

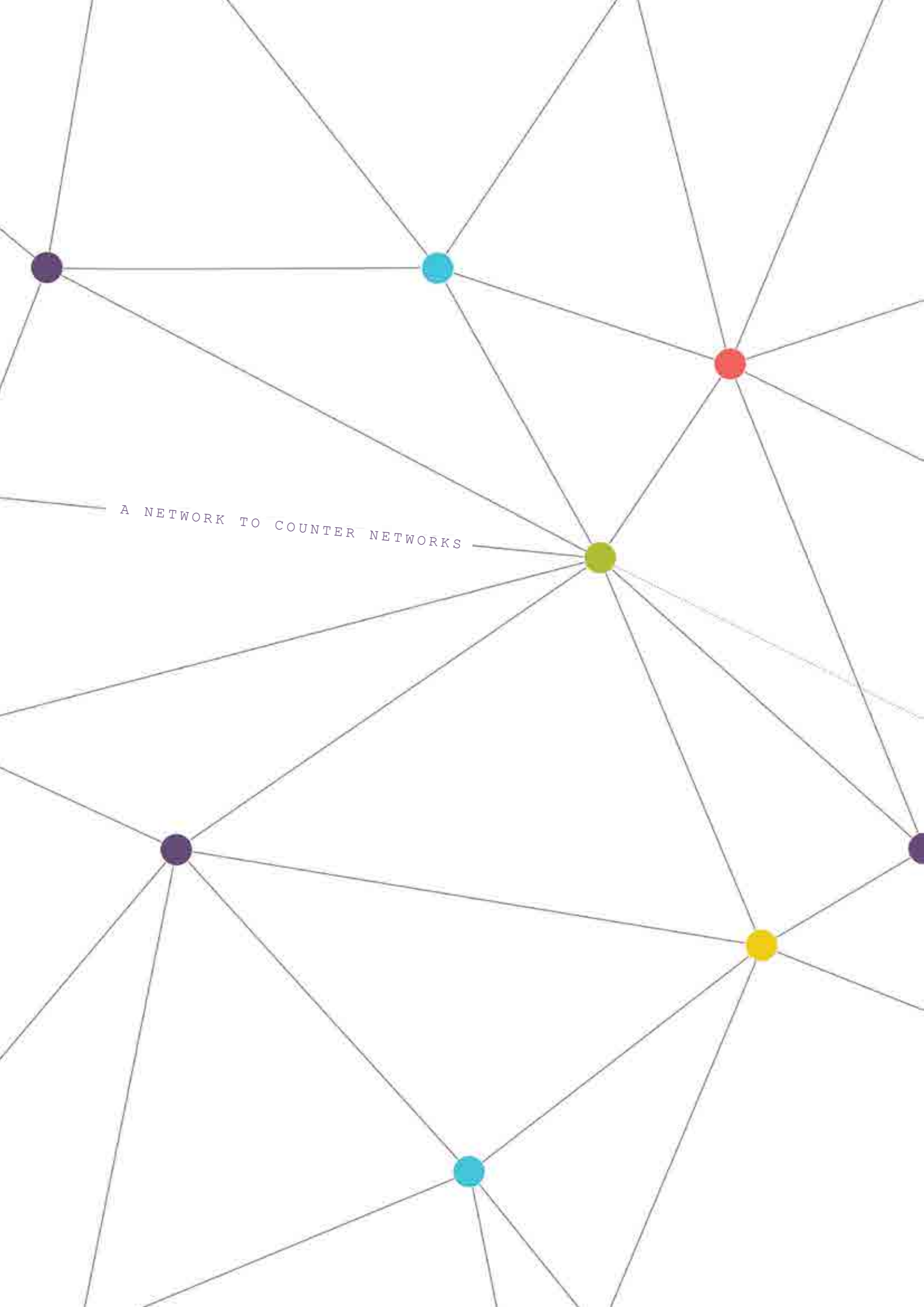


THE GLOBAL INITIATIVE
AGAINST TRANSNATIONAL
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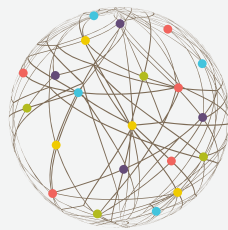
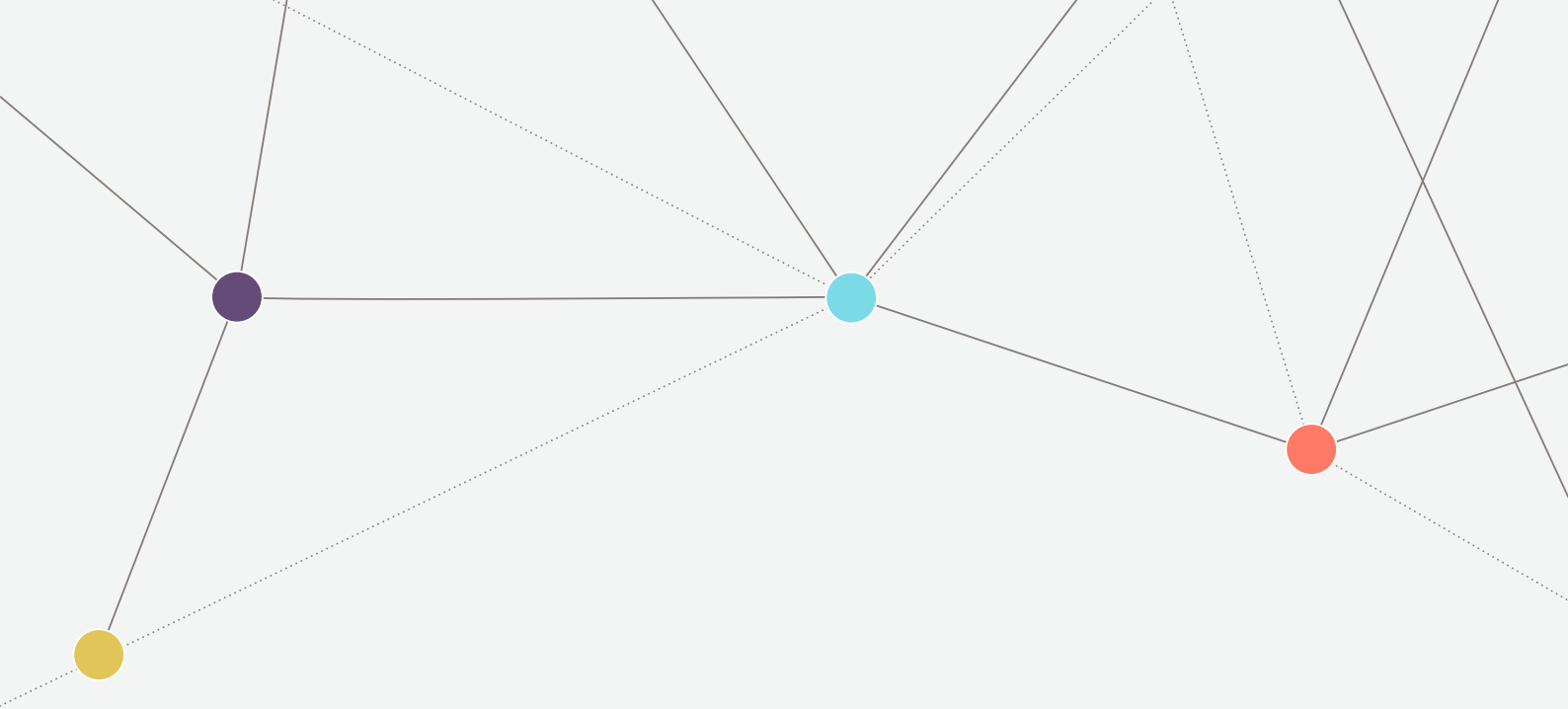
The nexus of conflict and illicit drug trafficking



**Syria and
the wider
region**



A NETWORK TO COUNTER NETWORKS



**The nexus of conflict and illicit drug
trafficking
Syria and the wider region**

November 2016

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NORWEGIAN MINISTRY
OF FOREIGN AFFAIRS

Executive Summary

The conflict in Syria has raged for over five years, creating massive destruction and human misery. Over 5 million people have fled Syria and over 6.6 million are internally displaced. Much of the suffering and conflict is being maintained by actors turning to a variety of illicit funding, and increasingly trafficking in the drug captagon. Unlike many other drugs the primary destination markets for captagon is countries in the Arab peninsula and increasingly Syria and the Syrian diaspora. Captagon has emerged as a conflict drug helping to sustain the war. For other drugs, particularly, Afghan sourced heroin, the instability and conflict has had the opposite effect of moving trajectories away from Turkey and Syria and north through the Black sea. Many long-established drug trafficking networks prefer a more stable environment to that found in Syria and neighboring countries.

Within Syria people living under extreme conditions often turn to drug use, while soldiers from all parties to the conflict can use the drugs as combat stimulants. 6 million Syrian migrants and refugees in neighboring countries are an at risk community to drug use and acting as mules to pay for their travel to European countries. Though, the challenge of illicit drug trafficking and production in Syria is not new it has become a reliable war drug for many actors. International interest by law enforcement in drug trafficking is often limited by domestic political concerns. Yet there are long term public health and rule of law consequences for development and law enforcement actors that unless directly recognised now and responses planned for in a post-conflict Syria will lead to more suffering and instability in the region.

This report looks at the current impact of drug trafficking and conflict within Syria and neighboring countries, discussing trajectories, development and organised crime response to the challenge and opportunity conflict provides.

Key findings

- Drug trafficking and its impact on the rule of law is extensive and chronic, this must be factored into development implementation in a post-conflict Syria. Development policies should have a mid- to long term focus understanding the local needs, conflicts and development of the rule of law as a cornerstone for success.
- Conflict in South Eastern Turkey has shifted much of the Balkan route of Afghan opiates away from Turkey into the caucuses and across the Black Sea. Turkish OCG's are exploiting the Black Sea trajectories due to the perceived increased risk and instability of moving Afghan opiates through Turkey.
- Captagon production within Syria has been occurring for at least a decade. The current conflict has exploited the breakdown of the rule of law to intensify production and trafficking with the direct involvement and enrichment of actors in the conflict.
- Most pills seized in the region contain amphetamine base rather than Fenethylamine (captagon), although some seizures in Turkey have contained Fenethylamine.
- The current level of conflict within Syria has forced some traffickers to move production of captagon to Lebanon and Turkey and potentially other countries within the region including Sudan. If the conflict worsens for either the regime, FSA, or ISIS¹ and extremist groups, captagon drug trafficking could be

¹ ISIS is the preferred nomenclature for ISIL or IS in this work



moved on a larger scale to neighboring countries.

- Trajectories for captagon produced in Syria are by land, sea and air, controlled by OCG's affiliated with forces on the ground within their area of control.
- Sea trajectories include containers of captagon and other drugs transiting Libya for redirection to other countries in North Africa and the Middle East.
- Syrian and Turkish OCG's are working directly with non-state actors such as the FSA and extremist Islamist groups to produce captagon within Syria and to facilitate exportation.
- It is unclear if ISIS is a net exporter of captagon due to other more reliable sources of funding (oil, extortion). However, there are clear links between Tramadol trafficking and ISIS.
- Huge data gaps remain regarding captagon usage in Syria and neighboring countries as well as destination markets, particularly among Syrian refugee populations.
- Destination markets for captagon are predominantly in the Arab Peninsula and East Africa with consumption in Turkey and Syria also rising precipitously.
- Drug trafficking and serious organised crime are a significant challenge to some countries in the region, due to newer priorities and limited capacity of drug trafficking is a secondary or tertiary priority to law enforcement.
- Limited reliable information on drug use and prevalence in Syria and the region.

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Glossary

BMK	Beth Methyl Ketinone
FSA	Free Syrian Army
NPS	New Psychoactive Substances
OCG	Organised crime group
TNP	Turkish National Police



Introduction

Figure 1: Cilvegözü border crossing point between Turkey and Syria



Source: Daily sabah

Drug trafficking is a time honored source of income not only for organised crime but for a variety of state and non-state actors. Historical precedent takes us as far back as the 1840s and the opium wars in China, to the Iran-Contra affair in the 1980s, plus more modern conflicts (e.g. FARC in Colombia and the conflict in Afghanistan). Drug trafficking provides large quantities of difficult to trace hard currency that can be used for any number of activities to promote political ends. Yet the less appreciated aspect is the more chronic. Drug trafficking and organised crime is often exacerbated by, and serves to exacerbate conflict and further undermine the rule of law.

Statements that all conflict or civil war are good for organised crime or that most terrorist groups are involved in drug trafficking lack nuance and do not reflect reality. Above all, organised crime thrives on weak and corruptible, rather than non-existent, rule of law. Instability raises risks and impacts the business model of some drug trafficking organised crime groups. This presents challenges to both policymakers and development actors when entering post conflict nation states that have been riven by drug trafficking and conflict for years.



The Syrian Conflict: Opportunity and challenge to new and established drug traffickers

Now ending its fifth year the conflict in Syria has become so complex and entrenched, that the original mass protests in 2011, triggered by the Arab spring call for more democracy and freedoms in the region, have been almost forgotten. With over 250,000 dead, 5 million people having left Syria altogether and another 6 million internally displaced and an economy collapsing, the immediate human suffering is inescapable.

To make this conflict even more tragic not only has international diplomacy failed so far but Syria has turned into a proxy war. Regional powers from Turkey, to Iran and Saudi Arabia, and great powers, the United States of America and Russia, as well as non-state actors like Hezbollah, are all pursuing different agendas and providing financial and military support to different parties to the conflict. The weakness of the Syrian regime to control its territory has led to the expansion of rebel and extremist groups most notably ISIS. These groups often practice asymmetric warfare and support terrorist acts in Syria the region and globally. While this expansion in human misery has rightly been the focus of most attention, the expansion of the illicit economy, and particularly drug production is no less worrisome and will have considerable consequences for post conflict development.

Globally, cannabis is the most widely used illicit drug in the world² and cocaine has a higher value³ and expanding markets, New Psychoactive Substances (NPS) can be produced almost anywhere dependent upon precursor availability. Yet it is captagon and heroin that have a strategic influence upon the region in terms of consumption, impact on the rule of law and funding of terrorism and conflict.

Drug trafficking can be a great source of funding for actors to the conflict in Syria but not without risks. For terrorist groups, state and non-state actors, the risk to prestige from profiting from drug trafficking can have very negative consequences on political agenda. To be seen promoting drug production and condoning illegal activity, can undermine actors as responsible and capable of administering justice fairly as well as tarnish their image internationally. If other more reliable and larger sources of funding are available; actors will tend to turn to these first to the exclusion of drug trafficking, as may be the case with ISIS. ISIS is assumed to derive most of its monthly income from oil and other sources rather than drug trafficking.⁴

Yet desperate times lead to desperate actions, actors other than ISIS, from the FSA to Jabhat Fatah al-Sham⁵ to smaller independents as well as the Syrian regime need access to new and easily exploitable sources of funding, provided by captagon production and trafficking. With the fragmented and protracted conflict in Syria, and with oil prices falling globally, drug trafficking has become an important mainstay of the war economy.

The conflict in Syria, and its subsequent impact upon surrounding countries, has provided the right environment for the explosion of captagon production, trafficking and use. This explosion of production and trafficking has been because of sudden intensity of demand from conflict actors in Syria as well as the funding needs of state and non-state actors within Syria and the wider region to wage war and administrate areas under their control. Moreover, the close proximity of large destination markets in Saudi Arabia and the rest of Arab peninsula, are very attractive to captagon producers in Syria. Although connections between Syrian OCG's and South-East

² UNODC, World Drug Report 2015

³ Per Kilogram in destination markets in Western and Central Europe

⁴ See actors section ISIS and extremist groups

⁵ Previously known as Al Nusra front



European captagon producers have existed since the 1980s, captagon production in Syria and the wider region is relatively new, having begun in the mid to early 2000s. Yet the conflict has allowed this production and trafficking to expand considerably.

Captagon production and trafficking has become a perfect source of financing for conflict actors in Syria. The simplicity and mobile nature of production facilities and limited chemical knowledge combined with close proximity to major destination markets plus burgeoning demand within Syria offer highly profitable sources of income with low risk of interception due to a lack of law enforcement capacity and priorities. Despite the conflict and instability captagon production is booming.

For Afghan opiates transiting the Balkan route, which was recently valued at USD 26.8 billion⁶, traffickers prefer to avoid conflict and instability. Established over decades, the Balkan route of Afghan opiates has traditionally transited Afghanistan and Iran finally entering South-Eastern Turkey before heading by land, and occasionally sea, for destination markets in Western and Central Europe. Afghan Opiate traffickers have established their modus operandi and targeted weakness in the rule of law over decades of practice and experience. This has developed into a preference for reliability, stability and routine rather than conflict or increased law enforcement and border control pressure. Since the conflict between the Turkish government and Kurdish separatist intensified in mid-2015, traditional trajectories for Afghan opiates have become increasingly unviable and this has impacted trafficker's business models. Compounded with the recent Turkish army incursion into Northern Syria, the Southern border provinces of Turkey have become even more unstable and difficult to permeate.

This has resulted in a recent shift of some well-established Afghan opiate traffickers and trajectories north into the caucuses bypassing Turkey and the unstable South East of the country. While conflict in Syria has bred production and trafficking of captagon in Syria and the region the main thesis of this report is to show that the ideal situation for long term opiate traffickers is corruptible and minimal rule of law rather than instability and lawlessness presented by conflict. By contrast actors party to the conflict are looking for reliable sources of funding, independent of outside donors; drug trafficking is one such source.

This report consists of a narrative of the development of the trafficking in these illicit drugs from the recent past to understand how we arrived at the situation today and the challenges that face Syria and the wider region post-bellum. The first chapter explores questions related to captagon production and trafficking. Among other questions, this section asks how did captagon production start, where is production occurring and how may it develop into countries beyond Syria and recently Lebanon and Turkey.

Secondly, the impact of the conflict in Syria and the wider region has affected traditional drug trafficking routes, namely the Balkan route of Afghan opiates. How this differs from captagon trafficking and its relevance to conflict is discussed in the second chapter.

In the concluding chapter analysis is provided of the impact in the mid to long term on Syria and the region, how it undermines the rule of law now and post-conflict development. A brief analysis of the impact of the recent coup attempt in Turkey is also discussed due to the critical role Turkey plays in the region in particular to drug trafficking. This section also raises the data gaps that still exists and highlights the need for continued monitoring of the situation to effectively engage development after the conflict has ended.

⁶ UNODC, Drug Money: the illicit proceeds of opiates trafficked on the Balkan route 2015



The nexus of conflict and drug trafficking in Syria continue to reinforce and fuel one another, and impact the stability of other countries in the region. As and when some kind of peace settlement is formed it will be of crucial importance to disrupt and dismantle, illicit activities, particularly lucrative ones such as drug trafficking. If not tackled and recognised from the start, drug trafficking will create long term instability and act as an impediment to peace and development. Such has been the fate of Afghanistan, Mali and Libya. A proactive monitoring and mapping of illicit networks of drug trafficking needs to be implemented now to provide an accurate knowledge of the political economy that will serve as a foundation for future negotiations and avoid repeating past mistakes.

Note on methodology

Most of the data and information used within this report has been provided through interviews and data exchange from a variety of national and international law enforcement, and civil society actors. Over 15 interviews were conducted with law enforcement actors in Turkey, Lebanon and Iraq during 2016. Field research also took place in Turkey, Lebanon and Iraq. In many cases seizure data is used to draw some analysis and conclusions. Due to the nature of drug trafficking this only provides the analyst with the “visible” understanding of production, trajectories and modus operandi as well as appropriate conclusions. While other points may be more conjectural, and is noted so correspondingly in the text. Accepting this weakness in the methodology highlights the fact that regardless of how much research is conducted, perfect or complete data on a subject such as drug trafficking can never be achieved. Moreover, due to the dynamic nature of the subject, trafficking trends can change quickly in response to law enforcement actions or other factors potentially rendering some analysis redundant.

In the case of captagon seizures there is some incompatibility of the unit of measurement. Dependent on the country, reporting authorities sometimes use kilograms or pieces seized. While a rough conversion can be suggested of 5,000 pieces/pills per kilogram, in this report the author uses the original data without conversion. While this complicates the data analysis it avoids the possibility of manipulation on the part of the author.



I: The Origins of Captagon: production and markets in South Eastern Europe

With the end of the Soviet Union and the fall of the Iron Curtain in 1990 many former Soviet countries were left to reorient themselves towards a capitalist free market economy and the establishment of multi-party democracy. While in the Western Balkans this resulted in wars of secession from Yugoslavia by its constituent parts, countries such as Bulgaria and Romania found themselves dismantling large state run enterprises. Bulgaria had a long tradition of a large chemical industry with strong experience of chemical production for export abroad. Already in the 1980s state controlled chemical companies were producing large amounts of captagon for export.⁷ During this time the production of captagon was tightly controlled by the Bulgarian security services. They enforced what could be produced and trafficked out of Bulgaria.⁸

Captagon? Is that a pill?

Captagon is a misnomer for an amphetamine type stimulant (ATS) called fenethylamine. Fenethylamine was developed in 1961 in Germany as a medicine for children with attention deficit disorder (ADD). It acts as a stimulant, improving concentration and awareness, as well as making the user feel very energetic and active. In the 1980s it was listed as a controlled substance and banned. Marketed and branded as captagon in the 1980s it has since developed into a recreational drug particularly in the middle east and Arab peninsula. However, law enforcement in South East Europe and the Middle East often seize pills that contain little to no active amphetamine, but substitutes such as high concentrated caffeine. Indeed, actual captagon is probably rarely produced and it is more likely pills contain amphetamine base with the captagon stamp on the pill.

Before the end of the cold war almost all captagon production in Bulgaria had been state controlled and only for export in particular to the Middle East.⁹ The market for captagon in Syria and the Middle East was facilitated by political and technical cooperation between Bulgaria and Syria. During the cold war many Syrians went to study chemistry in Bulgaria and established contacts that would aid illicit drug trafficking and production later.¹⁰ Captagon left over from the pre-1990 produce of state pharmaceutical companies was reportedly exported by black market entrepreneurs who exploited previous contacts with the Arab world to make continuing deliveries to Middle Eastern countries.¹¹

With a large technically capable work force void of employment, due to denationalisation, many former chemists turned to illegal, but lucrative sources of funding in Bulgaria. Chief among these was the production of captagon.

⁷ Centre for the study of Democracy, 2007, *Organized Crime in Bulgaria: Trends and Markets*; p.39

⁸ Interview Bulgarian law enforcement June 2016.

⁹ Ibid. p.40

¹⁰ Interview Bulgarian law enforcement June 2016.

¹¹ Centre for the study of Democracy, 2007, *Organized Crime in Bulgaria: Trends and Markets*; p. 68



Figure 2: Captagon trafficking routes from Bulgaria to the Middle East (1990-2007)
Production moves to Turkey (2007-2009)



After the Cold War, chemists were able to produce for the domestic market as well leading to a rise in drug use within Bulgaria. It must be noted that the captagon that was being produced by Bulgarian OCG's¹² was not captagon itself but rather an amphetamine base with the pills branded like captagon. Rarely, did Bulgarian or Serbian law enforcement come across cases of active fenethylamine.

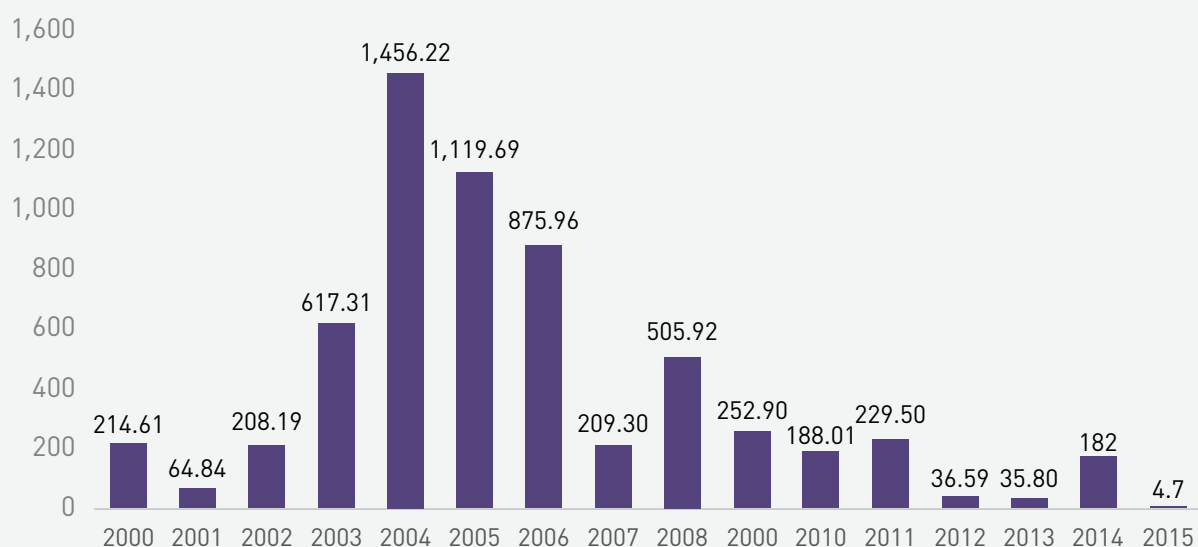
By the mid-2000s Bulgarian police had begun a crackdown on captagon production in Bulgaria forcing production to be moved to countries closer to the destination markets in the middle east, namely Turkey, and Syria. This was facilitated by the strong links already established between Bulgarian OCG's and middle eastern OCG's in the 1990s and early 2000s.

Diversification as captagon production in Bulgaria declines

Bulgarian law enforcement with assistance from international actors was enabled to actively disrupt captagon production in Bulgaria. Seizures of captagon grew exponentially peaking in 2004 (see Figure 1) at just over 1.4 tons. While this was hailed as a great victory in the fight against drug trafficking, few cases of grand corruption or seizure of assets and money related to drug trafficking within Bulgaria or the wider region occurred.

¹² Not only Bulgarian but also Serbian OCG's were deeply involved in captagon production at this time and often worked together.

Figure 3: Bulgarian Amphetamine seizures 2000-2015 (kg)



Source: SELEC DATA 2006-2013, Bulgarian counter narcotics law enforcement 2000-2015

This is not to say that production in Bulgaria has stopped altogether. Bulgarian law enforcement still regularly dismantle amphetamine producing 'kitchen' labs.¹³ As late as 2013, the latest year of available information, Bulgarian law enforcement reported dismantling 35 laboratories for synthetic drug production but noted that most of these were of a small scale for domestic markets.¹⁴ Although the trafficking seems to have lessened, as will be noted later, Bulgarian chemists continue to export their expertise in amphetamine production to producers in the middle east and ties with Syria remain strong.

In 2015, Bulgarian law enforcement in cooperation with Sudanese law enforcement, dismantled an amphetamine lab in Sudan that was producing pills with captagon stamps on them.¹⁵ Three Bulgarian nationals, one Syrian national and one Pakistan/Bulgarian national were arrested. The scale and size of the lab suggests the captagon pills were intended for regional markets.

While captagon production has declined other drugs such as ecstasy originating from the Netherlands, is transiting the reverse Balkan route to markets in Turkey and the Middle East.¹⁶ It has been determined that Turkish OCG's with residence in the Netherlands but using Bulgarian and other nationalities of the region as couriers are the primary actors in this trade.

As is often the case, OCGs react to law enforcement pressure by moving production, often closer to destination markets. Just after the peak of captagon seizures in Bulgaria in 2004, law enforcement officers noted the movement of captagon production facilities away from Bulgaria to the Middle East and Turkey from 2005 onwards.¹⁷

¹³ Mobile easy to set up and dismantle labs capable of producing large quantities of usually low quality amphetamine for domestic markets.

¹⁴ EMCDDA, National Report Bulgaria 2015 p.122

¹⁵ Data provided by Bulgarian law enforcement

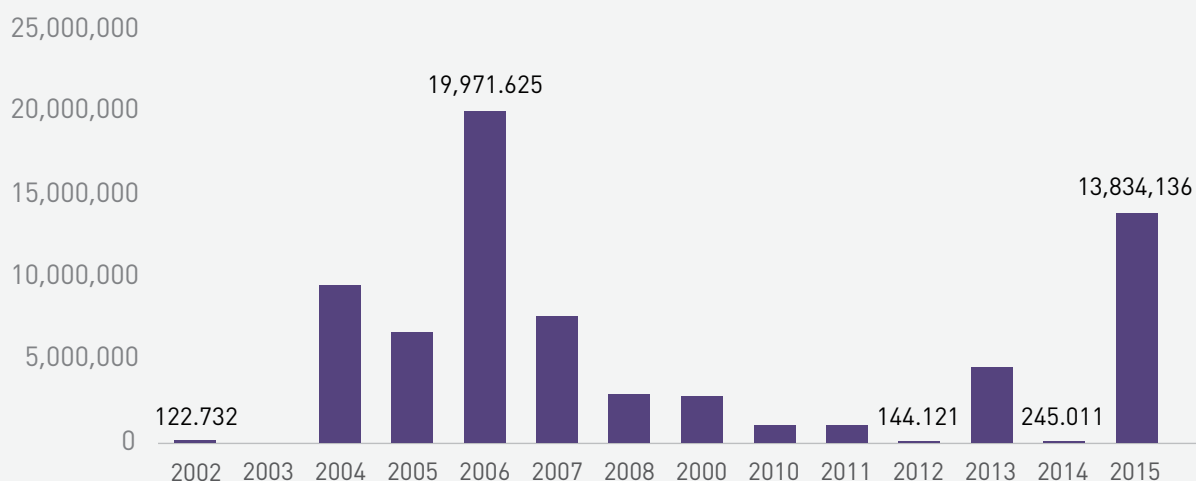
¹⁶ Bulgarian Counter Narcotics Police, interview June 2016.

¹⁷ Centre for the study of Democracy, 2007, Organized Crime in Bulgaria: Trends and Markets; p.71

Turkey

Some production of captagon moved to Turkey, as Bulgarian and Turkish OCG's have always had a strong connection through their involvement in the Balkan route trafficking of Afghan opiates. Indeed, during this time period, Turkish and Bulgarian law enforcement reported that some shipments of heroin from Afghanistan would be bartered for captagon from Bulgaria.¹⁸

Figure 4: Turkey Captagon Seizures 2002-2015 (number of pieces)



Source TNP SELEC

Conversion of pieces/ pills to kg

5000 pills ➤ to 1Kg

After this first cycle of trafficking from South Eastern Europe into Turkey ended in 2005, large production facilities of captagon were dismantled in Istanbul and Hatay province starting in the same year. Yet this period of production within Turkey seems to have been brief and ended by 2009, due in part to law enforcement pressure and more lucrative opportunities in countries closer to the destination markets in the Arab peninsula. TNP reported that 72% of the Captagon seized in 2008 (2,145,000) were brought to Turkey from Syria through hiding in legal cargo and seized in Adana on its way to Saudi Arabia.¹⁹ This highlighted the shift in Turkey's position from producer back to a transit country with regard to Captagon from Syria at an early stage before the conflict began. In 2014 TNP noted that 80% of the people arrested from operations with captagon trafficking were Syrian citizens.²⁰ Focus had clearly shifted to Syrian exports of captagon.

In addition to being a transit country Turkey also became a destination market for Syrian captagon. Although the amounts being seized between 2006 and 2011 declined significantly the number of operation carried out against street dealers increased significantly. The number of captagon operations increased by 530% and the number of arrests increased by 77%.²¹ There has been a significant upsurge in captagon seizures in street level operations in recent years. This indicates that availability and consumption of captagon increased dramatically in Turkish illicit drug markets.

¹⁸ This is also true of ecstasy. Produced in the Netherlands and traded for heroin destined for Turkish markets. Source: EMCDDA, National Reports Bulgaria and Turkey, 2007 p.77; p.111

¹⁹ KOM Annual Report 2008 p. 20

²⁰ KOM annual report 2014 p.18

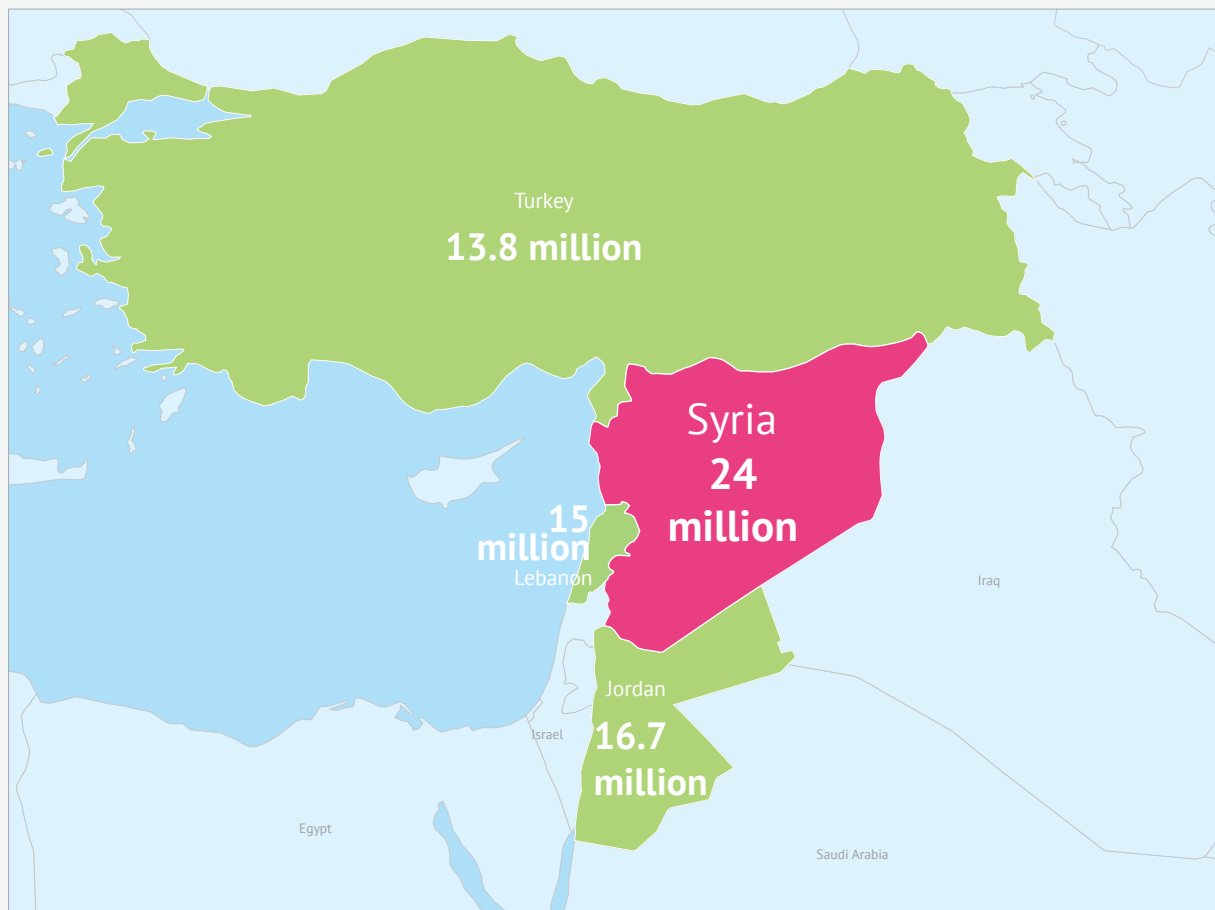
²¹ KOM annual report 2011 p.20

Syria

There was a strong historical connection between Bulgarian producers, Turkish trafficking facilitators and Syrian OCG's since the late 1980s. With the increase in law enforcement effectiveness, production began to move to Syria with the technical know-how and logistics networks moving at the same time. Turkey remained a strong route for captagon moving through Northern Syria into Turkey, and continues to do so now. However, the current conflict has fragmented the Syrian state, limiting production facilities and altering entry and exit trajectories for captagon traffickers, as well as incentivizing some OCG's to relocate to Lebanon and more recently Turkey.

According to regional law enforcement captagon production in Syria received new impetus since 2011 and the beginning of the conflict. Although reliable seizure data within Syria remains scarce, Syrian regime officials have noted an increase in captagon seizures to a record 24 million tablets seized in 2015.²² Considering the limited capacity of law enforcement in Syria, this is more than the rest of the countries in the region declared in 2015, and an indication that the problem is far larger.

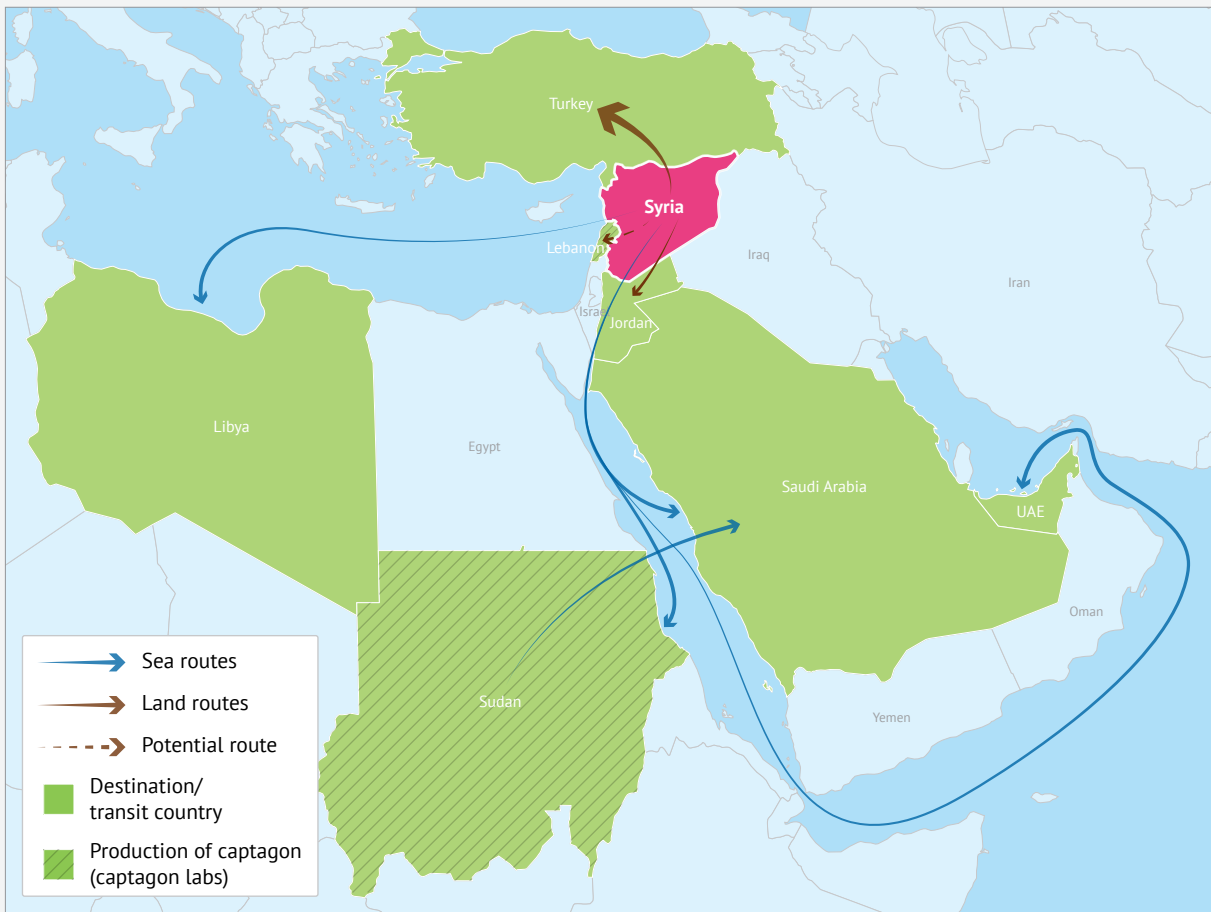
Figure 5: Captagon seizures for 2015



²² Al Monitor "Major Busts in Syria, Lebanon shed light on drug trade", 04 March 2016 <http://www.al-monitor.com/pulse/sites/almonitor/contents/afp/2016/03/syria-conflict-lebanon-drugs.html>

Current trajectories of captagon, 2016

Figure 6: Current Trajectories



As noted above the production and trafficking of captagon in Syria has been occurring for at least a decade if not longer. The primary trajectories for captagon out of Syria to destination markets in the Arab Peninsula and East Africa, remain similar to the *ante bellum* situation with the conflict forcing some changes in moving captagon out of the country

Figure 7: Primary trajectories for the movement of captagon from Syria to destination markets

Country of origin	Transit Country	Country of destination	Route type
Syria	Turkey	Saudi Arabia, Kuwait, UAE	By Land, by sea
Syrian Ports	Jordan, Libya	Jordan, Saudi Arabia	By sea
Syria	Lebanon	Jordan, Saudi Arabia, UAE	By air and sea
Syria	Jordan	Saudi Arabia, Kuwait, UAE	By Land

The four primary trajectories are by land and sea. From the ports of Latakia and Tartous in western Syria, container shipments of captagon (and hashish) can head by open sea either directly through the Suez Canal to ports in the Arab peninsula or East Africa. To the north west, captagon is moved through South Eastern Turkey, to ports on the Mediterranean coast and/or markets either within Turkey or the Arab peninsula. Some captagon is moved south through the land border with Jordan especially through rebel held areas in southern Syria. Finally, west through Lebanon and then by sea or air to destination markets in the Arab peninsula. While the international airport in Damascus offers direct access to markets in the Arab peninsula, there have been no recorded instances of captagon being seized at the airport or from flights originating from Damascus since the conflict began. However, it remains at risk to penetration by traffickers.

A final and consistent trajectory is by land into Lebanon and then by sea or air for markets further afield. While some captagon is being produced in Syria and sent across the land border to Lebanon, some actors have moved captagon production from Syria to Lebanon due to quicker access to precursor chemicals and more secure places to produce captagon, thus impacting the importance of this trajectory.

Currently, there is little evidence that captagon is moved in large quantities from Syria directly into Iraq. This is probably because the conflict there reduces the stability required for consistent trafficking.²³ However, according to the 2015 INCSR report “Fenethylamine pills (an amphetamine-type stimulant, or ATS) are trafficked via the Iraq Syria border for domestic consumption and for shipment to other countries in the Middle East”.²⁴ In the Kurdish controlled north of Iraq, law enforcement seemed surprised at the possibility of captagon trafficking through Iraq, being more concerned with opium usage of ethnic Kurds migrating from Iran.²⁵

The Iraqi government first seized fenethylamine pills in 2009, and seizures have increased substantially since that time. However, with the deepening conflict between ISIS and the Iraqi government as well as the KRG, reliable information on captagon production and trafficking in Iraq is scarce.

Weighing the relevant importance of these four primary trajectories is difficult based predominantly on seizure data. While large shipments of millions of pills have been seized or noticed going into Turkey and leaving the ports of Syria, smaller shipments seem to be leaving via land to Jordan or by air freight or passengers. Port activity may be more reliable as the container shipments offer more reliable and less risk to effective interception than shipments in trucks or small vehicles via the land borders to the south into Jordan.

A further complication is the volatility of the current situation. Some BCPs in Syria and Turkey are permanently closed while others open intermittently dependent on security and level of control by Syrian actors as well as by neighboring countries.

²³ Interview Kurdish Regional Government, law enforcement, May 2016.

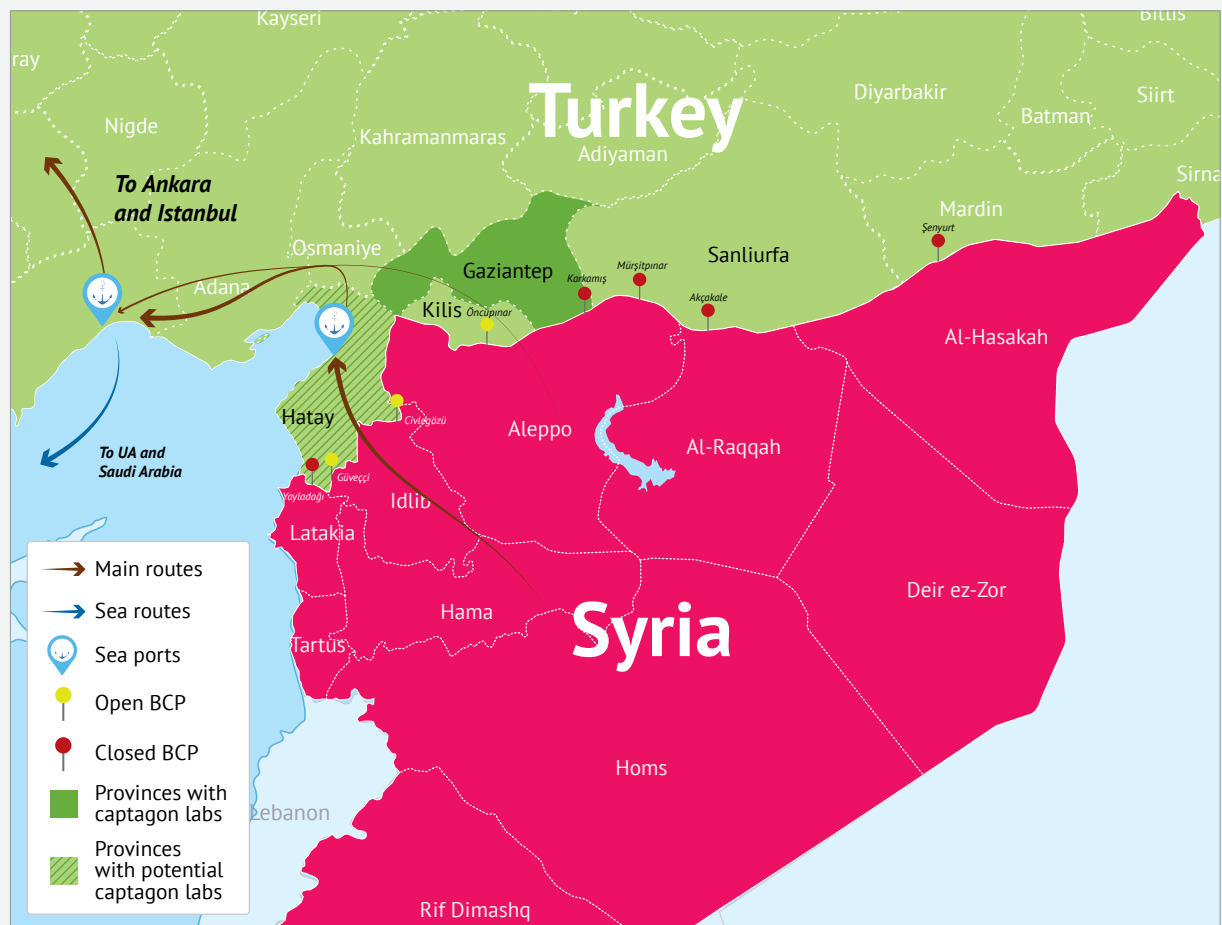
²⁴ International Narcotics Control Strategy Report 2016 - <http://www.state.gov/j/inl/rls/nrcrpt/2016/vol1/253275.htm>

²⁵ Interview KRG law enforcement May 2016



Northern Trajectories

Figure 8: Northern Syria



The Northern trajectories from Syria into Turkey have been established since at least the mid-2000s. The four main provinces along the Turkish border with Syria (Hatay, Gaziantep, Kilis and Sanliurfa²⁶) contain 8 primary BCPs for the movement of goods and people. These are supplemented by small mountain paths across the border that are difficult to monitor. Some BCPs have been closed permanently since the start of the conflict while others open or close on a day to day appreciation. This situation is further complicated by contestation of BCP's on the Syrian side of the border. Some such as the BCP at Mursitpinar/ Kobane²⁷ are permanently closed to traffic from the Turkish side, while others such as Yayladagi/ Kesab, in Hatay province, remain contested between FSA and Syrian regime forces, therefore reducing its attractiveness to traffickers.

In addition to this the entire border between Turkey and Syria has been double fenced and land-mined, with regular military and Jandarma patrols. Combined with the potential of being shot or blown up by landmines, this forces illicit traffic through the major BCP's. This is quite unusual as many borders, particularly in South East Europe, are quite porous with traffickers finding mountain passes or parts of the border that are not regularly patrolled.

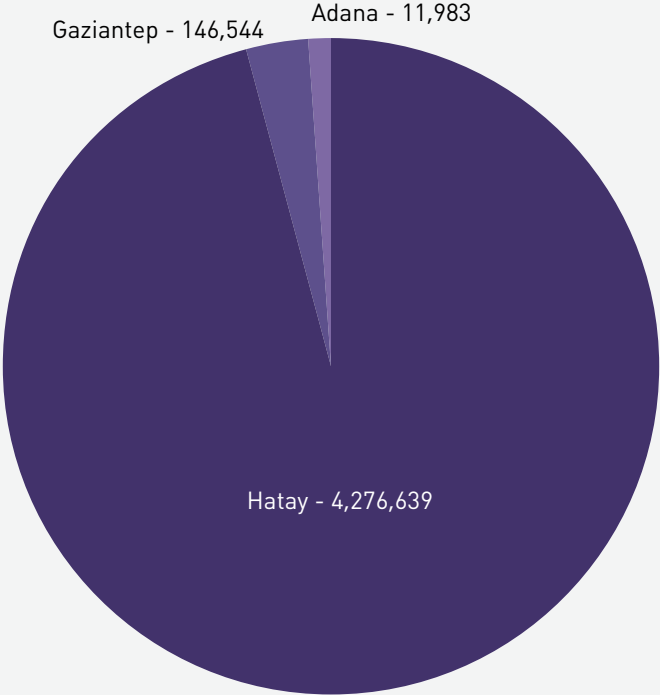
²⁶ Kilis is a border province but is surrounded on three sides by the province of Gaziantep.

²⁷ Turkish/ Syrian name of BCP

It is at Reyhanli in Hatay province that much of the captagon smuggled out of Syria may be entering Turkey. Since 2007, local Hatay police and TNP have noted the key importance of Hatay province to Syrian captagon traffickers.²⁸ Several big seizures have occurred near or at the BCP of Reyhanli/ Bab al Hawa. In 2013 a seizure of 4.2 million captagon pills took place in Reyhanli, the traffickers had come from Syria and were planning on transporting the pills to Saudi Arabia via the port of Mersin.²⁹ A further, even larger seizure of 10 million pills occurred in December 2015 in Hatay, with the same destination market of the Arab peninsula via the port of Mersin. Interestingly, this seizure contained active fenethylline, suggesting some producers do have access to the correct precursors and necessary lab equipment.

Such large seizures indicate increased sophistication of traffickers to produce captagon on a large scale and prepare them for shipment in containers or fuel trucks. It is also an indication of the risks involved in captagon trafficking to markets in the Arab peninsula and Saudi Arabia specifically. OCG's try to produce as much as possible and sell it on in Saudi Arabia where the death penalty for trafficking, regardless of quantity, promotes this approach of large shipments. Sophisticated logistics networks are needed for movement of such large amounts of captagon across multiple land and sea borders.

Figure 9: Top 3 provinces for seizures in Turkey of Captagon pills 2014



Source: TNP

²⁸ EMCDDA National Report Turkey 2007

²⁹ KOM Annual report 2014, p.18



From the latest available data there is a clear preference for traffickers of transiting Hatay province over the others. This may in part be because Hatay offers the shortest distance between Syria and the large ports of Mersin and Adana on the Mediterranean coast and thence to destination markets in the Arab peninsula. Additionally, the good transportation links in the province offer the shortest distance from Hatay to destination markets within Turkey, such as the bigger cities of Ankara and Istanbul.

Of secondary importance are the BCP in the provinces of Gaziantep and Kilis. These provinces contain several major BCP's such as Öncüpınar and Karkamış, that offer good connections to markets in Turkey and the wider region. However, the current level of conflict within these Kurdish dominated provinces of Turkey plus the intermittent access of these BCP present challenges for traffickers.

However, over 90% of the seizure totals for Turkey of captagon in 2014 and 2015 came from one seizure each year with millions of pills. While, this does skew the data the fact that both seizures did occur within Hatay province does suggest a preference by traffickers from Syria using the BCP's in Hatay over those in Gaziantep and Kilis.

The smaller mountain trails also offer possibilities for Syrian smugglers to enter Turkey more clandestinely at the cost of mobility, however Turkish law enforcement and the army are now constantly patrolling the border regions further raising the risks for traffickers.

Conversely, the movement of captagon through these provinces may have already led to the establishment of captagon producing facilities within these regions. Gaziantep and Hatay have been consider potential provinces where captagon production has begun to occur in 2016.³⁰

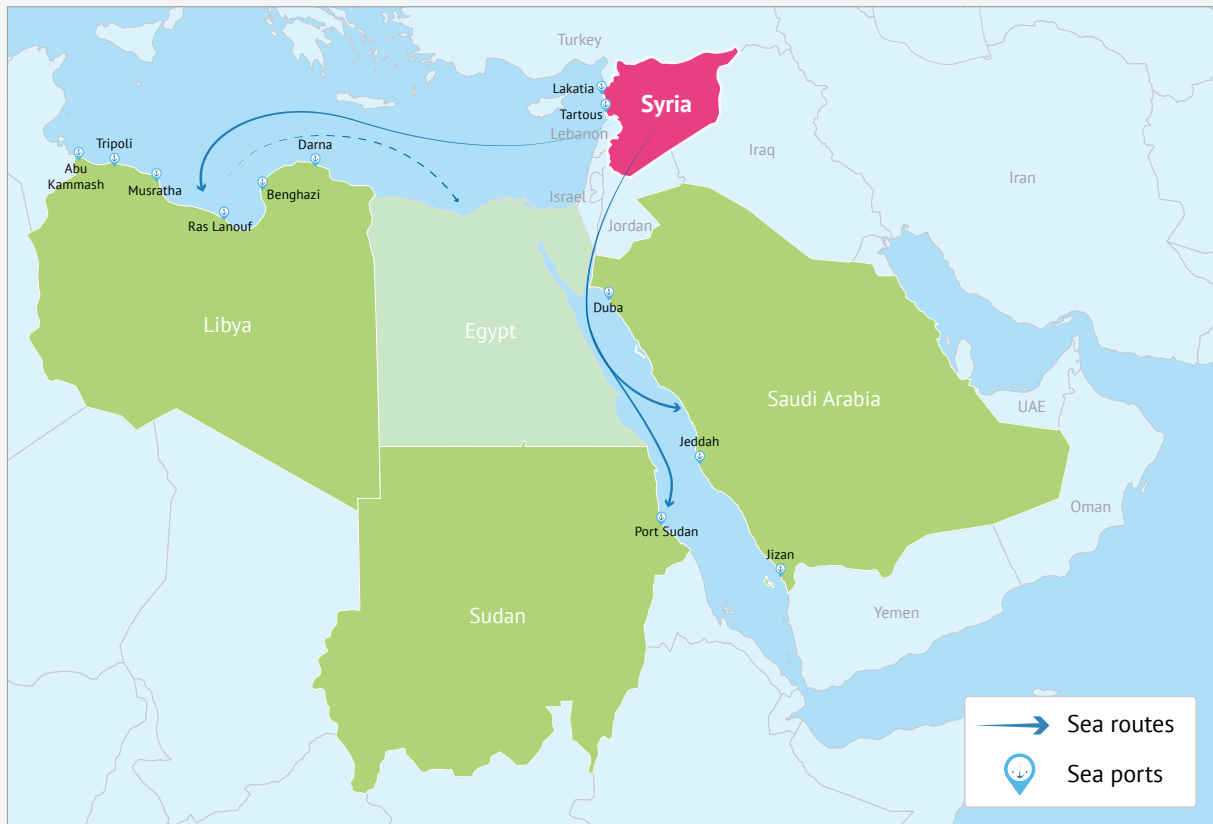
While it is potentially possible that some trafficking of captagon through these provinces is occurring from Turkey into Northern Iraq and then by land to markets in the Arab peninsula, due to the level of conflict there presently, this would be an extreme risk for traffickers when alternate trajectories are more reliable.

³⁰ Information provided by DEA May 2016



Western Trajectories: Ports

Figure 10: Western Trajectories



The primary ports of Latakia and Tartous offer traffickers direct access to shipping lanes to get captagon to markets in the Arab peninsula and other destinations. This has most recently been evidenced by a large seizure in December of 2015 of 102kg of captagon and 1 ton of hashish by the Turkish coast guard off the coast of Libya. Such use of the ports requires access to large container vessels as ferry traffic has ceased from these ports and smaller go fast boats are not as reliable for the longer journey to East Africa and the Arab peninsula.

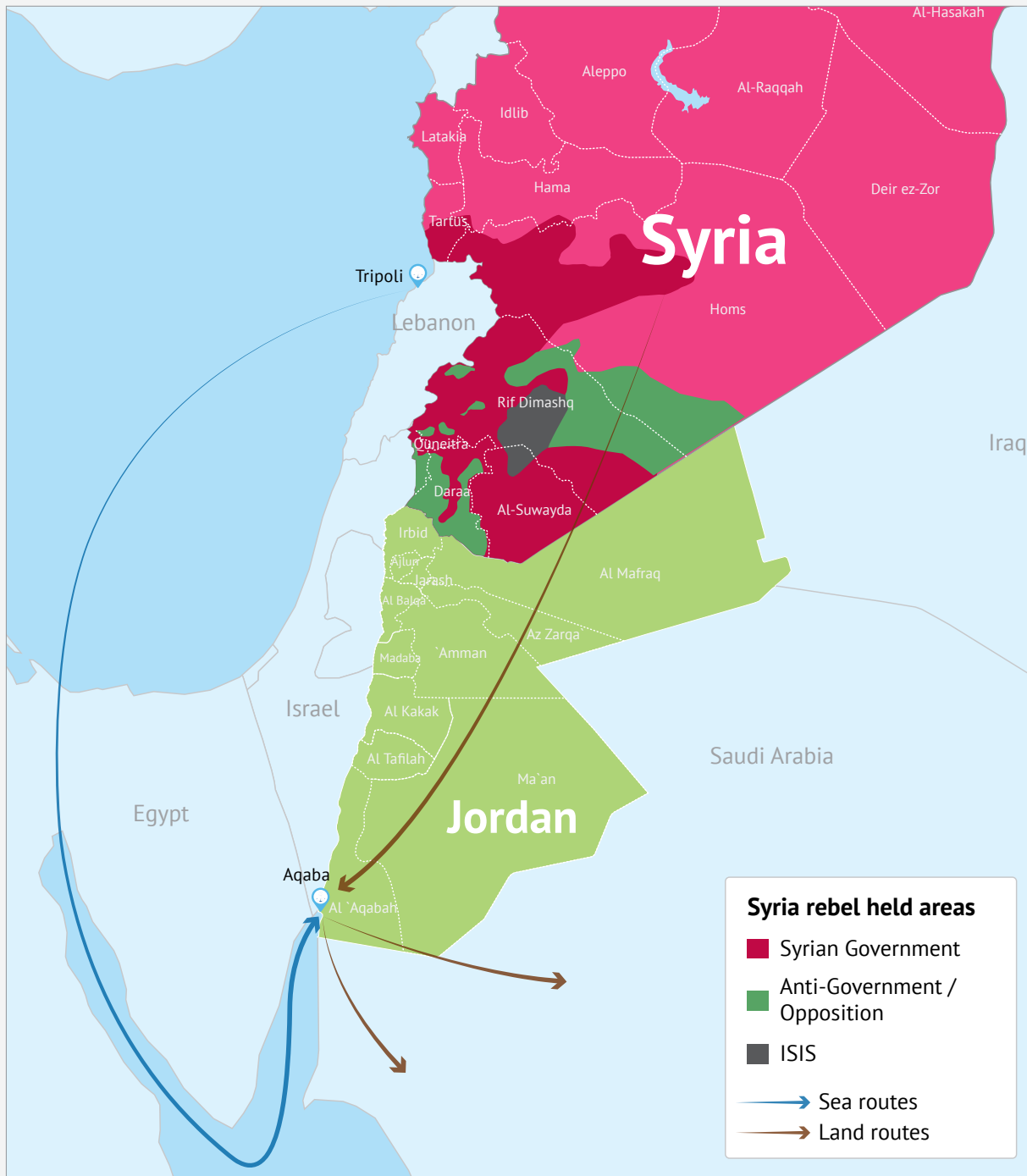
It is possible that Libya is acting as a redistribution point of captagon and hashish shipped from Syria to transit countries or potentially destination markets in East Africa (particularly Sudan) and elsewhere. Maritime law enforcement within the region have noted that Libya has become a transit point for organised crime not only for illegal migrants into Europe but for moving illicit drugs throughout the region with limited detection.

While these ports are government controlled, it may be possible that ISIS is also using these ports to bring in illicit drugs. Hellenic police seized large quantities of tramadol in June 2016 that were heading for Syria.³¹ The companies controlling these shipments were related to ISIS. Moreover, infiltration of the ports by other groups and sheer corruption of regime forces controlling the ports make Latakia and Tartous ideal entry and exit points for the smuggling of captagon out of the country and for bringing precursors in.

³¹ Interview Hellenic Law enforcement June 2015

Southern Trajectories: Jordan

Figure 11: Southern Trajectories: Jordan



The Southern trajectory is probably the least understood of the routes out of Syria due to the contested nature of the territory. Jordanian police have repeatedly clashed with traffickers in the border regions and at major BCP's. The amounts seized are often in the millions of pills.³² Yet, the value and end market of this trajectory is unclear. While much of the captagon entering Jordan by land will head for destination markets in the Arab pen-

³² Al Bawaba "Jordanian military seizes over four million captagon pills in border drug bust", 06 April 2016 <http://www.albawaba.com/news/jordanian-military-seizes-over-four-million-captagon-pills-border-drug-bust-830034>

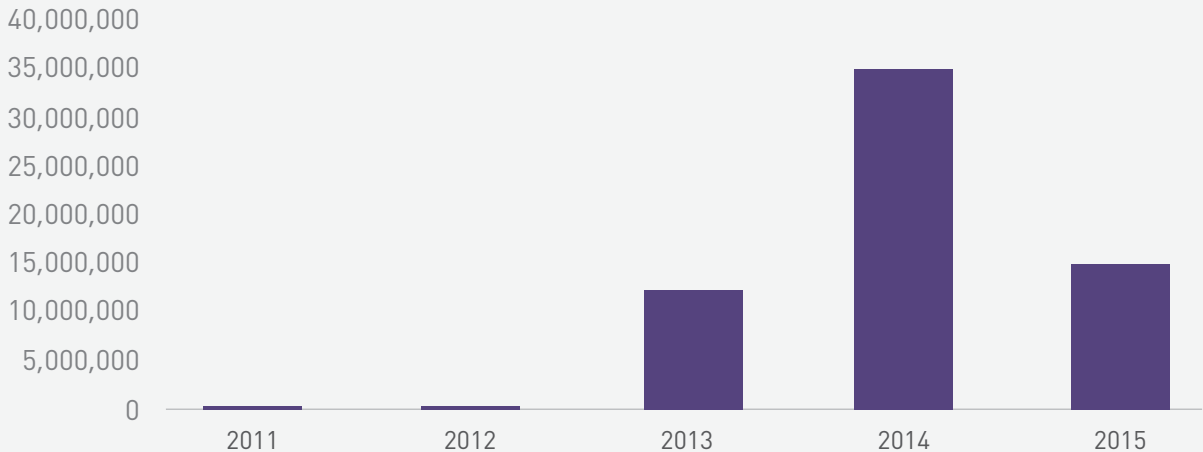
insula, open source reports suggest that the value of the Jordanian market is also considerable. Pills that are produced in Syria very cheaply can fetch between USD 5-20³³ in Jordan.

While the land routes from Syrian/ Jordanian border have seen large seizures of captagon heading for the Saudi border, the port of Aqaba also plays a role in importing and exporting captagon. Shipments of captagon transiting from Syria are often boarded on to ships heading for Saudi Arabia and UAE. Conversely, captagon from Lebanon has been noticed to enter the port of Aqaba via the Suez canal. A large seizure in Tripoli, Lebanon in March 2016 was headed for transshipment to Saudi Arabia via Aqaba.³⁴

Lebanon

Lebanon's experience with captagon is relatively recent. The challenge of captagon trafficking and production has escalated due in part by the conflict in Syria. Much of the captagon production that moved from Turkey and Bulgaria in the mid-2000s moved to production facilities in Syria. However, even in the mid-2000s Lebanese law enforcement were already noticing the presence of Bulgarian OCG's in providing Lebanese, and through Lebanon, Syrian OCG's technical expertise and equipment in captagon production.³⁵ This continues to be the case and is exemplified by the arrest and conviction of a well known Bulgarian captagon chemist Boris Karbazov in 2014. In conjunction with a Palestinian and a Syrian, he was arrested in Lebanon for captagon production in 2014.³⁶

Figure 12: Captagon seizures in Lebanon 2011-2015



Source: DEA Lebanon

Since the outbreak of conflict in Syria beginning in 2011, there has been an exponential increase in captagon seizures within Lebanon. As can be seen from table one, above, there were almost no captagon seizures by counter narcotics forces in Lebanon prior to 2011. But in the successive years, it increased from 463,977 pieces in 2012 to over 12,390,124 pieces in 2013. Over 27 times as many pieces were seized in 2013 as 2012. This trend has continued even more into 2014 and 2015, peaking in 2014 at 35 million pieces seized.

³³ Middle East Eye "Shootout reveals link between Syria and war on drugs" 02 June 2015 <http://www.middleeasteye.net/news/shoot-out-jordanian-border-reveals-link-between-syria-war-and-drugs-trade-392617814>

³⁴ Interview DEA Lebanon 2016

³⁵ EMCDDA

³⁶ Daily Star "Bulgarian captagon cook busted in Lebanon" 07 June 2014 <http://www.dailystar.com.lb/News/Lebanon-News/2014/Nov-25/278876-notorious-bulgarian-captagon-cook-busted-in-lebanon.ashx>



With conflict in Syria intensifying, some production, though not all, has moved from Syria into Lebanon and particularly the Bekaa' valley.³⁷ In 2013 and 2014 Lebanese law enforcement seized captagon producing equipment in the Bekaa' valley and at seaports. The OCG which was dismantled consisted of Lebanese and Syrian national's intent on producing captagon in Lebanon for distribution in the region.³⁸ Some production continues to occur within the Bekaa' valley in particular with the seizure of large quantities (tons) of precursors chemical and equipment there.³⁹ Captagon produced in Lebanon is being moved in bulk (millions of pills per shipment) through the major sea ports of Lebanon and the international airport of Beirut.

The instability of land border with Syria makes it a risky, yet not unheard of, proposition to send shipments by land from Syria into Lebanon to destination markets in the Arab peninsula and East Africa. In March 2016, Lebanese law enforcement made a seizure of 2.6 million captagon pills in the port of Tripoli that were said to have come from Syria via the border crossing at Masnaa on the route from Damascus. The ports of Beirut and Tripoli seem to be heavily favored by captagon traffickers with large shipments bound for both primary destination markets in the Arab peninsula as well as Egypt and East Africa.

The international airport of Beirut is also an outlet for captagon traffickers. While the sensational seizure in November 2015 of 2 tons of captagon aboard a private plane, and the subsequent arrest of a Saudi prince involved in the case⁴⁰, attract widespread media interest, less spectacular, but more frequent seizures, also occur. Small packages can often be located in hand luggage on commercial flights. In and of themselves this is not much, usually little more than several kilograms, but with traffickers using flights two to three times a day this could, in theory, result in hundreds of kilos being flown out of Beirut international airport annually.

Precursors

There are a variety of precursors and chemical agents, that go into the illicit production of captagon or amphetamine base pills. Chief amongst these are BMK (also known as P2P), and norephedrine.⁴¹

However, in response to law enforcement activity, amphetamine producers have in recent years also turned to using pre-precursors. These chemicals, that are often not as strictly controlled as precursors, can be shipped more easily to avoid detection by law enforcement.⁴² The chemicals are then turned into the precursors in the clandestine labs in preparation for making amphetamines. The main pre-precursors noted by law enforcement are called APAAN, APAA and occasionally Acetic Anyhdride (AA) which is also a necessary precursor for heroin. Globally, the primary sources for these precursors are China and India.

While precursors are often sourced directly from a manufacturer, amphetamine traffickers will also turn to buying or stealing large quantities of cough medicine from pharmaceutical companies or pharmacies (usually in pill form) that contain norephedrine or other precursors. These medicinal pills are reduced and repurposed in clandestine labs to create amphetamine pills.

³⁷ Interview Lebanese Drug Enforcement Agency.

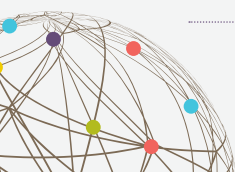
³⁸ DEA-Lebanon, January 2014.

³⁹ Interview DEA-Lebanon May 2016.

⁴⁰ BBC "Lebanon charges Saudi prince with drug smuggling" 02 November 2015 <http://www.bbc.com/news/world-middle-east-34700489>

⁴¹ P2P can also be used in Methamphetamine production

⁴² It should be noted that many of these pre-precursors including APAAN were placed on the INCB controlled list in 2014.



While it is true that before the conflict started in 2011, Syria and Jordan were the destination for 75% of the world licit trade in BMK, much of this will have been used up already as the licit economy in Syria collapsed. There have been no recorded instances of precursor seizures in Syria or destined to Syria in the last four years.⁴³ This raises the question of how traffickers are importing the necessary precursors or pre-precursors into Syria and what logistics networks are used. As the source countries for these chemicals are different from the destination markets, different logistics networks must be at play involving actors from outside the Syria and the Arab world.

While there is little evidence of precursors being seized in Syria, neighbouring Lebanon has reported seizing large quantities (tons) of BMK and ephedrine in recent years.⁴⁴ While it is possible that these precursors are only destined for labs within Lebanon one possibility is that they are trafficked further into Syria for amphetamine production there. A lack of precursor interdiction is partly due to other priorities of law enforcement within the region. Where drug trafficking itself is subsumed by a focus on illegal migration and counter-terrorism by law enforcement, precursor risk analysis and interdiction is even lower on the list of priorities for law enforcement capacity. This data gap is crucial to further interdiction of captagon production at an international level.

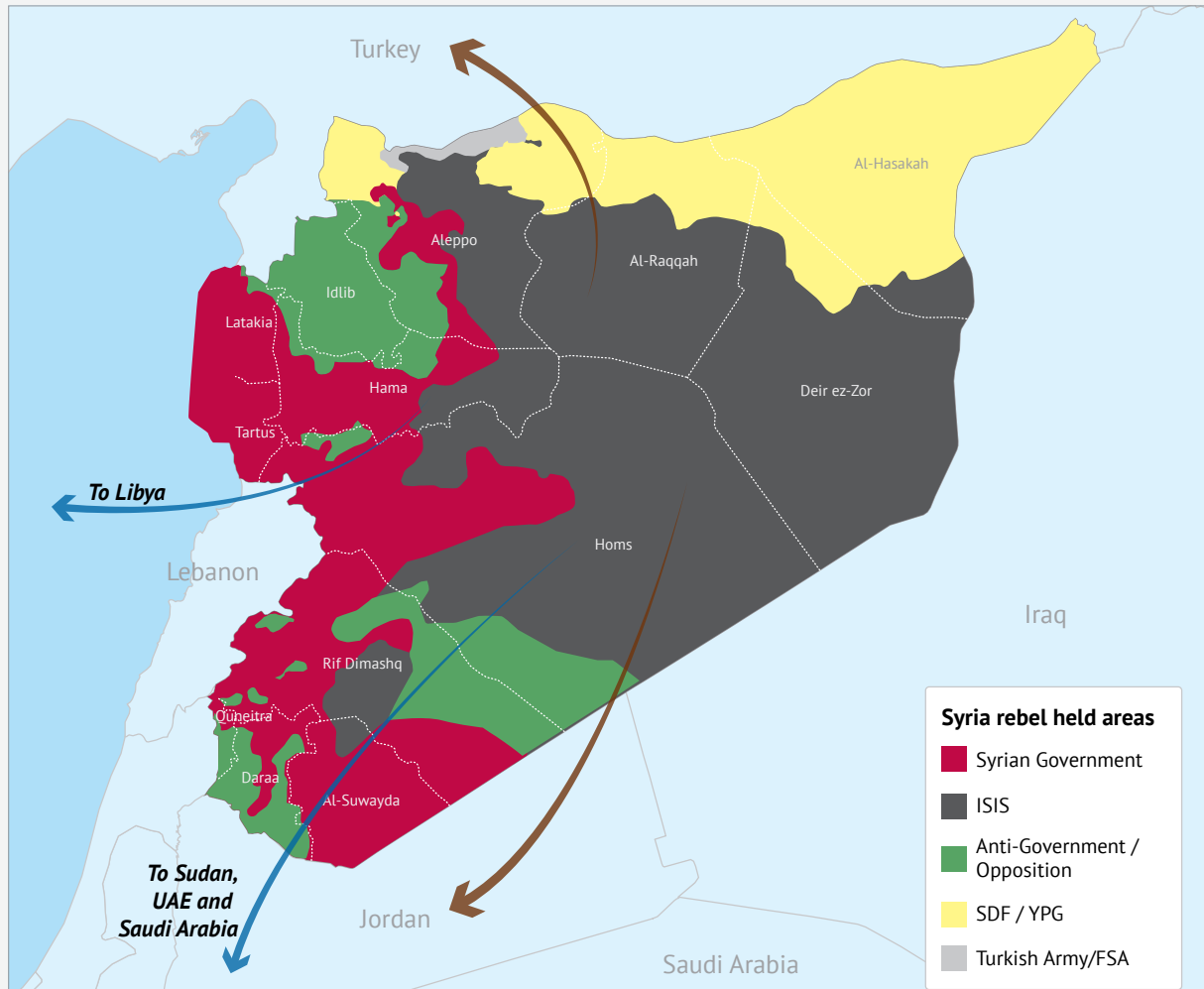
⁴³ UNODC, Drugs monitoring Platform

⁴⁴ Interview Lebanese Customs



II: Actors: Organised Crime Groups and political actors in captagon trafficking

Figure 13: Actors



Drug trafficking is first and foremost a business: maximising profit while minimising risk. Captagon production in Syria is a reliable and considerable source of income for actors in the conflict in Syria and neighboring Iraq, particularly for those actors that have few other reliable sources of financing. This combined with the amounts of captagon seen to be leaving Syria in recent years suggest that most serious parties to the conflict are affected by, if not involved in, trafficking.

The story is similar for the conflict between the Turkish government and Kurdish separatists in South Eastern Turkey. Taxation and facilitation of opiate shipments through Kurdish controlled territory has funded the PKK for decades.⁴⁵

Direct involvement in drug trafficking by actors in a conflict environment is less common as it is often easier for state and non-state actors to simply tax the activities of traffickers active in areas that the state/non state actors control, rather than take on the risk of production and trafficking to destination markets.⁴⁶ Within Turkey this has long been

⁴⁵ FATF, Financial Flows Linked To Production and Trafficking of Afghan Opiates, 2014 p.48

⁴⁶ M. Shaw and F. Mangan, Profits and Losses: Illicit economies and emerging patterns of organised crime as obstacles to peace and state consolidation in Libya, Washington DC, United States Institute of Peace, 2013

the case with the PKK. PKK commanders tax Afghan opiate traffickers roughly 7% for secure movement of shipments through their territory.⁴⁷

Due to the volatile situation in Syria, it is difficult to accurately assess which groups may be involved in the trafficking of captagon through understanding organised crime patterns. However, the prevalent trajectories of captagon from Syria, overlaid with the areas controlled by various actors, do suggest who may be involved in drug trafficking either overtly or through protection and taxation of OCG's active in drug trafficking through their territory.

Free Syrian Army and Moderate Rebel forces

Rebel groups within the FSA have almost certainly used and benefitted from captagon trafficking. While some of the production has moved to Lebanon, groups within Syria may still be active in using this funding, as well still controlling some local production. A recent documentary on the involvement of individual FSA commanders with captagon trafficking has highlighted a clear link between the FSA and drug trafficking.⁴⁸

Moreover, as can be seen by the trajectories from Syria into Hatay province, it is FSA or other rebel groups that control the primary BCP between Northern Syria and Turkey. While this does not necessarily denote active collusion, taxation is more than probable as it provides a reliable source of funding for these actors particularly when other sources of funding (oil, extortion etc.) provide meagre returns to groups in this part of Syria.

Syrian Regime involvement with drug trafficking

The boom in trafficking via Syria seems indicative of a weakening state, increasingly challenged to prevent narcotics production and consumption within its borders, let alone halt cross-border smuggling. Whereas the regime had a complicated relationship with trafficking groups before the conflict broke out, this has worsened as the regime has struggled to find reliable sources of funding.⁴⁹ During Syria's occupation of the Bekaa valley in Lebanon, from the Lebanese civil war until Syria pulled out in 2006, cannabis resin cultivation and counterfeiting proliferated in either direct cooperation or as protection to OCG's.⁵⁰ The regime apparently made USD 500 million a year from this.⁵¹ Within Syria the Shabiha or unofficial militia/organised crime supported by the regime has carried out attacks on opposition figures in exchange for which the regime looks the other way on smuggling and other profitable illegal activities by the Shabiha.⁵²

While there is little clear link between drug trafficking and the regime, collusion and corruption certainly occurs. Several large seizures made in Turkey, and Jordan, and maritime seizures off the coast of Libya, from 2016 were sourced in regime held areas. In 2013, captagon producing laboratories were discovered in areas around Homs that may have benefited the Syrian regime.⁵³ Moreover, the lack of seizures since 2011 at the Damascus International Airport suggest some collusion between traffickers and the regime.⁵⁴ As other authors have noted, Syria has main-

⁴⁷ UNODC GPML this percentage is not recent but indicative

⁴⁸ Kravitz, Max Nichols, *Journal of International Affairs A Bitter Pill to Swallow: Connections between Captagon, Syria and the Gulf* (2016) <http://jia.sipa.columbia.edu/bitter-pill-swallow-connections-captagon-syria-gulf/>

⁴⁹ Herbert, Matt *Partisans, profiteers, and criminals: syria's illicit economy* (2014) P.82

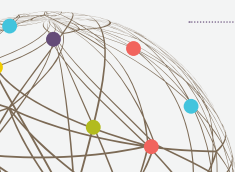
⁵⁰ Institute for the study of War "Criminalization of the Syrian conflict" May 2012 <http://www.understandingwar.org/article/criminalization-syrian-conflict>

⁵¹ Ibid

⁵² Ibid

⁵³ Ibid. P.79

⁵⁴ According to open source seizures: focus has often been on trafficking in the countryside or border regions with no mention of the airport.

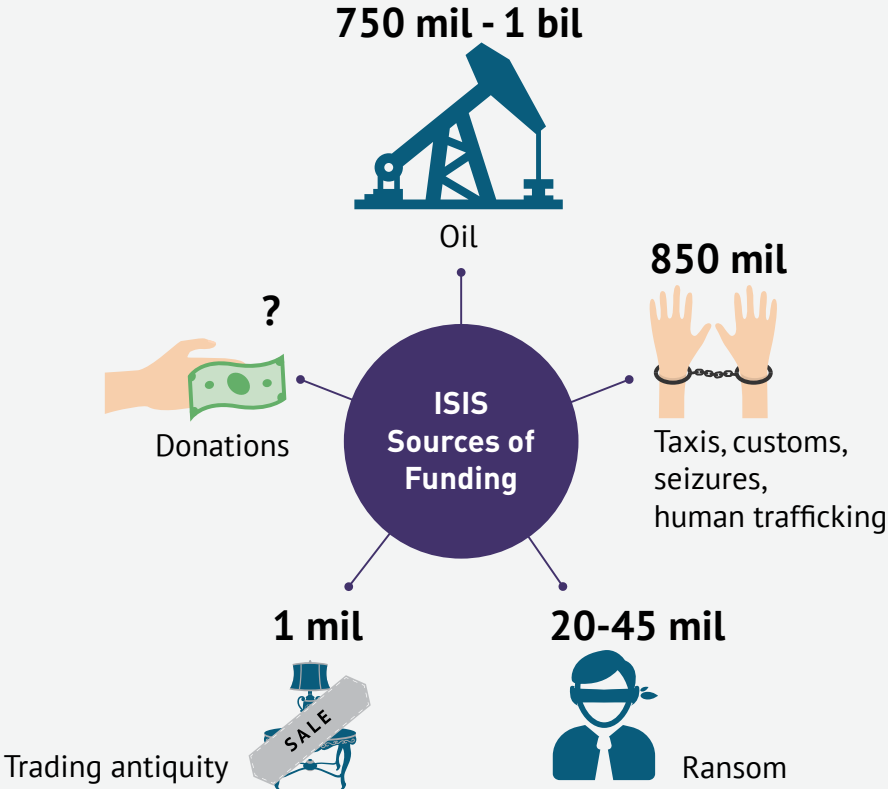


tained a strong illicit economy for many years.⁵⁵ With the shrinking of Syria's GDP to USD \$ 55.8 billion in 2014⁵⁶, a reduction of 15.4% since 2011⁵⁷, coupled with high official unemployment, this matter can only have worsened.

ISIS and Extremist Groups

ISIS, or Daesh to use its Arabic name, spread into the conflict in Syria from Iraq in 2014. Taking control of the oil fields and refineries in the eastern part of Syria, especially around Raqqa, ISIS had slowly spread north and west pushing against the border with Turkey as well as threatening Damascus. Espousing an extremist interpretation of Islam, ISIS represents an attempt to end the traditional view of international borders and the nation-state established by the Westphalian system and implemented in Syria and the Middle East in the aftermath of world war one. Unlike some of its forerunners, such as Al Qaeda, ISIS is determined to maintain and hold territory to build its caliphate. Funding the administration of this territory is costly.

Figure 14: ISIS estimated annual sources of funding



Source 2FATF Financing of the Terrorist Organisation Islamic State in Iraq and the Levant (2015)

According to FATF analysis⁵⁸, the primary sources of funding have been oil production and smuggling, taxation and extortion (see figure 14). As can be seen from the chart these estimates vary wildly and dependent upon their accuracy can inform whether or not ISIS is involved in trafficking or how much market control ISIS has either within Syria or markets in the region. It is interesting to note that references to drug trafficking by open sources such as the media often describe ISIS as a serious actor in drug trafficking, particularly with captagon or opiates. An example of this is the reporting by the head of the now defunct Russian counter narcotics bureau, FSKN, that ISIS made over USD 1 billion

⁵⁵ Kravitz, Max Nichols, Journal of International Affairs A Bitter Pill to Swallow: Connections between Captagon, Syria and the Gulf (2016) <http://jia.sipa.columbia.edu/bitter-pill-swallow-connections-captagon-syria-gulf/>

⁵⁶ CIA, WorldFact Book, 2015, <https://www.cia.gov/library/publications/the-world-factbook/geos/sy.html>

⁵⁷ World Bank, August, 2016

⁵⁸ Spiegel.de "Die Beute-Ökonomie" June 2014 <http://www.spiegel.de/wirtschaft/islamischer-staat-so-finanziert-sich-der-is-a-1063522.html>

from drug trafficking and production, a claim which upon investigation is misleading due to the claims dubious focus on Afghanistan.⁵⁹ On the other hand, according to the FATF's own analysis drug trafficking is not explicitly mentioned as a considerable source of funding for ISIS.

It remains unclear if ISIS is a net drug exporter or that it produces for its own sake or allows trafficking or production at all. ISIS definitely has a conflicted relationship with drug trafficking, what is probable is that ISIS is importing some synthetic opiates, such as tramadol, to be used by ISIS fighters as a combat medicine to deal with the trauma of combat and as a sedative. While traffickers caught within ISIS-controlled territory often have been executed⁶⁰, captured or killed ISIS fighters have often been discovered with bags of pills on them for use in combat. Moreover, as seems likely from the seizure of large quantities in Greece in June 2016 of tramadol, ISIS has needs of synthetic opiates for battlefield medicinal reasons as well as recreational markets. Law enforcement have seen ISIS go to considerable lengths to import tramadol.⁶¹

While comparison with the Taliban in Afghanistan are understandable, they are inaccurate. ISIS is a far more unified actor than the Afghan Taliban as it aims to create a multinational Islamic state out of territory of multiple states. ISIS has established a centralised "state" with governed territory, The Afghan Taliban, while undeniably controlling several provinces, do so in contestation with the government of Afghanistan and between varying factions of the Taliban.⁶² Moreover, the Afghan Taliban's major role in drug trafficking was usually at a local level in protection rackets or taxation of farmers and traffickers transiting their territory. ISIS may be just taxing captagon traffickers within its territory.

As indicated above, ISIS has access to multiple sources of funding beyond drug trafficking. While getting precursor supplies into ISIS held areas and sending finished product out of Syria is not impossible for ISIS, it would still present a considerable challenge when compared to the ease of resource mobilisation via oil and extortion. With the recent loss of Manbij in Northern Syria to Arab and Kurdish forces, and Jarabulus to Turkish backed FSA units, ISIS capacity to traffic captagon out of their territory, has become more difficult, although a southern trajectory through Jordan would be possible.

Finally, there is an ideological problem for ISIS and drug trafficking. The primary markets for captagon are Muslim majority countries in the Arab peninsula. The Afghan Taliban could claim to be allowing the sale and trafficking of Afghan opiates only to infidels in Western Europe and Russia. To be seen actively endorsing captagon trafficking could have severe implications on ISIS propaganda efforts and claims to follow a strict interpretation of the Koran.⁶³ As such, ISIS has made occasional efforts to show it is against drug trafficking. In March 2016 it executed 5 men it claimed were drug traffickers, it has also reportedly tried to destroy cannabis plantations discovered in territory it controls.⁶⁴

While ISIS role in drug trafficking is more difficult to define smaller groups such as Jabhat Fatah al-Sham are using drug production and trafficking through their territory to fund their war efforts. Several captagon labs around Aleppo and Homs have been discovered by regime forces with links to Jabhat Fatah al-Sham.

⁵⁹ Russian Times, High Finance: ISIS generates up to USD 1 billion annually from Afghan heroin, 6 March 2015 <https://www.rt.com/news/238369-isis-drug-money-trafficking/>

⁶⁰ Ara News "Isis executes five drug traffickers" 2016 <http://aranews.net/2016/03/isis-executes-five-people-charges-drug-trafficking-syrias-manbij/>

⁶¹ Interview with DEA August 2016

⁶² This has been particularly true of infighting between Pashtun and Baluch tribal factions of the Taliban.

⁶³ The Koran refers to intoxicants (often interpreted as narcotics and alcohol) as being bad for people and to avoid them in order to prosper. Koran 5:90

⁶⁴ Ara News "Isis executes five drug traffickers" 2016 <http://aranews.net/2016/03/isis-executes-five-people-charges-drug-trafficking-syrias-manbij/>



III: The Balkan Route of Afghan opiates

Traditional trajectories

Figure 15: Balkan Route



While captagon production in Syria and the region is a relatively recent phenomenon, the Balkan route is a decades old trajectory for moving Afghan opiates to destination markets in Western and Central Europe. From cultivation in Afghanistan, opium base is either turned into heroin within Afghanistan or brought to neighbouring countries of Pakistan or Iran for heroin conversion. The heroin produced outside of Afghanistan seems to be of higher purity than that produced within the country. This suggests that heroin exported to destination markets of the Balkan route may be more likely produced in Iran and Pakistan. Often embedded in large trucks, shipments of several hundred kilos make their way by land through Turkey into South Eastern Europe and finally destination markets in Western and Central Europe. From 1 kilogram bricks of heroin in Iran, cutting facilities in Turkey and South Eastern Europe cut to usually 1/2 kilogram blocks for smaller shipments. Heroin is then repeatedly cut at different stages until reaching consumers in Western and Central Europe.⁶⁵

The OCG's primarily involved in opiate trafficking have most often been of Turkish/ Kurdish origin with logistics and mid-level actors consisting of citizens of the countries through which shipments pass. In particular, Albanian OCG's are well known to be active as logistics supplier's for Turkish/Kurdish opiate traffickers. With diaspora in Western and Central European countries as well as relationships with opiate producers in Iran and

⁶⁵ UNODC, *The Illicit Drug Trade Through South Eastern Europe*, 2014

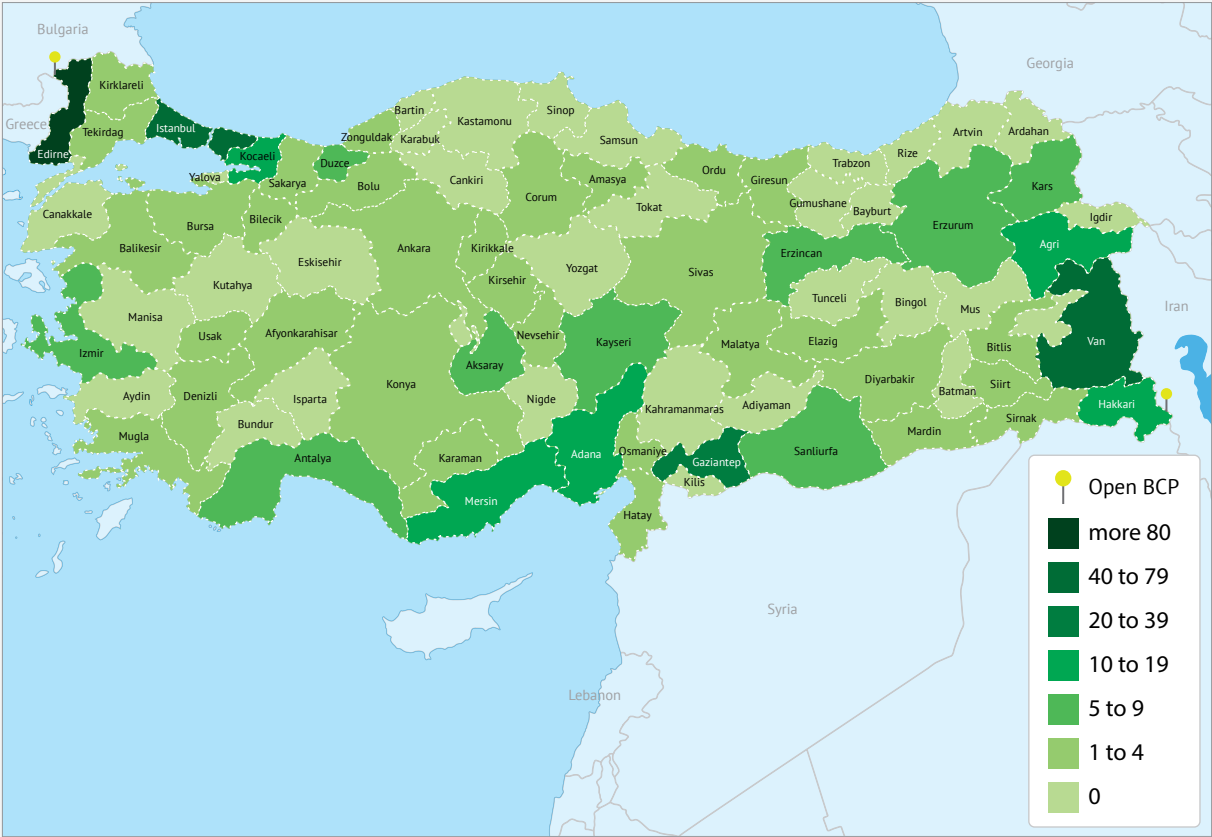


Afghanistan, there is common consensus that Turkish/ Kurdish OCG's have long maintained a stranglehold on Afghan opiates transiting the Balkan route due to these comparative advantages.

This system, with some variation, has existed since at least the 1980s with trajectories within South Eastern Europe varying dependent upon increased risks to opiate traffickers. With cultivation of opium consistently rising since the removal of the Taliban from power in Afghanistan in 2001, opiate traffickers have had even more heroin available to get to market.

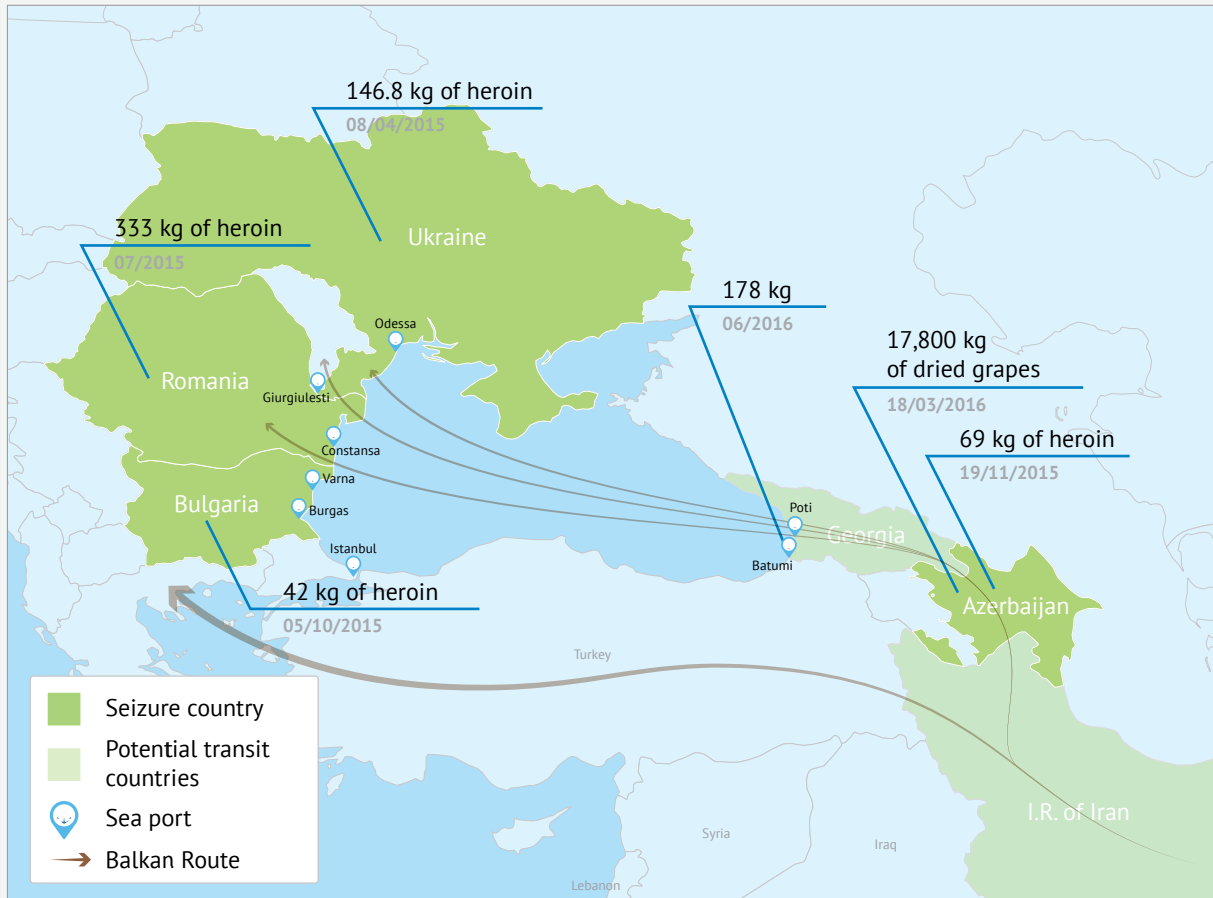
Latest Trends

Figure 16: Opiate seizures in Turkey (2011-2015)



As a key country along the Balkan route, through which most shipments of opiates transited, Turkish law enforcement, with assistance from international law enforcement actors, responded with improved risk analysis, joint operations and tighter controls at the main BCP's with Bulgaria and Iran. This saw a marked increase since 2011 in the seizures of heroin in Turkey as well as number of convictions. From the map above, it is clear many of the seizures occurred around the primary BCP's in Hakkari province on the border with Iran and in the west at the BCP of Kapitan Andreevo with Bulgaria as well as around Istanbul.

Figure 17: Black Sea seizure map

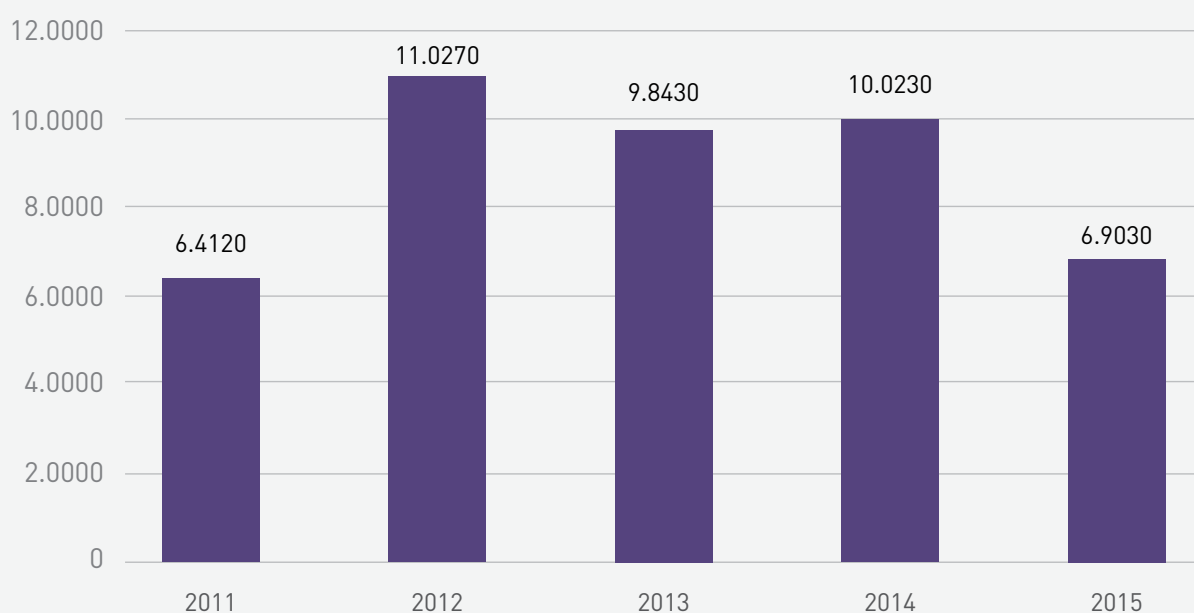


Increased risks from conflict and law enforcement to the business model of many Turkish opiate traffickers has forced them to look for alternative trajectories. Of particular interest is the caucuses and the Black Sea. Since the end of 2014 law enforcement have noted a considerable shift of Afghan heroin being moved on trucks through the caucuses to Georgia⁶⁶ and then across the Black Sea to ports in Ukraine and Romania. But there are also incentives to opiate traffickers using the Black Sea route. Establishing logistics companies in Georgia and Ukraine is very easy and requires few background checks. The Black Sea itself is not well monitored, with limited radar coverage reducing the likelihood of interdiction. The importing ports in Ukraine, Romania and Bulgaria are also good access points to destination markets in Western and Central Europe. Law enforcement has particularly noted the vulnerability of Odessa, Ukraine in the movement of Afghan heroin into Western and Central Europe.⁶⁷

⁶⁶ Particularly, the port of Poti, in Georgia is at risk.

⁶⁷ Interviews with SELEC, NCA and DEA DLO's, Bucharest, Istanbul 2016.

Figure 18: Turkey Heroin Seizures (2011-2015)



Source: 1 TNP

While this shift to the Black Sea has been occurring since at least the end of 2014, further impetus was provided by the escalation of the conflict between the Turkish government and the PKK in the middle of 2015, as can be seen from the figure (NUMBER) on opiate seizures in Turkey. Turkish seizures of Afghan heroin declined by over 30% from 2014 to 2015.⁶⁸ Moreover, almost 6 tons of the total 6.9 tons seized in Turkey occurred in the first 7 months of the year⁶⁹ before the conflict in South Eastern Turkey was reignited.

Additionally, there has not been a corresponding decline in opiate seizures in countries further downstream. In July 2015 Romania seized its largest ever shipment of 333kg of heroin coming from Ukraine and the Black Sea destined for the Netherlands and Western and Central European markets.⁷⁰ Several of the suspects involved were of Turkish origin. Bulgarian ports have also seen increased targeting recently by Afghan opiate traffickers moving heroin from Georgia and the Caucasus.⁷¹

In a recent seizure of 178kg of heroin in Georgia in 2016, the purity of the heroin was tested and found to be at 52%. Such a level is similar to wholesale purity found along the traditional Balkan route through Turkey and as provided by Turkish law enforcement.⁷² This may suggest that traffickers are sticking to the same laboratories and production facilities that they use for opiates transiting the traditional Balkan route rather than changing production facilities as well as trajectories. However, traffickers seem to have grown more cautious. Most of the seizures, along the Black Sea trajectory average between 50-200kg with several notable exceptions. This is considerably less than the 750+kg seizures that were made in the eastern parts of Turkey in 2014 and 2013. Law enforcement have confirmed that many heroin traffickers along the Black Sea are moving to relatively smaller but more frequent quantities than previously in order to reduce risk.⁷³

⁶⁸ Comparing Turkish National Police seizures for 2014 and 2015.

⁶⁹ INCSR report 2016 Turkey

⁷⁰ SELEC <http://www.selec.org/p629/28+March+2016>

⁷¹ Interview Bulgarian Law Enforcement 2016

⁷² Average purity for Balkan route heroin from Turkey has been around 52% for many years. See: UNODC Afghan Opium Poppy Survey 2014 and The Illicit Drug Trade Through South-Eastern Europe.

⁷³ Interview US DEA August 2016.



In addition to this Black Sea trajectory a further possibility has been the shifting of routes south from Iran into Iraqi KRG, Syria and either shipments into Southern Turkey and thenceforth along the Balkan route⁷⁴ or maritime trafficking from Syria to Western and Central Europe. In 2011 and 2012, several seizures of Afghan sourced heroin were made on the Iraqi/Syrian border with transshipment through Turkey to Western and Central Europe.⁷⁵ However, more recent evidence and a lack of seizures suggest that this route has dried up even further due to the intensification of conflict in Syria and within Iraq itself. Although caution should be observed. A lack of seizures is not a complete indication of a lack of trafficking.

This is not to say that opiate traffickers have given up on Turkey completely nor that the expansion in by Turkish OCG's into the caucuses is solely driven by conflict with the Kurds. Seizures continue to be made particularly at the BCP's in Hakkari and Kapitan Andreevo. New law enforcement priorities and potentially improved modus operandi may be allowing shipments to be smuggled through with limited observation. Yet such a considerable drop in opiate seizures year on year combined with consistent seizures in surrounding countries suggest a substantial shift in trajectories.

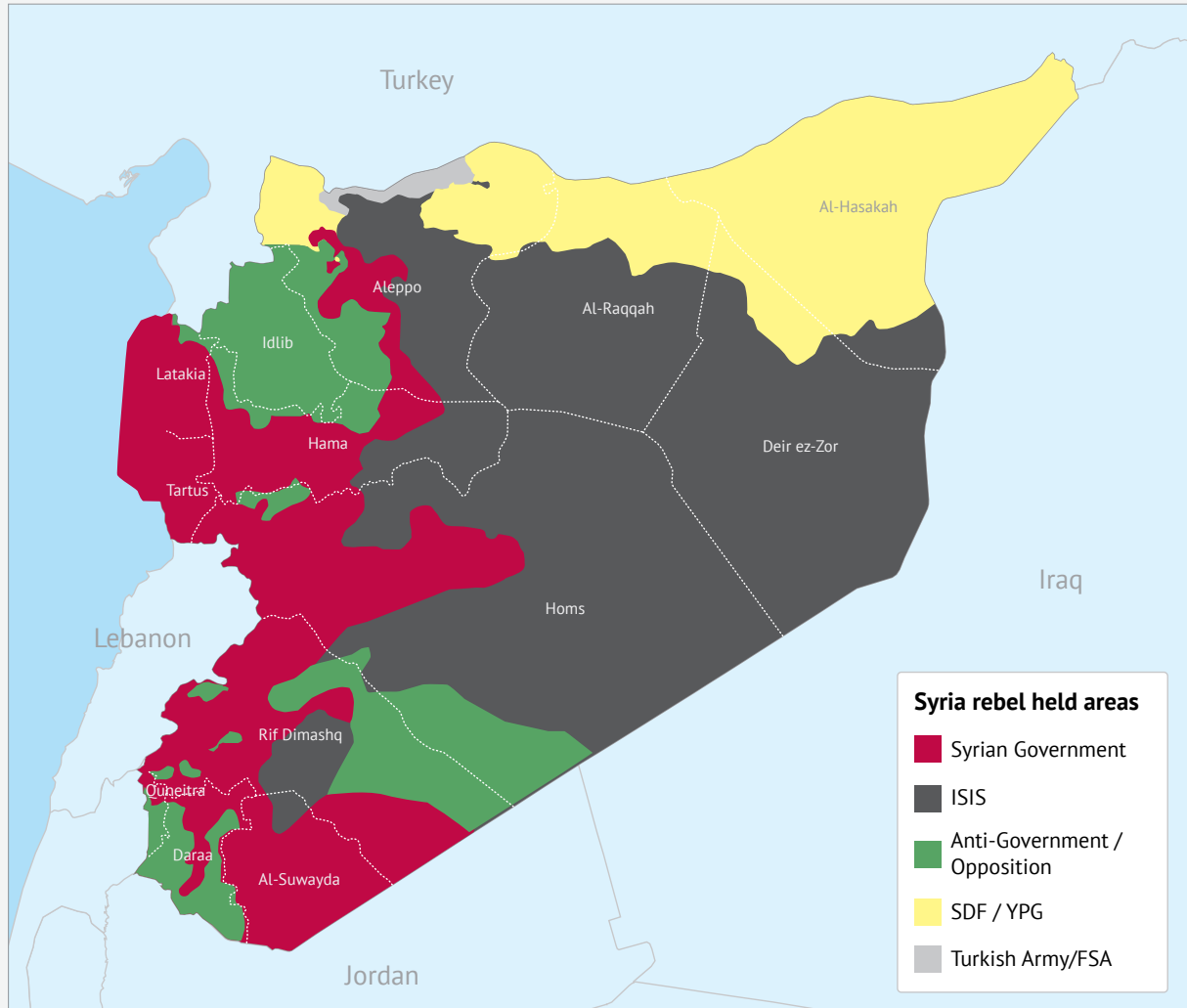
⁷⁴ UNODC, *Afghan Opiate Trafficking Through the Southern Route*, 2015, p.56-57

⁷⁵ This was further corroborated by TNP KOM reports 2010-2013



IV: Future Analysis and Policy Implications

Figure 19: Current areas of control by different factions



While there seems no immediate end to the war in Syria, it is highly unlikely to return to the ante-bellum situation with a centralised state. At best some kind of loose federal system may be possible, or autonomy or independence of particular regions not least of all the Kurdish enclaves in the north.⁷⁶ Regardless, the prolonged nature of the conflict into the next several years make a stable and coherent Syria unlikely.

As has been discussed in the report, captagon trafficking and production within Syria occurred long before the conflict broke out. However, the expansion of production since the beginning of the conflict has left many actors dependent upon drug trafficking as a source of income. In the event of a political solution, political forces will be most unwilling to give up a lucrative and reliable source of income such as drug trafficking or other illicit activities in the short or mid-term. This has been the case in both Mali and Libya where illicit flows are strong

⁷⁶ "Is there a political solution for Syria?" Carnegie Europe, February 2016 <http://carnegieeurope.eu/strategieurope/?fa=62725>

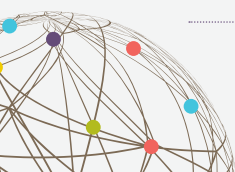
generators of instability.⁷⁷ In Syria this is particularly true for those actors that have few other reliable sources of financing, such as the FSA. When conflict ends and development and rebuilding begins, actors with few other financial means to maintain themselves, especially when legal sources of income are inadequate, can become obstacles to stability, security and political transition in post-conflict countries. Taking the examples of Libya and Mali, the desire to control lucrative trafficking routes, has proven a detriment to consolidation of the state and the monopoly of the use of violence.⁷⁸ Moreover, former militias in Mali and Libya became entrenched in illicit flows, which can become their *raison d'être*, superseding previous political aims.

Moreover, if some of the actors lose control of territory they have gained, and from which they are able to tax or produce captagon, this may well cause them to export production and trafficking to neighboring countries. As is indicated in the report, this has already occurred to some extent with the expansion of captagon production from Syria into Lebanon. Historical precedent is also relevant here, captagon production moved from South Eastern Europe to Turkey and then Syria and Lebanon, as the risk / benefit rationale for traffickers changed.

While this may be due in part to strengthened law enforcement capacity in the countries of South Eastern Europe, production of captagon will move rather than cease altogether. Due to the amount of captagon currently being produced in Syria and Lebanon, countries such as Turkey, Jordan, Iraq, Sudan and Egypt are at increased risk of finding Syrian traffickers establishing captagon producing laboratories in their countries in the mid-term, if it is not occurring already. This will further undermine stability and rule of law in these countries, many of which are already very fragile with limited state control, if not full-blown insurgencies.

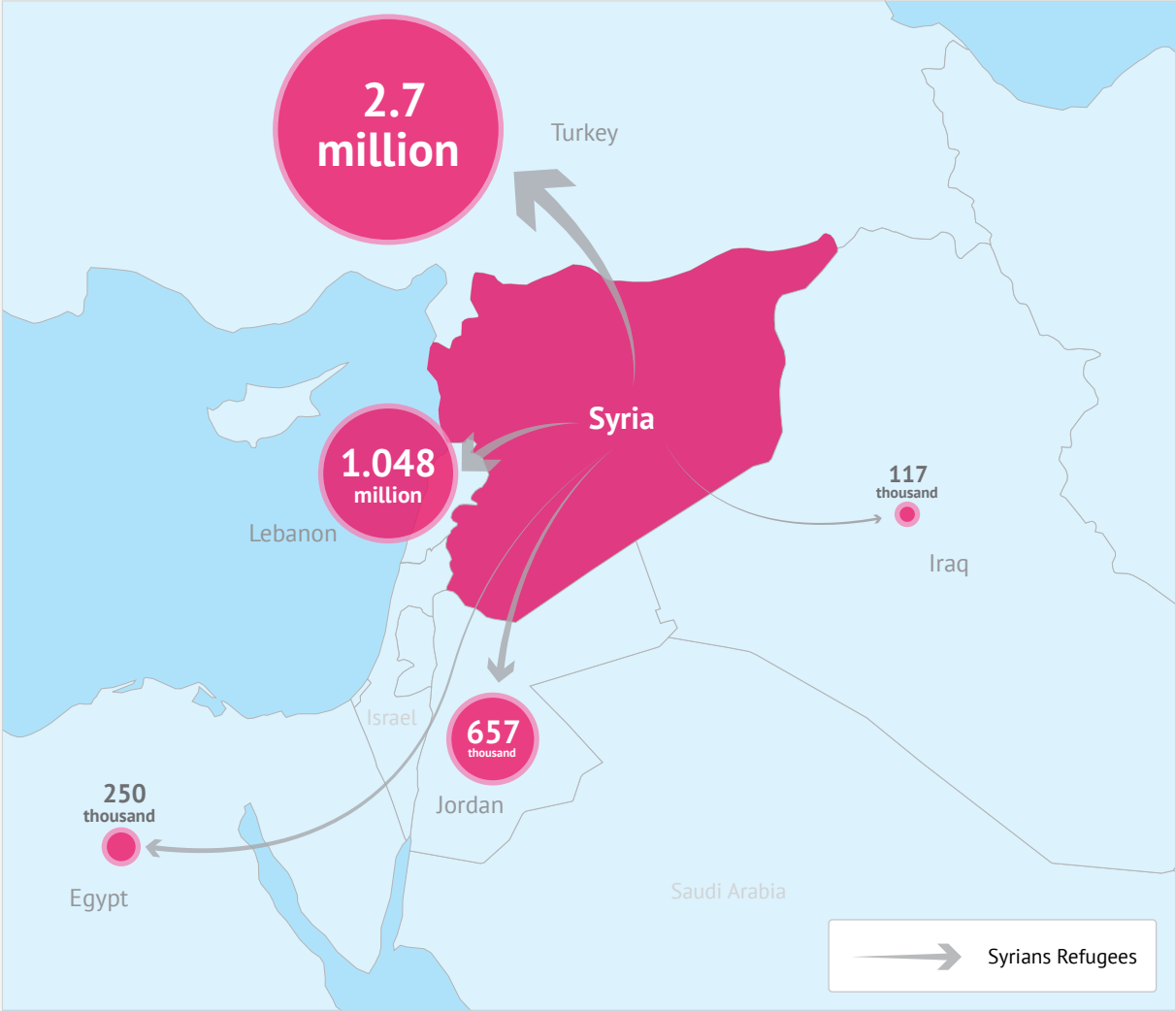
⁷⁷ See Tuesday Reitano and Mark Shaw, *Fixing a fractured State? Breaking the cycles of crime, conflict and corruption in the Sahel*, April 2015, and M. Shaw and F. Mangan, *Profits and Losses: Illicit economies and emerging patterns of organised crime as obstacles to peace and state consolidation in Libya*, Washington DC, United States Institute of Peace, 2013

⁷⁸ *Ibid*



Migration, Refugees and expanding addiction

Figure 20: Internally displaced people (IDP) in Syria and countries in the region (September 2016)



Source: UNHCR (2016) Syria Regional Refugee Response. Available at: <http://data.unhcr.org/syrianrefugees/regional.php>

As drug trafficking sprawls, so does the potential for addiction and increased abuse of captagon by Syrian nationals, both within Syria and amongst the refugee population. According to the UNODC, "...studies on the mental health of populations displaced by conflict have brought out the links with post-traumatic stress disorder and depression, both potential triggers for initiating or escalating drug use".⁷⁹ At latest estimates, there are about 6.6 million internally displaced persons within Syria, and a further 5 million within the region (see map 12). With the level of intensity of the conflict and the destitution and pain this brings to people affected by the conflict; drug abuse is an understandable escape. Yet this challenge is neither well researched nor recognised as having potential long term consequences for the post-conflict development of Syria as well as the wider region.

⁷⁹ UNODC, World Drug report 2016 p. 70

Instability in Turkey

With the attempted coup in July 2016 in Turkey, the situation for opiate and captagon traffickers may well change further. At the end of July, President Erdogan declared a state of emergency and removed over 60,000 Ministry of Interior personnel, including officers from TNP, KOM and the Counter Narcotics department. Within the military and Jandarma, which have jurisdiction in rural areas and the South-East of Turkey, many officers were also removed. This may lead to a weakening of Turkish security and capacity to interdict traffickers as well as an atmosphere of distrust within Turkey and of international partners. Opiate and captagon traffickers may try and exploit the situation and move more illicit drugs through the country. While the Caucasus and the Black Sea are still heavily favoured by opiate traffickers, recent events may incentivise them to move back to the traditional Balkan route trajectories. Due to the cycle between cultivation, production and shipment of Afghan opiates potential changes may be visible in seizures and intelligence within the next 12-18 months.

Law enforcement priorities and capacity

A further challenge is the priority of law enforcement in the region. While countries to the west and north of Syria are aware of trafficking, some have turned to focusing on interdiction efforts at local level⁸⁰ rather than pursuing integrated sophisticated transnational counter organised crime investigations.

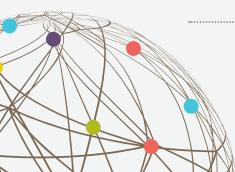
Moreover, international and regional political priorities at the moment are very much focused on illegal migration, migrant smuggling and counter-terrorism. Turkey and Lebanon have received considerable political pressure regarding illegal migration from the EU and Western European countries, which has led to a focus on that issue more heavily than drug trafficking. Other countries, such as Jordan and Egypt have their own challenges and internal conflicts to deal with. For all countries of the region counter terrorism and preventing the spread of war take priority over drug trafficking and further fueling corruption. In all countries, resources for combating organised crime are scarce. Capacity and priorities can often be placed upon acute, though temporary challenges, rather than systemic and long term ones, which combined with a lack of understanding of the relationship between drug trafficking and conflict can further impact the rule of law.

Data and analysis gaps

Lack of comprehensive or accurate data is a difficult problem. Many gaps remain in the data used above, and there are many questions that have yet to be fully addressed. More needs to be researched on the business model of captagon trafficking within the region. Who the actors are, what their organisational structure looks like; from mules to accountants to logistics facilitators or modus operandi, few patterns have emerged. The production and trafficking costs, expected profits and repatriation of proceeds from destination markets to Syria is little understood. No data is available on captagon seizure testing (for active chemicals) at a regional level.

A better understanding of the regional drug market for captagon would also be useful. While it is understood that the primary markets are in the Arab peninsula and East Africa, the size and value of these markets remain an open question. Levels of dependency and prevalence rates, the spread of abuse from primary to secondary markets is not well appreciated. Understanding retail and wholesale prices between different countries and provinces can inform trajectories and concentrations of destination markets

⁸⁰ So called street rips or buy busts



Policy implications

Drug trafficking and organised crime are by their nature a transnational business oriented towards profit. Responses and monitoring have to be equally transnational in nature. While some effective law enforcement cooperation already exists, political forces within some countries in the region have led to a reduction in cooperation for reasons of mutual mistrust, internal politics, or the imposition of external priorities. Engagement with international law enforcement and development actors at senior, but also mid-level, is of great importance. Instances where mid-level law enforcement can work openly with development actors on the ground can be of immeasurable benefit to both. Most importantly, a clear roadmap must be established by political and development actors focusing on what is immediately achievable with the ongoing conflict, post-conflict and long term.

While the conflict continues mapping the dynamics of illicit drugs flows out of Syria as well as better understanding of the precursors is fundamental. With considerable amounts of captagon leaving Syria by sea for Northern Africa or the Red Sea, cooperation and dialogue between national coast guards in the Mediterranean, EUROPOL, NATO patrols in the Aegean and the Combined Maritime Forces (CMF) in the Red Sea would be of benefit now. Though their ability to instruct or improve capacity within Syria and the region in the short term is limited, this longer-term goal should not be overlooked. A current, and regularly updated understanding of law enforcement priorities and capacity at national, regional and international levels would further help to create more efficient transnational containment and disruption efforts.

Development actors should preemptively apply some of the lessons identified in Afghanistan and Iraq as well as Libya and Mali for the immediate post-conflict Syria. Sustainable development is more than providing schools and physical infrastructure for the populace, though these are undeniably important. Understanding the extent of the rule of law in a country, and how to interact with local actors, and the relationship between law enforcement and other public services as well as private business at local, regional and transnational levels, is vital. The similarities and differences between different tribes, sects, and religions in a given province or area, and how they interact with one another is also important, as is their relationship to the central government. Sustainable development actors who work with corrupt officials who can facilitate action on the ground, may lead to short term success, but also leads to a long term undermining of the rule of law, and often negates any substantial progress made in sustainable development, as was witnessed in Afghanistan. Some of this pre-emptive work can be done now in preparation for a post-conflict Syria. When the conflict ends development actors should be in a position to identify challenges to the rule of law and what obstacles (either from the government or non-state actors and organised crime) need to be overcome.

Development strategies and implementation policies should be planned with a mid- to long-term approach. Instilling a sense of the rule of law, which is necessary for sustained development, is a process that takes place over many years, particularly when conflict has stripped away belief in state structures. Taking Afghanistan and Iraq as examples, efforts were focused on military development at the expense of judicial and law enforcement capacity and tackling endemic corruption. This lack of capacity led to many Afghans turning to Taliban courts which were seen as less corrupt.

Looking at the current map of conflict, (see map 11) borders and areas of jurisdiction will be complicated and confused, and will be a complex mix of local and state authority. In the long-term this presents both opportunity and difficulties for drug traffickers, counter narcotic law enforcement and post conflict development actors. Many of the actors on the ground with which development agencies and the UN will have to work with will have some experience/ involvement in drug trafficking and organised crime in general. As shown above



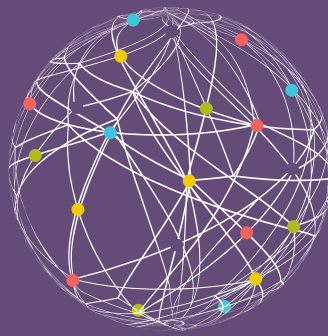
areas currently under FSA and extremist groups are closely linked with captagon trafficking and regime controlled areas are open to both petty and grand scale corruption, if not direct involvement with organised crime. In many cases people on the ground who control logistics networks for licit and illicit goods can also be prominent members of society, who development and law enforcement will have to work with in the mid-term post-conflict Syria.

Weaning these actors off drug trafficking is a long term challenge. In previous examples, such as Afghanistan, international development efforts have met with mixed success, and even reversal, as in the case of increased opium poppy cultivation in Afghanistan despite alternative development efforts.⁸¹ The application of the rule of law must be the cornerstone for any kind of sustainable development in Syria post-bellum. The challenge of organised crime, and drug trafficking specifically, will determine the long term viability of sustainable development in Syria and the wider region.

One view will be that as the conflict is still ongoing, compared to illegal migrant smuggling, kidnapping or oil smuggling, drug trafficking is less of an immediate problem. This would be erroneous. Drug trafficking supports terrorism and hinders development. At a regional and international level, development and law enforcement actors should inform themselves of the challenges that drug trafficking in Syria presents to post-conflict reconstruction and development. It is therefore crucial to the maintenance in the rule of law in the region that monitoring by international actors of drug trafficking and drug abuse be stepped up or face the long term consequences.

⁸¹ New York Times "Tasked with combating opium trafficking Afghan official profit from it" 16 February 2016 <http://www.nytimes.com/2016/02/16/world/asia/afghanistan-opium-heroin-taliban-helmand.html?hp&action=click&pgtype=Homepage&clickSource=story-heading&module=second-column-region®ion=top-news&WT.nav=top-news>





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