

PRECURSORS CONTROL SECTION OF THE SECRETARIAT OF THE INTERNATIONAL NARCOTICS CONTROL BOARD

INTELLIGENCE GATHERING OPERATIONAL PLAN:

OPERATION ?seudonym

In light of recent incidents related to diversion and trafficking in ephedrine and pseudoephedrine including their preparations (hereinafter referred to as “ephedrines”) involving countries in Africa, Asia and Europe, the Secretariat of the International Narcotics Control Board and the Precursors Task Force propose a time-bound operation focusing on shipments of **ephedrine and pseudoephedrine, including pharmaceutical preparations containing those substances** (herein after referred to as ‘target substances’), traded internationally, and to the extent possible also domestically.

1. Justification

The recurring problem of diversion and trafficking in ephedrines is not confined to a particular country or region. In 2022, seizures of pharmaceutical preparations containing pseudoephedrine were reported by 21 countries, the largest number of countries reporting such seizures in the last 10 years.¹

Major incidents involving trafficking in bulk ephedrine and pseudoephedrine as well as pharmaceutical preparations containing these substances diverted from both international and also domestic trade and distribution have been reported by a number of countries in Europe.² Ephedrine and pseudoephedrine seized in Europe was believed to have been primarily destined for illicit drug manufacture within the region.

Further, there have been instances of possible diversion from international trade of these substances, which have been reported by the Board in its annual

¹ INCB Annual Report on Precursors for 2023, para 86:
https://www.incb.org/documents/PRECURSORS/TECHNICAL_REPORTS/2023/E/08_Extent_of_licit_trade_and_latest_trends_in_trafficking_in_precursors.pdf

² <https://www.eurojust.europa.eu/news/crackdown-criminal-network-produced-and-distributed-methamphetamine-europe>

Precursors Reports.³ Suspected shipments of the substances which have been objected to in PEN Online and have been the subject matter of investigations, have also been noted during 2024.

India reported a significant number of seizures of ephedrine and pseudoephedrine, including in the form of preparations, destined primarily to Australia and New Zealand, but also to countries in Asia. However, of these, seizures of ephedrines were reported by Australia alone. Countries in Africa appear to be used by traffickers as a source, transit and destination for diverted shipments of ephedrines.

In addition, shipments of pharmaceutical preparations containing ephedrine and pseudoephedrine in amounts exceeding the estimated annual legitimate requirements of the countries of destination, have also been noted in PEN Online, including countries in Africa and Europe. INCB is also aware of traffickers' attempts to replace genuine pharmaceutical preparations containing ephedrine or pseudoephedrine with fake preparations not containing ephedrine or pseudoephedrine as an active ingredient, to facilitate their diversion and trafficking.

Given that planned exports of preparations containing ephedrine or pseudoephedrine are not systematically notified through PEN Online despite INCB's repeated calls and several resolutions by the Commission on Narcotic Drugs, and that actual exports of such preparations are not systematically reported on form D, the licit trade patterns involving ephedrines are not fully clear. In addition, common markets, created with a view to facilitate trade among member states, present difficulties for monitoring trade in precursors because transactions between member states are not considered international trade. For example, trade between the European Union member States is regarded as domestic trade and distribution as per the EU precursor legislation, and therefore information on such trade within the European Union is not communicated through PEN Online nor submitted in form D.

The primary objective of the planned operation is therefore to fill in the knowledge gaps regarding trade in ephedrine and pseudoephedrine and preparations containing these substances, in particular the trade that has not yet been communicated at international level, as well as verification of the legitimacy of identified suspicious shipments involving the substances in question.

2. Objective

The proposed operation will focus on shipments of ephedrine and pseudoephedrine in the form of raw material as well as their preparations, with a view to verifying, to the extent possible, their legitimacy.

This three-month long operation will include the review of past trade in cooperation with national customs authorities and the physical tracking of individual shipments notified through PEN Online from source to final destination. It will assist

³ For example, [INCB Precursors Report 2022](#), paragraphs 77 and 88, and [INCB Precursors Report 2021](#), paragraphs 92 and 93.

Governments in gathering intelligence relating to illicit traffic of precursors and the criminal networks involved. The operation could also help identify the possible areas of illicit methamphetamine manufacture. Upon the conclusion of the operation, the intelligence gathered during the same will be reviewed and evaluated and all participating governments will be informed of the results through a Project Prism Special Alert.

3. Designation and Duration

This operation will be known under the code name “Pseudonym” and will take place over a three-month period from **1 October to 31 December 2024**.

4. Participation

All countries with focal points under Project Cohesion and Project Prism are invited to participate in the operation. Participation is on a voluntary basis. By agreeing to participate in the operation, Governments agree to its procedures, detailed in this Plan.

The countries that wish to join the operation are kindly requested to formally confirm their participation to INCB Secretariat by email at incb.precursors@un.org. Authorities participating in the operation will ensure that mechanisms are in place to gather information and to provide PENs on all shipments of target substances. Where necessary, temporary mechanisms should be introduced with authorities responsible for the control/monitoring of such trade and with industry.

5. Extent

Based on the global analysis of precursor trafficking and information gathered through Project Prism, Operation “Pseudonym” will focus on the identification and seizure of suspicious consignments of the above-mentioned substances, in quantities over 25 kilograms.

Both regulatory and law enforcement authorities will share responsibilities under the operation. The INCB PEN Online system will serve as the basis for the exchange of information. Therefore, any government not yet registered for use of the system is encouraged to do so without delay. For any queries regarding the system, please contact incb.pen@un.org or incb.precursors@un.org.

Regulatory authorities will conduct initial information gathering and submit PENs to the country of destination as well as to any countries in transit, for appropriate follow-up investigations. Where suspicious cases are identified, authorities will launch appropriate investigations to suspend, stop or seize shipments and to identify those involved. Where possible controlled or monitored deliveries should be utilized.

Participants commit to report to INCB any seizure of the substances in question, in order to launch backtracking investigations.

6. Implementation

The countries participating in the operation are encouraged to review, in cooperation with their national customs authorities, information on past imports and exports (say 3-4 years) of pharmaceutical preparations from / to their country and their legitimacy. The (unique) Harmonized System (HS) codes assigned to such preparations to facilitate monitoring of their international trade are indicated below:

**Ephedrine preparations:
300341, 300441**

**Pseudoephedrine preparations:
300342, 300442**

In the duration of the operation, participants will monitor the shipments of the target substances in international trade from exporter to importer to end-user. Since the time period between submission of the pre-export notification and actual receipt of shipment at the destination may on occasions exceed the duration of the operation, participants are requested to track:

- the shipments of all PENs issued prior to the commencement of the operation, for which actual import/ export has not been concluded by the time the operation commences (1 October 2024).
- shipments for which PENs are issued during the period of the operation (October to December 2024) and for which the actual trade has not concluded by the time the Operation ends (31 December 2024).

In this case, participants are requested to continue to track the shipments even after the operation is over, on a case-to-case basis selected on the basis of their own risk assessment (including factors such as first time/ non regular importer, export in quantity not commensurate with ALR provided, among others).

The participating authorities will verify the legitimacy of importers and end-users, including through physical inspections, and where suspicious orders or transactions are encountered, appropriate investigations will be launched to identify those responsible. Measures under the operation include:

- i) PENs sent by exporting countries on a shipment-by-shipment basis, including informing countries of transit and brokerage;
- ii) Legitimacy of importers and end-users verified, preferably through physical checks;
- iii) Establishment of suspicion by countries involved or INCB;
- iv) Launching of backtracking investigations in the event of seizures and stopped shipments, with special attention to the point of diversion and the modus operandi and sharing this information with the countries concerned and INCB
- v) Where possible conducting controlled deliveries in the event of seizures;
- vi) Ensuring increased awareness of border control authorities, particularly customs;

- vii) Updating estimated annual legitimate requirements (ALRs) for imports of target substances, should the information published on INCB website <https://www.incb.org/incb/en/precursors/alrs.html> be obsolete or missing.⁴
- viii) Where appropriate, special alerts will be issued.

7. Organization

The INCB Secretariat will serve as the global focal point for the exchange of information. Where suspicious cases are identified by INCB, the authorities of the exporting, any transiting, and importing countries will be contacted. When suspicion is not confirmed all parties involved will be notified, as appropriate.

8. Acceptance/Beginning of Operation

All countries that have agreed to participate in the operation have reviewed and agreed upon the present plan for the operation. The operation will therefore be launched at the proposed date without further notice.

⁴ The information published on the website relates to calendar years and remain valid until a new estimate is received.