



Australian Government



**GLOBAL
INITIATIVE**
AGAINST TRANSNATIONAL
ORGANIZED CRIME

MEKONG

RISK MONITOR



ISSUE No. 3
AUGUST 2026



Australian Government

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ABOUT THE MEKONG RISK MONITOR

Welcome to the third issue of the Mekong Risk Monitor. The monitor is a periodic publication by the Mekong Network to Counter Transnational Crimes (MNET-CTC), a programme implemented in partnership by the Global Initiative Against Transnational Organized Crime and the Australian government. The monitor tracks developments in the illicit economies of

Cambodia, Laos, Myanmar, Thailand and Vietnam, and their intersection with regional development, governance and security issues. It draws on primary and secondary sources, including interviews with key stakeholders such as journalists, state officials and civil society, and open-source data to deliver evidence-based analysis of emerging threats and vulnerabilities.

In this issue

This issue examines drug market developments in the region. The first story provides an update on Thailand's cannabis industry, exploring how legalization has given rise to illegal international drug smuggling.¹ The second story builds on research published in the monitor's second issue, exploring the experiences of drug users in Cambodia as they navigate the country's punitive legal system and inadequate rehabilitation programmes. The third article takes stock of ketamine production in Vietnam: one year after a major production facility in Nha Trang was dismantled, we look at what the case tells us about Vietnam's role in the Mekong's synthetic drug economy.

This issue also provides insights into other regional vulnerabilities. Taking the example of the Sithandone special economic

zone (SEZ) in Laos, currently under construction, the fourth article looks at the risk of the geographically isolated gambling and tourism hub becoming yet another criminally infiltrated SEZ in the Mekong region. The final story looks at the increasing monetization of child sexual abuse material in Cambodia and how it is easily accessible through social media platforms.

Collectively, these stories illustrate how organized crime in the Mekong does not emerge from a single vulnerability, but from an interconnected ecosystem of enablers and facilitators, underlining the need for comprehensive, holistic regional responses that address root causes and tackle enforcement gaps.

THAILAND'S CANNABIS BOOM HAS BECOME A PIPELINE FOR ILLICIT EXPORTS

Four years after cannabis was de facto legalized in Thailand, smuggling operations from the South East Asian kingdom are a thriving business. Tonnes of illicit cannabis are seized at the main Thai airports every year, while seizures of Thai cannabis in Germany, Italy, the UK, Indonesia and Hong Kong have also spiked.²

Unclear division of competencies among key agencies and a regulatory limbo have created loopholes for mules, criminals and opportunists. In July 2026, Thai Prime Minister Anutin Charnvirakul – leader of the Bhumjaithai Party, which led the cannabis liberalization movement – once again warned he may shut down the cannabis industry and re-criminalize the plant due to increased smuggling operations.³ But amid weak oversight in a flourishing industry, it is unclear how the genie can be put back in the bottle. This article explores the current legal framework on cannabis use, distribution and exports, as well as potential ways forward for a stronger regulatory environment.

The rise of Thailand's cannabis economy

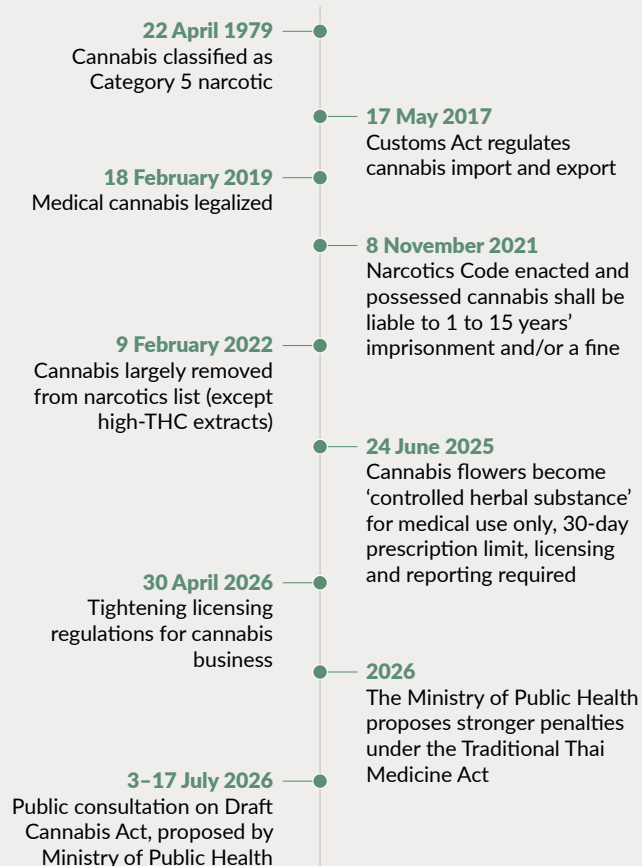
As of July 2026, cannabis is classified as a 'controlled herb' in Thailand. Domestic possession and sales are legal for medical purposes and commercial use is authorized for individuals over the age of 20, though sales are prohibited to pregnant women and breastfeeding mothers.⁴ Cannabis products are also banned from schools and universities, and smoking in public can result in a fine.⁵ Furthermore, unauthorized exports and processing remain illegal.⁶

Thailand first legalized the medical use of substances scheduled as Category 5 narcotics, including cannabis, hemp and kratom, with an amendment to the country's Narcotics Act in February 2019, making it the first South East Asian country to do so. Authorities initially only approved licences to grow cannabis for the medical market to state agencies and scientific institutions, before cultivation was gradually opened to non-state actors in early 2021.⁷

In February 2022, the Thai Ministry of Public Health (MOPH) then removed most parts of the cannabis plant from the Category 5 narcotics list. The change, which took effect on

9 June 2022, effectively decriminalized the plant, though restrictions remained on cannabis extracts containing more than 0.2% of the cannabinoid THC.⁸ While this move was supposed to be accompanied by a dedicated Cannabis and Hemp Act that would regulate the plant's production and sale, the proposed bill failed to secure sufficient parliamentary support. In the following months, government officials mobilized policy instruments to regulate the rapidly expanding market, often creating confusion amid an increasingly polarized debate.⁹ However, overarching legislation continued to stall and was eventually withdrawn from parliamentary consideration amid major political tensions in the lead-up to Thailand's 2023 general election.

TIMELINE OF CANNABIS RELATED LEGISLATION



The years since have seen Thailand's cannabis industry flourish despite persistent regulatory uncertainty. But cannabis dispensaries were handed a major blow on 1 April 2026, when the MOPH announced they would be given three years to transition into medical clinics.¹⁰ The move to again restrict cannabis to only medical use has been described as 'the beginning of the end' for the four-year period of legal uncertainty characterized by repeated policy flip flopping.¹¹ But the move has also been criticized by advocates and experts, who have raised concerns about how the policy will be enforced, as well as its potential to push dispensaries towards the illicit market.¹²

While this move takes a stride towards resolving the legal ambiguity, government agencies are still grappling with how to effectively regulate Thailand's cannabis industry. The main government agency responsible for regulating the cannabis market is the MOPH, an agency with a health rather than a security focus. While it collaborates with the Office of the Narcotics Control Board (ONCB), Thailand's drug control body, in practice the ONCB can no longer conduct arrests for cannabis smuggling as it did before 2022, with enforcement and export controls having shifted almost entirely to the Thai Customs Department.¹³ The Customs Department has limited capacity to intercept the high volume of illicit drugs leaving the country.¹⁴

Thailand's cannabis boom goes global

The 2022 cannabis reforms had immediate and very visible effects across Thailand. Cannabis dispensaries mushroomed across the country, offering dozens of strains of cannabis flowers, pre-rolled joints, bongs and other paraphernalia. By April 2026, there were an estimated 11 000 cannabis dispensaries operating across the country.¹⁵

By March 2023, MOPH data indicated that 1.38 million individuals had been granted licences to grow cannabis,¹⁶ while nearly 200 licensed cannabis farms were operating legally across the country by March 2026.¹⁷ This diversity of producers and production sites has created conditions that are difficult to supervise and control, and there appear to be currently no reliable and comprehensive estimates on the quantity of cannabis grown across Thailand annually.

Widespread availability and limited controls over production and distribution have created ideal conditions for smuggling operations from Thailand to the international market. This is reflected in official seizure data: while in 2024 only 786 cases of cannabis trafficking were recorded (amounting to 4 598 kilograms), this had surged to 3 135 cases (34 719 kilograms) in 2025. In January 2026 alone, 464 cases were recorded with a total weight of 6 500 kilograms.¹⁸

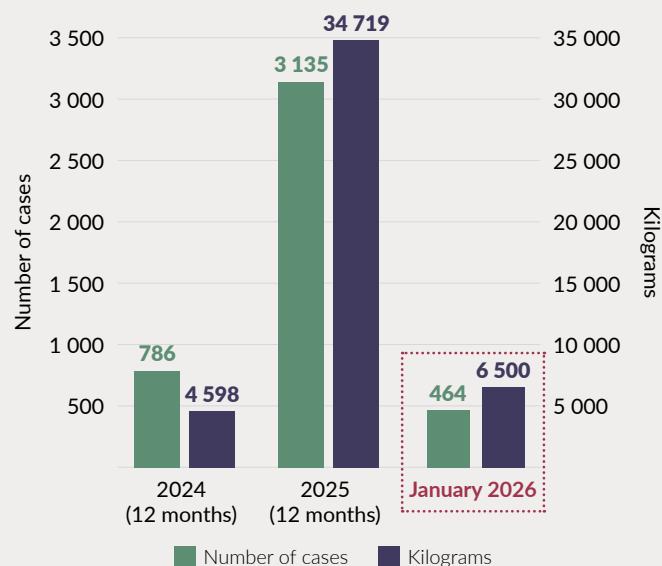


FIGURE 1 Cannabis seizures in Thailand, 2024–January 2026.

Thailand is a regional airport hub with connections to global destinations, and much of the cannabis is trafficked through airports. Between February and December 2025, a task force working to intercept cannabis at Thailand's major airports recorded 789 cases of attempted cannabis smuggling.¹⁹ This resulted in the seizure of approximately 19 200 kilograms of cannabis, worth approximately THB 144 million (approximately US\$4.4 million). '[Cannabis] seizures have become a daily routine for us,' confirmed Siwachat Chattratratri, a senior investigator with the Thai Customs Department.²⁰ Chattratratri explained that, while previously cannabis was often hidden inside electronics, dried food or among clothing, officers now often find it directly inside suitcases.²¹

The most common airports used to traffic cannabis to Europe include Bangkok's Suvarnabhumi Airport, as well as smaller regional airports in Koh Samui, Chiang Mai and Surat Thani, which are used to bypass the more stringent screening systems in the capital.²² Key international destinations for attempted smuggling are shown in Figure 2.²³

Other trafficking methods include postal services and maritime shipments. For example, in 2025 the ONCB reported 2 385 arrests related to parcels containing a total of 4 658 kilograms of cannabis valued at THB 67.02 million (more than US\$2 million).²⁴ While the frequency of maritime seizures is lower – only seven maritime interceptions were made in 2025, involving 6 055 kilograms valued at THB 87.30 million (US\$2.6 million)²⁵ – the volume per seizure is significantly higher, often exceeding 1 tonne.²⁶

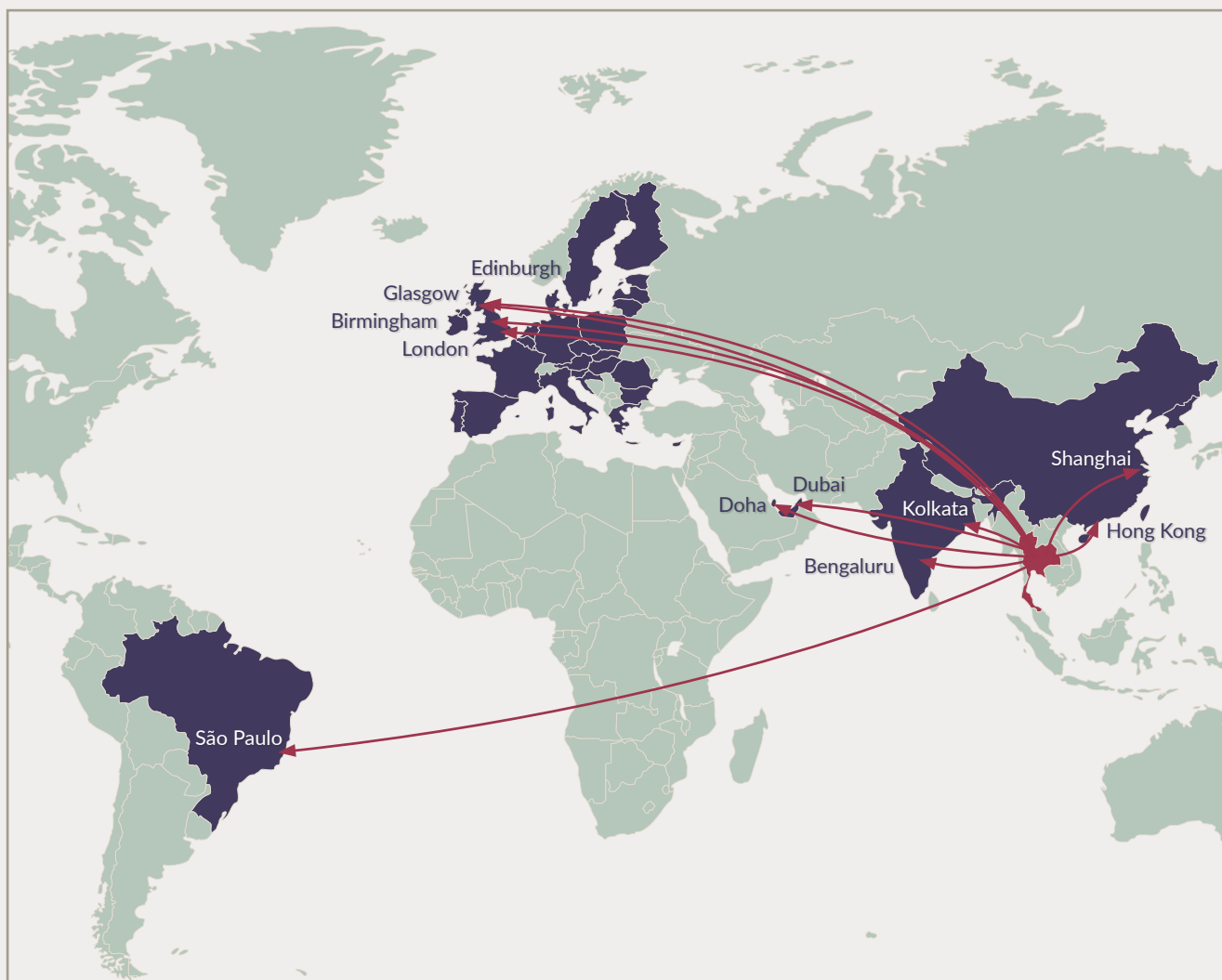


FIGURE 2 Selected major international destinations for Thai cannabis trafficked by air.

Seizures of Thai cannabis are also being made at transit points or destinations. For example, the UK arrested almost 200 people linked to the illegal smuggling of cannabis from Thailand in 2024 alone.²⁷ On 7 July 2026, Italian authorities also found 700 kilograms of hashish in a container of bananas that originated in Thailand.²⁸ Similarly, German authorities said they had seized 1 200 kilograms of cannabis from Thailand in Hamburg throughout May and June 2026.²⁹ More information on the routes, transit hubs and final destination markets is needed to better understand where the Thai cannabis ultimately ends up and who profits. A clearer picture of the supply chain would help identify strategic intervention points to disrupt trafficking networks from source to destination.

Opportunists or criminal networks?

The shifting of responsibilities among Thailand's enforcement agencies in relation to cannabis has resulted in major enforcement issues. Cannabis's ambiguous legal status in recent years means customs officials no longer transfer cases of criminal networks to the police for expanded investigations, a standard practice in the past.³⁰ This has resulted in Thai law enforcement having limited understanding about the individuals and networks behind the surge in cannabis trafficking.

The ONCB's deputy secretary-general believes that networks involved in cannabis trafficking most likely overlap with those smuggling other illicit substances. In Europe, it appears that

buyers have established links with Thai suppliers using social media platforms, such as X, to coordinate and ensure that the couriers they dispatch receive high-quality products that meet specific market demands. By controlling distribution to individual couriers, this also allows them to control product quality and secure specific cannabis varieties.³¹ This has been confirmed by the UK's National Crime Agency, which suggested the illicit trade relies on a professionalized recruitment model where organized crime groups lure couriers through social media with promises of paid travel.³² Elsewhere in Europe, couriers are recruited with a free trip to Thailand and €6 000 if they can bring a suitcase filled with cannabis back to Europe.³³

Couriers are recruited globally: individuals coming from 47 countries were apprehended at Thai airports between February and December 2025. Of those, British nationals were the largest group, making up 53.4% of all arrests (421 people³⁴). This was followed by Malaysians (52 individuals), Indians (49), French (37), Thais (28) and Americans (21).³⁵

It also seems relatively easy for buyers to procure products directly from cannabis farms or retail dispensaries. With Thailand's domestic market flooded with cannabis, many smaller producers supply their products to illegal overseas markets to make a profit.³⁶ A Thai cannabis legalization advocate and former dispensary owner also explained that Thai sellers do not necessarily know the destination of their products and may be unaware they are destined for trafficking.³⁷

Putting the genie back in the bottle

Thai authorities have justified the country's cannabis reforms as an economic venture offering major benefits to rural farmers and to boost tourism.³⁸ While studies have confirmed the economic benefits,³⁹ there is mounting evidence it is also fuelling

organized crime, with experts arguing that cannabis is being hijacked by criminal networks.⁴⁰

Although the 2026 legal reforms restricting cannabis once again to medicinal purposes have to some extent fixed the legal ambiguity surrounding the industry, this is unlikely to curb Thailand's growing illicit cannabis trade. Experts have already warned that this move is likely to push operators who cannot fulfil new regulations further into the illicit market.⁴¹ A new penalty introduced by the Thai customs authority is likely only going to target lower-level couriers rather than the criminal networks behind the operations.⁴²

More robust political reforms will be required to find a policy solution that regulates both the domestic market and reduces the incentives for trafficking. While the Bhumjaithai Party, the initial advocator for liberalization, is back in government, it is unclear to what extent they are willing to enact further regulation. As of July this year, the Department of Thai Traditional and Alternative Medicine has prepared a sweeping new Cannabis Control Bill that would restrict it once again to medicinal use, and introduce stricter licensing measures and criminal penalties for offenders. The proposed legislation, which would create a single regulatory framework for the industry, is expected to be submitted to the Cabinet soon for consideration.⁴³

Thailand urgently needs to find a regulatory approach to cannabis and include organized crime in its considerations. The situation requires a swift solution that allows for comprehensive oversight of the entire industry – covering cultivation, processing and distribution, as well as import and export activities. The local industry is unlikely to go away any time soon, but establishing a clear system for tracing the origin of cannabis products can empower law enforcement to target the criminal networks seeking to traffic it abroad.

CONFINEMENT INSTEAD OF CARE: CAMBODIA'S DRUG REHABILITATION CENTRES

Drug use is a serious concern in Cambodia. Thousands of people are arrested each year for drug consumption and low-level distribution. Official figures show that in 2025, Cambodian authorities detained 26 421 drug-related suspects, up 1.49% from 2024.⁴⁴ Despite the prevalence of drug use, there is little data on the country's consumption dynamics and limited awareness of the harms associated with drug use, or where to seek support. Many users who get arrested are trapped in a vicious cycle: they are detained and confined, but upon release often return to drug use.

People convicted of drug-related offences make up almost half of Cambodia's prison population. Inside, they experience overcrowded and unsanitary conditions, and drug treatment programmes are non-existent. Drug users report that the alternative, rehabilitation centres, function more as sites of punishment than treatment, offering a temporary pause in addiction rather than a solution.

Through interviews with drug users and civil society groups, this article explores the situation in rehabilitation centres and prisons, and discusses how civil society aims to reduce discrimination

and stigmatization related to drug use in Cambodia. It complements research published in issue 2 of the Mekong Risk Monitor, in which researchers conducted a survey with current and former drug users in Phnom Penh, Pursat province and Sihanoukville to better understand consumption patterns and prices in Cambodia's drug market.⁴⁵

Punishment disguised as help

In Cambodia, when drug users are arrested and test positive, they generally have three options: pay bribes, undergo compulsory rehabilitation or face court and risk imprisonment. Cambodia's Drug Control Law (2012) gives prosecutors and courts discretion to divert drug offenders away from imprisonment towards rehabilitation programmes, but in practice this option is rarely exercised.⁴⁶ According to official statistics from the Cambodian Ministry of Interior, as of March 2024, 45 122 people were imprisoned across the country, of which 21 644 (or 48%) were held for drug offences, including 2 214 minors.⁴⁷

If drug users enter compulsory rehabilitation, they are likely to be admitted to one of Cambodia's 18 rehabilitation centres. These include six state-run facilities and 12 centres operated by private organizations or NGOs, which are located in nine provinces, as well as the capital, Phnom Penh.⁴⁸

The state-run facilities are managed by the Department of Rehabilitation under the National Authority for Combating Drugs (NACD) and aim to provide medical treatment, counselling and psychological support to drug users. According to NACD data, approximately 20 000 drug users are currently receiving treatment at these health centres, provincial hospitals and national medical institutions.⁴⁹ Most patients are typically treated for six months, though under the Law on Drug Control, detention can extend to up to two years.⁵⁰ In practice, however, drug users with experience in the system report that many are yet to access treatment and continue to live with their families.⁵¹

Interviews with drug users revealed that even when they are admitted to rehabilitation centres, they endure punishment rather than treatment. Several users who had been treated at a rehabilitation facility described it as a space of confinement, strict discipline and fear. Punishments, including beatings,

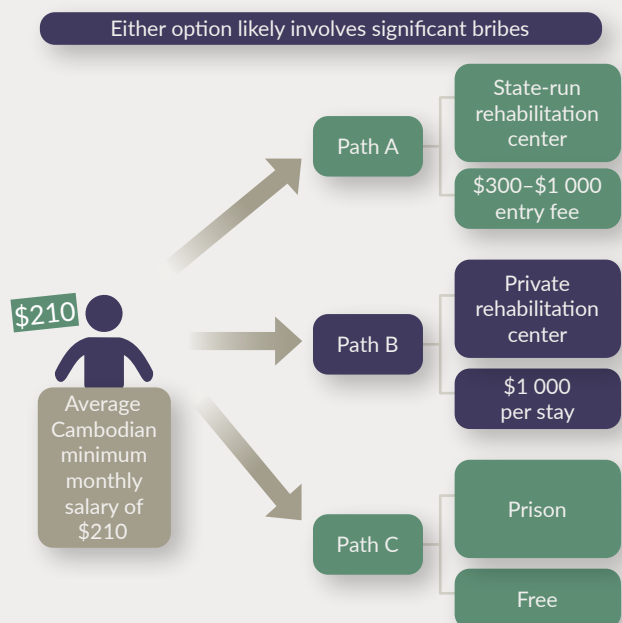


FIGURE 3 Rehabilitation or incarceration: the cost to the drug user.

appear to be common, even for minor infractions.⁵² The food was often described as poor, and lacking taste or nutritional value. Other patients explained that they were treated like criminals, rather than people who need help.⁵³

Corruption is another problem. While state-run facilities are officially free, in practice paying an 'entry fee' along with monthly 'donations' are needed to secure a place.⁵⁴ In 2012, the UN Office on Drugs and Crime (UNODC) reported that the entry fee was in the region of US\$100 to US\$200, with

the monthly fee around US\$50.⁵⁵ These costs have increased since, with interviewees reporting that entry fees now range from US\$300 to US\$1 000.⁵⁶

Private rehabilitation centres have a reputation for offering better care, but also charge significantly more for treatment. One user in Pursat province reported staying at a private rehabilitation facility for about six months after his mother had paid roughly US\$1 000 for admission,⁵⁷ equivalent to five times the minimum monthly salary in Cambodia (US\$210).⁵⁸

BRIBERY AND CORRUPTION

Corruption and bribery are common in the system, with drug users reporting that they have been asked to make unofficial payments at various points.

The first request for a bribe often comes immediately after arrest, with users and lower-level dealers reporting that police target them if they are known to be able to afford to pay bribes or have family members able to do so.⁵⁹ If users are arrested with drugs in their possession, and therefore face a harsher punishment,

payments are higher, as they may involve lawyers facilitating bribes to trial judges to reduce charges or sentences⁶⁰ and to the court to issue fabricated reports.⁶¹

Bribes are also paid to reduce sentences, change legal proceedings from mandatory court to rehabilitation, or at rehabilitation centres and prisons to receive food and other basic necessities, or allow family visits or medical treatment.⁶²

Civil society groups have widely criticized Cambodia's drug rehabilitation treatment, saying the services offered and the amount of time spent by drug users at centres is insufficient for recovery.⁶³ This was confirmed by various previous patients, who explained they received little to no psychological counselling and were not given medication to manage withdrawal symptoms.⁶⁴

Drug users who have passed through Cambodia's rehabilitation centres have described them as a temporary pause in addiction but not a permanent solution.⁶⁵ Patients often relapse after release or end up in rehabilitation centres several times. For example, Sokha, a 26-year-old drug user in Sihanoukville spent one year in a state-run rehabilitation centre, where he reported being beaten and given poor food. 'I didn't get proper care or medicine to help me stop using drugs,' he said. 'Because of this experience, I did not want to return.' Shortly after his release he relapsed and returned to using crystal methamphetamine.⁶⁶

Detention and overcrowded prisons

Cambodia's prisons are heavily overcrowded, and the country ranks among the world's top 20 for prison population per 100 000 people.⁶⁷ Human rights NGO Licadho, which monitors prisons in Cambodia, has documented overcrowded

and unsanitary conditions throughout the prison system.⁶⁸ The organization said detainees, including children, routinely report inadequate access to food, clean water, sleeping space and family contact, and are often forced to pay for necessities. Licadho reported that inmates' access to basic needs, family visits and even out-of-cell time often depend on cash payments.⁶⁹ Those without money face the harshest conditions, including sleeping on bare concrete floors, forced labour and limited exposure to daylight and fresh air.⁷⁰

In addition to prison overcrowding, lengthy pre-trial detention is a persistent issue, with NGOs reporting that in some cases it lasts longer than the minimum sentence for the offence itself.⁷¹ As of December 2024, approximately 75% of inmates in Cambodian prisons were in pre-trial detention and not yet convicted of a crime.⁷²

Offsetting an enforcement-heavy approach

Cambodia's approach to drug users is overly reliant on incarceration, and is punitive and heavy handed. The country has been criticized for its hard-line approach, human rights violations and lack of transparency in the justice system.⁷³

Civil society is at the forefront of providing practical support to people who use drugs, including those released from prison or rehabilitation centres. They also run alternative, community-based rehabilitation spaces, often placing themselves at risk of being targeted by law enforcement. These organizations – based in the capital as well as several provinces throughout the country – provide a critical range of services, from harm-reduction outreach and health referrals, to counselling, vocational training and family reintegration support. They also assist individuals in accessing healthcare, social protection and employment opportunities, helping to stabilize their lives after detention or treatment,⁷⁴ and advocate for improved conditions in prison and government-led rehabilitation centres, especially for minors, pregnant people and mothers with young children.⁷⁵

Civil society also plays a key role in working to reduce the widespread discrimination and stigmatization of drug users in Cambodia, which reinforce their isolation and vulnerability, and undermine efforts at rehabilitation and reintegration. One former user explained: 'During my drug use, many people avoided me. They thought drug users cause chaos and are bad people.'⁷⁶ He added: 'Even now, after stopping, people still fear me. They do not want me near them, worried that I might steal their motorbikes, phones or other belongings.'⁷⁷

Civil society is stepping in where the state is falling short. Organizations provide community-led peer support networks and access to healthcare, mental health services and social support groups. They also help drug users access legal

representation and alternatives to detention and forced rehabilitation. This, however, remains challenging given the high case load and lack of funding, capacity and diverging perceptions of drug treatment.⁷⁸

Implications

The challenges around drug use and rehabilitation in Cambodia are not new, and neither are the concerns about the punitive nature of the current response. What is increasingly uncertain is whether the existing system will be able to cope with a changing drug market. As a wider range of synthetic drugs become available, the needs of people who use drugs are likely to become more varied and complex. At the same time, rehabilitation services are poorly equipped to provide appropriate care, be it medical, psychological or longer-term support.

Limited political will to move away from the status quo continues to impede progress. Cambodia's response remains heavily focused on punishment, with insufficient emphasis on prevention, education, treatment and rehabilitation. Changing this would require reforms to policing and criminal justice practices, stronger crackdowns on corruption, and for law enforcement agencies to target large-scale traffickers as opposed to people who use drugs or lower level distributors. Without such changes, limited rehabilitation and reintegration opportunities and persistent stigmatization are likely to deepen the vulnerabilities faced by people who use drugs and their families, pushing many into even more precarious situations.

MORE THAN A CORRIDOR: IS VIETNAM BECOMING A KETAMINE PRODUCTION COUNTRY?

In the early hours of 22 March 2025, Vietnamese police raided what authorities described as the largest synthetic drug production facility ever dismantled in the country.⁷⁹ The operation in the southern coastal city of Nha Trang was not a small, improvised laboratory. According to Vietnamese reporting, it involved a main production site, a separate storage location and a finishing site in the city.⁸⁰ Police seized 1.4 tonnes

of ketamine, with purity reportedly close to 99%, and almost 80 tonnes of precursor chemicals.⁸¹ The alleged ringleader, a Taiwanese national, had reportedly entered Vietnam in 2021 under the cover of an ornamental fish farming business, leased a 1 000-square-metre plot and another 300-square-metre plot, and recruited Chinese, Taiwanese and Vietnamese nationals as chemists and workers.⁸²

The case raises key questions about Vietnam's role in the region's synthetic drug trade. Vietnam has long been regarded primarily as a transit country through which methamphetamine, ketamine and other drugs are moved and stored between production hubs, consumer markets and export routes.⁸³ If ketamine is also being produced in Vietnam, that could represent a qualitative shift in the synthetic drug landscape. Unlike transit

and consumption, production embeds criminal activity more deeply in the local environment, as premises must be secured, equipment installed, chemicals sourced, labour recruited and protection bought. The Nha Trang case therefore raises a central question: was this an opportunistic outlier, or is Vietnam becoming part of the Mekong's synthetic drug production geography?



FIGURE 4 Aerial photography showing the location of the drug production lab in Nha Trang.

Evidence of production, but not yet a pattern

All available data points to Nha Trang as a scaled and sophisticated operation. Vietnamese authorities reported that the network used a two-stage process, including the production of an intermediate substance that was refined into finished ketamine. Cover stories were used to explain the movement of chemicals, equipment and unusual activity at the site, including fish farming businesses and production of additives for wastewater treatment.⁸⁴

The location was also strategically chosen. Nha Trang is a coastal tourism and transport hub, but the facility was set up in a secluded area. That combination of connectivity and concealment suggests Vietnam's attractiveness may lie in its proximity to major production and consumption markets like Myanmar and China, respectively, but also in its access to ports, airports, highways and domestic commercial infrastructure.

Nevertheless, there are information gaps around the facility and Vietnam's broader role in the ketamine market. It is not clear whether this was the network's first production cycle or how much ketamine it had previously produced, and whether there are other linked operations in Vietnam or the Mekong.⁸⁵ Officials said the product was likely destined for Taiwan⁸⁶ and had found no evidence it had already entered circulation.⁸⁷ A Vietnamese drug expert described the case as a 'sentinel event', as the industrial nature of the production operation raised concern of systemic shifts.⁸⁸

The Nha Trang case also raises questions about Vietnamese enforcement capacity, as monitoring began only after Chinese authorities shared intelligence on suspected illegal drug production. This resulted in months-long tracking by Vietnam's drug investigation unit before they finally intervened.⁸⁹ Media reporting notes that authorities disrupted the facility before the ketamine had reached its intended market.⁹⁰ But by the time police intervened, the network had allegedly leased land, installed industrial equipment, imported or sourced chemicals, recruited technical personnel and begun production. For a production operation of this scale, this is not a minor issue: it raises questions about the efficacy of precursor monitoring, business registration checks, local reporting mechanisms, inter-agency coordination and the ability of authorities to identify suspicious chemical or equipment procurement before production begins. It may not be a question of official complicity, but it does suggest the operation passed through regulatory, commercial and administrative touchpoints that either failed to detect it, were bypassed or may have been informally facilitated.

And although this case has attracted significant media attention, it is not the first time questions about Vietnam's role in the ketamine market have been raised. In 2023, Vietnamese

authorities dismantled a major staging operation in Hai Phong, a port city, where 1.2 tonnes of ketamine had been concealed in cement sacks for export.⁹¹ However, one regional law enforcement officer cautioned against overstating Vietnam's role in regional drug production. While smaller laboratories may exist, no other Vietnamese facility comparable to Nha Trang has ever been uncovered. Meanwhile, the limited visibility of operations in Laos and Myanmar means there is significant uncertainty over their scale.⁹²

A shifting Mekong drug market

The Nha Trang case appears to be in line with broader developments in the Mekong synthetic drug market, both in terms of drug production and use.

On the production side, the UNODC's 2025 report on synthetic drugs in East and South East Asia placed Vietnam alongside Cambodia and Laos as part of an expanding ketamine production geography.⁹³ In 2020, Cambodian authorities dismantled 16 industrial-scale ketamine labs and storage facilities.⁹⁴ In November 2023, Lao and Chinese authorities also targeted a large transnational ketamine-related manufacturing network in Bolikhamsai province, Laos.⁹⁵

The UNODC report found that synthetic drug production and trafficking in the region is being driven by agile, well-resourced transnational organized criminal groups, while also noting that trafficking groups are increasingly using front companies and legitimate business structures – not unlike the Nha Trang case.⁹⁶ A cautious interpretation of how Nha Trang may fit into this trend is that ketamine production in the Mekong is becoming more geographically flexible. This is concerning given that ketamine is often seized as part of larger poly-drug consignments involving methamphetamine, MDMA or ecstasy, and labs can be re-fitted to produce other synthetic drugs if the precursors and technical knowledge are available.⁹⁷

Meanwhile, the Mekong's synthetic drug consumption patterns are undergoing important changes, with drug users now able to access several products (such as ketamine, etomidate and 'Happy Water'⁹⁸ – a drug cocktail mixed into drinks) in a market once dominated by methamphetamines.⁹⁹ This was confirmed by a wastewater analysis conducted in Hanoi between 2018 and 2023, which indicated a considerable rise in ketamine consumption, with samples indicating its concentration had overtaken methamphetamine by between 2022 and 2023.¹⁰⁰ Although this does not show that ketamine use is dominant across Vietnam as a whole (wastewater findings are local, not national estimates), it indicates that ketamine use has become widespread in the capital. Increased local production may therefore not be driven solely by exports, but also in response to increased local demand.

This also matters from an organized crime perspective because production, transit and consumption reinforce one another. Domestic demand creates retail distribution networks, transit creates logistics capacity and, importantly, production creates a deeper embedded footprint consisting of chemical sourcing, business cover, premises, labour and protection. If all three are present in the country, Vietnam becomes more than a corridor.

Warning signs to monitor

The Nha Trang lab may therefore represent a broader regional pattern. While it would be too soon to say with certainty that, from this case, Vietnam has become a consolidated ketamine production hub, the dismantling of the lab, Vietnam's role in regional trafficking routes and its local drug market all point to a set of layered vulnerabilities. Nha Trang should therefore not be treated as an isolated incident but as a warning sign that Vietnam is part of a broader regional development.

This has important implications for the future of the Vietnamese drug market. If ketamine production were to expand, it is likely to connect into existing logistics rather than create an entirely separate market. Rising urban demand may also create incentives for criminal groups to establish production closer to consumer markets, reducing transport risks and allowing supply to

feed both domestic and export channels. The same networks or facilitators may move multiple synthetic drugs, share storage, exploit legitimate businesses and use existing border corridors.

It also has implications for response. Despite the active monitoring and enforcement by Vietnamese law enforcement, the case raises questions as to how the facility operated undetected for so long and what conditions enabled drug production. It is therefore important to examine regulatory loopholes (particularly around precursors and cover industries), strengthen early detection and responsive efforts, and improve international cooperation and intelligence sharing to better understand trafficking routes and actors involved.

To gain a better understanding of Vietnam's role in the regional drug market and policy requirements, what needs to be monitored next is recurrence. Further production site detections would be the clearest signal. But there are other indicators, including unusual imports of laboratory equipment and glassware, chemical orders inconsistent with declared business activity, foreign-linked chemists or investors linked to small industrial facilities, and precursor movements through Vietnam's borders and ports. If that capacity expands, Vietnam's role in regional drug markets will have shifted from transit to something more difficult to disrupt.

WHAT MAKES SPECIAL ECONOMIC ZONES VULNERABLE TO ORGANIZED CRIME? THE CASE OF SITHANDONE SEZ IN LAOS

SEZs are designed to attract foreign direct investment, drive industrial development, generate employment and enhance regional trade integration.¹⁰¹ But in Laos, as in many other places in the Mekong region, they have also proven vulnerable to infiltration by organized criminal groups.

Providing relaxed regulatory environments and fragmented oversight, SEZs facilitate the generation and laundering of illicit proceeds in a multitude of ways.¹⁰² There are several factors that increase the criminal risks of an SEZ: its location; its governance structure; the type of economic activity within the

SEZ; and other enabling factors like infrastructure, connectivity and corruption.

Sithandone SEZ (formally the Mahanathi Siphandone SEZ), situated 700 kilometres south of Vientiane, is one of Laos's lesser-known SEZs. It is considered a critical node connecting Laos to the other Mekong region countries.¹⁰³ While organized crime is yet to be documented in the zone, Sithandone combines several criminogenic elements that typically render SEZs susceptible to organized crime infiltration, not least the presence of a major casino.

Sithandone SEZ

Laos laid the foundation for SEZ development in 1986, when the New Economic Mechanism¹⁰⁴ liberalized its state-run socialist economy, attracting foreign investment and expanding private sector participation.¹⁰⁵ The country's first SEZ, the Savan-Seno SEZ, was established in 2003, followed by the Boten Beautiful Land SEZ later that year, and the Golden Triangle SEZ in 2007.¹⁰⁶ In 2010, Laos promulgated the Decree on Special Economic Zones and Specific Economic Zones, establishing a formal regulatory and governance framework for SEZs.¹⁰⁷ The National Committee for SEZs was also established in 2010 to oversee implementation.¹⁰⁸

First approved in 2018, Sithandone SEZ has promised to transform rural Khong District and the Siphandone region into a modern urban economic hub. In 2023, Prime Minister Sonexay Siphandone oversaw a high-profile groundbreaking ceremony for a luxury hotel at the site.¹⁰⁹ It is being developed as a joint venture between Hong Kong firm Laos Maha Nathi Sithandone Investment Co., Ltd. and the Laos-based LTV Road and Bridge Construction Sole Co., Ltd., with a capital commitment of US\$9 billion, to be implemented across six phases until 2050.¹¹⁰ A representative from the Ministry of Industry and Commerce said the zone seeks to attract foreign direct investment from China, Hong Kong and nearby ASEAN countries, such as Vietnam and Thailand.¹¹¹

Sithandone SEZ is situated at the so-called Emerald Triangle, where the borders of Laos, Cambodia and Thailand converge. This proximity enhances its vulnerability to organized crime.¹¹² The zone's vicinity to Cambodia is a risk factor, as ongoing law enforcement crackdowns on cyber scam operations there have displaced criminal networks, who may establish themselves in Laos or use it as a transit country to reach Myanmar.



The Mon Mon Hotel and resort sits at the centre of Sithandone SEZ. It also houses the zone's management office and casino. Photo supplied

Economic activity

The SEZ's development has been grouped into multiple phases. Plans include developing luxury tourism assets such as a golf course, a casino, luxury villa resorts and the landmark Khaen twin towers.¹¹³ Future phases may include the development of an airport, a hospital and other manufacturing industries, although the status of these projects is unclear.¹¹⁴

The SEZ's first development phase was initially slated to run from 2018 to 2025 using investment funds of US\$600 million, but development has been beset by delays. Field research conducted in April 2026 showed that core infrastructure, such as a ring road and newly integrated water and electricity grids, are now complete. The resort, hotel and initial phase of the golf course also appear operational, while the casino and associated hotel appear complete, though not yet open.¹¹⁵

Initially, the SEZ's construction boosted local trade and contributed to the growth of small to medium-sized guest-houses. However, since then many of the workers have left and construction has stalled after wages allegedly went unpaid.¹¹⁶ These accounts align with a local officer's statement, who described a significant labour outflow and inactivity in the zone over recent years.¹¹⁷



FIGURE 5 At a porous crossroads: Sithandone SEZ.

The local population have also said they are yet to see any real benefits from the development,¹¹⁸ including cash compensation promised to them as part of a comprehensive resettlement programme.¹¹⁹ According to locals, many households that lost land to the project have yet to receive adequate compensation.¹²⁰

Governance

Sithandone SEZ's governance structure is broadly similar to that of other SEZs in Laos and follows a 2018 presidential decree, which established a standardized governance model.¹²¹ In practice, this means that the zone is overseen by the Champassak Provincial Special Economic Zone Management Authority, while day-to-day development and operations are managed by Sithandone Joint Development

Co., Ltd. This type of arrangement has been highly criticized, particularly in the context of the Golden Triangle SEZ (GTSEZ),¹²² for blurring the line between corporate and public interests. The GTSEZ has long been regarded as a lawless zone, home to rampant criminality, including drug and sex trafficking, and cyber scam operations.¹²³ Laos's government and law enforcement reportedly do not exercise full authority over activity within the GTSEZ, with security in the area outsourced to a private security firm.

Security at the Sithandone SEZ is officially the responsibility of local police,¹²⁴ although private security is also present at the site. The police said they are currently free to patrol and check if incidents or crimes occur in the zone, but that so far 'there have not been any official cases'.¹²⁵

THE COUNTRY'S MOST INFAMOUS SEZ

The Golden Triangle Economic Zone has become synonymous with organized crime in the Mekong region. Developed by Kings Romans Group – a designated transnational criminal organization run by US-sanctioned Chinese businessman Zhao Wei¹²⁶ – it covers a 39-square-mile stretch along the Mekong River in the Golden Triangle area, the point where Myanmar, Thailand and Laos meet. The zone was approved in 2007, with the Lao government granting Kings Romans a 99-year lease.¹²⁷

Over the past two decades there have been repeated reports of the GTSEZ's role in the illegal wildlife trade,¹²⁸ drug trafficking, money laundering and cyber scam operations.¹²⁹ Despite widespread evidence of criminal activities and attempted crackdowns by local authorities, criminal operations in the zone continue. In 2026, authorities reported widespread arrests linked to cyber scam operations,¹³⁰ while enforcement data from the first six months of 2025 showed rampant drug trafficking, with approximately 107 million methamphetamine tablets seized and 482 suspects arrested.¹³¹

Risk of illicit markets and criminal activity

The Sithandone SEZ lies in an area vulnerable to organized crime that has been used as a smuggling and trafficking corridor. In 2025, a provincial police report recorded 35 human trafficking cases and significant drug seizures, including over 317 000 meth tablets and 20 kilograms of crystal meth. It also documented the smuggling of 49 cars, 164 motorcycles and illicit goods, and the illegal entry of foreign nationals.¹³² The porousness of the region's borders was also described by a used-car dealer in the provincial capital, Pakse, who explained that most vehicles in his showroom are smuggled from neighbouring countries. 'I acquire these vehicles at significantly lower prices and "legalize" them through the assistance of provincial customs officials,' he said, 'making it possible for me to sell them as legitimate assets on the local market.'¹³³

While no major crackdown on cyber scam operations has yet occurred in the area, there are strong signals that criminal groups are attempting to relocate to Pakse and the Sithandone SEZ. For example, hotel owners reported that increasingly large groups of undocumented foreign nationals have sought accommodation in the area. Although many hotels refuse guests without proper documentation, some facilitate their stay, and in some cases even entire buildings are rented to groups.¹³⁴

In addition, people previously involved in cyber scam operations in Cambodia have been trafficked through Champassak Province. In one interview with a Lao woman, her Chinese boyfriend and his associates, they said they had paid a Cambodian broker approximately US\$4 000 per person to smuggle them from Phnom Penh into Laos via Champassack.¹³⁵ This is concerning given the continued crackdowns on cyber scam operations in the GTSEZ and Cambodia, which have displaced illicit online operations and the criminal groups running them.¹³⁶

Enabling factors of illicit activity

There are several enabling factors that make the SEZ vulnerable to criminal activity. For example, there have been issues with embezzlement and corruption connected to the zone. Police officers said that projects (including the luxury hotel) have been suspended due to internal corruption within the Sithandone Joint Development Co. Ltd. This allegedly included the misappropriation of more than US\$2 million, leaving the company unable to meet wage obligations.¹³⁷ When researchers visited the site in April 2026, workers had still not returned.¹³⁸

Casino infrastructure within the SEZ may also increase its exposure to transnational organized crime, particularly through the exploitation of cash-intensive gaming for money laundering. The criminogenic nature of casinos has already been widely documented in the Mekong, including in the GTSEZ, where the casino is reportedly used to integrate illicit proceeds derived from cyber scams, trafficking and other illicit activities.¹³⁹

So while organized crime has yet to be documented in Sithandone SEZ, its border location, form of governance, economic activity and exposure to corruption and organized crime in the wider province make it a potentially criminogenic site vulnerable to infiltration.

To prevent this, and to ensure that Laos benefits from the perceived economic value of SEZ developments, steps need to be taken now to clarify governance structures, ensure law enforcement access and increase transparency. This can prevent organized crime from taking root in the first place. In addition, the community should be closely integrated into the operation of the zone and resettlement disputes resolved. When construction resumes, it is likely that another influx of domestic and international workers will move to the zone. Robust labour regulations and worker protection will be needed to minimize exploitation and other types of abuse. Finally, once the casino opens, it will be crucial that its activities are regulated, monitored and enforced to limit its exposure to money laundering.

MONETIZATION OF NON-CONSENSUAL INTIMATE CONTENT AND CHILD SEXUAL EXPLOITATION IN CAMBODIA

In 2025, a 15-year-old high school student in Cambodia's Kampong Thom province was persuaded to share explicit photographs through Facebook Messenger. According to an NGO that documented her case, the material was later circulated among students at her school without her consent. She was living with her grandparents while her parents worked in a neighbouring country, and the incident caused the girl severe emotional distress as she struggled to cope with the resulting bullying, stigma and social isolation. She stopped attending school before eventually transferring to a new one.¹⁴⁰

This is one case among a growing trend of online child sexual abuse material (CSAM) being produced and distributed in Cambodia, as well as across South East Asia. Technology-facilitated abuse, including the coercion or grooming of minors into creating and sharing sexual images or videos, has become a significant child protection challenge.

Through interviews with NGOs working to document and combat CSAM in Cambodia, this article aims to shed light on this issue and propose ways in which law enforcement can better tackle this increasingly organized industry.

Sophisticated and interconnected: The online exploitation ecosystem in Cambodia

Globally, the scale of CSAM continues to increase. According to INHOPE, a global network working to eliminate CSAM from the internet, more than 4.7 million suspected CSAM cases were identified in 2025, an increase of more than 450% on 2024.¹⁴¹

CSAM is also increasing in scale and sophistication in Cambodia. In 2025, local child protection NGO APLE received a total of 303 CSAM cases, of which 226 (approximately 74%) were identified as online child sexual exploitation and abuse cases.¹⁴² UNICEF

research also shows that one in ten Cambodian 12- to 17-year-olds, around 160 000 children, has experienced some form of online child sexual exploitation and abuse.¹⁴³ It also found that approximately 16% of Cambodian children reported being subjected to sexual comments that made them feel uncomfortable; 16% reported receiving unwanted sexual images; and a further 9% reported receiving unwanted requests to share sexual images of themselves. Much of this engagement had happened on social media.¹⁴⁴

Civil society organizations working on online child sexual exploitation also report that networks are increasingly organized and interconnected across national borders using the latest technologies. NGOs (some of which asked to remain anonymous) have observed an increase in the use of encrypted messaging platforms and file-hosting services to share, store and distribute illegal content. Cross-platform approaches to recruitment, content distribution and monetization also speak to an increase in organization among networks,¹⁴⁵ with groups removed from one platform reappearing under different names or migrating to new channels.¹⁴⁶

Additionally, rather than operating only within Cambodia, many CSAM distribution networks now function transnationally in the region, including Thailand, the Philippines, Indonesia and Vietnam. Civil society representatives said technology enables offenders to operate across jurisdictions, reaching both victims and users, while reducing the risk of detection and prosecution.¹⁴⁷

Perpetrators also frequently use fake identities and multiple online accounts to conceal their activities.¹⁴⁸ NGOs described patterns consistent with online grooming, in which perpetrators build relationships by posing as peers or romantic partners before encouraging victims to move conversations to private messaging platforms. In some cases, victims were persuaded to share intimate photographs or videos after trust had been established through prolonged online communication.¹⁴⁹

Finally, there are indications that CSAM is profit-driven, as it is increasingly produced, sourced and distributed for payments in exchange for access to images and videos. There are indications that some offenders use regional digital payment systems and online wallets to facilitate access to CSAM, including payment for subscription-based groups, premium content or livestreamed abuse.¹⁵⁰

Telegram networks and the monetization of intimate content

Internet connectivity and smartphone affordability have led to ubiquitous digital access in Cambodia. Cambodia's approximately 20 million internet subscriptions in a country of 17.8 million

people indicates that many people maintain multiple internet or social media accounts.¹⁵¹ More than 80% of Cambodian children aged 12 to 17 are internet users,¹⁵² with most people accessing the internet primarily through mobile devices. Facebook is the country's most widely used social networking platform with 15.6 million accounts,¹⁵³ followed by TikTok and YouTube. Telegram has also become an increasingly popular messaging application for personal communication, business activities and community groups.¹⁵⁴ NGOs report that these platforms provide access to large numbers of young users and enable offenders to create fake identities, establish trust and initiate conversations without revealing their true identities.¹⁵⁵

This is in line with observations made on Facebook, where posts and profiles were found sharing links redirecting users to Telegram channels and groups. Rather than hosting explicit material directly, these public platforms appeared to function as recruitment gateways into more private online environments.¹⁵⁶

One such group on Telegram is called 'Sell Khmer Video 18+'. Upon joining the group, users can view video previews, typically lasting around 20 seconds, for material described as 'leaked videos' and 'leaked videos from students', suggesting the availability of images featuring minors, particularly young girls.¹⁵⁷ Group administrators advertise that users wishing to access full-length videos are required to join a separate VIP group. There, users are instructed to pay around US\$5 to gain access to the full content.¹⁵⁸

This is one of several Telegram groups claiming to host thousands of videos and advertising daily content updates. Membership in these groups ranged from several hundred users to more than 10 000 subscribers. Based on usernames and the use of the Khmer language, many participants appeared to be Cambodian, although some content also appeared to involve individuals from other countries.¹⁵⁹

While the origin and authenticity of every video posted in these groups could not be independently verified, the use of Telegram accounts to distribute illegal explicit material is widely documented in Cambodia. Cases documented by local human rights NGO Licadho also illustrate how Telegram is being used to facilitate child sexual exploitation.¹⁶⁰ Perpetrators obtained intimate images and videos by secretly recording children in private settings or sexual activity without consent, coercing victims into producing content, and recirculating material originally shared in confidence. The material was then used to silence and control victims, including by threatening to send it to their families or communities. In some cases, these threats were intended to force victims into further sexual activity or the production of additional content. Other motives included preventing the reporting of rape, maintaining control after

the end of a relationship and securing financial gain. Licadho documented at least 10 cases in which perpetrators circulated intimate images or videos online, including through Telegram, or shared them directly with victims' families and communities.¹⁶¹

The apparent monetization mechanisms operating within these networks also appear in line with existing research and NGO data. Many groups promoted tiered VIP memberships that required users to make payments before accessing additional content. Observed fees were low – typically between US\$1 and US\$5¹⁶² – which may reduce barriers to entry while enabling administrators to generate revenue from a large subscriber base. Similarly, data from APLE indicates that approximately 60% of its 303 recorded cases of online child sexual exploitation in 2025 involved some form of paid subscription mechanism. In these instances, websites or online platforms often displayed thumbnail previews of images or victims, which then redirected users to external platforms requiring payment to access or download full content. This frequently involved file-hosting services that required premium subscriptions for access.¹⁶³

Another observation from Telegram groups involved the use of multiple forms of sexually explicit content and services that were often marketed within the same online ecosystem. Promotional messages advertised access to various private groups, including those described in Khmer as 'Cambodian Sex Groups', 'VIP Sex Groups' and groups claiming to contain 'leaked videos of TikTok personalities', each requiring payments of approximately US\$5. Other advertisements promoted paid video calls or other sexually explicit online interactions for higher fees, typically around US\$10.¹⁶⁴

Payment instructions were generally communicated in Khmer, and several groups appeared to rely on Cambodian bank accounts or local digital payment platforms. Additional investigation would be required to identify the individuals responsible for managing these transactions, but research indicates that locally accessible financial channels are facilitating entry into private Telegram networks and are likely to be facilitating illicit payments linked to CSAM.¹⁶⁵

Challenges and victim protection

The increased scale, monetization and sophistication of CSAM have made investigating these cases and protecting children complex. One core challenge is CSAM's increasing international dimension. Investigations are also hampered by the limited digital capacity of local law enforcement agencies, particularly in digital forensics, content tracing and systematic identification of offenders. While arrests and prosecutions

occur in some cases, these are limited, while victims are often not identified. Consequently, even after offenders are apprehended, URLs and copies of CSAM remain accessible online, contributing to continued circulation, monetization and secondary victimization.¹⁶⁶

NGOs also describe challenges in detecting and removing CSAM, particularly when hosted across fragmented and semi-private online environments.¹⁶⁷ As some content is distributed through subscription-based platforms, file-hosting services or links designed to restrict access and vet users before granting access, this makes it difficult for investigators to locate, document and take down CSAM.

Another challenge is victim disclosure and family response. Distrust in the criminal justice system means victims frequently seek assistance through NGOs rather than pursue criminal proceedings. According to these groups, many are reluctant to report cases to law enforcement because of concerns about stigma, fear that family members or classmates will learn about the incident, and anxiety about becoming involved in lengthy legal processes.¹⁶⁸ This was also confirmed by APLE data, which shows that among the 226 online CSAM cases, only 20% of victims were identified while only 14% participated in criminal justice procedures.¹⁶⁹ In some cases, victims disengage entirely from support services after initial contact, limiting access to legal and psycho-social support. NGOs note that formal law enforcement action often depends on a complaint from the victim or guardian, which may not be filed due to these concerns, creating a protection gap where victims remain vulnerable while content circulates on platforms like Telegram, Facebook or TikTok, causing severe psychological distress.¹⁷⁰

NGOs also said that victims and families often have limited knowledge of where or how abusive content is being circulated, with information frequently obtained indirectly through peers, school environments or the offender.¹⁷¹ This makes removal particularly challenging, as victims are often unable to provide specific links or locations for the CSAM.

Adopt an anti-organized crime strategy

The level of organization observed in social media-based CSAM networks, their embeddedness within cross-platform ecosystems, monetization of access and closed-group content distribution all point to a sophisticated criminal landscape. While the full operational structure of these networks is not entirely clear, this is an organized crime phenomenon and should be countered accordingly. Identification and prosecution of perpetrators are particularly important, as this will act as a deterrent for others and can help in the rehabilitation process of victims.

Adopting an anti-organized crime approach can break down siloes and strengthen responses from law enforcement, civil society and private sector entities, particularly technology companies, social media platforms and the financial sector. For instance, law enforcement investigations could utilize global anti-money laundering teams to cut off CSAM revenue streams. Financial institutions also need to strengthen the monitoring systems of financial infrastructure linked to exploitation networks to improve monitoring and disrupt suspicious transactions linked to non-consensual intimate content. Similarly, technology companies and authorities need to strengthen cross-platform cooperation, including in victim recruitment on social media platforms and migration between messaging services. Law enforcement capacity should also be reinforced

through specialized training in digital forensics, payment tracing and online exploitation investigations, alongside the development of dedicated cybercrime response units.

Finally, social service providers and NGOs should improve digital safety and awareness initiatives for children, parents, teachers and the public, addressing key risks such as online grooming, sextortion and the non-consensual creation and distribution of intimate content. Prevention efforts should be integrated into school-based curriculums and broader child protection systems to improve early awareness and reporting, but this needs to be coupled with better access to survivor-centred support services, including psychological care, legal assistance and structured case management for victims and families.

Notes

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The Mekong Network to Counter Transnational Crimes (MNET-CTC) is funded by the Australian Government through the Mekong-Australia Partnership and implemented by the Global Initiative Against Transnational Organized Crime.

