sharing database in collaboration with the Judicial Authority. The UIF reports access to underlying transaction data is quicker and is increasing as a result of the new system. The UIF is in the process of developing, in

collaboration with the BOI, artificial intelligence to aid in the detection of suspicious transactions.

Italy seeks to implement revisions to its AML policies in accordance with the EU's Fifth AML Directive by January 2020; Italy entered into compliance with the Fourth AML Directive in 2017, with Legislative Decree N. 90.

Money remitters operating under EU passport and free border arrangements were not adequately regulated or supervised, although the situation was expected to improve with the implementation of the EU's Fourth AML Directive.

Italian authorities have strong policy cooperation and coordination, and Italy continues to develop national AML policies informed by its NRA. Law enforcement agencies have been successful in undertaking complex financial investigations and prosecutions and have confiscated large amounts of criminal proceeds.

Jamaica

OVERVIEW

Money laundering in Jamaica is largely perpetrated by organized criminal groups. Jamaica continues to experience a large number of financial crimes related to advance fee fraud (lottery scams), corruption, and cybercrime.

In September 2018, Jamaica implemented new software that fully automates AML data collection and dissemination within the Jamaican government.

The Government of Jamaica has enforced the asset forfeiture provisions of the Proceeds of Crime Act (POCA) with moderate success but the law still is not being implemented to its fullest potential due to difficulties prosecuting and achieving convictions in financial crime cases. Law enforcement, prosecutors, and the judiciary also lack sufficient resources and training to investigate and prosecute financial crimes efficiently and effectively.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Political and public corruption both generate and facilitate illicit funds and activity.

Money laundering in Jamaica is primarily related to proceeds from illegal narcotics, weapons trafficking, financial fraud schemes, corruption, and extortion. The activities are largely perpetrated by the dozens of violent, organized criminal groups on the island. The large number of financial crimes related to cybercrime and financial fraud schemes also target U.S. citizens.

KEY AML LAWS AND REGULATIONS

Jamaica has implemented the POCA with moderate success but is still not enforcing it to its fullest potential. The POCA permits post-conviction forfeiture, cash seizures, and the civil forfeiture of assets related to criminal activity. The act allows the court to order post-conviction forfeiture of proceeds assessed to have been received by the convicted party within six years preceding the conviction. The confiscation provisions apply to all property or assets associated with or derived from any criminal activity, including legitimate businesses used to launder illicitly derived money. Jamaica's Financial Investigations Division (FID), which includes the FIU, continues to work with partners in the Jamaica Constabulary Force (JCF) and others to pursue cases that could result in seizure of assets.

The Banking Services Act allows for stronger enforcement powers and greater information sharing among the Bank of Jamaica, the Financial Services Commission, and foreign counterparts. A number of DNFBPs, such as real estate dealers, accountants, gaming establishments, and casinos, are subject to AML preventative measures.

Jamaica is a member of the CFAAT, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/cfatf-mutual-evaluation-reports/jamaica-1>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Lengthy delays in prosecuting cases hinder the effectiveness of the Jamaican judicial system. The Jamaican courts and prosecutors have been unable to keep pace with an increase in crime. Inefficient methods of practice in the justice system, combined with corruption and a lack of accountability, further exacerbates an already overburdened system. Law enforcement and prosecutors tend to pursue predicate offenses to money laundering, rather than pursuing money laundering as a stand-alone offense, due to the necessity of proving the unlawful conduct from which the money laundering activity derives. In other cases, where a defendant has pleaded guilty, prosecutors sometimes dismiss POCA charges to secure a guilty plea.

To date, the regulatory agencies have not used their enforcement authority to sanction reporting entities for identified violations of AML/CFT compliance regulations.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Jamaica's financial institutions (including money remitters and exchanges) are subject to a range of preventative measures. These entities file an inordinately high volume of STRs annually, the vast majority of which are likely defensive filings.

In the first nine months of 2018, there were 13 prosecutions and three convictions related to money laundering. In 2017, there were 27 prosecutions and one conviction related to money laundering. Jamaica continues to extradite lotto scammer money launderers. In the first ten months of 2018, four alleged Jamaican lotto scammers were extradited to the United States, compared to 12 in 2017, and zero in 2016.

In 2017, the FID imposed forfeitures totaling approximately U.S. \$685,000 in cash and other assets, while freezing approximately U.S. \$300,000 in cash and assets. By comparison, in 2016, the FID forfeited approximately U.S. \$4.96 million in cash and other assets, while restraining approximately U.S. \$6.23 million in cash and assets.

Authorities obtained convictions under section 101A of the POCA, which prohibits cash transactions greater than approximately U.S. \$7,870 (1 million Jamaican dollars). The FID conducts programs to sensitize the public about POCA provisions to reduce the possibility individuals would unwittingly breach the law.

In a recent POCA ruling, on March 2, 2018, local courts ordered Jamaican cocaine trafficker Ralph Gregg to pay a U.S. \$150,000 penalty.

Relevant authorities in Jamaica collaborate on investigations and prosecutions in major cases. Authorities also regularly collaborate with foreign law enforcement on cases of mutual interest and there are a number of joint initiatives to deal with such cases.

The Integrity Commission Act, which came into force on February 22, 2018, consolidates three anticorruption bodies into one entity, the Integrity Commission. Jamaica's Parliament is currently engaged in debating a law to establish the Major Organized Crime and Anti-Corruption Agency, which currently falls under the auspices of the JCF, as an independent agency.

Kazakhstan

OVERVIEW

Kazakhstan is susceptible to money laundering and financial crimes as a transit country for heroin and opiates and because of weak enforcement of its AML regime, as indicated by low investigation and conviction numbers. Tracking narcotics revenue and investigating financial crimes are a challenge for law enforcement agencies due to the use of informal remittance systems by drug traffickers and lack of capacity to investigate financial crimes committed utilizing sophisticated technology.

In 2018, Kazakhstan continued to work on its money laundering national risk assessment. The government is seeking to bring its AML regime into greater compliance with international standards. Kazakhstani law enforcement authorities do not routinely conduct parallel financial investigations while investigating money laundering predicate offenses and weak interagency cooperation prevents information sharing on investigations.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Governmental corruption, the presence of organized criminal groups, and a large shadow economy make the country vulnerable to money laundering, as does the transit of Afghan heroin and opiates on the way to Europe via Russia. The use of virtual currency in financial crime is also growing. Law enforcement agencies believe virtual currency is being used to pay bribes or

launder illicit proceeds. A significant part of Kazakhstan's mineral wealth is held in offshore accounts with little public scrutiny or accounting oversight.

The major sources of laundered proceeds are graft by public officials, tax evasion, and fraudulent financial activity. Common methods of money laundering include transactions using shell companies to launder funds returned in the form of foreign investments. In addition, the smuggling of contraband goods and fraudulent invoicing of imports and exports by Kazakhstani businessmen remain common practices.

Casinos and slot machine parlors are located only in selected territories. The Ministry of Culture and Sport is responsible for the licensing and regulation of the gaming sector. Kazakhstani law prohibits online casinos and gaming, though people do engage in these activities. Law enforcement agencies find it challenging to combat online gaming because servers of most online casinos are located outside of Kazakhstan. There are no known estimates of the size of illegal gaming activity in Kazakhstan.

Kazakhstan's newly established Astana International Financial Centre (AIFC) is designed to be a regional financial hub and offshore zone. It is supervised by the Astana Financial Services Authority and has a common law court system that operates outside of the Government of Kazakhstan's jurisdiction on matters for which AIFC has issued regulations. AIFC judicial findings would be referred to Kazakhstani courts for enforcement. This procedure has not been tested as the AIFC is still too new.

KEY AML LAWS AND REGULATIONS

The AML/CFT Law, adopted in 2009 and most recently amended in 2015, creates the legal framework for preventive, risk-based measures the private sector should observe.

Kazakhstan has a bilateral MLAT with the United States, which entered into force on December 6, 2016. Kazakhstan is also a signatory to relevant multilateral conventions that have mutual legal assistance provisions.

Kazakhstan is a member of the EAG, a FATF-style regional body. Its most recent MER is available at: <https://eurasiangroup.org/en/mutual-evaluation-reports>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Kazakhstani authorities require additional resources and political will to ensure proper enforcement of the AML/CFT regulations. The government should train and educate local institutions and personnel on further implementation of the AML law. Current AML law does not cover financial management firms, travel agencies, or dealers of art, antiques, and other high-value consumer goods. These entities are not required to maintain customer information or report suspicious activity.

Regulatory agencies lack the resources and expertise to inspect entities for AML compliance. There is no criminal or administrative liability for money laundering offenses for legal persons. Enhanced due diligence is required only for foreign PEPs; domestic PEPs are not covered.

A 2015 amendment to Kazakhstan's Criminal Code that came into effect in January 2018 limits Kazakhstan's ability to confiscate all assets of a criminal defendant. The new provision requires Kazakhstani law enforcement agencies to prove that assets belonging to a convicted criminal were obtained using the proceeds of crime. Prior to that all assets could be subject to mandatory confiscation.

Kazakhstan lacks a mechanism to share with other countries assets seized through joint or trans-border operations.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

During the first nine months of 2018, prosecutors brought nine money laundering-related and three terrorist finance-related cases to court, which resulted in convictions in all 12 cases. The number of money laundering investigations and prosecutions remains low.

On October 5, 2018, the president announced a reorganization of the Economic Crimes Service (ECS) of the Ministry of Finance, moving the ECS to the Committee for Financial Monitoring of the Ministry of Finance, the FIU. This was the second ECS reorganization in 2018, the prior occurring in July 2018 when ECS was separated from the Committee for State Revenue. These frequent changes increase the risk of the loss of highly qualified personnel capable of conducting complex financial investigations.

A pool of certified financial investigation instructors regularly deliver training programs to law enforcement and state officials. There is a two-tier AML-CFT certification program for private sector representatives that includes both national and international components. The majority of Kazakhstani banks have at least one certified compliance specialist.

Kenya

OVERVIEW

Kenya remains vulnerable to money laundering and financial fraud. It is the financial hub of East Africa, its banking and financial sectors are growing in sophistication, and it is at the forefront of mobile banking. Money laundering occurs in the formal and informal sectors, deriving from domestic and foreign criminal operations. Criminal activities include transnational organized crime, cybercrime, corruption, smuggling, trade invoice manipulation, illicit trade in drugs and counterfeit goods, trade in illegal timber and charcoal, and wildlife trafficking.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Financial institutions engage in currency transactions connected to international narcotics trafficking involving significant amounts of U.S. currency derived from illegal sales in Kenya, other East Africa countries, the United States, and elsewhere.

Banks, wire services, and mobile payment and banking systems are increasingly available in Kenya. Nevertheless, unregulated networks of hawaladars and other unlicensed remittance systems facilitate cash-based, unreported transfers that the government cannot track. Foreign nationals, including refugee populations and ethnic Somali residents, primarily use the hawala system to transmit remittances internationally. Diaspora remittances to Kenya totaled \$1.38 billion between January and June 2018. Most of Kenya's 165,900 mobile-money agents use Safaricom's M-Pesa system, and there are 14 million accounts on M-Shwari, a mobile lender. These services remain vulnerable to money laundering activities.

Kenya is a transit point for regional and international drug traffickers, and TBML remains a problem. Kenya's proximity to Somalia makes it an attractive location for laundering piracy-related proceeds, and a black market exists for smuggled and grey market goods. Goods transiting Kenya are not subject to customs duties, but authorities acknowledge many such goods are sold in Kenya. Trade in goods provides counter-valuation in regional hawala networks.

KEY AML LAWS AND REGULATIONS

Under the Proceeds of Crime and Anti-Money Laundering Act (POCAMLA) and other banking regulations, Kenyan financial institutions and entities reporting to the Financial Reporting Center (FRC), Kenya's FIU, are subject to KYC and STR rules and have enhanced due diligence procedures in place for PEPs.

The POCAMLA legislation provides a comprehensive framework to address AML issues and authorizes appropriate sanctions for money laundering crimes. The Office of the Director of Public Prosecutions has used ancillary provisions in the POCAMLA to apply for orders to restrain, preserve, and seize proceeds of crime in Nairobi. In 2016, the judiciary established the Anti-Corruption and Economic Crimes Division in the High Court.

In March 2017, Kenya enacted the Proceeds of Crime and Anti-Money Laundering (Amendment) Act 2017. The legislation includes new legal sanctions for economic crimes and measures to identify, trace, freeze, seize, and confiscate crime proceeds. Persons can be fined up to (approximately \$47,400 (5 million Kenyan shillings)), and corporate bodies up to approximately \$237,100 (25 million Kenyan shillings), with up to approximately \$94,900 in additional fines for failure to comply. It also establishes an Assets Recovery Agency to handle all cases of recovery of crime proceeds.

Extradition between the United States and Kenya is governed by the 1931 U.S.-U.K. Extradition Treaty. The United States and Kenya do not have a bilateral MLAT; however, Kenya is party to relevant multilateral law enforcement conventions that have mutual legal assistance provisions. The U.S. and Kenya also can make and receive requests for assistance on the basis of domestic laws.

Kenya is a member of the ESAAMLG, a FATF-style regional body. Its most recent MER is available at: https://www.esaamlg.org/index.php/Mutual_Evaluations/readmore_me/15.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

While Kenya has made strides in implementing an AML framework, challenges remain to achieving comprehensive, effective implementation of AML laws and regulations. Kenya should fully satisfy its commitments on good governance, anti-corruption efforts, and improvements to its AML regime.

Terrorist financing is not a crime in Kenya.

An automated system would improve the FRC's efficiency and ability to analyze suspicious transactions. Although the FRC receives STRs from some MVTs providers, this sector is more challenging to supervise for AML compliance.

To demand bank records or seize an account, police must obtain a court order by presenting evidence linking deposits to a criminal violation. Confidentiality of this process is not well maintained, allowing account holders to be tipped off and to move assets.

Despite some progress, Kenya has not fulfilled all of its commitments to join the Egmont Group.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The government, especially the police, should allocate adequate resources to build sufficient institutional capacity and investigative skills to conduct complex financial investigations independently. Bureaucratic and other impediments also may hinder investigation and prosecution of these crimes.

The tracking and investigation of suspicious transactions in mobile payment and banking systems remains difficult. Criminals could use illicit funds to purchase mobile credits at amounts below reporting thresholds. Lack of rigorous enforcement in this sector, coupled with inadequate reporting from certain reporting entities, increases the risk of abuse.

Kenya's constitution requires public officials to seek approval from the Ethics and Anti-Corruption Commission (EACC) prior to opening a bank account. In 2016 (the most recent data available), the EACC denied permission to 146 government employees to open foreign bank accounts.

Laos

OVERVIEW

Over the last year, Laos made significant progress in enhancing its AML/CFT regime. In 2018, Laos' Anti-Money Laundering Intelligence Office (AMLIO), the Lao FIU, partnered with donors

to complete Laos' first-ever national risk assessment (NRA); upgraded its IT systems; held multiple workshops and training seminars throughout the country to raise awareness of AML/CFT issues and to build capacity among law enforcement and judicial officials; and finished drafting two important decrees focused on AML prosecutions. AMLIO has also funded the training of one staff member to be an assessor on mutual evaluations, and international partners have ongoing projects aimed at enhancing Laos' ability to prosecute money laundering cases and to build the capacity of law enforcement officials.

The new Lao penal code took effect in November 2018. The new penal code contains articles that define terrorism financing and money laundering and sets forth specific penalties for various crimes.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Laos' cash-based economy, borders with five larger countries, and limited law enforcement capacity makes it an attractive environment for criminal networks. High-value commodities including land, property, and luxury vehicles are routinely purchased with cash. Beyond the formal border crossings, Laos has over 5,000 kilometers of remote, porous borders. Corruption, drug trafficking, environmental crime, the casino industry, and human trafficking all present significant vulnerabilities to Laos' AML regime. According to AMLIO, the recently-completed NRA identifies seven sectors vulnerable to money laundering, including banking, real estate, insurance, securities, financial institutions, the casino industry, and foreign exchange bureaus.

There are four casinos in Laos, including one in the Golden Triangle Special Economic Zone in Bokeo Province bordering Thailand and Burma. At present, there are no laws or decrees regarding supervision of the gaming industry, though the Prime Minister's office has expressed a desire to increase industry supervision via a decree.

KEY AML LAWS AND REGULATIONS

In 2015, Laos issued a new AML/CFT law that significantly updated its legal framework. Laos' AML/CFT law is technically compliant with international standards. Laos has issued guidance to reporting entities on the enhancement of KYC policies, and STRs and CTRs are now filed online by reporting entities, including by financial institutions other than banks.

Laos has also established a National Coordinating Committee (NCC) to oversee AML/CFT implementation. The NCC is a non-permanent group comprised of senior-level government officials appointed or removed by the Prime Minister. With NCC oversight, the Lao government has issued numerous regulations, instructions, and guidelines, including with respect to wire transfers, onsite supervisory examinations, and STR requirements, among others.

The AMLIO has MOUs with 12 foreign countries, and regularly exchanges information related to individual and corporate accounts that are under investigation. Laos does not have a records-exchange mechanism in place with the United States, but mutual legal assistance is possible through multilateral conventions.

Laos is a member of the APG, a FATF-style regional body. Its most recent MER is available at: <file:///C:/Users/default.default-PC/Downloads/Lao%20PDR%20MER%202011.pdf>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Despite having established the necessary legal framework and an independent FIU, and making significant capacity improvements in recent years, Laos' enforcement of AML/CFT laws remains a challenge. Awareness and capacity among commercial and state-owned banks are low, though improving. AMLIO is engaging in a sustained outreach campaign to law enforcement and prosecutors to raise awareness and push for more money laundering prosecutions.

Deficiencies include a lack of oversight for MVTS providers and a lack of protection against liability for individuals reporting suspicious activity, although safe harbor regulations have been discussed. Legal persons previously were not subject to criminal liability for money laundering, but this changed when the penal code was officially promulgated on November 1, 2018.

Laos needs to expand risk-based supervision beyond financial institutions, especially to the high-risk casino sector, which is now covered by an STR requirement.

In 2017, Laos reported confiscating real property, vehicles, phones, computer equipment, and cash, amongst other items.

Laos is not a member of the Egmont Group, but is working to become one with the support of sponsor FIUs.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Despite the introduction of the money laundering law and the inclusion of the money laundering offense in the penal code, financial investigations in parallel with those of the predicate crime do not happen in significant numbers. The People's Court of Vientiane Capital prosecuted one criminal case of money laundering in 2018, with two additional cases still under investigation.

Laos' NCC has proven effective in coordinating AML/CFT work among various government agencies, including the Bank of Lao PDR, Ministry of Public Security, the Office of the Supreme People's Prosecutor, and other law enforcement entities. With NCC support, AMLIO is conducting a multi-ministry outreach campaign designed to reach all 18 Lao provinces by the end of November 2018.

International cooperation on AML/CFT and asset forfeiture should be improved.

Liberia

OVERVIEW

The Government of Liberia has made some efforts to strengthen its AML regime, but significant challenges remain. The Central Bank of Liberia (CBL) does not robustly enforce AML requirements. While interagency coordination has improved, key stakeholders have not produced actionable financial intelligence, conducted systematic financial investigations, or secured financial crimes convictions. Generally, financial institutions have limited capacity to detect money laundering and their financial controls remain weak. Liberia's FIU is dramatically under-funded and lacks the institutional and technical capacity to adequately collect, analyze, and disseminate financial intelligence. These risk factors are compounded by Liberia's cash-based economy and weak border controls. Corruption remains endemic and Liberia remains vulnerable to illicit activities.

The Liberian government should seek to enhance the oversight authority of the CBL and provide additional resources to the FIU. Liberia should continue to work with international partners to ensure its AML laws, regulations, and policies meet international standards.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Smuggled goods enter Liberia through its porous borders. Illicit transactions are facilitated by Liberia's cash-based economy, with both Liberian and U.S. dollars recognized as legal tender.

Money exchange operations are poorly controlled, and there are numerous unlicensed foreign exchange sites and unregulated entities whose opaque activities raise concerns. Several money exchange entities facilitate hawala money transfers, which serve as an alternative remittance channel outside the formal banking system. Artisanal diamond and gold mines are largely unregulated and difficult to monitor, contributing to an enabling environment for illicit financial transactions. In general, the financial system is not sophisticated enough to detect cash flows from illicit activities.

The Liberia National Police (LNP), Liberia Drug Enforcement Agency, and National Security Agency have the authority to investigate financial crimes but are not effective in pursuing investigations and subsequent prosecutions. Liberia does not currently have functional FTZs. There are two registered casinos in the country, for which limited oversight is provided by the National Lottery Authority.

KEY AML LAWS AND REGULATIONS

Liberian laws against money laundering and economic sabotage include the Anti-Money Laundering and Terrorist Financing Act of 2012; the New Penal Law, Title 26 of the Liberian Code of Law Revised; the Liberia Anti-Terrorism Act of 2017; the Targeted Sanctions Against Terrorists Act of 2017; and the Special Criminal Procedures for Offenses Involving Terrorists Act, also from 2017. The FIU Act of 2012, which establishes and governs the FIU's actions, is currently under revision.

In 2016, the FIU adopted three new AML regulations requiring declarations for all cross border transportation of currency exceeding U.S. \$10,000; CTRs for all transactions by individuals that exceed U.S. \$5,000 and by businesses over U.S. \$10,000; and STRs for any unusual or suspicious transactions. The FIU is currently updating its regulations to operationalize the Targeted Sanctions Against Terrorists Act.

In April 2018, Liberia's FIU conducted a workshop on a money laundering and terrorist financing national risk assessment (NRA) required for member states of the Economic Community of West African States, which will be implemented over the course of 18 months.

Liberia is a member of the GIABA, a FATF-style regional body. Its most recent MER is available at: <https://www.giaba.org/reports/mutual-evaluation/Liberia.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Key challenges to developing a robust AML regime include the authorities' limited institutional capacity, including analytical capability and technical experience, to enforce regulations, investigate financial crimes and illicit money flows, and conduct successful prosecutions and asset recovery. To date, there have been no prosecutions or convictions for money laundering in Liberia.

Donors have been helping the government to build capacity and improve the operational effectiveness of the FIU to identify, analyze, and disseminate financial intelligence data; assisting the CBL in expanding on-site examination of domestic banks and non-bank financial institutions; and mentoring enforcement authorities in the development of financial crime cases.

The Liberian FIU is not a member of the Egmont Group.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The CBL has completed on-site AML/CFT risk-based examinations of all nine commercial banks in the past three years, and the AML/CFT unit conducts follow-up inspections in addition to off-site surveillance. The CBL also supervises commercial banks' implementation of KYC and CDD guidelines. However, the CBL has limited technical capacity to systematically monitor and enforce compliance. The CBL reported banks are gradually improving their compliance with the AML laws and regulations, but there is still much work to be done as banks have yet to conduct money laundering risk assessments of all their products, customers, delivery channels, and geographic locations.

The FIU shares its regulations and guidance on STRs and CTRs as well as information on cross-border transfers of cash with other agencies, including the Liberia Revenue Authority, the LNP, and the Liberia Immigration Services. The FIU is currently piloting a mechanism that would allow banks to electronically upload STRs and CTRs.

Money laundering investigations are hampered by limited capacity, political interference, corruption, lack of financial transparency, inadequate record-keeping, and weak judicial institutions.

Macau

OVERVIEW

Macau, a Special Administrative Region (SAR) of the People's Republic of China, is not a significant regional financial center. Its financial system, which services a mostly local population, includes offshore financial businesses such as credit institutions, insurers, underwriters, and trust management companies. The offshore sector is subject to supervisory requirements similar to those of domestic institutions and oversight by Macau's Monetary Authority.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

With gaming revenues of \$33.2 billion for 2017, Macau is the world's largest gaming market by revenue. The gaming sector caters to three main customer types - premium players, junket players, and mass gaming players - and relies heavily on junket operators for the supply of wealthy gamblers, mostly from Mainland China. In addition to attracting those seeking anonymity or alternatives to China's currency movement restrictions, junket operators are also popular among casinos unable to collect gaming debts on the Mainland where gaming is illegal. Asian organized crime groups, including triads, are active in the gaming services and involved in illegal activities such as drug trafficking. This mingling of licit and illicit activities, together with the anonymity gained through the use of a junket operator in the transfer and commingling of funds, as well as the absence of currency and exchange controls, present vulnerabilities for money laundering.

Macau government officials indicate the primary sources of laundered funds, derived from local and overseas criminal activity, are gaming-related crimes, property offenses, and fraud. Macau is likely both a transit point and an end destination for such funds.

KEY AML LAWS AND REGULATIONS

Macau authorities continue their efforts to develop an AML framework that meets international standards. Macau has an interagency AML/CFT working group, which coordinates responses to identified risks. Macau's Law 2/2006 on the prevention and repression of money laundering crimes and Law 3/2006 on the prevention and suppression of the crimes of terrorism and CFT came into effect in 2006. These laws impose AML/CFT requirements on all financial institutions, including currency exchangers, money transmitters, casinos, pawnshops, and property agents. The laws postulate STR requirements for solicitors, accountants, and dealers in precious metals, gems, luxury vehicles, and other high value goods. Effective May 2017, laws 2/2006 and 3/2006 widen the scope of identifiable criminal offenses to include smuggling and

drug trafficking and strengthen CDD measures to identify and verify the identity of beneficial owners.

Macau's casino regulator, the Gaming Inspection and Coordination Bureau (DICJ), requires all gaming and junket operators to keep records of large and/or suspicious transactions, CDD, and enhanced due diligence. Macau gaming supervisors have a good understanding of the risks posed by junket operators. Macau is taking a more stringent approach toward licensing and the supervision of junket promoters, which, in addition to acting as third party introducers, are also subject to enforceable AML requirements. This area is the subject of enhanced and renewed focus by DICJ. The number of licensed junket promoters has decreased from 225 in 2011 to 110 in 2018.

A new law on cross-border cash declaration and disclosure systems became operative on November 1, 2017. Travelers entering or leaving Macau with cash or other negotiable monetary instruments valued at approximately \$15,000 (120,000 pataca) or more now have to sign and submit a declaration form to the Macau Customs Service.

Macau is a member of the APG, a FATF-style regional body. Its most recent MER is available at: <http://www.apgml.org/includes/handlers/get-document.ashx?d=7fdf27f1-b6eb-4865-88c6-ac3c157609ce>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Gaming entities are subject to threshold reporting for transactions over approximately \$62,640 (500,000 pataca) under the supplementary guidelines of the DICJ. Macau should lower the large transaction report threshold for casinos to \$3,000 to bring it in line with international standards.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

As a SAR of China, Macau cannot sign or ratify international conventions in its own right. China is responsible for Macau's foreign affairs and may arrange for its ratification of any convention to be extended to Macau. Conventions extended to Macau include: the 1988 UN Drug Convention (1999), the UNTOC (2003), and the UNCAC (2006).

The government should continue to strengthen interagency coordination to prevent money laundering in the gaming industry, especially by continuing to encourage smaller junket operators, who have weaker AML controls, to exit the market while encouraging the professional junket operators to further develop their compliance programs. Macau should enhance its ability to support international AML investigations and recovery of assets. Only a handful of money laundering convictions have been obtained in recent years.

In 2017, STRs received from the gaming sector accounted for 67 percent of the 3,085 reports filed. A total of 135 STRs were sent to the Public Prosecutions Office.

Malaysia

OVERVIEW

Malaysia is a highly open, upper-middle income economy with exposure to a range of money laundering threats. The country's porous land and sea borders, visa-free entry policy for nationals from over 160 countries, strategic geographic position, and well-developed financial system increase its vulnerability to domestic and transnational criminal activity, including fraud, corruption, drug trafficking, wildlife trafficking, smuggling, tax crimes, and terrorism finance.

Malaysia has largely up-to-date AML legislation, well-developed policies, institutional frameworks, and implementation mechanisms. The country has shown continuing progress in efforts to improve AML enforcement by investigating, prosecuting, and securing more convictions of money laundering. One key area for development is the prosecution of foreign-sourced crimes.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Malaysia is used primarily as a transit country to move drugs globally. Drug trafficking by Chinese, Iranian, and Nigerian organizations is a significant source of illegal proceeds. Malaysia is also a source, destination, and transit country for wildlife trafficking, with some contraband (i.e., ivory) used as currency by the trafficking networks.

Malaysia's third iteration of the National Money Laundering/Terrorist Financing Risk Assessment (NRA) was completed and endorsed by the National Coordination Committee in July 2018. The NRA identifies fraud, smuggling, corruption, drug trafficking, and organized crime as the top five high-risk crimes.

Money laundering methods used for terrorist financing include cash couriers, funds skimmed from charities, gold and gem smuggling, front companies and businesses. Illicit proceeds also are generated by fraud, criminal breach of trust, illegal gaming, credit card fraud, counterfeiting, robbery, forgery, human trafficking, and extortion. Smuggling of high-tariff goods also occurs. It is yet to be determined if the Sales and Services Tax (SST), established in September 2018, will lead to improved government control.

Malaysia has an offshore sector on the island of Labuan, which is subject to the same AML laws as those governing onshore financial service providers. The financial institutions operating in Labuan include both domestic and foreign banks and insurers. Offshore companies must be established through a trust company, which is required by law to establish true beneficial owners and submit STRs.

The large cash and informal economies and unauthorized MSBs continue to pose significant vulnerabilities. Bank Negara Malaysia (BNM) continues to take enforcement actions against unauthorized MSBs. In 2018, BNM raided four retail outlets suspected of providing MSB services in the city of Johor. BNM is promoting migration to formal MSB channels through digitalization and is working to enhance its own supervisory and regulatory capabilities.

Malaysia has Free Industrial Zones (FIZ), where manufacturing and assembly take place, and Free Commercial Zones (FCZ), generally for warehousing commercial stock. Currently, there are 17 FIZs and 17 FCZs in Malaysia. Companies wishing to operate in a FIZ or FCZ must be licensed. In 2017, Malaysia became the second country to launch a Digital FTZ.

The Ministry of Finance licenses and regulates the activity of casinos. Under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 (AMLA), the central bank periodically assesses Malaysia's one licensed casino for AML compliance.

Malaysia is a global leader in Islamic finance. Malaysia's national risk assessment includes the Islamic financial sector, and this sector is subject to the same AML legal and regulatory regime as the conventional financial sector. Based on their supervisory experience, Malaysian regulators believe there are no material differences in AML risks between Islamic and conventional institutions.

KEY AML LAWS AND REGULATIONS

The AMLA covers the money laundering offense, reporting obligations, investigative powers, the forfeiture regime, and the cross-border declaration regime. Malaysia has comprehensive KYC and STR regulations.

Malaysia is a member of the FATF and the APG, a FATF-style regional body. Its most recent MER is available at: <file:///C:/Users/default.default-PC/Downloads/Malaysia%20MER%202015%20-%20published%20version.pdf>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Malaysia has a high degree of technical compliance with international AML standards, but deficiencies remain. Malaysia should continue its efforts to target effectively high-risk offenses and foreign-sourced crimes. Malaysia has a national action plan focusing on these areas.

Because criminal AML cases and predicate offenses have separate investigators and prosecutors, combining investigations may lead to an increase in successful prosecutions. Malaysia has traditionally pursued other measures, particularly forfeiture, rather than money laundering prosecutions; however, its management and efficient disposal of seized assets remain challenges. Additionally, the actual penalties for money laundering have been low, and existing legislation could be used more effectively.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The new government (in office since May 9, 2018), with foreign assistance, has taken action to prosecute a number of former government officials, including former prime minister Najib Razak, who allegedly were involved in misappropriations from the state-owned development fund "1Malaysia Development Berhad." Other state-owned enterprises also have been subject to investigations of alleged corruption.

In 2017, Malaysia pursued 488 non-drug-related money laundering investigations and 1,713 drug-related money laundering investigations. In 2017, there were 88 money laundering convictions and 23 drug-related money laundering convictions. Although money laundering convictions remain low, the number of money laundering investigations opened have increased by approximately 50 percent and the number of convictions finalized have more than doubled compared to 2016.

Asset sharing is done on an informal basis, as there are no legal provisions.

Mexico

OVERVIEW

Illicit actors launder billions of dollars of drug trafficking proceeds through the Mexican financial system annually. Corruption, bulk cash smuggling, kidnapping, extortion, fuel theft, intellectual property rights violations, fraud, human smuggling, and trafficking in persons and firearms serve as sources of additional funds laundered through Mexico. Mexican authorities have had some success investigating and blocking accounts of suspected money launderers and other illicit actors but have shown extremely limited progress in successfully prosecuting money laundering and other financial crimes. Two Supreme Court rulings in 2017 will temporarily slow and complicate investigations into illicit financial activities.

Money laundering offenses continue as the government struggles to prosecute financial crimes and seize known illicit property and assets. To increase the number of illicit finance convictions, the government needs to combat corruption, improve its judicial capacity, and reform cumbersome asset forfeiture laws.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Illicit drug proceeds leaving the United States are the principal sources of funds laundered through the Mexican financial system. Mexican transnational criminal organizations (TCOs) launder funds using a variety of methods. TBML involves the use of dollar-denominated illicit proceeds to purchase retail items for export to and re-sale in Mexico or the United States, and then routing the revenue from the sale of such goods to TCOs. TBML also includes over reporting exports, or reporting exports of merchandise that never existed or merchandise never exported, to justify the transfer of large sums of funds into Mexico's financial system.

Illicit actors in Mexico invest in financial and real assets, such as property, businesses, and luxury items. Money laundering through the luxury real estate sector remains a concern, especially as a vehicle for laundering the proceeds of public corruption. Two popular laundering methods include: structuring deposits, whereby criminals smuggle bulk amounts of U.S. dollars into Mexico to deposit into bank accounts in small, structured increments; and funnel accounts, whereby cash deposits into multiple accounts in the United States are funneled into a single account and wired to Mexico, where they are then rapidly withdrawn. Asian money launderers

continue to compete with the traditional Mexican launderers conducting “mirror transactions” more efficiently and at a lower cost than the traditional Mexican launderers. Narcotics-related proceeds are also laundered through unlicensed exchange houses, although Mexico’s main banking regulator, the National Banking and Securities Commission (CNBV), issues regulations and has a special unit to curtail the number of unlicensed exchange houses in operation.

Mexican authorities have increasingly been monitoring the potential for criminal exploitation of financial technology, including convertible virtual currencies like bitcoin.

KEY AML LAWS AND REGULATIONS

Mexican AML law criminalizes money laundering using an “all serious crimes” approach and covers legal persons criminally and civilly. CDD rules cover most financial sector entities. Beginning in April 2018, CDD rules also cover financial technology institutions (FTIs). The CNBV will now regulate FTIs involved in electronic payments, exchanges of virtual assets, and virtual currencies. Critics argue the FTI law’s secondary regulations allow for additional money laundering vulnerabilities because they went too far in liberalizing financial markets for FTIs.

Mexico is a member of both the FATF and GAFILAT, a FATF-style regional body. Mexico’s most recent MER is available at: www.fatf-gafi.org/media/fatf/documents/reports/mer4/MER-Mexico-2018.pdf.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

In October 2017, the Supreme Court ruled the FIU’s freezing of accounts violates constitutional protections under the law and due process rights. A subsequent decision in November 2017 further curbed the FIU’s ability to present financial records during court proceedings, mandating only records obtained by court order would be admissible. In response to the rulings, several high-profile affected entities have filed cases in Mexican federal court to have their accounts unfrozen and cases dismissed, including known money launderer Alvaro Garduño Montalvo. Law enforcement and judicial authorities have struggled to investigate and prosecute financial crimes and these rulings may result in additional case dismissals until a legislative or procedural fix is implemented. It is too soon to tell how the incoming administration will handle FIU operations, but transition officials have indicated plans to work with the judiciary and legislature to resolve these obstacles.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Although authorities recognize the abuse of certain sectors by money launderers, law enforcement responses are limited by corruption, lack of judicial capacity, and cumbersome asset forfeiture laws. The FIU has not yet published the number of convictions for 2017 but according to the incoming administration’s FIU Chief-designate, there were only 22 convictions.

The relative lack of money laundering convictions on money laundering cases is representative of the high rates of impunity in Mexico. Currently, Mexico has one federal judge and two prosecutors assigned to prosecute money laundering offenses for the entire country. The 2016

transition to an accusatorial judicial system is expected to improve Mexico's prosecution rates over the medium to long term. Draft civil asset forfeiture legislation remains under consideration in the Mexican Congress of the Union and would enable law enforcement agencies to more easily seize illicit proceeds, thereby making it more difficult for illicit finance actors to deposit and invest these funds in Mexico's financial system. Corruption in the judicial system, however, impedes the government's ability to convict organizations and individuals involved in money laundering.

Morocco

OVERVIEW

Morocco continues to strengthen its AML regime, making strides in risk management, information sharing, and streamlining implementation. Morocco's 2016 AML/CFT national risk assessment (NRA), though limited in scope, incorporated all reporting entities and is expected to lead to the development of a national AML strategy.

Money laundering vulnerabilities in Morocco stem from a large informal sector, the prevalence of cash-based transactions, a high volume of remittances, and international trafficking networks. Morocco is an integration point for illicit drug money into the legitimate economy, with hundreds of millions of euros laundered through Morocco yearly. Although exact figures are unavailable, a large percentage of this money is believed to be linked to the hashish trade.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The informal business sector and Moroccans' tendency to transact in cash present regulatory challenges. The Moroccan Central Bank (BAM) reported the ratio of the informal economy to GDP averaged 31 percent between 2007 and 2016.

Since its launch in July 2017, Islamic banking in Morocco has grown and could have a market share of 10 percent by 2022, with growth mostly from new customers. BAM and the telecommunications regulator are now launching mobile banking to encourage electronic (and more easily traceable) payments.

Money transfer services present a money laundering vulnerability due to their volume. Annual remittance transfers rose 5.7 percent to \$66.1 billion in 2017. The majority of transfers originate in Europe. The Financial Intelligence Processing Unit (UTRF), the FIU, now requires transfer operators to collect identification information on both senders and recipients abroad.

Morocco's geographical location as a gateway to Europe makes it an attractive conduit for smuggling, human trafficking, and illegal migration. The anti-trafficking in persons law seeks to deter trafficking and money laundering with heavy sentences for offenders and a broad definition of trafficking to include anyone who gives or receives payments or benefits related to trafficking. Unlawful trade in Moroccan-grown cannabis and, increasingly, the trafficking of cocaine from

Latin America to Europe via Morocco also generate illicit profits. Investments in real estate, and to a lesser extent jewelry and vehicles, are mechanisms to launder drug proceeds.

An interagency commission chaired by the Ministry of Finance regulates Morocco's seven FTZs. The FTZs allow customs exemptions for goods manufactured in the zones for export abroad. Currently, there are six offshore banks located in the Tangier FTZ, the only FTZ with offshore banks. The UTRF has reported suspicions of money laundering activity through the Tangier FTZ.

International casinos are another vehicle through which money enters and exits Morocco without currency control restrictions. At a Moroccan casino that is part of a multi-national business, one can establish an in-house account, which can receive money from any casino in the world where an individual has an account. There are no limits on the amount of money transferred into or out of Morocco by this method. There are at least two such casinos in Morocco, and the extent to which this transfer method is used to launder illicit drug proceeds is unknown. Moroccan casinos that are not part of an international consortium cannot establish in-house accounts.

KEY AML LAWS AND REGULATIONS

The UTRF continues to update policies, improve capacity, and promote coordination. Morocco has key AML laws and regulations in place, including KYC programs and STR procedures. High-risk customers/transactions are scrutinized under Morocco's AML law and Central Bank Circular No. 2/G/2012.

In 2015, the government passed Law 114-13, which offers benefits for informal sector workers to register as "self-employed" small businesses and requires them to pay taxes. More than 61,000 entrepreneurs had registered by February 2018.

Morocco is a member of the MENAFATF, a FATF-style regional body. The most recent MER is available at: <http://www.menafatf.org/information-center/menafatf-publications/mutual-evaluation-report-kingdom-morocco>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The real estate market, art and antiquities dealers, and vendors of precious gems were included in the NRA process. Most non-financial sectors, including notaries and accountants, do not appear to pose significant risks, according to the UTRF.

The money laundering offense is only considered a misdemeanor under Moroccan law.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Morocco works closely with international partners to strengthen its AML regime. Morocco has implemented applicable multilateral agreements and has voluntarily initiated exchanges with private sector partners to address key vulnerabilities.

While the BAM has supervisory authority to ensure compliance with banking regulations, the UTRF plays a vital role as the recipient of STRs. The UTRF also assesses systemic risk, disseminates information to financial entities, and regularly communicates with banks, other financial entities, and government authorities to facilitate information sharing, capacity building, and coordination.

The extent to which financial intelligence is used by law enforcement to identify money laundering activity or enhance ongoing predicate investigations to trace proceeds or recover assets is unclear. The UTRF refers some information to law enforcement, including the Royal Public Prosecutor, but use of this information to conduct financial investigations and pursue money laundering investigations appears infrequent. Prosecutions and convictions for money laundering are low in relation to the large number of predicate crimes that occur and are pursued by authorities.

In January 2018, the UTRF held a workshop on typologies and joint capacity with regional partners.

Mozambique

OVERVIEW

Money laundering in Mozambique is driven by cases of misappropriation of state funds, kidnappings, human trafficking, narcotics trafficking, and wildlife trafficking. With a long and largely unpatrolled coastline, porous land borders, and a limited rural law enforcement presence, Mozambique is a major corridor for the movement of illicit goods, with narcotics typically trafficked through Mozambique to South Africa or on to further destinations, such as Europe.

Although the Attorney General's Office (PGR) and Bank of Mozambique (BOM) have shown a willingness to address money laundering and the Government of Mozambique has taken steps to improve the legal framework, attorneys, judges, and police lack the technical capacity and resources to combat money laundering successfully. Mozambique would also benefit from better collaboration and information sharing AML enforcement institutions.

Former Mozambican Finance Minister Manuel Chang, two unnamed Mozambicans, three ex-Credit Suisse bankers, and two others were indicted by a New York federal court for money laundering and other crimes committed using the U.S. financial system in relation to Mozambique's \$2 billion hidden debt scandal. Chang was detained in South Africa on December 29, 2018, under a U.S. extradition request. Although the PGR referred 17 individuals, including Chang, to the GRM's highest audit institution in January 2018 to mete out financial penalties related to the \$2 billion in illicit debt, the PGR's investigation resulted in no criminal charges in 2018. Lax oversight of government borrowing creates opportunities for misappropriation of state funds and the potential for money laundering to hide ill-gotten assets.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

International criminal syndicates play a prominent role in illicit activities in Mozambique, with South Asian narcotics syndicates trafficking opiates and East Asian criminal organizations engaging in wildlife poaching, illegal timber harvesting, and the transshipment of elephant ivory and rhino horns.

Authorities believe proceeds from these illegal activities finance commercial real estate developments, particularly in the capital. Although money laundering in the official banking sector is a serious problem, it is conducted primarily through informal markets by foreign currency exchange houses, cash smugglers, and hawala brokers. Unlike the financial sector, the real estate sector lacks a regulatory body, which makes it more susceptible to money laundering.

Black markets for smuggled goods and informal financial services are widespread, dwarfing the formal retail sector in most parts of the country. Although there are three FTZs in Mozambique, there is no known evidence they are tied to money laundering.

KEY AML LAWS AND REGULATIONS

Law 14/2013 and decree regulation 66/2014 provide additional tools and authority to combat money laundering and terrorism finance in Mozambique. This law and its implementing regulations allow the authorities to freeze terrorist assets and enter into mutual legal assistance agreements for terrorism finance cases. The law also criminalizes terrorism finance, specifies evidence collection procedures, and allows for the seizure of documents. Mozambique has KYC provisions, and STRs are analyzed and flagged by the FIU and distributed to relevant investigative bodies. Regulations also require enhanced due diligence for PEPs. The BOM places AML obligations on local banks.

Mozambique is a member of the ESAAMLG, a FATF-style regional body. Its most recent MER is available at: http://www.esaamlg.org/index.php/Mutual_Evaluations/readmore_me/12.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Although Mozambique has made steady progress establishing a legal framework that supports money laundering investigations, implementing agencies require access to more robust human resources, and financial and technical resources to investigate and prosecute money laundering and financial crimes cases effectively. The government has attempted to address this deficiency with money laundering content in its police academy training programs and through donor-supported seminars designed to build awareness of money laundering crimes.

The FIU has expressed interest in joining the Egmont Group and has implemented many of the physical and information systems measures needed to become a member; however, it is still waiting for the Council of Ministers' approval to apply for membership.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Mozambique has demonstrated progress in enforcement of its AML laws and implementing regulations. The Criminal Code allows the confiscation of money in financial institutions where

there is evidence the funds are linked to a crime. During 2017, the Attorney General initiated 40 criminal cases related to money laundering, an increase of 24 from 2016. Most of the cases dealt with tax evasion, drug trafficking, and the illegal exploitation of forest resources. The PGR has noted the need for better technology and specialized human resources to analyze data and accounting information. The BOM fined multiple banks in 2018 for failing to comply with AML/CFT regulations.

The United States and Mozambique are in the early stages of establishing records-exchange procedures. The U.S. Drug Enforcement Administration opened an office in Mozambique in 2017 and is developing mechanisms to facilitate future information sharing on money laundering and narcotics cases. Additionally, the FIU has signed information-sharing MOUs with several FIUs in the region.

Mozambique became a member of the Asset Recovery Inter-Agency Network for Southern Africa (ARINSA) in 2017, which supports investigators and prosecutors in sharing information to identify, track, and seize criminal assets.

Netherlands

OVERVIEW

The Netherlands is a major trade and financial center and, consequently, an attractive venue for laundering funds generated from illicit activities, including those related to the sale of drugs. A government-commissioned study presented November 5, 2018 estimated around \$18.2 billion is laundered annually in the Netherlands.

Six islands in the Caribbean fall under the jurisdiction of the Kingdom of the Netherlands: Bonaire, St. Eustatius, and Saba are special municipalities of the Netherlands; Aruba, Curacao, and St. Maarten are autonomous countries within the Kingdom. The Netherlands provides supervision for the courts and for combating crime and drug trafficking within the Kingdom.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Financial fraud, especially tax evasion, and drug trafficking are believed to generate a considerable portion of domestic money laundering activity. There are indications of syndicate-type structures involved in organized crime and money laundering. Few border controls exist within the Schengen Area of the EU, although Dutch authorities run special operations in the border areas with Germany and Belgium and in the Port of Rotterdam to minimize smuggling. Hawala-style underground remittance systems operate in the Netherlands. Criminal networks increasingly operate online and use virtual currencies to facilitate illegal activity.

KEY AML LAWS AND REGULATIONS

The Dutch FIU is an independent, autonomous entity under the National Police Unit. The Anti-Money Laundering Center, established in 2013, combines participants from government agencies

(e.g., the FIU, the Fiscal Information and Investigative Service, the police, and the public prosecution service) as well as the private sector, to share knowledge and coordinate AML efforts. Seizing and confiscating proceeds of crime is a high priority for Dutch law enforcement.

The Netherlands implemented the Fourth EU Anti-Money Laundering Directive on July 25, 2018, which improved client due diligence requirements, among other things. A law to create a registry listing the ultimate beneficial owners (UBO) of companies and legal entities is scheduled to be presented to Parliament in 2019. The proposed UBO registry would operate under the Chamber of Commerce.

Dutch law has comprehensive KYC and STR regulations, which apply to many actors in the financial sector. Every three years, the government commissions an external assessment of its AML policy.

Law enforcement cooperation between the Netherlands and the United States is good; the existing MLAT allows for the exchange of records in connection with narcotics investigations.

The Netherlands is a member of the FATF. Its most recent MER is available at: <http://www.fatf-gafi.org/countries/n-r/netherlandskingdomof/documents/mutualevaluationreportofthenetherlands.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The Netherlands continues to make progress in addressing identified deficiencies. No significant technical deficiencies in the regulatory regime were identified. The magnitude of money laundering, however, remains a concern. A government-commissioned study released November 5, 2018 estimates \$18.2 billion is laundered annually in the Netherlands, with \$10.4 billion coming from abroad.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The Netherlands utilizes an “unusual transaction” reporting system. Designated entities are required to file unusual transaction reports (UTRs) on transactions that could be connected with money laundering. The FIU analyzes UTRs to determine if they are “suspicious,” denoting a greater likelihood of money laundering, and forwards them to law enforcement for criminal investigation, at which point they become classified as an STR. Intelligence is not systematically shared with law enforcement. Law enforcement only has access once a legal determination of suspicion has been made. The Netherlands does not require all covered entities to report all transactions in currency above a fixed threshold. Instead, different thresholds apply to various specific transactions, products, and sectors.

On September 4, 2018, the Dutch Prosecutor’s Office (OM) announced it had reached a settlement with Netherlands-based ING Bank for approximately \$888 million (€775 million). The OM accused ING of failing to prevent hundreds of millions of dollars of money laundering and violating the Dutch AML/CFT Act. The penalty is the largest AML enforcement action to date by authorities in Europe.

Nicaragua

OVERVIEW

The Republic of Nicaragua is not a regional financial center, but remains vulnerable to money laundering as it continues to be a transit country for illegal narcotics. The current socio-political crisis, law enforcement corruption, and deterioration of democratic institutions increase opportunities for financial abuses and other crimes.

Nicaragua made technical progress in addressing numerous recommendations to improve its AML/CFT framework. In July 2018, the government passed two AML/CFT laws.

Newly enacted laws and regulations ostensibly bring Nicaragua closer to international standards; however, the politicization of the police and increased corruption across key enforcement institutions compromise the laws' effectiveness.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Money laundering methodologies facilitate government corruption or international organized crime groups' trafficking of illegal narcotics, mostly cocaine. Nicaragua's geography and limited border control in remote regions leaves it vulnerable to cross-border movement of contraband and criminal activity. Money laundering also occurs via traditional mechanisms such as real estate transactions, sale of vehicles, livestock farming, money transfers, lending, and serial small transactions.

There is evidence of informal "cash and carry" networks for delivering remittances from abroad. Subject matter experts believe the black market for smuggled and stolen goods in Nicaragua is larger than officially recognized. Market vendors deal in cash. The existence of multiple, nontransparent, quasi-public businesses that manage large cash transactions and have ties to the ruling party, and the proliferation of shell companies, increase the country's vulnerability to money laundering. Many of these companies are subsidiaries of state-owned conglomerate Albanisa, co-owned by the Nicaraguan state-owned oil company Petroleum of Nicaragua S.A. (49 percent) and the Venezuelan state-owned petroleum firm, Petroleum of Venezuela S.A (51 percent).

The Central America Four Agreement among El Salvador, Guatemala, Honduras, and Nicaragua allows for visa-free movement of citizens of these countries across their respective borders; however, these persons can be subject to immigration or customs inspections. Nevertheless, this agreement makes each participating country vulnerable to the cross-border movement of contraband and criminal proceeds.

There are 228 companies, primarily involved in manufacturing goods for export, operating under FTZ status in Nicaragua.

Increased corruption and the lack of independence across government institutions, including the Financial Analysis Unit (UAF), the FIU, are of concern. On October 4, 2018, FinCEN issued an advisory warning U.S. financial institutions of the increasing risk that proceeds of Nicaraguan political corruption may enter or pass through the U.S. financial system.

KEY AML LAWS AND REGULATIONS

The Nicaraguan regulatory framework includes records exchange mechanisms with other nations. Covered entities follow comprehensive KYC and STR regulations and reporting procedures, and have in place enhanced due diligence procedures for domestic and foreign PEPs. Criminalization of money laundering predicate crimes employs the “all serious crimes” approach and all legal persons are subject to criminal liability.

In July 2018, the government passed two AML/CFT laws, Law 976 and Law 977. The new laws and regulations provide larger responsibilities to the UAF, including granting access to private information gathered by eight government institutions. The laws also broaden the reporting entities to include real estate agencies, car dealerships, fiduciary services and certified public accountants. Although NPOs are not reporting subjects, the law provides leeway to include them in the future.

The new law mandates financial institutions to identify and keep records regarding the origin of funds and final beneficiaries, implement early detection systems, analyze suspicious activities, and report these activities to the UAF.

Nicaragua is a member of GAFILAT, a FATF-style regional body. Its most recent MER can be found at: <http://www.fatf-gafi.org/media/fatf/content/images/GAFILAT-MER-Nicaragua-2017.pdf>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Public corruption is a serious problem in Nicaragua, exacerbated by the influence of foreign jurisdictions with a large business presence in the country. Nicaragua has not opened investigations on citizens sanctioned by the U.S. Department of Treasury under the Global Magnitsky Act for corruption. Nicaragua should address deficiencies in the rule of law and increasing concerns about corruption.

Identity falsification, counterfeiting, and piracy should be included in the legal framework as predicate offenses for money laundering. Criminals that use these means to launder money are tried for lesser crimes without this classification.

Jurists, private sector entities, and civil society members state that, without autonomy and transparency, the larger responsibilities and unlimited and discretionary scrutiny powers granted to the UAF under recent amendments, transform financial regulation into a political tool used against government opponents. In August 2018, the government opened an investigation for alleged money laundering of the general manager and partner of a local television channel that

covers protests against the government. In September 2018, a high profile democracy activist was charged with terrorist financing related to his support of peaceful civil society actors.

Nicaragua applied for Egmont membership in 2014 and the application remains pending.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

In 2018, the Government of Nicaragua reportedly conducted 12 investigations, 11 prosecutions of money laundering-related cases involving 26 people, obtained three convictions, and seized over \$12 million. A judge sentenced to 30 years in prison the alleged leader of an international gang for laundering \$1.5 million through real estate and other transactions.

Reporting entities' lack of confidence in the AML strategy will negatively affect enforcement results.

Nigeria

OVERVIEW

Despite the various measures taken by the Nigerian government to combat financial crimes, Nigeria is a major drug trans-shipment point and a significant center for financial crime and cyber-crimes. Nigeria has made concerted efforts in recent times to address some of the challenges it faces implementing its AML/CFT regime.

The Nigerian Financial Intelligence Unit (NFIU) is now independent of the Economic and Financial Crimes Commission (EFCC) and its Egmont Group membership has been restored. While systems exist for combating money laundering and associated predicate offenses, the Nigerian government must take steps to strengthen them and to institutionalize best practices in financial intelligence management, investigation, and prosecution.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Criminal proceeds laundered in Nigeria derive partly from foreign drug trafficking and other illegal activities. In Nigeria, money laundering occurs through real estate investment, wire transfers to offshore banks, deposits into foreign banks, round tripping (reciprocal sales of identical assets), jewelry, bulk cash smuggling, and reselling imported goods, such as luxury or used cars, textiles, and consumer electronics purchased with illicit funds. Financial institutions in Nigeria engage in currency transactions related to international narcotics trafficking that include significant amounts of U.S. currency. The proliferation of cryptocurrency exchanges in Nigeria pose challenges for the investigation and prosecution of money laundering crimes.

Money laundering vulnerabilities include the weakness of the AML legal framework, inadequate identification procedures, and non-availability and lack of access to beneficial ownership information. Other vulnerabilities include the existence of porous borders and poor border controls; inadequate controls of cash and similar financial instruments; the informal economy;

the limited capacity of regulators, law enforcement agencies (LEAs), prosecutors, the judiciary, and the NFIU; and the lack of a central national criminal database.

KEY AML LAWS AND REGULATIONS

The Money Laundering Prohibition Act 2011 (as amended), the Terrorism Prevention Act 2011 (as amended), and the Economic and Financial Crimes Commission Act 2004 are key AML/CFT laws. In the financial sector, the Central Bank of Nigeria, Securities and Exchange Commission, and National Insurance Commission have issued regulations, guidelines, and circulars to help financial institutions understand and comply with their respective obligations under the AML regime. Nigeria has KYC rules and STR regulations. Legal persons are covered criminally and civilly. Nigerian law also provides for enhanced due diligence for both foreign and domestic PEPs.

In 2018, Nigeria's House of Representatives passed the Proceeds of Crime Bill, which provides a legal and institutional framework for the confiscation, seizure, forfeiture, recovery, and management of assets, including instrumentalities used, or intended to be used in the commission of unlawful activities. The bill seeks to harmonize and consolidate the existing legal structure and to establish a central agency to manage forfeited assets and properties. The bill awaits concurrence by the Nigerian Senate, consideration by the Committee of the Whole House, and subsequent passage and transmission to the president for assent.

Nigeria is a member of the GIABA, a FATF-style regional body. Its most recent MER can be found at: <http://www.fatf-gafi.org/countries/n-r/nigeria/documents/mutualevaluationofnigeria.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Nigeria should establish a proportionate and dissuasive administrative sanctions regime.

The Company and Allied Matters Act should be amended to ensure the identification documents of all directors and shareholders are presented for all classes of registration, the beneficial ownership information of public companies is disclosed during registration, and a register of all beneficial owners is maintained.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

In July 2017, the Egmont Group suspended the NFIU's membership following repeated failures to address concerns regarding the protection of confidential information and over concerns of the NFIU's lack of operational independence from the EFCC. Following Nigeria's adoption of legislation to establish the NFIU as an independent agency and efforts to improve data protection, in September 2018, the Egmont Group lifted the suspension and restored full membership rights to the NFIU.

The Special Control Unit Against Money Laundering regulates and supervises DNFBPs for compliance with the Money Laundering Prohibition Act 2011(as amended).

There is inadequate information dissemination among LEAs about money laundering cases. There is also inadequate understanding of the nature and extent of AML issues in the various sectors in the country.

The growing use of new technology and emerging financial tools has the potential to circumvent the management and mitigation of risk even before measures to do so can be fully enacted and regulated.

The National Identity Management Commission should, as a matter of urgency, fast track the harmonization of the existing disparate databases, especially the Bank Verification Number database, the Independent National Electoral Commission database, and the Immigration and Drivers' License database.

Pakistan

OVERVIEW

Pakistan is strategically located at the nexus of south, central, and western Asia, with a coastline along the Arabian Sea. Its porous borders with Afghanistan, Iran, and China facilitate the smuggling of narcotics and contraband to overseas markets. Significant money laundering predicates in the country include tax evasion, fraud, corruption, trade in counterfeit goods, contraband smuggling, narcotics trafficking, human smuggling/trafficking, and terrorist financing. The black market, informal financial system, and permissive security environment generate substantial demand for money laundering and illicit financial services.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Money laundering affects both the formal and informal financial systems. The largely unregulated Pakistan-Afghanistan border facilitates the flow of illicit goods and monies into and out of Pakistan. Due to their distance from urban centers and the lack of comprehensive oversight, border regions – such as the areas near the Chaman and Torkham border crossings – experience illicit financial activity by terrorist organizations and insurgent groups. In fiscal year 2018, the Pakistani diaspora remitted \$19.6 billion to Pakistan via the formal banking sector. Though it is illegal to run an unlicensed hawala or hundi operation, the practices remain prevalent due to a lack of access to the formal banking sector, poor supervision and regulation, and a lack of effective penalties. Unlicensed hawala/hundi operators are common throughout the broader region. While much of the money is used for legitimate purposes, the unlicensed hawala/hundi operators are widely used to transfer and launder illicit money through neighboring countries.

Common money laundering vehicles include fraudulent trade invoicing, MSBs, and bulk cash smuggling. Criminals exploit import/export firms, front businesses, and the charitable sector. Pakistan's real estate sector is another common money laundering vehicle, since real estate transactions tend to be poorly documented and cash-based.

Additionally, the Altaf Khanani money laundering organization (Khanani MLO) is based in Pakistan. The group, designated a transnational organized crime group by the United States in 2015, facilitates illicit money movement globally and is responsible for laundering billions of dollars in organized crime proceeds annually. The Khanani MLO offers third-party money laundering services to a diverse clientele, including Chinese, Colombian, and Mexican organized crime groups and individuals associated with designated terrorist organizations.

KEY AML LAWS AND REGULATIONS

In 2015, Pakistan issued its National Action Plan (NAP), primarily addressing CFT. Despite frequent calls by the international community for the plan's implementation, the NAP remains largely non-operational, and authorities lack the institutional capacity and political will to implement it. Although the new Pakistan Tehreek-e-Insaf government has promised to implement the NAP, work has not advanced since the election. Pakistan agreed in June 2018 to implement an action plan to correct noted deficiencies in its AML/CFT regime.

The United States and Pakistan do not have a MLAT but are parties to multilateral conventions that include provisions for assistance. Extradition between the United States and Pakistan is governed by the 1931 United States-UK Extradition Treaty.

Pakistan is a member of the APG, a FATF-style regional body. Its most recent MER is available at: <http://www.apgml.org/members-and-observers/members/member-documents.aspx?m=8fc0275d-5715-4c56-b06a-db4af266c11a>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Pakistan's Financial Monitoring Unit (FMU), Pakistan's FIU, forwards a limited number of STRs to Pakistan's Federal Investigation Agency (FIA), one of the federal agencies with jurisdiction to investigate money laundering. The FIA lacks the capacity and resources to pursue sophisticated financial investigations and high-level targets. To date, there are no known successful prosecutions under Pakistan's 2010 Anti-Money Laundering Act.

Pakistan's FMU is not a member of the Egmont Group, but has expressed an interest in becoming a member.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Authorities have failed to implement adequate control measures at borders and airports, facilitating bulk cash smuggling and unlicensed MSBs. Moreover, the staff of Pakistan's national airline have been involved in bulk cash smuggling.

The government has taken steps to improve technical compliance with international AML standards; however, implementation deficiencies remain. Pakistani authorities should demonstrate interagency coordination to investigate and prosecute money laundering (in addition to the predicate offense). The government should demonstrate effective regulation over

exchange companies; implement effective controls for cross-border cash transactions; develop an effective asset forfeiture regime; and establish a formal regime and central authority for receiving and transmitting international requests for mutual legal assistance in criminal matters. Pakistan should design and publicly release metrics that track progress in combating money laundering, such as the number of financial intelligence reports received by its FMU and the annual number of money laundering indictments, prosecutions, and convictions. Law enforcement and customs authorities should address TBML and value transfer, particularly as they form the basis for account-settling between hawaladars.

The current government has promised to pursue funds untaxed or illicitly taken from Pakistan and held abroad. In September 2016, Pakistan signed the OECD Convention on Mutual Administrative Assistance in Tax Matters. Tax officials began to use the convention to seek financial information from OECD treaty signatories in January 2018, and automatic information exchange began in September 2018.

From April 10 to July 31, 2018, the government offered individuals a tax amnesty if they declared previously undisclosed local and foreign assets to the Pakistan Federal Board of Revenue. The government reported some 70,000 individuals took advantage of the program.

Panama

OVERVIEW

Panama's strategic geographic location; dollarized economy; status as a regional financial, trade, and logistics hub; and favorable corporate and tax laws render it attractive for exploitation by money launderers. Panama passed comprehensive AML legal reforms in late 2015. In October 2018, the OECD designated three residence-by-investment schemes in Panama as high-risk for offshore tax evasion. High-profile money laundering investigations, including the U.S. Treasury's 2016 designation of the Waked Money Laundering Organization, the "Panama Papers" leaks linked to Panamanian law firm Mossack Fonseca, former President Ricardo Martinelli's 2018 arrest and extradition, and the numerous offshoot investigations linked to bribes paid to public officials by Brazilian construction giant Odebrecht have intensified scrutiny of Panama's money laundering vulnerabilities.

Panama has demonstrated an increased commitment to fiscal transparency by becoming a signatory to the OECD bilateral Common Reporting Standards in January 2018, and through its participation in the Convention on Mutual Administrative Assistance for Tax Matters.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Money laundered in Panama primarily comes from illegal activities committed abroad, including drug trafficking, tax crimes, and smuggling of people and goods. Panama is a drug transshipment country due to its location along major trafficking routes. Numerous factors continue to hinder Panama's fight against money laundering, including lack of capacity to identify bulk cash shipments, inexperience with money laundering investigations and

prosecutions, inconsistent enforcement of laws and regulations, corruption, and an under-resourced judicial system.

Criminals launder money via bulk cash smuggling and trade at airports and seaports, through shell companies, casinos, cryptocurrencies, and the 12 active FTZs. Smuggling through various ports may be facilitated by corruption. There is a high risk that legal entities and arrangements created and registered in Panama, such as corporations, private foundations, and trusts, are misused to launder funds, especially those generated from foreign predicate crimes. Law firms and registered agents are key gatekeepers and are subject to mitigation measures; however, the use of nominee shareholders and directors is still prevalent.

KEY AML LAWS AND REGULATIONS

Panama has improved its compliance with international standards for AML prevention, enforcement, and cooperation. Panama has comprehensive CDD and STR requirements. Enacted in 2015, Law 23 criminalizes money laundering and sets AML compliance requirements for entities in 31 sectors. The *Intendencia* oversees the AML compliance of over 12,000 DNFBPs across 11 broad sectors, including the Colon Free Zone (CFZ), the second largest FTZ in the world. In May 2017, the banking supervisory and regulatory authority assumed oversight of MSBs and remitters (previously supervised by the *Intendencia*).

In 2017, Panama's National Commission on AML/CFT published its first national risk assessment, which identifies FTZs, real estate, construction, lawyers, and banks as "high risk" sectors. Subsequently, Panama released a supplemental National Strategy Report, which outlines 34 strategic priorities across five functional pillars to be pursued by 17 governmental institutions to improve its AML/CFT regime through 2019.

Panama is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/publications/mutualevaluations/documents/mer-panama-2018.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

As of yearend 2018, Panama does not yet criminalize tax evasion nor list it as a predicate offense for money laundering. In January 2018, the Varela administration presented a bill to the National Assembly to address this issue. In October 2018, the bill was approved at the first debate. The bill is expected to be signed into law in early 2019.

The government has increased resources devoted to financial and non-financial sector regulators. However, Panama lacks sufficient resources, including trained staff to effectively monitor whether entities, particularly DNFBPs, comply with reporting requirements. The government needs to enhance training activities, develop manuals, disseminate guidelines, and organize feedback sessions with reporting entities to improve the quality and levels of STR/CTR reporting, particularly among high-risk sectors. Regulators still cannot access STRs/CTRs due to confidentiality laws, but may interface with the FIU in person on particular matters.

Bank compliance officers often include minimal analysis in STRs, fearing liability; some notify clients and/or bank executives and directors about investigations despite Panama's tipping off law that criminalizes such acts.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Panama transitioned to an accusatory justice system in September 2016. However, law enforcement and judicial entities still lack experience and effectiveness under the new system, and a lack of coordination between these entities has resulted in few successful investigations, prosecutions, and convictions. Panama needs to demonstrate it is providing financial investigative training to law enforcement and prosecutors and is prioritizing financial investigations beyond cases related to drug trafficking.

Panama does not accurately track criminal prosecutions and convictions related to money laundering. Law enforcement needs more tools and protection to conduct long-term, complex investigations, including undercover operations. The criminal justice system remains at risk for corruption.

The Financial Analysis Unit (UAF), Panama's FIU, needs to demonstrate that STRs/CTRs are used to identify leads for illicit finance investigations, and that its reports are efficiently shared with law enforcement authorities, who in turn need to demonstrate that this information is used to investigate and prosecute money laundering and other crimes. In addition, elevating the UAF to independent agency status would further insulate it from outside influence.

The CFZ still remains vulnerable to illicit financial and trade activities, due to weak customs enforcement and limited oversight of transactions.

Paraguay

OVERVIEW

Paraguay continues a strong trajectory of economic growth, outpacing regional neighbors. The Tri-Border Area (TBA), comprised of the shared border areas of Paraguay, Argentina, and Brazil, is the center of a multi-billion dollar illicit goods trade, including marijuana cultivation, the trafficking of Andean cocaine, and arms smuggling, that facilitates significant money laundering in Paraguay. The Government of Paraguay has worked to reduce the criminal use of Paraguay's financial system to launder illicit proceeds by taking steps to address corruption, eliminate bureaucratic inefficiencies, and enhance interagency coordination. The current presidential administration has renewed Paraguay's focus on these efforts, with strong early results.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Money laundering occurs in the formal and informal financial sectors and in DNFBPs. Vulnerabilities include a large number of unregistered exchange houses; a primarily cash-based

economy in the TBA and along the border; the use of false or borrowed names to register businesses; lax regulation of import-export businesses and casinos; weak border controls; corrupt, overwhelmed, or untrained government agents; and insufficient oversight of a high volume of money transfers to Lebanon and China.

Transnational and local criminal organizations continue to take advantage of largely informal economies and lax border controls in the TBA and other border towns to engage in TBML, narcotics and arms trafficking, goods smuggling and counterfeiting, and document forgery. Criminal organizations disguise the laundering of proceeds from these activities in the high flow of goods sold into Brazil from Paraguay, often with the assistance of corrupt government officials.

Paraguay operates two FTZs in Ciudad del Este but does not have an offshore sector. Paraguay's port authority manages free trade ports and warehouses in Argentina, Brazil, Chile, and Uruguay.

KEY AML LAWS AND REGULATIONS

Paraguay established the National Secretariat for Asset Forfeiture (SENABICO) in 2018. With 26 staff and an initial budget of \$713,000, SENABICO manages the administration of criminal activity-linked assets seized by the Attorney General's Office (AGO). As of December 2018, SENABICO was administering \$77.5 million in seized assets and \$83,000 in forfeited assets.

Due to a 2017 law, Paraguayan businesses previously registered under a bearer bonds structure must convert to declared ownership before the end of 2019.

Paraguay has KYC and STR regulations applicable to a wide range of entities. Paraguayan legislation covers legal persons and requires enhanced due diligence for PEPs, for whom the Anti-Money Laundering Secretariat (SEPRELAD) issued updated identification guidelines. SEPRELAD also notes many regulations need amendments to empower SEPRELAD's enforcement mechanisms and clearly establish a sanctions regime.

There is no bilateral MLAT between Paraguay and the United States; however, both are party to multilateral conventions providing for cooperation in criminal matters.

Paraguay is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/countries/n-r/paraguay/documents/mutualevaluationofparaguay.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Paraguay struggles to investigate and prosecute complex money laundering cases within the statute of limitations, in part because of a disjointed AML regime, officials' lack of experience, judicial delays, and lack of interagency cooperation. While prosecutors previously treated SEPRELAD analytic reports as publicly releasable evidence, new leadership at SEPRELAD and the AGO worked to better protect intelligence therein. Though the Central Bank of Paraguay (BCP) has authority to inspect banks for money laundering compliance independent of

SEPRELAD, the sanctioning regime is not effective. To address these deficiencies, the new presidential administration is working to enhance planning and coordination on AML issues among government agencies. At the same time, the Paraguayan government continues work with international donors to improve its AML regime and implement its strategic plan.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Paraguay continues to take steps to implement international AML standards. During the first 10 months of 2018, Paraguay convicted three persons for money laundering, including two masterminds of the multi-million dollar Forex case. Paraguay arrested two individuals on U.S. money laundering charges, presented three cases for prosecution, and is investigating 38 additional cases (including the imprisoned former attorney general). The \$1 billion Megalavado case opened in 2014 remains an active investigation, but without indictments or convictions.

SEPRELAD is working with the BCP to improve coordination on and quality of STRs. As of October 2018, SEPRELAD had received 11,300 STRs and submitted 482 cases to the AGO. Of those submitted to the AGO, 79 percent lacked actionable financial intelligence information. The new leadership at SEPRELAD has improved STR quality dramatically since taking office in August 2018.

Paraguayan Customs continues to operate a TTU in partnership with the United States to combat TBML and other customs crime through the sharing and analysis of international trade data. In 2018, the TTU included a representative of the Taxation Secretariat, further enhancing information sharing and cooperation related to TBML investigations in Paraguay.

Peru

OVERVIEW

Billions of dollars in illicit funds from drug trafficking, illegal mining and logging, and other criminal activities continued to flow through Peru in 2018. The government of Peru estimates illegal mining alone produced over \$1 billion in illicit proceeds from January to August 2018.

The government took significant steps to further strengthen its AML laws and policies in 2018, including issuing new laws requiring companies to disclose beneficial owners, expanding oversight authorities over cooperative financial institutions, and establishing a civil asset forfeiture regime. Peru also began implementing its 2018-2021 National Plan to Combat Money Laundering (National AML Plan).

Nevertheless, Peru struggles to effectively enforce and implement its strong AML legal regime. Poor interagency coordination and information sharing impedes enforcement efforts. For example, the FIU should be able to share its reports with the police in addition to public prosecutors but is unable to do so due to current regulations. The government should increase efforts to ensure ministries and agencies share data and better coordinate their efforts on a day-to-day basis. Lack of expertise among police and prosecutors, high turnover, a dearth of experts

in forensic accounting, and corruption within the justice sector are among the factors hindering enforcement efforts. Peru particularly needs to develop a cadre of money laundering professionals in the justice sector.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Drug trafficking, illegal gold mining and logging, public corruption, and counterfeiting are the primary sources of illicit funds in Peru. State presence is limited outside of coastal areas and large population centers. Peru's challenging geography allows for the transit of large quantities of illegal goods, contraband, and cash across its borders and within remote areas. Pervasive corruption hampers investigations and prosecutions of narcotics-related money laundering crimes. Political figures and legislators have been implicated in money laundering, creating an impediment to progress on reform.

Individuals and organizations typically funnel illicit funds through front companies, many of which are engaged in illegal mining activities. International gold buyers who do not exercise due diligence in determining the source of their gold may unwittingly further money laundering activities. Individuals or front companies also launder illicit funds through real estate, financial institutions, money transfers, currency exchanges, crypto currency, and notaries.

KEY AML LAWS AND REGULATIONS

Peru has a robust AML regulatory framework, including the Law for the Efficient Fight against Money Laundering and other Crimes Related to Illegal Mining and Organized Crime, which establishes money laundering as an autonomous crime and KYC and STR requirements. Regulations define and require enhanced due diligence for PEPs.

Peru further strengthened its AML framework in 2018 through new laws and regulations, which largely implemented Peru's National AML Plan. Key legal developments include: an ultimate beneficiary law requiring disclosure of beneficial owners, regulations extending the authority of the FIU and Supervisory Banking Authority over cooperative financial establishments, and requirements that certain property purchases of over approximately \$3,700 be conducted through the banking system. In addition, Peru approved a civil asset forfeiture law, which allows authorities to seize and dispose of assets in cases where the possessor cannot establish legal ownership. The new law allows authorities to immediately seize illicit funds rather than waiting for a criminal conviction, which was required previously.

The DEA joined in an MOU to form a Money Laundering Task Force, to include representatives from the DEA, Peruvian National Police, Peruvian Prosecutors, and FIU.

Peru is a member of the GAFILAT, a FATF-style regional body. Its most recent MER is available, in Spanish only, at: <http://www.fatf-gafi.org/countries/n-r/peru/documents/mutualevaluationofperu.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The regulatory framework is generally strong and the government is receptive to recommendations from donors and international experts regarding potential improvements. Peru should improve its interagency coordination, such as by amending the FIU's authorities outlined in Law 27693 to allow the FIU to send reports directly to the police in addition to public prosecutors.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Peru lacks investigative, prosecutorial, and judicial capacity to ensure gains made in strengthening the AML regulatory framework are reflected through increased prosecutions and convictions. High turnover of specialized prosecutors, poor training, a lack of expert forensic accountants, and corruption throughout the justice sector hinder enforcement efforts. From January to June 2018, Peru convicted 12 individuals for money laundering, setting Peru on course to exceed prior year conviction rates. Under the prior asset forfeiture system, Peru attained 14 sentences since January 2018. Implementation of the new civil forfeiture law will create new specialized courts, prosecutorial offices, and investigative units; however, the government did not provide additional funding for implementation. Justice sector operators also need capacity building related to the link between corruption and money laundering in public contracting, particularly as Peru prepares to handle large-scale corruption cases pertaining to the Odebrecht scandal.

Of increased concern is the lack of regulatory enforcement and effective oversight in the small-scale mining sector, which the authorities identified as a sector particularly at risk for funneling profits from the narcotics trade. For example, state-owned company Activos Mineros since 2012 has contracted to purchase gold from Minerales del Sur, Veta de Oro, and E&M Company, which are now under investigation for buying illegally-mined gold from small scale miners. The government struggles to implement its formalization policy to obtain greater oversight of the small-scale gold mining sector.

Philippines

OVERVIEW

The Philippines faces elevated AML/CFT risk due to its physical location within international trafficking routes, the high volume of remittances from Filipinos living abroad, the presence of terrorist organizations, and its regulatory vulnerabilities that were exploited by hackers in the 2016 Bangladesh Bank Heist. In response to these risks, the Philippine Anti-Money Laundering Council (AMLC) has led a government-wide effort to bring Philippine laws and regulations up to international AML/CFT standards. Under the well-regarded leadership at the AMLC, the government continues work to minimize risks in key areas (including the gaming sector and DNFBPs) and to build the capacity of law enforcement, prosecutors, and the courts in order to successfully prosecute financial crime cases.

The government must now demonstrate if these measures have reduced the potential for money laundering in the Philippines.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The Philippine government's 2017 national risk assessment identified tax crimes, drug trafficking, graft and corruption, investment scams, smuggling, intellectual property violations, environmental crimes, and illegal arms trafficking as the most prevalent predicate crimes for money laundering. The banking sector remains the primary avenue for money laundering followed by the gaming industry and (to a lesser extent) the securities/insurance sector, with proceeds frequently derived from criminal activity committed abroad. Criminal organizations have also used nonprofit organizations and dummy corporations as conduits for money laundering.

The production, trade, and consumption of illegal drugs continues to be a major concern in the Philippines. Due to its location as a regional gateway, the Philippines is a choice transshipment point for the distribution of illegal drugs through its various airports, seaports, and porous maritime borders. International syndicates frequently use local drug groups to facilitate domestic distribution and employ displaced Overseas Filipino Workers and willing individuals as "mules" in drug smuggling.

The Philippine Economic Zone Authority oversees approximately 300 economic zones, most of which are well regulated. However, local government units and development authorities regulate multiple other free zones or freeports where smuggling can be a problem. Due to separate authorities of the security and customs officials monitoring these zones, Philippine law enforcement faces difficulty targeting organizations operating within them.

KEY AML LAWS AND REGULATIONS

Since its enactment in 2001, the Philippine Anti-Money Laundering Act (AMLA) has undergone numerous amendments, most recently in 2017, when the gaming industry was included as a covered sector.

The AMLA created the AMLC, which serves as the country's FIU and chief AML regulatory agency, to ensure covered persons and stakeholders comply with the AMLA. In 2018, AMLC took aggressive action to add at least 175 positions to its investigative, compliance, and financial intelligence/analysis staff; expand interagency training and coordination with law enforcement agencies; and issue regulations and guidelines related to banks, insurance companies, casinos, and DNFBPs. Additionally, in November 2018, President Duterte approved an executive order adopting a new National AML/CFT strategy and establishing a National AML/CFT Coordinating Committee, with AMLC as its secretariat, to facilitate interagency coordination on AML/CFT issues.

KYC, STR, and PEP provisions in the AML law and its implementing rules and regulations substantially meet international standards. In 2017, the central bank issued Circular 944, governing the operations and reporting obligations of the growing virtual currency exchange market.

The Philippines and the United States have a bilateral MLAT.

The Philippines is a member of the APG, a FATF-style regional body. Its most recent mutual evaluation is available at: <http://www.apgml.org/documents/search-results.aspx?keywords=philippines>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Despite AMLC's significant efforts to implement regulations and bolster investigative staff, shortfalls beyond AMLC's control create deficiencies in the AML regime. For example, current legislation does not include real estate brokers and dealers in certain high-value items (such as automobiles, arts, and antiques) as covered persons. NPOs also largely fall outside of AMLA regulation, although the Securities and Exchange Commission is finalizing guidelines to strengthen regulation of this sector.

The high single-transaction reporting threshold for gaming transactions (\$100,000) and the exclusion of non-cash transactions from reporting requirements and junket operators as covered entities are also deficiencies in the current AML regime. Furthermore, proxy gambling by offshore players via telephone or the internet is legal. Regulators have worked to tighten regulations and procedures. However, administrative and technical capacity remain key to addressing the AML/CFT monitoring challenges posed by this rapidly growing gaming segment.

Money laundering is not a stand-alone criminal act in the Philippines and requires a predicate crime, creating a challenge for investigators targeting transnational criminal organizations. Tax evasion, the falsification of public documents, and non-currency forgeries are not listed as predicate offenses to money laundering. Furthermore, strict bank secrecy laws create barriers to timely access to bank information on the part of investigators.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The AMLC and other competent authorities and agencies recognize that improving effectiveness in the implementation of the AML/CFT rules and regulations requires further interagency efforts. In 2018, AMLC improved interagency coordination with law enforcement, intelligence units, and prosecutors through drafting (or renewing) memoranda of agreement and understanding. These efforts have led to the conviction of 10 individuals for money laundering crimes in 2018.

Russian Federation

OVERVIEW

Russia has developed a vast AML/CFT legal framework with Rosfinmonitoring, the FIU, at its center. Corruption, misappropriation and embezzlement of public funds, tax crime, and drug trafficking generate significant amounts of proceeds. There is a large shadow economy and cash is prevalent. Financial flows from illicit activity linked to Russia have threatened weak financial institutions in neighboring countries; however, criminal proceeds from Russia also make their

way to global financial centers, often through opaque shell companies. To shield Russian individuals and entities from the effects of financial sanctions, the Russian government softened some reporting requirements leading to a decrease in transparency.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Official corruption at all levels of government constitutes one of the largest sources of laundered funds.

Russia is a transit and destination country for international narcotics traffickers, particularly from Afghanistan. Criminal elements use Russia's financial system and foreign legal entities to launder money. Criminals invest in and launder their proceeds through securities instruments, virtual currencies, precious metals, domestic and foreign real estate and construction, pension funds, and luxury consumer goods.

Cybercrime remains a significant problem, and Russian hackers and organized crime structures continue to work together. Russia has continued to encourage domestic development of blockchain-based technologies and innovations. The Russian government does not yet have a consistent position on the regulation of virtual currency, which could be abused for money laundering purposes.

There is a large migrant worker population in Russia. Many remittances are sent through an informal value transfer system that may pose vulnerabilities for money laundering. Gaming is only allowed in specified regions. The FIU monitors casinos for AML/CFT compliance, while other agencies supervise other parts of the gaming sector. Online gaming is prohibited.

KEY AML LAWS AND REGULATIONS

Russia's AML laws and regulations include the Federal Law on Combating Money Laundering and Terrorist Financing and numerous accompanying regulatory acts. Money laundering is criminalized in the Criminal Code of the Russian Federation. The Criminal Procedural Code provides a comprehensive set of rules, including those permitting international cooperation on money laundering investigations; and the Code on Administrative Offenses contains civil penalties for violations of AML controls. Russia has KYC and STR requirements in place.

Russia conducted a national money laundering risk assessment for 2017-2018. The key findings are publicly available.

Russia is a member of the FATF and two FATF-style regional bodies, MONEYVAL and the EAG. Its most recent MER is available at: <http://www.fatf-gafi.org/publications/mutualevaluations/documents/mutualevaluationoftherussianfederation.html>

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The United States and Russia are parties to a MLAT. Cooperation from Russia under the MLAT is primarily on child exploitation, violent crimes, and counterterrorism rather than financial crimes.

In July, the Finance Ministry unveiled the Comprehensive Russian Anti-Sanctions Plan, aimed at mitigating the impact of Western sanctions through various measures, including suspension of disclosure requirements with respect to sanctioned entities.

There is no corporate criminal liability for money laundering in Russia. A bill providing for such liability has been stalled in the Duma since 2015.

Changes to Russian law may have created vulnerabilities rather than closing them. For example, PEPs are subject to less stringent reporting requirements for foreign currency transactions. Certain entities are exempt from requirements to disclose beneficial ownership.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

In September 2018, Russia started sharing financial information under the OECD's Multilateral Competent Authority Agreement, joining the international fight against tax evasion. In 2017, Rosfinmonitoring prevented the laundering of approximately \$3.4 billion (230 billion rubles) through the Russian banking sector and the embezzlement of more than approximately \$59 million (4 billion rubles) in public procurement. The Central Bank of Russia revoked 47 bank licenses in 2017 and 48 bank licenses as of November 2018, primarily for suspicious transactions.

Since the imposition of financial sanctions against Russian officials, Russian government websites have severely restricted publicly available data and now publish only a fraction of the information previously available.

St. Kitts and Nevis

OVERVIEW

St. Kitts and Nevis is a federation composed of two islands in the Eastern Caribbean. Its economy is reliant on tourism and its economic citizenship program, and the jurisdiction has an offshore financial sector. Saint Kitts and Nevis is making progress in its AML regime.

The Financial Services Regulatory Commission (FSRC) (Saint Kitts Branch) is responsible for the licensing, regulation, and supervision of the non-bank financial sector in Saint Kitts. As of September 2018, the regulated entities supervised by the Saint Kitts Branch are two insurance managers, 52 trust and service providers, 15 domestic insurance companies, 11 MSBs, four credit unions, and one development bank.

The FSRC (Nevis Branch) is responsible for the licensing, regulation, and supervision of regulated persons and entities in Nevis that conduct fiduciary and international financial services

business. As of September 2018, the regulated entities supervised by the Nevis Branch are 18 insurance managers, one international bank, 53 registered agents/service providers, three international insurance brokers, five MSBs, and 326 international insurance companies. There is no recent information on the number of IBCs, limited liability companies, or trusts on either island.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

International experts have identified drug trafficking and fraud as the primary sources of illicit funds. Financial oversight of the offshore sector in Nevis remains challenging due to the strong secrecy and confidentiality laws covering IBCs and trusts. Bearer shares are authorized if the bearer share certificates are retained in the protected custody of persons or financial institutions authorized by the Minister of Finance. Specific identifying information must be maintained on bearer certificates, including the name and address of the bearer and the certificate's beneficial owner.

An individual is eligible for economic citizenship with a minimum real estate investment of U.S. \$200,000 or U.S. \$400,000 for each main applicant, or through a U.S. \$150,000 contribution to the Sustainable Growth Fund (SGF). The government uses SGF funds for economic diversification. Applicants must make a source of funds declaration and provide supporting evidence. International contractors conduct due diligence on applicants. Applicants also undergo vetting by the Joint Regional Communication Centre. Citizens of North Korea, Iran, and Afghanistan are prohibited from applying.

While the Gaming Board is responsible for the general regulatory and supervisory oversight of gaming in St. Kitts and Nevis, the FSRC has limited responsibilities for AML/CFT supervision of casinos.

KEY AML LAWS AND REGULATIONS

The AML legislation is at the federation level and covers both St. Kitts and Nevis. Each island has the authority to organize its own financial structure and procedures. The Proceeds of Crime Act (POCA), the Anti-Terrorism Act, the Financial Services Regulatory Commission Act, the Financial Intelligence Unit Act, the AML and CFT regulations, and the financial services (implementation of industry standards) regulations are the key laws and regulations.

Saint Kitts and Nevis has KYC and STR regulations and enhanced due diligence for PEPs.

Saint Kitts and Nevis is considering the adoption of model POCA legislation created by the Regional Security System Asset Recovery Unit for countries in the Eastern Caribbean.

Saint Kitts and Nevis has an MLAT with the United States. In 2018, Saint Kitts and Nevis reported assisting foreign jurisdictions with money laundering investigations and in the identification of possible proceeds of crime.

Saint Kitts and Nevis is a member of CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/cfatf-documents/mutual-evaluation-reports/saint-kitts-and-nevis-1/107-skn-3rd-round-mer/file>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

International experts have recommended improvement in the following areas: ensuring information is available in a timely fashion on all owners, partners, and beneficial owners of a partnership or company; and ensuring the availability of accounting information for such entities.

Nevis can form an IBC in less than 24 hours, and bearer shares are allowed, though “discouraged.”

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

While Saint Kitts and Nevis has helped foreign jurisdictions with money laundering cases, the country has not brought charges or prosecuted a money laundering case since 2015. The passing of an amended POCA or the model POCA legislation may reinvigorate this process.

In 2016, the FSRC issued the General Warning - Online Casino and Online Gaming stating that online gaming entities are illegal in Saint Kitts and Nevis.

St. Lucia

OVERVIEW

St. Lucia’s main sources of revenue are tourism and the offshore banking sector. St. Lucia is progressing with its AML regime.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

As of October 2018, the St. Lucia Financial Services Regulatory Authority (FSRA), the offshore sector supervisor, listed the following regulated entities on its website: 26 insurance companies, 17 credit unions, 14 international banks, 33 international insurance companies, and five MSBs.

St. Lucia reports drug trafficking as the primary source of illicit funds. St. Lucia’s geographic location and porous borders increase its risk of drug money laundering. Money laundering most commonly occurs through structured deposits and currency exchanges, or cash real estate transactions. St. Lucia identifies jewelry dealers, legal services, and NPOs as additional sectors vulnerable to money laundering activity.

There is one FTZ operating in Vieux Fort.

An individual can petition for St. Lucian citizenship through a minimum donation to the National Economic Fund of U.S. \$100,000 per applicant, U.S. \$165,000 for an applicant and spouse, or

U.S. \$190,000 for a family of up to four people. Other citizenship by investment options include a U.S. \$300,000 minimum purchase in real estate; a U.S. \$3.5 million investment for an individual, or U.S. \$6 million for more than one applicant, in an approved enterprise project; or a government bond minimum purchase of U.S. \$500,000 for an individual, U.S. \$535,000 for an applicant and spouse, or U.S. \$550,000 for a family of up to four people. Applicants must apply through a government-approved local agent. An in-person interview is not required. Applicants must make a source of funds declaration and provide evidence supporting the declaration. The government established a Citizenship by Investment Unit (CIU) to manage the screening and application process.

There remains a substantial black market for smuggled goods in St. Lucia, mostly gold, silver, and other jewelry, predominantly smuggled from Guyana. There is a black market in high-quality jewelry purchased from duty free establishments in St. Lucia by both local and foreign consumers. Monies suspected as derived from drug trafficking and other illicit enterprises are filtered into and washed through trading firms. TBML is evident in St. Lucia.

KEY AML LAWS AND REGULATIONS

St. Lucia's main AML laws are the 2003 Money Laundering Prevention Act, the Proceeds of Crime Act, and the Anti-Terrorism Act.

St. Lucia has KYC and STR regulations. It also has enhanced due diligence for PEPs. The Eastern Caribbean Central Bank regulates onshore commercial banks in St. Lucia.

There is an MLAT between the governments of St. Lucia and the United States.

St. Lucia is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/cfatf-documents/mutual-evaluation-reports/saint-lucia-1/110-saint-lucia-3rd-round-mer/file>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

St. Lucia is generally in technical compliance with international standards. U.S. law enforcement is increasingly concerned about the expansion of citizenship by investment programs due to the possibility of local corruption and the visa-free travel and ability to open bank accounts accorded these individuals.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

From 2017 to 2018, St. Lucia charged 12 people with money laundering. For 2018, there were six cash forfeitures totaling approximately U.S. \$565,050 (1,527,068 Eastern Caribbean dollars). St. Lucia reports increased interagency cooperation, leading to an increase in the number of cash seizures and forfeitures.

Further AML/CFT awareness training is recommended to continue developing AML compliance and build on this progress.

St. Vincent and the Grenadines

OVERVIEW

Saint Vincent and the Grenadines continues to make progress with its AML regime. The FIU has a good reputation in the Eastern Caribbean and cooperates with the United States regularly. In December 2017, the country began a National Risk Assessment.

St. Vincent and the Grenadines' economy is dependent on tourism and its offshore financial services sector. There are no FTZs, economic citizenship programs, casinos, or internet gaming licenses. As of September 2018, Saint Vincent and the Grenadines reported four international banks, four international insurance companies, 14 registered agents, 94 mutual funds, 5,676 IBCs, 47 limited liability companies, and 85 international trusts. IBCs can be incorporated in less than 24 hours from receipt of application.

The Financial Services Authority (FSA) is the regulatory body with the mandate to supervise the offshore financial sector, and the FIU is the supervisory authority for DNFBPs.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Physical presence is not required for offshore sector entities and businesses, with the exception of offshore banks. Resident nominee directors are not mandatory except when an IBC is formed to carry on banking business. Bearer shares are permitted for IBCs, but not for IBCs conducting banking functions. The government requires registration and custody of bearer share certificates by a registered agent who must also keep a record of each bearer certificate issued or deposited in its custody.

Saint Vincent and the Grenadines reports that drug trafficking, in particular marijuana, is the main source of illicit funds. The country is the Eastern Caribbean's leading producer of marijuana, and narcotics are transferred to speedboats at beaches on the leeward side or on uninhabited Grenadine islands. Couriers carry money through the airport, ports, or other points of entry. Sometimes, money remitters are used.

The country has made efforts against drug trafficking by imposing strict penalties. It is also engaged with the Regional Security System to coordinate border control issues and is developing its Coast Guard to cover the coastline. In December 2018, parliament passed legislation legalizing cultivation and use of marijuana for medical purposes.

KEY AML LAWS AND REGULATIONS

Saint Vincent and the Grenadines has comprehensive AML legislation and regulations, including the 2017 Proceeds of Crime (Amendment) Act and the 2017 Anti-Money Laundering Terrorist Financing Code. Saint Vincent and the Grenadines has KYC and STR regulations. The 2014 Anti-Money Laundering and Terrorist Financing Regulations provide for enhanced customer due

diligence and ongoing monitoring for PEPs. In December 2017, the FIU revised its standard operating procedures regarding receipt, processing, and handling of sensitive information and requests. The main change requires financial analysts to process SARs.

Saint Vincent and the Grenadines uses its Mutual Assistance in Criminal Matters Act to share information with the United States.

Saint Vincent and the Grenadines is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/cfatf-documents/mutual-evaluation-reports/saint-vincent-and-the-grenadines-1/116-svg-3rd-round-mer/file>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The Saint Vincent and the Grenadines government reports it is reviewing how to address gaps in the 2017 Anti-Money Laundering and Terrorist Financing (Amendment) Regulations. The country is also considering a bill that would regulate DNFBPs to address noted deficiencies.

Saint Vincent and the Grenadines should become a party to the UNCAC.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Saint Vincent and the Grenadines reports that DNFBPs are a focal point for enforcement and implementation. To that end, the country drafted a DNFBP Action Plan for 2019. In August 2018, the FIU appointed a supervisor with the responsibility of overseeing DNFBP compliance.

In February 2018, the FSA, FIU, and Eastern Caribbean Central Bank (ECCB) signed an MOU to facilitate collaboration, exchange of information, onsite examinations, and training. In July 2018, the ECCB performed two onsite evaluations of the AML/CFT program.

For 2017 to 2018, Saint Vincent and the Grenadines reported four money laundering charges and three convictions. The fourth case has not yet been heard by the High Court.

Senegal

OVERVIEW

Senegal serves as a regional business center for Francophone West Africa and hosts the headquarters of the Central Bank of West African Countries (BCEAO) for the eight-member West African Economic and Monetary Union (UEMOA). No major changes in money laundering trends emerged in 2018. Senegal's most important vulnerabilities to money laundering are bank transfers to offshore accounts in tax havens and real estate transactions conducted with cash. Senegal is exposed to risks from organized crime, drug trafficking, internet fraud, bank and deposit fraud, and Ponzi schemes. Corruption is a significant concern within government institutions and the private sector. Traffickers exporting illegal wildlife have

sophisticated operations based in Senegal due to the ease of conducting illicit business at the Port of Dakar.

The Government of Senegal continues to build its capabilities to prevent and investigate financial crimes. Open issues to address include training for law enforcement officers, prosecutors, and judges on the investigation and prosecution of money laundering. Recommendations for improvement include drafting and enacting a non-conviction-based forfeiture law to allow government seizures of assets in the absence of criminal charges. Senegal needs legislation on the management, storage, and disposal of seized property.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Corruption and drug trafficking are the most likely sources of laundered financial proceeds. Typical methods of money laundering include cash purchases of real estate and bank transfers through Senegalese financial institutions to offshore tax havens.

According to the BCEAO, 18.5 percent of Senegalese had a bank account at the end of 2016. As a result, most transactions are cash-based, including real estate purchases and construction financing, presenting opportunities for laundering illicit funds. Documentation of real estate ownership is both scarce and unreliable. Transfers of real property are often opaque. Informal businesses dominate Senegal's economy. The government can reduce vulnerabilities to money laundering by improving the system of land administration and encouraging all businesses to be registered.

Touba, located in the central region of Senegal, is an autonomous municipality under the jurisdiction of the Mouride religious brotherhood. As the focal point of a worldwide network of Mouride communities, Touba is the destination of a significant portion of the remittances Senegalese abroad send home each year. Estimates of formal remittance flows to Senegal exceed \$1 billion annually; the total flow of remittances is likely to be much larger. These facts, and the national government's limited authority in the city, make Touba vulnerable to TBML.

Other areas of concern include the transportation of cash, gold, and other items of value through Senegal's international airport and across its porous borders. The widespread use of cash and money transfer services, including informal channels (hawaladars) and new payment methods, also contribute to money laundering vulnerabilities. Mobile payment systems such as Wari, Joni-Joni, and Western Union cater to the needs of the unbanked Senegalese but are not always subject to enforcement of AML controls due primarily to resource constraints. Senegalese-based money transfer company Wari recorded remittances of \$2 million per day shortly after opening a new service for Touba. Wari was implementing KYC software in 2016 but discontinued this effort due to problems with its platform.

KEY AML LAWS AND REGULATIONS

In 2018, in response to a UEMOA directive, Senegal adopted an updated AML/CFT law which includes: extension of the FIU president's term of office to five, non-renewable years; a prohibition on the proliferation of weapons of mass destruction; limitations on the use of cash in

transactions; risk assessments for the country as well as for individual banks. The new legislation broadly defines PEPs and extends heightened due diligence measures as to them.

Senegal relies heavily on the knowledge and assistance of the BCEAO. The BCEAO regulates banks within the eight UEMOA countries and prescribes KYC practices for UEMOA financial institutions and money transfer operations.

Senegal is a member of the GIABA, a FATF-style regional body. Its most recent MER is available at: <http://www.giaba.org/reports/mutual-evaluation/Senegal.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The BCEAO is aware of and acknowledges the various money laundering activities in Senegal but does not have the tools or political will to stop them.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The BCEAO addresses money-laundering concerns at regional banking conferences, most recently in 2017. Financial institutions in Senegal are working with the BCEAO and Senegalese authorities to build their capabilities to detect suspicious transactions.

The United States and Senegal do not have a bilateral MLAT or an extradition treaty. Senegal is a party to relevant multilateral law enforcement conventions that have mutual legal assistance provisions. The United States and Senegal also can make and receive requests for mutual legal assistance based on domestic law.

The FIU published its last activity report in July 2018 covering 2017.

Serbia

OVERVIEW

In 2018, Serbia made a high-level political commitment to address noted deficiencies and has subsequently made significant progress in bringing its AML regime in line with international standards, resulting in an increased number of related investigations and convictions. With assistance from donors, Serbia updated its national risk assessment (NRA) to better identify current threats or crimes associated with money laundering and methods used to launder money and finance terrorism.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The most common money laundering typologies noted by Serbia's Administration for the Prevention of Money Laundering (APML) include loans and cash gifts of unknown origin to natural and legal persons; successive or structured cash deposits of unknown origin into the financial system, including through non-beneficial account holders; using shell companies;

foreign trade using over-invoicing and under-invoicing; cases combining money laundering with tax evasion; and integration of criminally-derived funds in sectors such as construction, real estate, casinos, currency exchange offices, hotels, and other trade (retail, wholesale, and cash-based businesses). Data from prosecuted cases show the majority of criminally-derived proceeds went through limited liability companies.

KEY AML LAWS AND REGULATIONS

Since December 2017, 12 key AML laws have entered into force or taken effect, including measures to improve factoring, accounting, auditing, and foreign exchange operations. These include: the Law on the Prevention of Money Laundering and Financing of Terrorism; the Law on Organization and Jurisdiction of State Bodies in the Suppression of Organized Crime, Terrorism, and Corruption; and the Law Amending the Criminal Code.

In 2018, several new laws entered into force, including Amending the Law on Factoring, designed to prevent convicted natural and legal persons from owning factoring companies; Amending the Law on Accounting to prevent legal persons, in addition to natural persons, from founding or owning an accounting services company if they have been convicted of certain criminal offenses; Amending the Law on Auditing to prevent legal persons, in addition to natural persons, from founding or owning an audit services company if they have been convicted of certain criminal offenses; Amending the Law on Foreign Exchange Operations that states any person associated with such operations must not have convictions for certain crimes; Amending the Law on Games of Chance; the Law on Intermediation in the Trade and Lease of Real Estate that requires proof of a non-conviction to be submitted to start an intermediation business; and the Law on the Centralized Records of Beneficial Owners.

To further strengthen a risk-based approach in supervision of related entities, new or updated AML/CFT risk assessment guidelines and risk-assessment matrices have been distributed to all appropriate supervisors. In March 2018, the Chamber of Public Notaries, Market Inspectorate, and Tax Administration all adopted individual risk matrices.

Legal persons are covered by existing legislation. Foreign PEPs are subject to enhanced due diligence under current law, and domestic PEPs are covered under the new AML/CFT Law.

Serbia is a member of MONEYVAL, a FATF-style regional body. Serbia's most recent MER is available at: <https://www.coe.int/en/web/moneyval/jurisdictions/-serbia>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Serbia should improve interagency cooperation; pursue money laundering independently of other crimes; raise awareness among entities obligated to submit STRs; ensure law enforcement agencies have timely and accurate access to legal entities' beneficial ownership information; demonstrate a record of training on the investigation and prosecution of third-party and stand-alone money laundering cases; and improve the capacities of the APML and AML supervisors.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Serbia cooperates with foreign governments on money laundering cases.

Serbia's new AML law significantly improves the efficiency and efficacy of its AML sanctioning regime, in part, by allowing for proportionality and timeliness of corrective measures. The National Bank of Serbia can now impose sanctions for AML/CFT violations, based on laws regulating the operation of banks, pension funds, financial leasing, insurance, and payment services. In 2017, there were investigations of 11 people and one company for money laundering violations, resulting in two convictions. During the first eight months of 2018, 11 criminal charges were filed against 31 individuals for the criminal offense of money laundering. During the first seven months of implementation of the new Law on Organization of State Bodies in Combating Organized Crime, Terrorism, and Corruption, 275 indictments and 142 criminal convictions were reported for corruption and economic offenses. The new anticorruption prosecutorial units are reporting dozens of ongoing proactive investigations. Donors have provided training and workshops to prosecutors and law enforcement officials, which supported the increased number of convictions.

Sint Maarten

OVERVIEW

Sint Maarten is an autonomous entity within the Kingdom of the Netherlands (Kingdom). The Kingdom retains responsibility for foreign policy and defense, including entering into international conventions. Sint Maarten has been recognized by the OECD as a jurisdiction that has implemented internationally-agreed tax standards. In 2016, Aruba, Sint Maarten, the Netherlands, and Curacao signed an MOU with the United States for joint training activities and information sharing related to criminal investigations and law enforcement. An ongoing priority area is interdicting money laundering operations.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The number of hotels that operate casinos on the island has significantly declined after the damage caused by hurricane Irma in 2017. Online gaming is legal and Sint Maarten has offshore banks and companies. Sint Maarten's favorable investment climate and rapid economic growth over the last few decades had drawn wealthy investors to the island to invest in large-scale real estate developments, including hotels and casinos. Hurricane Irma destroyed many of those real estate developments. The government of Sint Maarten is working with the Netherlands and the World Bank on procuring services for reconstruction efforts. The World Bank's procurement process should mitigate some inherent money laundering vulnerabilities in large-scale government procurement. Traditionally, money laundering of criminal profits occurs through business investments and international tax shelters.

KEY AML LAWS AND REGULATIONS

KYC laws cover banks, lawyers, insurance companies, casinos, customs, money remitters, the central bank, trust companies, accountants, car dealers, administrative offices, tax administration, jewelers, credit unions, real estate businesses, notaries, currency exchange offices, and stock exchange brokers.

The Kingdom may extend international conventions to the autonomous countries. The Kingdom extended to Sint Maarten the application of the 1988 UN Drug Convention in 1999 and the UNTOC in 2010. With the Kingdom's agreement, each autonomous country can be assigned a status of its own within international or regional organizations subject to the organization's agreement. The individual countries may conclude MOUs in areas in which they have autonomy, as long as these MOUs do not infringe on the foreign policy of the Kingdom as a whole. Sint Maarten is a member of the Global Forum on Transparency and Exchange of Information for Tax Purposes.

Sint Maarten is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/documents/cfatf-mutual-evaluation-reports/sint-maarten-1>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Sint Maarten has yet to pass and implement legislation to regulate and supervise its casino, lottery, and online gaming sectors in compliance with international standards. In addition, the threshold for conducting CDD in the casino sector does not comply with international standards.

The UNCAC has not yet been extended to Sint Maarten.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The National Ordinance Reporting Unusual Transactions has an "unusual transaction" reporting system. Designated entities are required to file UTRs with the FIU on any transaction that appears unusual (applying a broader standard than "suspicious") or when there is reason to believe a transaction is connected with money laundering. If, after analysis of an unusual transaction, a strong suspicion of money laundering arises, those suspicious transactions are reported to the public prosecutor's office.

The 1983 MLAT between the Kingdom of the Netherlands and the United States applies to Sint Maarten and is regularly used by U.S. and Dutch law enforcement agencies for international drug trafficking and money laundering investigations.

The harbor of Sint Maarten is well known for its cruise terminal, one of the largest on the Caribbean islands. After the airport and seaport were hit hard by hurricanes Irma and Maria in 2017, cruise ship visits had halted, but the seaport and the airport are slowly recovering. At the container facility, larger container ships dock their containers in Sint Maarten where they are picked up by regional feeders to supply the smaller islands surrounding Sint Maarten. Customs and law enforcement authorities are alert for regional smuggling, TBML, and value transfer schemes. In June 2017, the Sint Maarten Port Director was arrested in an investigation into

forgery, money laundering, and tax evasion. This case is ongoing. In June 2018, a Member of Parliament was charged with bribery, tax evasion, and money laundering.

From January to October 2018, Sint Maarten's FIU reported it had recommended eight money laundering investigations to the Public Prosecutor's Office. The recommendations led to seven investigations consisting of 1,006 suspicious transactions, involving approximately \$74 million. The FIU also initiated seven investigations consisting of 261 suspicious transactions, involving approximately \$16 million.

Spain

OVERVIEW

Spain proactively identifies, assesses, and understands its money laundering vulnerabilities and works to mitigate risks. Spain remains a logistical hotspot for organized crime groups based in Africa, Latin America, and the former Soviet Union. Spain also is a transshipment point for illicit drugs entering Europe from North Africa and South America. Spain largely complies with international AML standards and, in general, has updated AML regulations and competent authorities.

The government continues to build on its already strong measures to combat money laundering. After the EC threatened to sanction Spain for failing to bring its AML regulations in full accordance with the EU's Fourth AML Directive, in 2018, Spain approved measures to modify its money laundering legislation to comply with the EU Directive. These measures establish new obligations for companies to license or register service providers, including identifying ultimate beneficial owners; institute harsher penalties for money laundering offenses; and create public and private whistleblower channels for alleged offenses.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Spain is a transshipment point for the cross-border illicit flows of drugs. Moroccan hashish and Latin American cocaine enter the country and are distributed and sold throughout Europe, with the resulting proceeds often returned to Spain. Passengers traveling from Spain to Latin America reportedly smuggle sizeable sums of bulk cash. In addition, bulk cash is sent from Latin America to Spain by the same means that drugs enter Spain from Latin America. Informal money transfer services also facilitate cash transfers between Spain and Latin America, particularly Colombia. Law enforcement authorities continue to cite an emerging trend in drugs and drug proceeds entering Spain from newer EU member states with less robust law enforcement capabilities.

The most prominent means of laundering money are through the purchase and sale of real estate, the use of complex networks of companies and legal arrangements, the exploitation of MVTs, and the use of cash couriers. The major sources of criminal proceeds are drug trafficking, organized crime, customs fraud, human trafficking, and counterfeit goods. Illicit proceeds continue to be invested in real estate in the coastal areas in the south and east of the country, but

criminal groups also place money in other sectors, including services, communications, automobiles, artwork, and the financial sector.

KEY AML LAWS AND REGULATIONS

Spain's Council of Ministers, in February and August 2018, approved measures to modify Spain's AML legislation to comply with the EU Fourth Money Laundering Directive. The country has comprehensive KYC and STR regulations and PEPs are subject to enhanced due diligence. Spain issued a Ministerial Order in 2016 launching and defining the scope of the Asset Recovery and Management Office and the opening of its deposit and consignment account.

Spain is a member of the FATF. Its most recent MER is available at: <http://www.fatf-gafi.org/countries/s-t/spain/documents/mer-spain-2014.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Spain is largely compliant with international AML/CFT standards. Regulations issued by Spain in 2017 add to the information included by, and available to, financial institutions when processing wire transfers. Spain still needs to resolve technical deficiencies related to its handling of NPOs, such as outreach to encourage them to use regulated financial channels.

Additionally, effective controls are not in place to ensure lawyers comply with their AML obligations. Spain has not updated its penal code to extend the maximum period of disbarment for professionals.

Information about AML fines in Spain are not made available to the public.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Spain actively prosecutes money laundering cases, including those involving third-party money laundering, self-laundering, and laundering the proceeds of both domestic and foreign predicate offenses. Spain has had success disabling criminal enterprises and organized criminal groups by identifying and shutting down their complex money laundering networks of national and international companies. However, the relatively low level of sanctions (terms of imprisonment and periods of disbarment) imposed for money laundering offenses is a weakness, as is the judicial system's limited capacity to handle complex money laundering cases in a timely fashion.

Spain actively investigates money laundering. In April 2018, Spain's High Court placed Caixabank—Spain's third-largest bank—under formal investigation stemming from a separate investigation that began in September 2017 into the Luxembourg subsidiary of Industrial and Commercial Bank of China (ICBC) for laundering funds from Chinese criminal groups via Caixabank branches in Madrid. That investigation, which followed the arrest of seven ICBC executives in Madrid in 2016, revealed that Caixabank branches had failed to implement AML/CFT controls and properly report suspicious transactions to Spain's FIU.

As part of an investigation into the laundering in Spain of illicit funds from Venezuela, Spanish police in October 2018 arrested four individuals, some of whom had connections to former Venezuelan officials, and seized more than 115 properties worth nearly \$70 million—many of which were in the southern beach resort city of Marbella. Also in October 2018, Spanish security forces arrested the vice president of the Royal Spanish Football Federation on money laundering charges.

Suriname

OVERVIEW

Money laundering in Suriname is closely linked with transnational criminal activity related to the transshipment of cocaine, primarily to Europe and Africa. Casinos, real estate, foreign exchange companies, car dealerships, and the construction sector remain vulnerable to money laundering due to lax enforcement of regulations, though the FIU has increased its engagement with DNFBPs. Public corruption also contributes to money laundering, though the full extent of its influence is unknown. Profits from small-scale gold mining and related industries fuel a thriving informal sector. Much of the money within this sector does not pass through the formal banking system. In Suriname's undeveloped interior, bartering with gold is the norm for financial transactions.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Suriname has an adequate legal framework in place to allow for more robust AML enforcement, but a lack of training, resources, and implementation hampers efforts. There are indicators that TBML occurs, generally through the activities of local car dealerships, gold dealers, and currency exchanges (*cambios*). Supervision of DNFBPs remains limited. The FIU has increased outreach activities, registration, and off-site inspections of DNFBPs and is developing further technical skills through a donor-funded program. There is no effective supervision of the large gaming sector.

Money laundering may occur in the formal financial sector through banks and *cambios*, though there is no evidence the sector facilitates the movement of currency derived from illegal drug sales in the United States. Dutch authorities confiscated an approximately U.S. \$22.2 million (€19.5 million) cash shipment traveling through the Netherlands from Surinamese banks. Press reported the seized funds originated in *cambios* and were seized due to money laundering concerns. The case is ongoing. Since the seizure, banks instituted more stringent rules on identifying the source of large cash deposits and limiting deposits of high-denomination foreign currency bills. *Cambios* have begun enforcing proof of identity regulations.

Goods such as agricultural products, fuel, cigarettes, alcohol, and medicine are smuggled into the country via Guyana and French Guiana and sold at below-market prices, but there is little evidence to suggest this smuggling is related to narcotics trafficking or other illicit activity.

KEY AML LAWS AND REGULATIONS

Suriname did not pass or amend AML legislation in 2018 but is drafting amendments to the Disclosure of Unusual Transactions Act. KYC and STR requirements cover banks and credit unions, asset managers, securities brokers and dealers, insurance agents and companies, currency brokers, remitters, exchanges, auditors, accountants, notaries, lawyers, real estate agents, dealers in gold or other precious metals and stones, gaming entities and lotteries, and motor vehicle dealers. The FIU began registering designated DNFBPs and is taking steps to join the Egmont Group.

The exchange of records between Suriname and other countries is possible via individual MOUs and mutual legal assistance requests.

Suriname is a member of the CFATF, a FATF-style regional body. Suriname's most recent MER is available at: <https://www.cfatf-gafic.org/index.php/member-countries/suriname>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Suriname must complete a national risk assessment.

Suriname has requirements for enhanced due diligence procedures for foreign, but not domestic, PEPs.

Suriname is not a member of the Egmont group.

Suriname is not party to the UNCAC.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

A gaming board was established by law in 2009 but is still not fully active. Supervision and regulation of casinos remains deficient.

The FIU did 53 off-site inspections in the first nine months of 2018, an over fivefold increase from 2017. During the same period, 203,748 STRs were filed, more than double the number for the same period in 2017. Of these, only 1,002 STRs, or 0.5 percent, led to an investigation.

From January through September 2018, the Office of the Attorney General reported four money laundering prosecutions.

Tajikistan

OVERVIEW

Money laundering associated with Tajikistan's drug trade remains a dominant concern. Tajikistan lies on a major drug smuggling route connecting Afghanistan with Russian and Eastern European markets. In addition, a substantial amount of cash entering financial

institutions in the country stems from pervasive corruption in Tajikistan, including bribes obtained from the drug trade.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The main northern drug trafficking route from Afghanistan runs through Tajikistan. A 2018 UNODC report estimates that 42 to 74 tons of heroin left Afghanistan along the northern route annually between 2011 and 2015, much of it transiting Tajikistan. Large drug transshipments generate equally large amounts of cash, which require economic safe havens. The pervasive nature of corruption in the country allows criminals to circumvent Tajikistan's money laundering laws – which often meet international standards – with bribes or other in-kind incentives.

While drug smuggling clearly generates substantial amounts of illegal funds, the mechanisms used to launder these funds are harder to identify. Officials claim conducting transactions through Tajikistan's banking sector is the most common method of money laundering in the country, although real estate purchases may also be used.

Rampant corruption and bribery have deterred foreign investment and inhibit the success of local businesses.

There are four established economic free zones in Tajikistan, all of which are based on manufacturing. It is not known what, if any, role the zones play in national or international money laundering.

KEY AML LAWS AND REGULATIONS

The country has in place a capable legal framework, including KYC and STR requirements, to deal with money laundering; however, some areas still need attention, such as remittances. In 2018, President Rahmon approved the AML/CFT National Action Plan (NAP) for 2018-2021, which mandates that all relevant government agencies develop their own AML/CFT plans. As a result of the NAP, in 2018, the National Bank of Tajikistan (NBT) established a formal AML/CFT training center to train banking, government, and law enforcement officials. Previously, the NBT hosted several ad hoc trainings per year.

In 2018, the national legislature amended the Law on Countering AML/CFT and Weapons of Mass Destruction to give certain authorities to the NBT to monitor credit and insurance organizations and to the Ministry of Finance for security market professionals, precious metals and minerals dealers, audit companies, accountants, pawnshops, betting shops and bookmakers, and lotteries.

Tajikistan is a member of the EAG, a FATF-style regional body. Its most recent MER is available at: https://eurasiangroup.org/ru_img/news/tajikistan.pdf.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Tajikistan could improve AML/CFT oversight of the banking NPO sector. Overall, the government has a poor track record of uncovering money laundering in the private sector. The government also needs to engage non-financial businesses and DNFBPs to improve awareness of money laundering risks and their legal obligations, while promoting a better understanding among decision makers of the risks money laundering poses to the broader society.

Furthermore, the Tajik government has a limited ability to trace and confiscate assets identified in investigations.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

In 2018, the NBT investigated two private banks for money laundering and terrorist financing. The investigation resulted in criminal charges for four employees, a total fine for both banks of \$430,000, and the removal of the banks' top management. Appeasing the international AML community may have been a larger motivator than genuine AML/CFT enforcement.

It remains difficult to assess the effectiveness of money laundering investigations. During the first nine months of 2018, four money laundering investigations were launched, with two of those cases prosecuted.

Tajikistan's FIU, the Financial Monitoring Department (FMD) of the NBT continues to hire personnel in order to improve supervision and analytics, and can benefit from training, improved technological resources, and equipment upgrades. Overall, the FMD has a good understanding of the money laundering risks in Tajikistan, and law enforcement authorities note the FMD is effective in international information sharing and provides quality information to law enforcement officials.

However, law enforcement does not make money laundering a priority; money laundering charges arise only as an additional element of a predicate offense. It is generally believed law enforcement has a good understanding of the risks of terrorist financing, but there is limited understanding of money laundering risks.

Tajikistan has the capacity to confront money laundering, but lack of political will hinders its efforts. The government should take action to reduce corruption by developing a comprehensive anticorruption strategy. Without such action, people will launder money with little fear of prosecution or other negative repercussions.

Tanzania

OVERVIEW

Tanzania is vulnerable to money laundering and financial crimes due to its under-regulated, underdeveloped financial sector and limited capacity to address such criminal activity. Criminal activities with nexuses to money laundering include transnational organized crime, tax evasion, corruption, smuggling, trade invoice manipulation, illicit trade in drugs and counterfeit goods,

and wildlife trafficking. There are Tanzanian links to regional terrorist financing. The Government of Tanzania took steps in recent years to curb and prevent money laundering, such as creating a special Economic, Corruption, and Organized Crime High Court Division, tightening cross-border currency regulations, and revising the rules for operating retail foreign exchange (forex) bureaus. In 2018, there were a number of high profile arrests for money laundering; however, there were very few convictions. Money laundering charges, like corruption charges, are increasingly used as a political tool. The Government of Tanzania should continue to build the human and technical capacities of key financial sector, law enforcement, and customs and tax authorities, and judicial stakeholders.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Tanzania's large, porous borders and geographic position present challenges in combating financial crime. The vast majority of Tanzanians work in the informal sector, and thus use cash-based, informal, and nontraditional financial systems. For example, Tanzania is emerging as a world leader in mobile banking services with a penetration rate of 70 percent and \$1.6 billion in average monthly transactions. These services improve financial inclusion for underserved populations but also create new vulnerabilities for financial crime.

Over the past two years, the Tanzania Revenue Authority (TRA) dramatically increased efforts to collect taxes, often using aggressive tactics and levying arbitrary assessments. This has motivated businesses and individuals, especially international traders with Asian and Middle Eastern suppliers, to transfer more money outside the formal financial system to avoid taxation. However, criminals exploit these same methods of moving money. Cross-border trade in used-cars, auto parts, clothing, cosmetics, and smuggled cigarettes and foodstuffs are of particular concern. Furthermore, front companies, hawaladars, and currency exchanges are used to launder funds, particularly in Zanzibar. Two busy international seaports and numerous smaller ports service Tanzania and the region and create opportunities for TBML. Foreign investment in the tourism sector in Zanzibar and real estate in both mainland Tanzania and Zanzibar are also used for money laundering.

KEY AML LAWS AND REGULATIONS

Tanzania's Criminal Procedure Act (CAP20); Mutual Legal Assistance in Criminal Matters Act; and Proceeds of Crime Act were all amended in June 2018 via the Written Laws (Miscellaneous Amendments) (No. 2) Act, 2018. The new amendments update procedures for executing mutual legal assistance (MLA) requests and allow for enforcement of foreign forfeiture orders, but still do not provide for asset sharing. Both mainland Tanzania and Zanzibar have KYC and STR regulations, which also carry strict noncompliance penalties. The Bank of Tanzania issues directives for financial institutions, including forex bureaus.

Tanzania does not have a formal records-exchange mechanism in place with the United States. However, ongoing cooperation takes place through the Egmont Group.

Tanzania is a member of the ESAAMLG, a FATF-style regional body. Its most recent MER is available at: https://www.esaamlg.org/index.php/Mutual_Evaluations/readmore_me/7.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

In recent years, Tanzania has taken steps to strengthen its response to money laundering, yet deficiencies remain. The National Strategy for Anti-Money Laundering and Combating Terrorist Financing covers the period of 2010-2013 and has not been updated since. The FIU's last annual report was for 2014/2015. Existing strategies, policies, laws and regulatory tools are thus out of date with current realities, focus on the formal banking sector, and do not address new trends such as mobile money, TBML, or the full range of DNFBPs.

Tanzania has yet to establish a database of MLA statistics. Additionally, authorities still have failed to address problems related to non-conviction-based forfeiture. Tanzania has limited capacity to implement the existing money laundering laws and to supervise the banking sector; and money laundering laws are used as political tools, which dilutes their efficacy in combating real crime.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

In August 2018, TRA announced that TRA-Zanzibar would start implementing existing AML regulations, including the requirement to declare international transactions of more than \$10,000. This follows a similar effort on the mainland in 2017. In May 2018, the Bank of Tanzania (BoT) resumed licensing forex bureaus after a nine-month suspension, during which time it revoked 144 licenses for money laundering concerns, more than half of the existing outlets. During 2018, the BoT and private sector actors offered KYC and STR training for mobile money operators and realtors.

Tanzania should increase awareness of money laundering issues within the financial, law enforcement, and judicial sectors and allocate the necessary human, technical, and financial resources to update and implement a national AML strategy. Tanzanian authorities must ensure existing AML laws and regulations are enforced and applied in the spirit in which they are intended, not as a political tool, with a focus on convicting criminals engaged in money laundering and financial crime.

Thailand

OVERVIEW

Thailand's status as a logistics and financial hub, porous borders, and uneven law enforcement make it vulnerable to money laundering and other categories of transnational crime. Thailand is a source, transit, and destination country for illicit smuggling and trafficking in persons; a production and distribution center for counterfeit consumer goods; and a center for the production and sale of fraudulent travel documents. The proceeds of illegal gaming, official corruption, underground lotteries, and prostitution are laundered through the country's informal financial channels.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Funds from various illegal industries are transported across Thailand's four land borders and through airports and seaports. Money launderers and traffickers use banks, non-bank financial institutions, and businesses to move the proceeds of criminal enterprises. Unlicensed and unregulated hawala brokers serve Middle Eastern travelers by transferring money through their own honor-based channels rather than formal financial instruments. Unregulated Thai and Chinese remittance systems are also prevalent.

KEY AML LAWS AND REGULATIONS

Thailand's Anti-Money Laundering Act (AMLA) has been amended several times since its initial passage in 1999, broadening the overall scope of criminal liability and increasing powers to conduct investigations and make seizures. Tax offenses, terrorism, and proliferation of weapons of mass destruction are money laundering predicate offenses. The Anti-Money Laundering Office (AMLO) acts as the country's FIU. It is responsible for supervision of all reporting entities and is the key AML/CFT enforcement agency.

AMLA includes KYC and STR requirements. The Act requires financial institutions to keep customer identification and financial transaction data for five years from termination of relationship. They must also keep due diligence records for ten years. Penalties for violating reporting requirements can include potential asset seizure. Since the revision to AMLA in 2015 (AMLA No. 5), the law no longer requires AMLO to prove intent before an asset can be seized; a simple connection to narcotics activity allows a seizure. AMLA No. 5 includes provisions intended to reduce the barriers to asset sharing and recovery in cases in which repatriating or sharing forfeited proceeds with a foreign jurisdiction is appropriate.

Thailand has reporting requirements for the import and export of currency, which vary depending on the type of currency, whether the currency is being imported or exported, and the source or destination country. For Thai currency being imported into Thailand, there is no reporting requirement. Foreign currency amounts exceeding the equivalent of approximately \$15,000 (450,000 Thai baht) must be declared to Customs. Approval from the Bank of Thailand is required in order to take Thai currency out of the country in amounts exceeding approximately \$1,700 (50,000 Thai baht). The threshold is higher at approximately \$61,500 (2 million Thai baht) for Thai currency destined for Cambodia, Laos, Burma, Vietnam, Malaysia, and China's Yunnan province. For fund transfers to commercial banks, foreign (non-Thai) currency can be transferred into Thailand without limit. However, the deposit must be transferred into an authorized bank and either be exchanged into Thai baht or held in a foreign currency account.

Thailand's Digital Asset Business Decree, which took effect in May 2018, regulates the offering of digital assets and brings the operations of cryptocurrency exchanges and intermediaries under the supervision of the Thai Securities and Exchange Commission (SEC). The SEC has issued draft regulations regarding digital assets business operators.

Thailand has an MLAT with the United States. Thailand actively shares information with international partners, including the United States, through the Egmont Group process.

Thailand is a member of the APG, a FATF-style regional body. Thailand's most recent MER is available at: <http://www.apgml.org/documents/default.aspx?s=date&c=7&pcPage=8>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Thailand has numerous unlicensed, unregulated informal remittance systems. The AMLA's compliance regime should be applied more strictly to these MSBs to deter their use as money laundering vehicles.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Operationally, Thai government authorities continue to utilize the AML regime to focus on civil asset seizure and forfeiture, as well as criminal enforcement. The AMLO is effective in fighting money laundering and can operate in conjunction with, or independently from, other law enforcement bodies. The AMLO has exercised its authority to seize assets in a number of suspected human trafficking cases. From January to October 2018, there were 131 prosecutions and 105 convictions. In 2017, there were 141 prosecutions and 155 convictions.

Thailand has some difficulty sharing information with jurisdictions that require separate MOUs outside of the Egmont Group.

Trinidad and Tobago

OVERVIEW

Trinidad and Tobago's geographic location, generally stable economy, and developed financial systems make it vulnerable to money laundering.

In November 2017, Trinidad and Tobago developed an action plan to address deficiencies noted by international experts. Throughout 2018, Trinidad and Tobago has done much to improve its AML regime.

Despite substantial and continuing efforts to reform the criminal justice system, a lengthy judicial process can still mean years before criminal prosecutions are resolved. While the number of persons charged with money laundering-related offenses continues to increase, there has not yet been a stand-alone conviction for money laundering. Continued legislative and institutional reforms, including adequate resources and implementation, are needed to ensure the proper enforcement of Trinidad and Tobago's AML regime.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The country's close proximity to Venezuela and other drug-producing countries, its position as a regional hub for commercial air and shipping, and its relative wealth increase the risk of drug-related money laundering in Trinidad and Tobago. Along with proceeds from drug trafficking,

fraud, forgery, and public corruption are among the most common sources of laundered funds. There are also indications that structuring, commingling of funds, and TBML are all used to introduce illicit funds into the formal economy.

Although public casinos and online gaming are illegal, “private members’ clubs,” which operate as casinos and move large amounts of cash, also exist throughout the country; oversight of these casinos and other forms of gaming is patchwork and in need of comprehensive reform. Reports suggest certain local religious organizations are involved in money laundering, and comprehensive AML oversight of NPOs is still developing. Member-based financial cooperatives, or credit unions, also present a risk for money laundering.

There are 16 FTZs in Trinidad and Tobago, which aim to attract both foreign and local investors to set up manufacturing, international trading, and services operations. A free zone enterprise must be a company incorporated or registered in Trinidad and Tobago; all foreign companies are required to register a business entity locally.

Trinidad and Tobago does not have an offshore banking sector, nor an economic citizenship program.

KEY AML LAWS AND REGULATIONS

Trinidad and Tobago has comprehensive KYC and STR regulations, and requires enhanced due diligence for PEPs.

Trinidad and Tobago’s Parliament passed legislation in 2018 that improves the ability of its FIU and other agencies to cooperate with international partners on tax matters. The bill also broadens the authority of the FIU and facilitates the prosecution of stand-alone money laundering cases. Parliament also approved amendments to Trinidad and Tobago’s Anti-Terrorism Act, which created several new criminal offenses, including some related to the financing of terrorism. Trinidad and Tobago also formalized the creation in law of a National Anti-Money Laundering and Counter-Financing of Terrorism Committee to make recommendations and coordinate implementation of AML/CFT policies.

Trinidad and Tobago is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <http://www.fatf-gafi.org/media/fatf/documents/reports/mer-fsr/cfatf-4mer-trinidad-tobago.pdf>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

A number of pieces of legislation have been passed by the current government to reform the criminal justice system, and further legislation and institutional reforms are at various stages of development. If implemented properly, these efforts should permit more timely money laundering prosecutions in the future.

Fraud and corruption in government procurement rarely result in convictions. The failure to prosecute financial crimes successfully or in a timely manner has a corrosive impact on the

integrity of public finances and may encourage others to engage in financial crimes. While Trinidad and Tobago's Parliament approved amendments to the country's public procurement laws in 2017, those changes are not yet fully implemented.

Trinidad and Tobago is also continuing its efforts to address deficiencies related to the beneficial ownership of corporate and other legal entities and to monitor NPOs properly.

Legislation to more comprehensively regulate gaming has also been pending since 2016, though the current government has stated its intention to pass the law and implement it in 2019.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

As described above, Trinidad and Tobago has taken a number of steps to address its AML deficiencies. The country has an action plan to work toward improving areas such as international cooperation, legal entity transparency and beneficial ownership, money laundering prosecutions, and criminal asset tracing and confiscation.

A working group is in place to promote greater interagency cooperation with respect to the investigation and prosecution of financial crimes. The primary law enforcement unit responsible for conducting financial investigations has increased its staffing and created policies to prioritize certain investigations, including terrorism financing cases. While there has been a steady increase in the number of persons charged with money laundering offenses, there has not been a conviction to date.

Ensuring that Trinidad and Tobago's positive reform efforts are fully implemented—and adequately staffed and resourced—is critical to Trinidad and Tobago's ability to consistently comply with international standards regarding its AML legal and regulatory frameworks, as well as its efforts to investigate and prosecute money laundering cases adequately and in a timely manner.

Turkey

OVERVIEW

Turkey is an important regional financial center, particularly for Central Asia and the Caucasus, the Middle East, and Eastern Europe. Turkey's rapid economic growth over the past 15 years combined with its commercial relationships and geographical proximity to areas experiencing political turbulence, such as Iraq, Syria, and Crimea, make Turkey vulnerable to money laundering risks. It continues to be a major transit route for Southwest Asian opiates moving to Europe. In addition to narcotics trafficking, other significant sources of laundered funds include smuggling, invoice fraud, tax evasion, and to a lesser extent, counterfeit goods, forgery, highway robbery, and kidnapping. Recent conflicts on the southern border of Turkey have, to a small extent, increased the risks for additional sources of money laundering. In 2018, Turkey implemented new regulations on the registration and supervision of foreign exchange houses,

passed a tax amnesty law, and the government underwent a restructuring, resulting in new ministries.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Money laundering takes place in banks, non-financial institutions, and the informal economy. Money laundering methodologies in Turkey include the large-scale cross-border smuggling of currency; cross-border transfers involving both registered and unregistered exchange houses and money transfer companies; bank transfers into and out of the country; TBML; and the purchase of high-value items such as real estate, gold, and luxury automobiles. Turkey-based traffickers transfer money, weapons, and sometimes gold, via couriers to pay narcotics suppliers in Pakistan or Afghanistan. The transfer of money typically occurs through the non-bank financial system and bank transfers. Funds are often transferred to accounts in Pakistan, the United Arab Emirates, and other Middle Eastern countries.

A tax amnesty law (No. 7143) passed by Parliament on May 11, 2018, allows repatriation of foreign assets, such as money, gold, foreign exchange, securities, and other capital market instruments. If declared to a financial institution by July 30, 2018, these assets would not be taxed. Assets declared between August 1 and November 30, 2018, are taxed at 2 percent. The law expired on November 30, 2018.

Turkey eased the process for foreign investors to receive citizenship. In September 2018, Turkey lowered the requirements for citizenship to a \$500,000 investment, real estate purchase of \$250,000, or the generation of jobs for at least 50 people. The government also opened offices in Istanbul and Ankara to streamline the approval process for investors.

KEY AML LAWS AND REGULATIONS

The Financial Crimes Investigation Board (MASAK) is Turkey's FIU, and its mission is the prevention and detection of money laundering and terrorist financing offenses. KYC and STR regulations cover a variety of entities, including banks; bank or credit card issuers; authorized exchange houses; money lenders; financial services firms; precious metal exchange intermediaries; and dealers and auction houses dealing with historical artifacts, antiques, and art.

In January 2018, Turkey implemented Communiqué No. 2018-32/45, which establishes new registration and supervision requirements for money service businesses, including foreign exchange houses. Following the July 2018 government reorganization, MASAK and the Banking Regulatory and Supervision Agency fall under the Ministry of Treasury and Finance.

Turkey is a member of the FATF. Its most recent MER is available at: <http://www.fatf-gafi.org/media/fatf/documents/reports/mer/MER%20Turkey%20full.pdf>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

While Communiqué No. 2018-32/45 made improvements, weaknesses remain in Turkey's regulatory framework and supervisory regime, which could enable illicit actors to misuse and

exploit exchange houses and trading companies operating as unregistered money transmitters. Turkey's regulated exchange house sector is unwieldy, and Turkish authorities face challenges providing effective oversight of the nearly 900 covered exchange houses. Additionally, there are indications a large number of unregulated exchange houses and trading companies provide money transfer and foreign exchange services illegally. Despite hiring initiatives, MASAK remains understaffed.

PEPs are not subject to enhanced due diligence.

Turkey's nonprofit sector is not audited on a regular basis for money laundering activity and does not receive adequate AML outreach or guidance from the government. There is an insufficient number of auditors to cover the more than 100,000 NPOs.

As a general rule, Turkey will consider implementing U.S. requests to freeze assets only if such requests are made pursuant to the provisions of UNSCR 1373.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Turkey's AML efforts, especially following the July 2016 coup attempt, focus primarily on combating the finances of what the government has designated the so-called "Fethullah Gulen Terror Organization."

Although Turkey's legislative and regulatory framework for addressing money laundering has improved, Turkey's investigative powers, law enforcement capability, oversight, and outreach are weak. Many of the necessary tools and expertise to effectively counter this threat through a comprehensive approach are lacking. Further, interagency coordination on AML is poor, and Turkey's financial and law enforcement agencies are often reluctant or unable under Turkish law to share actionable information with one another. There are case-by-case examples that demonstrate improvement. Turkey also lacks the civil, regulatory, and supervisory tools needed to supplement public prosecutions, further limiting the Turkish government's ability to counter money laundering.

Turkey has not kept adequate statistics on money laundering prosecutions and convictions since 2009. Therefore, Turkey's record of official investigations, prosecutions, and convictions is unclear. No data was available for 2018.

In March 2018, Turkey and the United States held the first AML/CFT Bilateral Exchange.

Ukraine

OVERVIEW

Corruption enables and exacerbates the significant money laundering problem in Ukraine. The authorities have made some progress but need to strengthen AML legislation and focus more on investigating and prosecuting cases involving high-level officials. In 2018, Ukrainian authorities

increased money laundering convictions and drafted new legislation to identify ultimate beneficial owners (UBOs).

Ineffective state institutions and criminal justice system allow criminal proceeds to go undetected. Although authorities are implementing measures to address the problem, law enforcement agencies (LEAs) rarely target large-scale, corruption-related money laundering, with the exception of cases associated with the former Yanukovich administration.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The use of cash and Ukraine's large informal economy represent significant money laundering vulnerabilities. The primary sources of illicit proceeds include corruption; fraud; trafficking in drugs, arms, and persons; organized crime; prostitution; cybercrime; and tax evasion. Money is laundered through real estate, insurance, financial and non-financial institutions, shell companies, and bulk cash smuggling schemes. Criminals use aliases to register as UBOs of companies to commingle licit and illicit funds. Transnational organized crime syndicates use Ukraine as a transit country for money and drugs. Transactions are routed through offshore tax havens to obscure ownership, evade taxes, or mask illicit profits.

Casinos and gaming enterprises are prohibited in Ukraine. Despite the prohibition, there is a flourishing market of underground gaming (often disguised as national lottery offices, which are legal). Poker was recently decriminalized. Since its purported annexation by Russia in 2014, Crimea has been designated as a special gaming zone.

KEY AML LAWS AND REGULATIONS

Ukraine's 2015 AML/CFT Law #889-VIII lays out Ukraine's AML regulatory and supervisory regime, obligations of reporting entities, LEA roles, risk-based approaches, due diligence for PEPS, and procedures for determining UBOs. Authorities drafted a new bill in 2018 to amend the AML/CFT law to harmonize it with the Fourth EU AML Directive. The Ministry of Justice (MOJ) has the draft for comment.

In September 2018, the MOJ introduced stricter registration requirements for legal entities, sole proprietors, and public company formations, aimed at increasing monitoring of UBOs.

The Asset Recovery Management Agency (ARMA), established in 2017, is responsible for tracing and managing assets derived from corruption and other crimes. It gives authorities the necessary powers and tools, on paper, to locate, recover, and manage assets. The ARMA is not yet fully functioning as designed.

Ukraine and the United States have a MLAT.

Ukraine is a member of MONEYVAL, a FATF-style regional body. Its most recent MER is available at: <https://www.coe.int/en/web/moneyval/jurisdictions/ukraine>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

While money laundering investigations may be opened without a conviction for a predicate offense, legal professionals widely assume such a conviction is essential before a money laundering case can be taken to court.

Agents acting on behalf of other individuals are not obligated to report suspicious activities and not liable for failing to report such activity. The law also allows for PEPs to be de-listed three years after leaving public office, which is not consistent with international standards.

Efforts to establish bilateral mutual legal assistance agreements for asset seizure and forfeiture remain hindered by corruption, breaches of confidentiality, weaknesses in document seizure procedures, and the absence of a system to prioritize requests. The authorities should take steps to correct these deficiencies and to counter corruption.

ENFORCEMENT/IMPLEMENTATION ISSUES AND COMMENTS

Ukraine's AML/CFT Council approved a national risk assessment (NRA) report in 2016. Authorities should more thoroughly examine the significant amounts of money flowing through the banking system related to cybercrime and associated transnational organized criminal activities. It should examine how gaming is used to launder money and either enforce its prohibition on gaming or regulate its gaming industry. Authorities also should investigate how the informal sector and MVTs are used to transfer illicit proceeds. Ukraine should enact its draft bill on international law enforcement cooperation.

Money laundering convictions increased in 2018. Money laundering is prosecuted under two criminal codes, Article 209 (money laundering as a broad criminal offense) and Article 306 (drug-related money laundering). From January-September 2018, there were 17 convictions under Article 209. All 17 are now under appeal. Under Article 306, 105 cases were sent to court, compared to 37 in 2017. There is no additional data available on these cases.

Banking and securities regulators have made strides in ensuring the transparency of beneficial ownership of banks and securities firms and in removing criminal elements from control. Other supervisory authorities often appear unable or unwilling to verify whether relevant reporting entities are beneficially owned or controlled by criminal elements or their associates.

Ukraine should improve the implementation of its asset freezing, confiscation, and forfeiture provisions. It is unclear how often judges are using these provisions and how many final forfeiture orders have been issued. In some cases, ARMA has seized assets that were already being managed by a competing agency.

Shortcomings in personnel capacity and resources hamper Ukraine's ability to conduct financial investigations. The State Financial Monitoring Service, the FIU, produces high-quality financial intelligence; however, its work is hindered by an ever-increasing workload, antiquated IT systems, low staffing levels, and low wages. The Specialized Anti-Corruption Prosecutor (SACP) is pursuing senior members of the former Yanukovich regime and current senior PEPs for

corruption and, to some extent, money laundering. More resources are needed to develop financial investigation capacity in SACP, and in law enforcement generally.

United Arab Emirates

OVERVIEW

The United Arab Emirates (UAE) is a stable regional hub for transportation, trade, and financial activity and has aggressively expanded its financial services business and FTZs. Illicit actors exploit the UAE's relatively open business environment, multitude of global banks, exchange houses, and global transportation links to undertake illicit financial activity.

The UAE government is enhancing its AML/CFT system and has demonstrated the capability to take action against illicit financial actors. However, the UAE needs to continue increasing the resources it devotes to investigating money laundering.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

The exponential growth of exchange houses, hawalas, and trading companies in the UAE, coupled with the UAE's complex and uneven regulatory environment, facilitates the use of bulk cash smuggling, TBML, and the transfer of funds for illicit activity. TBML occurs, including through commodities used as counter-valuation in hawala transactions or through trading companies illegally operating as exchange houses. Such activity might support the financing of weapons proliferation or sanctions-evasion networks and terrorist groups in the region. Unregulated hawalas remain a concern, especially because of the large number foreign workers present in the UAE.

A portion of the money laundering activity in the UAE is likely related to proceeds from illegal narcotics produced in Southwest Asia. Money laundering vulnerabilities in the UAE include the real estate sector, the misuse of the international gold and diamond trade, and the use of couriers to transfer illicit funds. Domestic public corruption contributes little, if anything, to money laundering.

The UAE has an extensive offshore financial center, with 45 FTZs, including two financial free zones. There are over 5,000 multinational companies located in the FTZs and thousands more individual trading companies. FTZs companies are considered offshore or foreign entities for legal purposes. UAE law prohibits the establishment of shell companies and trusts; however, the operation of unidentified, unregulated, or unsupervised financial entities in FTZs presents a significant gap in regulatory oversight. There is significant opportunity for regulatory arbitrage and avoidance of the controls and supervision put in place by the Central Bank of the UAE (CBUAE) and the regulators of the two financial free zones. The UAE authorities' limited ability to regulate financial activity in the myriad zones has traditionally hampered the effectiveness of the Anti-Money Laundering Suspicious Cases Unit (AMLSCU), the FIU, in monitoring STR reporting from covered entities in the zones.

In the UAE, an Emirati citizen must act as a 51 percent shareholder in any commercial company or business venture. Emiratis, to produce personal income, will sponsor a non-Emirati business for an agreed upon monthly stipend. The Emirati will put his/her name on the business; however, he/she often does not have any personal relationship with the business operator and may not be aware of the function/activities of the business itself. This has the potential to lead to the creation of shell companies, as these “Emirati-owned” businesses are not heavily scrutinized.

KEY AML LAWS AND REGULATIONS

AML law permits the CBUAE to freeze the assets of suspicious institutions or individuals, and it has comprehensive KYC and STR regulations. Additionally, the UAE has enhanced due diligence procedures for PEPs, both foreign and domestic. The UAE has a records exchange mechanism in place with other governments, but not with the United States. As of late 2018, the UAE and United States are negotiating an MLAT.

Federal Decree No. 20 of 2018, passed on October 30, 2018, will allow the government to undertake national risk assessments and compliance inspections of domestic financial institutions. Should any institution be found in violation of the law, the new legislation provides for administrative penalties.

The UAE is a member of the MENAFATF, a FATF-style regional body. Its most recent MER is available at: <http://www.menafatf.org/information-center/menafatf-publications/mutual-evaluation-report-united-arab-emirates>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Exchange houses and general trading companies should be more tightly regulated and supervised, and the UAE should release annual numbers of AML prosecutions and convictions to better gauge the effectiveness of its regime.

A thorough assessment of money laundering risk by national authorities, and subsequent outreach to the private sector, is needed.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

The UAE continues to enhance its AML program. In June 2018, the CBUAE banned seven currency exchange houses from processing remittances, citing violations of money laundering and other regulations. The UAE has enhanced the level of cooperation among equivalent regulatory authorities.

While the UAE is showing progress in its ability to investigate suspected money laundering, it should increase the resources it devotes to this activity, both federally at the AMLSCU and by law enforcement at the emirate level. Among the emirates, there is significant variation in the level of cooperation on money laundering issues. In particular, Dubai provides significantly more cooperation than Abu Dhabi.

Several areas of AML implementation and enforcement require action, including proactively developing money laundering cases and establishing appropriate asset forfeiture procedures. Additionally, the enforcement of cash declaration regulations after the passage of new legislation in 2018 is unclear. Officials should conduct more thorough inquiries into large amounts of cash imported into the country and enforce outbound declarations of cash and gold using existing smuggling and AML laws. TBML also continues to deserve greater scrutiny.

United Kingdom

OVERVIEW

The UK plays a leading role in European and world finance. Money laundering presents a significant risk to the UK because of the size, sophistication, and reputation of its financial markets. UK law enforcement invests resources in tackling cash-based money laundering and the drug trade, and ‘high-end’ money laundering through the financial sector and related professional services. The UK should follow through on plans to strengthen the capabilities of its FIU, remove inconsistencies in the supervisory regime, and increase its international reach to tackle money laundering. The UK should ensure there are no gaps in implementation or enforcement that accrue when it departs the EU in 2019.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Much money laundering is cash-based, particularly cash collection networks, international controllers, and MSBs. Professional enablers in the legal and accountancy sector are used to move and launder criminal proceeds. There have historically been intelligence gaps, in particular in relation to ‘high-end’ money laundering, where the proceeds are held in bank accounts, real estate, or other investments rather than cash; this type of laundering is particularly relevant to major frauds and serious foreign corruption. Law enforcement agencies have taken increased steps in recent years to fill these gaps.

KEY AML LAWS AND REGULATIONS

Money laundering is criminalized, and the UK uses an “all crimes” approach to determine money laundering predicate crimes. The UK has a comprehensive AML regime and is an active participant in multilateral efforts to counter transnational financial crimes. The UK adheres to the EU Fourth Anti-Money Laundering Directive. The Sanctions and Anti-Money Laundering Act 2018, passed in May 2018, provides the legislative basis for the UK’s AML regime after the UK leaves the EU in March 2019.

The UK supervises both financial institutions and DNFBPs for AML compliance. There are 25 AML supervisors in the UK, ranging from public sector statutory organizations to professional bodies. The UK has a mandatory reporting process for supervisors. In January 2018, the government established the Office for Professional Body AML Supervision within the Financial Conduct Authority to share best practices across the system and ensure professional-body AML supervisors provide effective supervision.

The UK is a member of the FATF. Its most recent MER is available at: <http://www.fatf-gafi.org/documents/documents/mutualevaluationofunitedkingdomofgreatbritainandnorthernireland.html>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

The AML legal framework in the UK is particularly strong with only two areas in need of significant improvement, including insufficient resources and the limited role for the UK FIU, and measures related to correspondent banking.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

In 2017, there were 4,925 prosecutions and 3,474 convictions for money laundering-related offenses in England and Wales. Money laundering was not the primary offense in all cases. Scotland and Northern Ireland statistics for 2017 are not yet available. UK legislation provides for non-conviction-based forfeiture as another means of recovering criminal assets, alongside conviction-based confiscation. Non-conviction-based asset recovery is most commonly used when it is not possible to obtain a conviction, for example, if a defendant has died or fled.

The UK maintains a freely accessible public register of company beneficial ownership information. Companies that do not provide information are subject to penalties. By 2020, the UK will expand the scope of and access to the register in line with the EU Fifth Anti-Money Laundering Directive.

In 2017, the UK passed the Criminal Finances Act (CFA), which makes it easier to seize criminals' money from bank accounts; makes it harder for criminals to launder money through property, precious metals and stones, and casino chips; and makes it possible to confiscate assets from people guilty of gross human rights abuses. The CFA also introduces unexplained wealth orders (UWOs), which can require those suspected of having links to serious crime and non-European Economic Area PEPs to explain how they lawfully acquired their assets. The first UWO was served within 14 days of the new powers being implemented on January 31, 2018. To date, three UWOs have been issued.

On October 31, 2018, the UK established the National Economic Crime Centre (NECC) to plan, task, and coordinate responses to economic crime across government agencies. The NECC will work with the other bodies, including the National Crime Agency's national intelligence capabilities, to develop the best possible understanding of the threat and ensure intelligence-supported intervention and investigations. The NECC will draw on the support of operational partners across law enforcement, the private sector, and internationally.

The UK has been a leader in multilateral discussions and implementation of international asset recovery efforts in regard to proceeds of high-level corruption, often in collaboration with the United States.

Uzbekistan

OVERVIEW

Uzbekistan has made consistent efforts to meet international standards through new legislation; however, corruption and law enforcement's susceptibility to political influence limit the effectiveness of this legislative base. Connected individuals can circumvent established AML rules through private financial institutions, shell/mailbox companies, and bribery. Uzbekistan increased prosecutions on financial crimes; nevertheless, the government's lack of transparency makes verifying the effectiveness of law enforcement in countering money laundering difficult.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Uzbekistan is a transit country for Afghan opiates, which enter Uzbekistan mainly over its Afghan and Tajik borders. Corruption, narcotics trafficking, and smuggling generate the majority of illicit proceeds. Well-connected individuals launder money domestically or move it abroad using corruption, private banks, and the circumvention of regulations. Offshore shell companies that conceal financial interests and proceeds remain a favored laundering method. Uzbekistan's high customs-clearance costs encourage a black market for smuggled goods. This black market does not appear to be significantly funded by narcotics proceeds but could be used to launder drug-related money. A predominantly cash economy combined with significant migration flows and the associated use of money transfer systems remain major money laundering risks. The expected introduction of cryptocurrencies will require proper AML regulation of such exchanges.

KEY AML LAWS AND REGULATIONS

Uzbekistan made progress toward meeting international standards by implementing the 2017 currency convertibility reform, the 2017 law "On combating corruption," and the 2017-2018 State Anti-Corruption Program. The convertibility reform effectively eliminated the black market exchange rate and reduced unofficial markets and unofficial channels for remittances.

The Law on Combating Legalization of Proceeds Obtained through Crime and Financing of Terrorism is Uzbekistan's core AML legislation establishing comprehensive KYC and STR regulations, including for legal persons. This law designates the FIU, under the Office of the Prosecutor General (PGO), as the key governmental body responsible for AML enforcement. A 2016 amendment allows for asset freezes and suspension of transactions if transaction parties appear on a list of individuals/legal entities involved or suspected of involvement in proliferation of weapons of mass destruction. It also names the FIU as the body responsible for maintaining this list. In 2017, the FIU issued internal control procedures for commercial banks and credit institutions governing the suspension of transactions and freezing of funds or other assets and introducing enhanced due diligence for domestic PEPs. In 2018, the President transformed the FIU into the PGO Department on Economic Crimes with a broader mandate, including corruption and money laundering crimes.

In 2018, the President created the Interagency Commission on Countering Money Laundering and the Financing of Terrorism and Weapons of Mass Destruction in order to improve regional cooperation.

Uzbekistan has bilateral agreements on AML assistance with 15 countries and MOUs with individual U.S. law enforcement agencies.

Uzbekistan is a member of the EAG, a FATF-style regional body. Uzbekistan's most recent MER is available at:

https://eurasiangroup.org/files/uploads/files/other_docs/ME/01.%20Mutual%20Evaluation%20Report%20on%20AMLCFT%20-%202010.pdf.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

Legal entities are not criminally liable for money laundering activity. Although government officials are required to disclose income earned outside their public employment, these records are not publicly available.

KYC rules cover insurance companies, insurance brokers, securities market players, stock exchange members, financial leasing companies, and postal service operators. The AML legislation does not include measures to prevent criminals from assuming a controlling financial interest in such entities.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Uzbekistan has made progress in implementing recommendations and closing legislative and enforcement gaps. The government has tasked all relevant agencies with conducting a national money laundering risk assessment.

The FIU may face pressure to cease investigations when suspicious bank transactions are linked to politically powerful interests. The FIU's analytical capacities are limited and the unit requires modern IT analysis tools and training. In 2017, the FIU received over 236,000 STRs but initiated only 83 money laundering-related criminal cases. In the first six months of 2018, over 116,000 STRs resulted in only 48 money laundering-related criminal cases. There were 83 convictions for money laundering crimes in 2017, and 25 in the first six months of 2018.

Despite the established MOUs with U.S. law enforcement, Uzbekistan largely abstained from substantive cooperation with the U.S. government in enforcement and information exchange relating to drug trafficking. The United States and Uzbekistan do not have a bilateral MLAT, although the government of Uzbekistan has requested negotiation of one. Uzbekistan is a signatory to relevant multilateral law enforcement conventions that have provisions enabling law enforcement cooperation with the United States and other parties to the conventions. The PGO and the U.S. Justice Department have assisted each other under this framework in non-narcotics cases.

Venezuela

OVERVIEW

Conditions in Venezuela allow ample opportunities for financial abuses. Venezuela's proximity to drug producing countries and its status as a drug transit country, combined with weak AML supervision and enforcement, lack of political will under the Maduro government, limited bilateral cooperation, an unstable economy, and endemic corruption make Venezuela vulnerable to money laundering and financial crimes. Venezuela's distorted and controlled multi-tiered foreign exchange system and strict price controls provide numerous opportunities for currency manipulation and goods arbitrage. They also force many legitimate merchants to engage illicit actors to obtain access to foreign currencies, which is tightly limited by the government, thereby facilitating money laundering. A robust black market continues to function in the porous border regions of Venezuela and Colombia.

On September 20, 2017, FinCEN issued an Advisory on Widespread Public Corruption in Venezuela, which stated all Venezuelan government agencies and state-owned enterprises appear vulnerable to public corruption and money laundering, and it asked U.S. financial institutions to prevent illicit proceeds tied to Venezuelan public corruption from moving through the U.S. financial system. U.S. legal actions against Venezuelan citizens and government officials and their relatives have exposed questionable financial activities related to money laundering.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Money laundering is widespread in Venezuela, including through government currency exchanges, the petroleum industry, and minerals, and to a lesser extent, through commercial banks, gaming, real estate, agriculture, livestock, securities, and metals. TBML remains common and profitable. One such trade-based scheme, a variation of the black market peso exchange, involves drug traffickers providing narcotics-generated dollars from the United States to commercial smugglers, travel agents, investors, and others in Colombia in exchange for Colombian pesos. In turn, those Colombian pesos are exchanged for Venezuelan bolivars at the parallel exchange rate and used to repurchase dollars through Venezuela's currency control regime at much stronger official exchange rates. Additionally, media report that under the Maduro administration Venezuelan officials were involved in channeling hundreds of millions of dollars from Venezuelan state-owned oil company Petroleum of Venezuela S.A (PDVSA) into U.S. and European banks. PDVSA continues to be Venezuela's primary source of income and foreign currency.

KEY AML LAWS AND REGULATIONS

Revisions made in 2014 to the 2012 Organic Law against Organized Crime and Financing of Terrorism were a positive step, but the law lacks important mechanisms to combat domestic criminal organizations, such as the exclusion of the state and its companies from the scope of investigations. Approximately 900 types of offenses can be prosecuted as "organized crime" under the law. The Maduro government used the law as a tool to suppress political opposition and intimidate its broadly-defined "enemies."

Amendments to the Anti-Corruption Law in 2014 create the National Anti-Corruption Body to combat corruption. The reform also creates a criminal penalty for bribes between two private companies. However, the law differentiates between private and public companies and includes exemptions for public companies and government employees.

There are enhanced due diligence procedures for foreign and domestic PEPs.

Venezuela is a member of the CFATF, a FATF-style regional body. Its most recent MER is available at: <https://www.cfatf-gafic.org/index.php/member-countries/venezuela>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

In 2018, Venezuelan government entities responsible for combating money laundering and corruption were ineffective and lacked political will. Furthermore, their technical capacity and willingness to address financial crimes remained inadequate. The National Office against Organized Crime and Terrorist Finance has limited operational capabilities. A politicized judicial system further compromised the legal system's effectiveness and impartiality. Venezuela's FIU, the National Financial Intelligence Unit (UNIF), is supervised by the Superintendent of Banking Sector Institutions, which prevents UNIF from operating independently. FinCEN suspended information sharing with the UNIF in 2006 due to an unauthorized disclosure of shared information. The suspension remains in effect until FinCEN has assurances its information will be protected. The UNIF should operate autonomously, independent of undue influence. Venezuela should increase AML institutional infrastructure and technical capacity.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Venezuela's foreign exchange system that allocates foreign exchange to the private sector remains an opaque system subject to manipulation by connected insiders. The Maduro government maintained many off-budget accounts in foreign currencies that lacked transparency and oversight, making them vulnerable to corruption. For example, virtually all U.S. dollars laundered through Venezuela's formal financial system pass through the government's currency commission, the central bank, or another government agency.

At the end of 2018, Venezuela operated one official, managed exchange rate of 564 bolivars per U.S. dollar (Bs/\$), while the volatile parallel exchange rate had increased to 710 Bs/\$. Although the overall volume of money passing through the official foreign exchange (FX) auction system has diminished substantially over the past few years, until recently the huge profit margin achievable by obtaining "cheap" FX resulted in sophisticated trade-based schemes, including the laundering of drug money. Trade-based schemes make it extremely difficult for financial institutions and law enforcement to differentiate between licit and illicit proceeds. Numerous allegations have been made that some government officials are complicit and even directly involved in such schemes.

Vietnam

OVERVIEW

Large parts of Vietnam's economy remain cash-based, but the government has set aggressive targets to move its economy to being significantly cashless by 2020. Vietnam has made progress in many areas, including its newly revised penal code and increased international cooperation. Continuing economic growth and diversification; increased international trade; a long, porous land border; a relatively young, tech-savvy population; and newly legalized local casinos all suggest Vietnam's exposure to illicit finance will increase in coming years.

Vietnam needs to continue to build its AML capabilities, especially within key enforcement agencies and the National AML Steering Committee. Vietnam will need political will and a stronger coordinated effort across government to increase enforcement of existing AML laws.

VULNERABILITIES AND MONEY LAUNDERING METHODOLOGIES

Sources of illicit funds include public corruption; fraud; gaming; prostitution; counterfeiting of goods; and trafficking in persons, drugs, wildlife, and related commodities. Remittances from Vietnamese organized crime groups in Asia, Europe, and North America continue to be significant sources of illicit funds, particularly proceeds from narcotics and wildlife traffickers using Vietnam as a transit country.

Vietnam remains a predominantly cash-based economy. High-value items, including real estate and luxury vehicles, are routinely purchased with cash with few questions asked. The banking system is still at risk for money laundering through false declarations, including fictitious investment transactions. Customs fraud and the over- and under-invoicing of exports and imports are common and could be indicators of TBML.

In 2018, Vietnam granted its first pilot licenses to local casinos, increasing its money laundering risks if authorities do not ensure these establishments effectively implement and enforce AML standards. Online gaming is prohibited.

KEY AML LAWS AND REGULATIONS

The revised penal code came into effect on January 1, 2018, with a revised money laundering offense and added criminal liability for legal persons. The Supreme People's Procuracy is in the process of drafting guidance under a resolution of the Judge's Council to implement the revisions. The State Bank of Vietnam (SBV) also completed a five-year review of the Law of Anti-Money Laundering to recommend potential revisions. Various ministries are currently revising related laws to reflect the need for enhanced AML activities in various sectors.

Vietnam has in place KYC and STR legal requirements. The SBV instituted standardized STR forms to ensure consistency of reported data. The SBV FIU's electronic STR system is only partially functioning, with non-bank entities still having to file hard copies of STRs.

Vietnam does not have a MLAT or other information-sharing mechanisms in place with the United States, but the government typically provides records and responses to the United States and other governments upon request.

Vietnam is a member of the APG, a FATF-style regional body. Its most recent MER is available at: <http://www.apgml.org/includes/handlers/get-document.ashx?d=68a28c62-1ebe-41f7-8af6-e52ead79150c>.

AML LEGAL, POLICY, AND REGULATORY DEFICIENCIES

While Vietnam is mostly compliant with the technical requirements of the international standards, Vietnam needs to improve its AML supervision, and banks need to enhance and fully implement CDD and KYC policies. Regulations on updating information of customers whose transactions originate in other countries are minimal and weakly enforced.

With its long border with China, Laos, and Cambodia, Vietnam's cross-border controls remain weak. Vietnam needs to improve its efforts to tackle the instances of bulk cash smuggling and wildlife and drug trafficking.

The lack of rigorous and impartial financial oversight of key state-owned enterprises (SOEs) represents an additional AML vulnerability. In 2018, new Decree 131 established a Super Committee over 19 prominent SOEs; however, it is too early to evaluate if this will improve financial oversight of SOEs.

Vietnam's FIU is not a member of the Egmont Group but has applied for membership and is currently working to strengthen its authorities and enhance its independent status within the SBV. Vietnam's FIU has signed nine MOUs with the FIUs of other jurisdictions.

ENFORCEMENT/ IMPLEMENTATION ISSUES AND COMMENTS

Vietnam has a National AML/CFT Coordinating Committee and a national AML/CFT action plan for 2015-2020. While Vietnam's laws are adequate, AML enforcement needs to improve. With donor assistance, authorities completed an AML/CFT national risk assessment in June 2018. The report is currently awaiting the prime minister's approval. Vietnam's adoption of any recommendations for reform will depend upon interagency cooperation and high-level support.

The lack of resources and difficulty coordinating multiple agencies hinder parallel money laundering investigations during predicate crime investigations. Cooperation among agencies is infrequent because it is not codified; interagency coordination occurs with signed MOUs. Progress toward changing operating practices among key agencies remains slow, and there is still no MOU between SBV and Customs.

In November 2018, Vietnam prosecuted over 90 defendants accused of criminal charges associated with illegal online gaming and obtained convictions against almost all defendants, including four on money laundering charges, Vietnam's second money laundering criminal prosecution.

Vietnam seized nearly \$16 million in connection with the 2017 money laundering conviction related to embezzlement from an SOE. Vietnam relies exclusively upon MLATs to seize assets related to the proceeds of transnational criminal activity in Vietnam. However, Vietnam has very few of these treaties, limiting its ability to seize assets related to transnational crime. Although Vietnam has considered non-conviction-based forfeiture and illicit enrichment provisions in recent years, it has no plans to introduce such legislation.