

## **Illicit Chinese Fentanyl—America’s Next National Security Crisis**

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### **Dedication**

In memory of Connor Dillion Rusin—4 October 1992 to 12 June 2018—"You will live in our heart and memories and will always be a part of all that we do."

## INTRODUCTION

Since illicit fentanyl's re-introduction into American society circa 2013, prohibited use, addiction, overdoses, and deaths continue to rise at alarming rates. A powerful synthetic opioid delivering an intense feeling of euphoria, illicit fentanyl cuts across ethnic and socioeconomic lines, filling a growing demand of an over-prescribed, opioid-addicted U.S. populace. Extremely profitable, an initial \$5,000 USD investment can bring returns of over \$1.5M USD.<sup>1</sup> Available in pure form and becoming a widespread additive in almost every street drug from marijuana to cocaine, illicit fentanyl in terms of its presence and availability is rampant.<sup>2</sup> From a handful of daily overdoses and approximately 3,000 deaths in 2013, to a staggering 200 daily overdoses and nearly 30,000 deaths in 2017, illicit fentanyl costs taxpayers the better part of \$500B USD a year (nearly two-thirds of the current U.S. Defense budget).<sup>3</sup>

China reigns as the global leader in illicit fentanyl and precursor production and supply—accounting for roughly 70 percent of the world's product as a result of high profitability, available infrastructure, loose regulation, and minimal oversight.<sup>4</sup> Pedaled via the regular Internet and the dark web, illicit fentanyl and its precursors are easily ordered online and shipped direct to the buyer's destination of choice.<sup>5</sup> Smuggled through legal ports entry or sent via the

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<sup>1</sup> Wilber, Del Quentin. "Fentanyl Smuggled from China Is Killing Thousands of Americans." Los Angeles Times. October 19, 2018. Accessed November 17, 2018. <https://www.latimes.com/politics/la-na-pol-china-fentanyl-20181019-story.html>.

<sup>2</sup> Millar, Abi. "Fentanyl: Where Did It All Go Wrong?" Pharmaceutical Technology. February 27, 2018. Accessed November 25, 2018. <https://www.pharmaceutical-technology.com/features/fentanyl-go-wrong/>.

<sup>3</sup> Superville, Darlene. "Public Broadcasting Service." PBS. November 20, 2017. Accessed January 20, 2019. <https://www.pbs.org/newshour/nation/white-house-says-opioid-crisis-cost-504-billion-in-2015-much-higher-than-once-thought>.

<sup>4</sup> Wilber, Del Quentin. "Fentanyl Smuggled from China Is Killing Thousands of Americans." Los Angeles Times. October 19, 2018. Accessed November 17, 2018. <https://www.latimes.com/politics/la-na-pol-china-fentanyl-20181019-story.html>.

<sup>5</sup> Mershon, Erin. "For Fentanyl Sellers, USPS Is 'Virtually Guaranteed' Route to Not Get Caught." STAT. January 24, 2018. Accessed November 25, 2018. <https://www.statnews.com/2018/01/24/china-fentanyl-usps/>.

U.S. Postal Service's (USPS) international mail system due to archaic guidelines, bribery, and limited detection capability, most suppliers virtually guarantee delivery—offering to replace product on the off-chance confiscation occurs.<sup>6</sup> When questioned about these nefarious practices, Chinese leadership does not deny the premise, but instead quickly blames criminal elements and an addicted U.S. populace.<sup>7</sup> However, in closely examining China's drug history, military doctrine and fentanyl related actions, a vast and dark scheme emerges. **China is complicit in pushing fentanyl into the United States in an effort to destabilize, undermine and weaken the fabric of America's social and political systems.** Without swift action, Chinese produced illicit fentanyl remains on track to become America's next national security crisis.

### THE RISE OF FENTANYL

Fentanyl is a powerful synthetic opioid analgesic (pain-killer) similar to morphine but 50 to 100 times more potent.<sup>8</sup> It is a Schedule II (highly addictive) prescription drug developed to treat patients with severe pain stemming from disease, injury or surgery. First synthesized in 1960 by Belgian chemist Dr. Paul Janssen, medical fentanyl use quickly spread across Western Europe and was later approved by the U.S. Food and Drug Administration (FDA) in 1968—with several opponents noting its potency made it a likely candidate abuse.<sup>9</sup> Due to these concerns, the FDA initially approved fentanyl for use in combination with other drugs; however, in 1972 fentanyl won approval for stand-alone use.<sup>10</sup> During its first 10 years in the field, fentanyl was

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<sup>6</sup> Wilber, Del Quentin. "Fentanyl Smuggled from China Is Killing Thousands of Americans." Los Angeles Times. October 19, 2018. Accessed November 17, 2018. <https://www.latimes.com/politics/la-na-pol-china-fentanyl-20181019-story.html>.

<sup>7</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 28. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

<sup>8</sup> Centers for Disease Control and Prevention. Accessed November 25, 2018. <https://www.cdc.gov/index.htm>.

<sup>9</sup> Millar, Abi. "Fentanyl: Where Did It All Go Wrong?" Pharmaceutical Technology. February 27, 2018. Accessed November 25, 2018. <https://www.pharmaceutical-technology.com/features/fentanyl-go-wrong/>.

<sup>10</sup> Centers for Disease Control and Prevention. Accessed November 25, 2018. <https://www.cdc.gov/index.htm>.

primarily (and very successfully) prescribed to patients recovering from cardiac and vascular surgery. However, once its patent expired in 1981, sales of the drug increased tenfold—and subsequently, the first incidents of misuse, overdose and illicit production began surfacing.<sup>11</sup>

The 1990s and early 2000s brought about a fentanyl boom. With a reputation to quickly and effectively treat chronic pain around the clock (where other opioids could not) combined with new delivery methods (transdermal patch, oral lozenge, sublingual tablet, and buccal spray), fentanyl became a commonly prescribed pain drug earning a place on the World Health Organizations (WHO) List of Essential Medicines.<sup>12</sup> During this time there was also a noted increase in illicit production and recreational use. Between 2005 and 2007, the U.S. Drug Enforcement Agency (DEA) identified over 1,000 deaths associated with illegally manufactured fentanyl (produced in and trafficked via Mexico).<sup>13</sup> However, several subsequent raids and seizures (on both sides of the border) curbed the problem until 2013.<sup>14</sup>

### **THE CURRENT U.S. FENTANYL PROBLEM—A NATIONAL EMERGENCY**

In 2013, illicit fentanyl reemerged on American soil and began its current and rapid ascent to the top of the illegal drug pyramid.<sup>15</sup> Predominantly originating from China this time, illicit fentanyl started appearing in New England and quickly made its way South along the Eastern seaboard before rapidly moving Westward, causing the most significant damage in the Rust Belt.<sup>16</sup> Also known by its street names “China Girl” or “China White,” users describe an

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<sup>11</sup> Millar, Abi. "Fentanyl: Where Did It All Go Wrong?" Pharmaceutical Technology. February 27, 2018. Accessed November 25, 2018. <https://www.pharmaceutical-technology.com/features/fentanyl-go-wrong/>.

<sup>12</sup> Centers for Disease Control and Prevention. Accessed November 25, 2018. <https://www.cdc.gov/index.htm>.

<sup>13</sup> Millar, Abi. "Fentanyl: Where Did It All Go Wrong?" Pharmaceutical Technology. February 27, 2018. Accessed November 25, 2018. <https://www.pharmaceutical-technology.com/features/fentanyl-go-wrong/>.

<sup>14</sup> Millar, Abi. "Fentanyl: Where Did It All Go Wrong?" Pharmaceutical Technology. February 27, 2018. Accessed November 25, 2018. <https://www.pharmaceutical-technology.com/features/fentanyl-go-wrong/>.

<sup>15</sup> Scutti, Susan. "US Life Expectancy Drops in 2017 Due to Drug Overdoses, Suicides." CNN. November 29, 2018. Accessed November 29, 2018. <https://www.cnn.com/2018/11/29/health/life-expectancy-2017-cdc/index.html>.

<sup>16</sup> Scutti, Susan. "US Life Expectancy Drops in 2017 Due to Drug Overdoses, Suicides." CNN. November 29, 2018. Accessed November 29, 2018. <https://www.cnn.com/2018/11/29/health/life-expectancy-2017-cdc/index.html>.

intense and lasting euphoric feeling unlike anything else available. Possessing potency typically exceeding pharmaceutical grade fentanyl, minute doses (.25 mg—the equivalent of a few grains of salt) can be fatal.<sup>17</sup> With over 500 lethal doses contained in just one sugar packet, overdoses and deaths via over-consumption, over-mixing, and even inadvertent glancing contact continue to spike.<sup>18</sup>

Quickly finding a growing niche in America's escalating pharmaceutical opioid addiction crisis, illicit fentanyl also found its way (mixed as an additive) into the myriad of other less potent street drugs; unsurprisingly, fentanyl overdoses and fatalities increased year after year. By the end of 2016, the U.S. Centers for Disease Control (CDC) and DEA stated the U.S. faced a fentanyl flood—responsible for approximately 20,000 deaths for the year; a 540 percent increase over just three years.<sup>19</sup> This frightening trend combined with new and even more potent fentanyl derivatives (carfentanil—100 times stronger than fentanyl) hitting the street every few months drove the Trump administration to declare fentanyl a public health emergency in 2017.<sup>20</sup> According to Josh Bloom, Senior Director of Chemical and Pharmaceutical Research at the American Council on Science and Health: "There has never been a drug like fentanyl before—for street drugs, this absolutely destroys anything else in terms of lethality and danger."<sup>21</sup>

Even after President Trump's public health emergency declaration (granting additional federal authorities, resources and funding to the problem), American deaths due to fentanyl grew

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<sup>17</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 2018. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

<sup>18</sup> Edney, Anna. "This Killer Opioid Could Become a Weapon of Mass Destruction." Bloomberg.com. December 12, 2018. Accessed December 12, 2018. <https://www.bloomberg.com/news/features/2018-12-12/killer-opioid-fentanyl-could-be-a-weapon-of-mass-destruction>.

<sup>19</sup> Millar, Abi. "Fentanyl: Where Did It All Go Wrong?" Pharmaceutical Technology. February 27, 2018. Accessed November 25, 2018. <https://www.pharmaceutical-technology.com/features/fentanyl-go-wrong/>.

<sup>20</sup> Centers for Disease Control and Prevention. Accessed November 25, 2018. <https://www.cdc.gov/index.htm>.

<sup>21</sup> Edney, Anna. "This Killer Opioid Could Become a Weapon of Mass Destruction." Bloomberg.com. December 12, 2018. Accessed December 12, 2018. <https://www.bloomberg.com/news/features/2018-12-12/killer-opioid-fentanyl-could-be-a-weapon-of-mass-destruction>.



by more than 50 percent to nearly 30,000 in 2017 according to the National Institute on Drug Abuse (NIDA).<sup>22</sup> These latest statistics now confirm fentanyl as the drug most frequently involved in overdose deaths in the U.S.<sup>23</sup> Furthermore, experts assert these numbers remain artificially low as individual state coroners follow differing reporting criteria; many do not mandate specific drug identification, much less basic drug testing when filing a death certificate.<sup>24</sup> Nonetheless, this surge in fentanyl related deaths played a major role in the CDC's recent 2019 announcement lowering overall U.S. life expectancy.<sup>25</sup> In her 2018 testimony before Congress, Assistant Secretary of State Kirsten Madison describes the situation as "the most severe drug crisis the U.S. has ever faced."<sup>26</sup>

#### **CHINA—THE WORLD'S LEADING FENTANYL PRODUCER AND EXPORTER**

China leads the world in the production and supply of fentanyl as well as the chemical precursors to manufacture the drug. With over 160,000 chemical companies in operation, the Defense Intelligence Agency (DIA) assesses nearly 70 percent of all global fentanyl and associated precursor movements originate from China (see Figure 1).<sup>27</sup> Weak regulation and oversight combined with ease of production and lucrative profits allow manufacturing of illicit

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<sup>22</sup> Edney, Anna. "This Killer Opioid Could Become a Weapon of Mass Destruction." Bloomberg.com. December 12, 2018. Accessed December 12, 2018. <https://www.bloomberg.com/news/features/2018-12-12/killer-opioid-fentanyl-could-be-a-weapon-of-mass-destruction>.

<sup>23</sup> Wamsley, Laurel. "WGBH News." News. December 12, 2018. Accessed December 12, 2018. <https://www.wgbh.org/news/national-news/2018/12/12/fentanyl-surpasses-heroin-as-drug-most-often-involved-in-deadly-overdoses>.

<sup>24</sup> Wamsley, Laurel. "WGBH News." News. December 12, 2018. Accessed December 12, 2018. <https://www.wgbh.org/news/national-news/2018/12/12/fentanyl-surpasses-heroin-as-drug-most-often-involved-in-deadly-overdoses>.

<sup>25</sup> Scutti, Susan. "US Life Expectancy Drops in 2017 Due to Drug Overdoses, Suicides." CNN. November 29, 2018. Accessed November 29, 2018. <https://www.cnn.com/2018/11/29/health/life-expectancy-2017-cdc/index.html>.

<sup>26</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 28. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

<sup>27</sup> O'Connor, Sean. "Fentanyl: China's Deadly Export to the United States." 2016 Annual Report to Congress | U.S.-CHINA. February 01, 2017. Accessed January 12, 2019. <https://www.uscc.gov/Research/fentanyl-china's-deadly-export-united-states>.

fentanyl and its precursors to thrive.<sup>28</sup> Chinese chemical companies openly state that even as fentanyl and related substances become banned, several will continue to sell due to pure profitability.<sup>29</sup> Additionally, Chinese chemical companies increasingly turn to science and technology to dodge applicable drug laws (both American and Chinese). By shifting analogues, or molecules, they create fentanyl-like compounds (chemical cousins) producing similar effects on the body, but not identified on any restricted list.<sup>30</sup> The Shanghai-based Zheng Drug syndicate recently bragged its lab could synthesize “nearly any drug” and that it churns out “16 tons of illicit chemicals a month.”<sup>31</sup>

The next step in China’s illicit fentanyl and precursor process focuses on marketing and sales. Chinese drug syndicates follow the 21<sup>st</sup> Century’s most successful sales model; they create Internet sales websites in the open and on the dark web. A recent bi-partisan report conducted by the Senate’s Permanent Subcommittee for Investigations focused on Internet fentanyl sales. “A simple Google search of ‘fentanyl for sale’ returned a number of potential sellers”.<sup>32</sup> Posing as buyers, investigators contacted the first six sellers—all of whom were based or had ties to China, offered to ship directly to the U.S., and included a virtual money back

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<sup>28</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." [www.theepochtimes.com](http://www.theepochtimes.com). January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).

<sup>29</sup> Wee, Sui-lee. "Trump Says China Will Curtail Fentanyl. The U.S. Has Heard That Before." *The New York Times*. December 03, 2018. Accessed December 03, 2018. <https://www.nytimes.com/2018/12/03/business/fentanyl-china-trump.html>.

<sup>30</sup> McCombs, Dave. "U.S. Panel Says China Is Not Doing Enough to Stem Tide of Fentanyl." *Bloomberg.com*. November 26, 2018. Accessed November 26, 2018. <https://www.bloomberg.com/news/articles/2018-11-27/u-s-panel-says-china-not-doing-enough-to-stem-tide-of-fentanyl>.

<sup>31</sup> Wilber, Del Quentin. "Fentanyl Smuggled from China Is Killing Thousands of Americans." *Los Angeles Times*. October 19, 2018. Accessed November 17, 2018. <https://www.latimes.com/politics/la-na-pol-china-fentanyl-20181019-story.html>.

<sup>32</sup> Wilber, Del Quentin. "Fentanyl Smuggled from China Is Killing Thousands of Americans." *Los Angeles Times*. October 19, 2018. Accessed November 17, 2018. <https://www.latimes.com/politics/la-na-pol-china-fentanyl-20181019-story.html>.

guarantee.<sup>33</sup> Investigators then subpoenaed just one international pay service (Western Union) for transaction information related to the six online sellers.<sup>34</sup> The results yielded over 500 U.S.-based financial transactions totaling over \$230K USD—an amount roughly translating to \$750M in U.S. street value.<sup>35</sup> Considering additional factors—the vast number of additional online sellers, the corresponding number of dark web sellers, and the large number of international currency services—the scope of this problem only begins to become visible.

When Yu Haibin of China's National Narcotics Control Commission was recently asked about large amounts of illegal fentanyl shipped from China directly to America he stated: "There is no problem" and "no proof".<sup>36</sup> However, given China's stringent Internet controls, oversight, and monitoring, it remains highly unlikely the Chinese government is unaware of these activities. Regularly arresting bloggers, VPN users, and domestic internet drug traffickers with pinpoint accuracy, China certainly possesses the capability to find and disrupt those pedaling deadly illicit drugs bound for America.<sup>37</sup> It therefore begs the question: Is the Chinese government turning a blind eye or complicit in this reprehensible enterprise?

Figure 1—Illicit Fentanyl and Fentanyl Precursor Flows From China<sup>38</sup>

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<sup>33</sup> Mershon, Erin. "For Fentanyl Sellers, USPS Is 'Virtually Guaranteed' Route to Not Get Caught." STAT. January 24, 2018. Accessed November 25, 2018. <https://www.statnews.com/2018/01/24/china-fentanyl-usps/>.

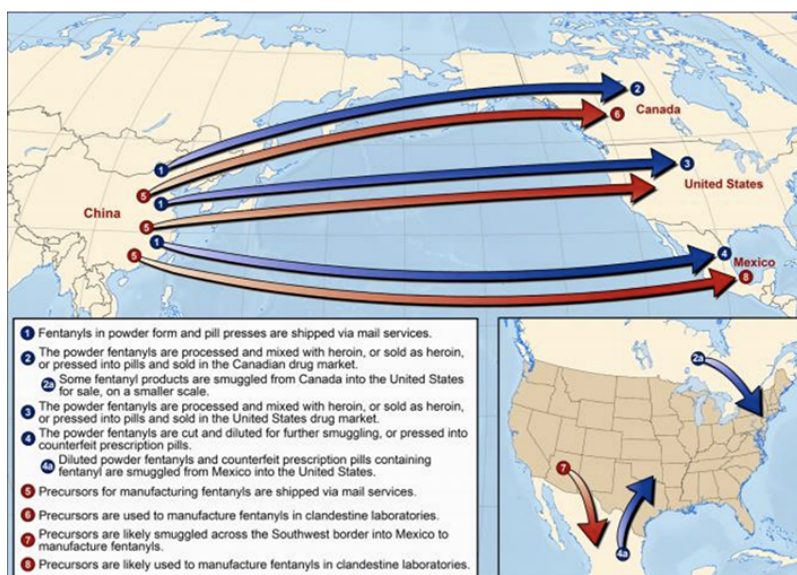
<sup>34</sup> Mershon, Erin. "For Fentanyl Sellers, USPS Is 'Virtually Guaranteed' Route to Not Get Caught." STAT. January 24, 2018. Accessed November 25, 2018. <https://www.statnews.com/2018/01/24/china-fentanyl-usps/>.

<sup>35</sup> Mershon, Erin. "For Fentanyl Sellers, USPS Is 'Virtually Guaranteed' Route to Not Get Caught." STAT. January 24, 2018. Accessed November 25, 2018. <https://www.statnews.com/2018/01/24/china-fentanyl-usps/>.

<sup>36</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 28. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

<sup>37</sup> Kounalakis, Markos. "China Is Using Fentanyl in a Chemical War against America." Miamiherald. November 2, 2017. Accessed December 17, 2018. <https://www.miamiherald.com/latest-news/article182139826.html>.

<sup>38</sup> O'Connor, Sean. "Fentanyl: China's Deadly Export to the United States." 2016 Annual Report to Congress | U.S.-CHINA. February 01, 2017. Accessed January 12, 2019. <https://www.uscc.gov/Research/fentanyl-china's-deadly-export-united-states>.



But this China-to-U.S. problem represents only the tip of the illicit fentanyl iceberg. Mexico reigns as the top recipient of illicit Chinese produced fentanyl and precursors. Ordering in bulk directly from Chinese laboratories, Mexican drug cartels use bribery and take advantage of loose regulation and oversight to import enormous amounts of product and precursors.<sup>39</sup> According to the DEA, Mexican cartels produce more than 90 percent of the fentanyl used in the U.S.; 80 percent of that product is produced using ingredients from China.<sup>40</sup> Once in country, the cartels combine the precursors, sell the resulting fentanyl, and mix small amounts with other drugs to increase potency.<sup>41</sup> The resulting drugs are then packaged and readied for delivery to U.S. recipients via multiple means. The endeavor is proving so lucrative, that even the most infamous of cartels (Joaquín “El Chapo” Guzman’s Sinaloa Cartel) are significantly dropping

<sup>39</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." [www.theepochtimes.com](http://www.theepochtimes.com). January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).

<sup>40</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." [www.theepochtimes.com](http://www.theepochtimes.com). January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).

<sup>41</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 28. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

heroin and cocaine production in favor of fentanyl.<sup>42</sup> DEA officials further assert Chinese and Mexican nationals are increasingly working together, resulting in a drastic increase of fentanyl coming across the Southwest border—evidenced by the largest illicit fentanyl bust in history (254 lbs.) occurring at the Nogales, AZ border crossing on 31 Jan 2019.<sup>43</sup>

To its credit, Mexican leaders attempted to cooperate with China (on multiple occasions) to stem the flow of drug ingredients, but were told they would have to deal with the problems themselves. Jorge Guajardo, Mexico's former ambassador to China, stated: "In all my time there, China never showed any willingness to cooperate on stemming the flow of precursors to Mexico."<sup>44</sup> A possible reason for this unwillingness centers on the China-Mexico-U.S. dilemma representing a best case scenario for Beijing. By effectively drug-laundering fentanyl and precursors via Mexico, China pushes massive amounts of product to their intended U.S. target but absolves itself as soon as shipments arrive on Mexican soil—ultimately minimizing risk and blowback.

While fentanyl and its precursors enter the U.S. from vastly different areas of the globe, the methods by which they enter remain remarkably similar: legal U.S. ports of entry and the USPS.<sup>45</sup> Like other illicit drugs, a large portion of illicit fentanyl enters America by via legal ports of entry. Due to its miniscule size and extreme potency (approximately 1000 hits in a sugar

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<sup>42</sup> Bernstein, Leandra. "Drug Trade War: Chinese Fentanyl Is Fueling the US Opioid Crisis." WJLA. October 2, 2018. Accessed November 17, 2018. <https://wjla.com/news/nation-world/chinese-fentanyl-is-fueling-the-us-opioid-crisis-drug-trade-tensions-escalate>.

<sup>43</sup> Williams, Pete. "NBC News - Breaking News & Top Stories - Latest World, US & Local News." NBCNews.com. January 31, 2019. Accessed January 31, 2019. <https://www.nbcnews.com/news/us-news/feds-make-largest-fentanyl-bust-u-s-history-n965486>.

<sup>44</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." [www.theepochtimes.com](http://www.theepochtimes.com). January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).

<sup>45</sup> Wilber, Del Quentin. "Fentanyl Smuggled from China Is Killing Thousands of Americans." Los Angeles Times. October 19, 2018. Accessed November 17, 2018. <https://www.latimes.com/politics/la-na-pol-china-fentanyl-20181019-story.html>.

packet-sized package) and synthetic make up (extremely low rate of canine detection), U.S. Customs and Border Protection (CBP) and DEA agents rely on intelligence, keen detection skills, and a small number of handheld technological devices (Gemini handheld analyzer) to catch the product as it enters via the Mexican and Canadian borders, airports, and seaports.<sup>46</sup> This unnerving reality warrants special consideration.

Yet, the preferred method for illicit fentanyl delivery is via the U.S. government's own USPS international mail.<sup>47</sup> In 2017 nearly 500M international mail packages (averaging ~1.4M a day) entered the U.S.—and of that amount, only a small fraction underwent screening by customs inspectors (see Figure 2).<sup>48</sup> Furthermore, approximately 65 percent (320M items) did not include electronic shipping data, making advanced automated detection next to impossible.<sup>49</sup> U.S. Senate testimony revealed the USPS is not appropriated staffed or equipped to track or prevent it from happening.<sup>50</sup> It is estimated that “hundreds of millions of dollars of illicit fentanyl—likely more” is pouring in through the USPS international mail system.<sup>51</sup> Chinese fentanyl syndicates exclusively shipping via USPS international mail (and offering money back guarantees) only bolsters this unfortunate and unpleasant truth. It also casts suspicion on the possibility of nefarious activity which shows minimal signs of abating.

Figure 2—Growth of Inbound International Mail to the U.S.<sup>52</sup>

<sup>46</sup> Mershon, Erin. "For Fentanyl Sellers, USPS Is 'Virtually Guaranteed' Route to Not Get Caught." STAT. April 12, 2018. Accessed November 17, 2018. <https://www.statnews.com/2018/01/24/china-fentanyl-usps/>.

<sup>47</sup> Mershon, Erin. "For Fentanyl Sellers, USPS Is 'Virtually Guaranteed' Route to Not Get Caught." STAT. April 12, 2018. Accessed November 17, 2018. <https://www.statnews.com/2018/01/24/china-fentanyl-usps/>.

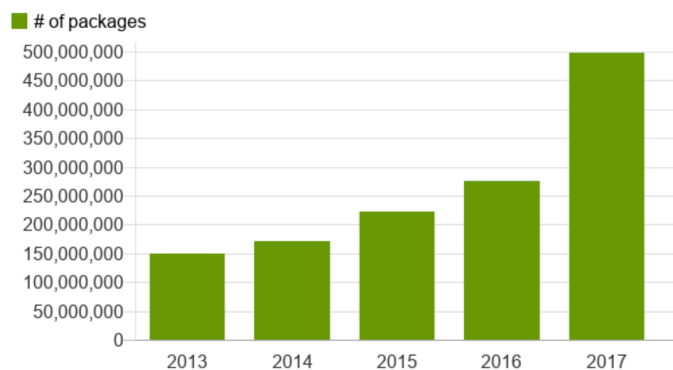
<sup>48</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 28. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

<sup>49</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 28. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

<sup>50</sup> Mershon, Erin. "For Fentanyl Sellers, USPS Is 'Virtually Guaranteed' Route to Not Get Caught." STAT. April 12, 2018. Accessed November 17, 2018. <https://www.statnews.com/2018/01/24/china-fentanyl-usps/>.

<sup>51</sup> Mershon, Erin. "For Fentanyl Sellers, USPS Is 'Virtually Guaranteed' Route to Not Get Caught." STAT. April 12, 2018. Accessed November 17, 2018. <https://www.statnews.com/2018/01/24/china-fentanyl-usps/>.

<sup>52</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 28. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.



### **CHINA’S DRUG WARFARE DOCTRINE: A REVERSE OPIUM WAR**

While many maintain China’s innocence in this US crisis, a growing body of evidence suggests a dark side of China’s illicit fentanyl production and distribution exists. China maintains a deep and visceral understanding of how a drug problem can convulse a nation and collapse an empire.<sup>53</sup> During the British-fueled Opium Wars of the 1800s, China watched the demise of their society from the scourge of Western-supplied opium, including the loss of multiple wars to European powers, the fall of the Qing Dynasty, and the ceding of Hong Kong to British rule.<sup>54</sup> Known as “The Century of Humiliation,” it took the rise of Mao Tse-tung, a brutal civil war claiming the life of millions, and the rise of Communism to curb China’s opium addiction.

However, what remains lesser known about Mao’s rehabilitation success was his nationalization of opium production and the trafficking of narcotics.<sup>55</sup> While cracking down on domestic use, he simultaneously began cultivating Chinese opium on a grand scale—pushing the

<sup>53</sup> Kounalakis, Markos. "China Is Using Fentanyl in a Chemical War against America." Miami Herald. November 2, 2017. Accessed December 17, 2018. <https://www.miamiherald.com/latest-news/article182139826.html>.

<sup>54</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." Www.theepochtimes.com. January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).

<sup>55</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." Www.theepochtimes.com. January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).

resulting harvest specifically to non-Communist states.<sup>56</sup> Despite formal and repeated investigations, complaints, and protests from both the United States and Japan over the past 50 years, this formal activity persists and now includes synthetic opioids like fentanyl.<sup>57</sup> In short, China continues to apply the hard-learned lessons of stealth attack and economic power to damage its Western adversaries.<sup>58</sup>

A closer look at current Chinese doctrine affirms this tactic. In 1999, following U.S. military successes in Desert Storm and Allied Force, Chinese military strategists, Colonels Qiao Liang and Wang Xiangsui developed a comprehensive whole of nation strategy articulating the use of “Unrestricted Warfare” against powerful and technologically advanced adversaries, specifically America.<sup>59</sup> “Cultural Warfare,” (a subset of China’s “Unrestricted Warfare”) defines a broad military-based strategy aimed at destabilizing an adversary.<sup>60</sup> Falling under the umbrella of “Cultural Warfare”, “Drug Warfare” describes an unconventional warfare strategy meant to decay the moral fabric of a rival nation—and, ultimately, weaken it.<sup>61</sup> In short, illicit drugs are used to stimulate addiction inside the target countries’ youth—in order to accomplish political goals.<sup>62</sup> While many identify this process as revolutionary, the use of drug warfare by Communist regimes is nothing new. Communist regimes have used narcotics for decades as a

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<sup>56</sup> Douglass, Joseph D. *Red Cocaine: The Drugging of America*. Atlanta, GA: Clarion House, 1999.

<sup>57</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." *Www.theepochtimes.com*. January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).

<sup>58</sup> Kounalakis, Markos. "China Is Using Fentanyl in a Chemical War against America." *Miami Herald*. November 2, 2017. Accessed December 17, 2018. <https://www.miamiherald.com/latest-news/article182139826.html>.

<sup>59</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." *www.theepochtimes.com*. January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).

<sup>60</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." *www.theepochtimes.com*. January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).

<sup>61</sup> Douglass, Joseph D. *Red Cocaine: The Drugging of America*. Atlanta, GA: Clarion House, 1999.

<sup>62</sup> Philipp, Joshua. "China Is Fueling a Drug War Against the US." *www.theepochtimes.com*. January 05, 2018. Accessed November 17, 2018. [https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states\\_1915904.html](https://www.theepochtimes.com/china-is-supplying-a-drug-war-against-the-united-states_1915904.html).



decisive weapon in the ongoing low-level warfare continuously waged against Western civilization.<sup>63</sup> Expert testimony, intelligence data, and defector reporting over the past several decades detail this process.<sup>64</sup> To that end, America now finds itself in a reverse opium war, where it is the U.S., not China, that is the victim.<sup>65</sup>

However, skeptics on both sides say a reverse opium war is far-fetched, citing high-level American and Chinese meetings between U.S. Presidents Obama (2016) and Trump (2017 and 2018) and Chinese President Xi Jinping where the leaders agreed on enhanced measures to keep fentanyl from coming to America.<sup>66</sup> While initial agreements showed promise—25 fentanyl substances and five precursors listed as “controlled/prohibited”—despite U.S. insistence the addition of new substances to that list has yet to occur.<sup>67</sup> Furthermore, China has yet to specify any additional steps it intends to take to address the problem, and when questioned, its follow up has been patchy at best.<sup>68</sup> Perhaps most telling, between 2016 and 2017, 1,072 shipments of fentanyl from China were seized upon entry into the United States—but only four such shipments were seized as they were leaving China.<sup>69</sup>

Lastly, if any government can control its nation’s people and industry, it is China.

Beijing already uses its authoritarian state structure and technology to control the movement of

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<sup>63</sup> Douglass, Joseph D. *Red Cocaine: The Drugging of America*. Atlanta, GA: Clarion House, 1999.

<sup>64</sup> Douglass, Joseph D. *Red Cocaine: The Drugging of America*. Atlanta, GA: Clarion House, 1999.

<sup>65</sup> Lawson, Greg R. "The Fentanyl Crisis Is a Reverse Opium War." *The National Interest*. December 27, 2017. Accessed November 17, 2018. <https://nationalinterest.org/feature/the-fentanyl-crisis-reverse-opium-war-23812>.

<sup>66</sup> McCombs, Dave. "U.S. Panel Says China Is Not Doing Enough to Stem Tide of Fentanyl." *Bloomberg.com*. November 26, 2018. Accessed November 26, 2018. <https://www.bloomberg.com/news/articles/2018-11-27/u-s-panel-says-china-not-doing-enough-to-stem-tide-of-fentanyl>.

<sup>67</sup> McCombs, Dave. "U.S. Panel Says China Is Not Doing Enough to Stem Tide of Fentanyl." *Bloomberg.com*. November 26, 2018. Accessed November 26, 2018. <https://www.bloomberg.com/news/articles/2018-11-27/u-s-panel-says-china-not-doing-enough-to-stem-tide-of-fentanyl>.

<sup>68</sup> Wee, Sui-lee. "Trump Says China Will Curtail Fentanyl. The U.S. Has Heard That Before." *The New York Times*. December 03, 2018. Accessed December 03, 2018. <https://www.nytimes.com/2018/12/03/business/fentanyl-china-trump.html>.

<sup>69</sup> Wee, Sui-lee. "Trump Says China Will Curtail Fentanyl. The U.S. Has Heard That Before." *The New York Times*. December 03, 2018. Accessed December 03, 2018. <https://www.nytimes.com/2018/12/03/business/fentanyl-china-trump.html>.

people and ideas within its country with stunning efficiency. Unsurprisingly, it maintains a similar capability with commodities exports—leading analysts to assume China knows exactly what is leaving their ports, where it is going, and when it will arrive.<sup>70</sup> Moreover, China remains determined to crack down on illegal drug use. Recent reporting highlights Chinese government officials now chemically examine city sewage for traces of illicit drugs.<sup>71</sup> By analyzing bodily waste, officials can isolate neighborhoods followed by structures (apartments or homes) in an effort to target the offenders.<sup>72</sup> Given all this information, U.S. policymakers unequivocally assess: “The Chinese government undoubtedly has the capacity to curb the export of illicit fentanyl into the U.S.”<sup>73</sup> Unfortunately, China has decided these actions are not worth their costs.<sup>74</sup>

## CONCLUSION

In conclusion, U.S. illicit fentanyl use, addiction, overdoses, and deaths continue to rise at alarming rates. Easily available and cutting across ethnic and socioeconomic lines, illicit fentanyl fills the growing demand of an over-prescribed, opioid-addicted U.S. populace. Furthermore, due to its cheap cost and high profitability, it is also becoming a widespread additive in almost every street drug—turning the typically benign fatal.<sup>75</sup> It is not only costing

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<sup>70</sup> Kounalakis, Markos. "China Is Using Fentanyl in a Chemical War against America." *Miami Herald*. November 2, 2017. Accessed December 17, 2018. <https://www.miamiherald.com/latest-news/article182139826.html>.

<sup>71</sup> Ma, Alexandra. "China Is so Desperate to Win Its War on Drugs, It's Started Analyzing People's Sewage for Contaminated Pee." *Business Insider*. July 29, 2018. Accessed January 12, 2019. <https://www.businessinsider.com/china-analyzing-sewage-for-drug-traces-in-pee-as-part-of-crackdown-2018-7>.

<sup>72</sup> Ma, Alexandra. "China Is so Desperate to Win Its War on Drugs, It's Started Analyzing People's Sewage for Contaminated Pee." *Business Insider*. July 29, 2018. Accessed January 12, 2019. <https://www.businessinsider.com/china-analyzing-sewage-for-drug-traces-in-pee-as-part-of-crackdown-2018-7>.

<sup>73</sup> Bernstein, Leandra. "Drug Trade War: Chinese Fentanyl Is Fueling the US Opioid Crisis." *WJLA*. October 2, 2018. Accessed November 17, 2018. <https://wjla.com/news/nation-world/chinese-fentanyl-is-fueling-the-us-opioid-crisis-drug-trade-tensions-escalate>.

<sup>74</sup> Bernstein, Leandra. "Drug Trade War: Chinese Fentanyl Is Fueling the US Opioid Crisis." *WJLA*. October 2, 2018. Accessed November 17, 2018. <https://wjla.com/news/nation-world/chinese-fentanyl-is-fueling-the-us-opioid-crisis-drug-trade-tensions-escalate>.

<sup>75</sup> Millar, Abi. "Fentanyl: Where Did It All Go Wrong?" *Pharmaceutical Technology*. February 27, 2018. Accessed November 25, 2018. <https://www.pharmaceutical-technology.com/features/fentanyl-go-wrong/>.

every American money from their wallet (an estimated \$1T USD between 2019 and 2020), but is also systematically lowering US life expectancy.<sup>76</sup> As the global leader in illicit fentanyl and precursor production and supply, China accounts for the majority of the world's product as a result of high profitability, available infrastructure, loose regulation, and minimal oversight.<sup>77</sup> The process to acquire product has become easy and effective, illicit Chinese fentanyl can be ordered online and shipped to the place of one's choosing by the USPS.

Chinese officials do not deny an illicit fentanyl problem exists, but act quickly to cast blame elsewhere. However, in closely examining China's drug history, "Unrestricted Warfare" doctrine and fentanyl related actions/inaction, its complicity becomes apparent; China is pushing illicit fentanyl into the U.S. in an effort to destabilize, undermine and weaken the fabric of America's social and political systems. Without swift action, Chinese produced illicit fentanyl remains on track to plunge America into its next national security crisis. And in the aftermath, as the U.S. finishes wrestling its internal demons and struggles to regain its focus—much to its chagrin, the 21<sup>st</sup> Century will have continued tilting away from the eagle and towards the dragon—with fentanyl playing a stealthy but extremely key role in this process.<sup>78</sup>

## RECOMMENDATIONS

In order to combat America's growing illicit fentanyl crisis, the U.S. should aggressively develop and implement a coherent whole of government strategy grounded in information, partnerships and policy. Key steps in this strategy include: first, make the strategy a national

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<sup>76</sup> Superville, Darlene. "Public Broadcasting Service." PBS. November 20, 2017. Accessed January 20, 2019. <https://www.pbs.org/newshour/nation/white-house-says-opioid-crisis-cost-504-billion-in-2015-much-higher-than-once-thought>.

<sup>77</sup> Wilber, Del Quentin. "Fentanyl Smuggled from China Is Killing Thousands of Americans." Los Angeles Times. October 19, 2018. Accessed November 17, 2018. <https://www.latimes.com/politics/la-na-pol-china-fentanyl-20181019-story.html>.

<sup>78</sup> Lawson, Greg R. "The Fentanyl Crisis Is a Reverse Opium War." The National Interest. December 27, 2017. Accessed November 17, 2018. <https://nationalinterest.org/feature/the-fentanyl-crisis-reverse-opium-war-23812>.

priority; second, create a transparent communications plan that shines a light on bad behavior; third, work with China and Mexico to curtail supply; and fourth, develop and enact new policies and programs aimed at reducing U.S. demand.<sup>79</sup> A detailed plan containing these keys steps and enacted quickly should produce a substantial cooling effect on illicit fentanyl's all-out assault on the fabric of America's social and political systems.

The first step in a coherent US strategy countering illicit fentanyl relies on US senior policymakers to understand, advocate for, and approve a national illicit fentanyl strategy.<sup>80</sup> Focused on supply (China and Mexico) and demand (U.S. populace), the goals, aims and consequences of unchecked illicit fentanyl need to become a national discussion.<sup>81</sup> The strategy cannot fall victim to partisan politics or other Washington roadblocks; it needs strong and swift political backing and approval by all branches of government so subsequent rapid financing can commence. The declaration of an Illicit Fentanyl National Emergency with true bipartisan support should be strongly considered. With policy and funding in place, the successive steps to counter illicit fentanyl can commence.

The second step of a national illicit fentanyl strategy focuses on creating a transparent communications and broadcasting plan that shines a light on, and combats, bad behavior. The U.S. should engage in a frank and open dialog with both China and Mexico, using validated data to highlight the sheer volume of illicit fentanyl entering the country and the associated damage (both financial and societal) it levies on the American populace.<sup>82</sup> The result should leave no

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<sup>79</sup> Pardo, Bryce. "China's Role in the U.S. Synthetic Opioid Market." RAND Corporation. September 06, 2018. Accessed January 12, 2019. <https://www.rand.org/pubs/testimonies/CT497.html>.

<sup>80</sup> USAF AT&L, comp. *Study I - Great Power Competition in the 21st Century: Understanding the Critical Elements*. Office of Commercial Economic Analysis Summer Studies. Washington, DC: USAF AT&L, 2017. 1-57

<sup>81</sup> Pardo, Bryce. "China's Role in the U.S. Synthetic Opioid Market." RAND Corporation. September 06, 2018. Accessed January 12, 2019. <https://www.rand.org/pubs/testimonies/CT497.html>.

<sup>82</sup> Pardo, Bryce. "China's Role in the U.S. Synthetic Opioid Market." RAND Corporation. September 06, 2018. Accessed January 12, 2019. <https://www.rand.org/pubs/testimonies/CT497.html>.

doubt the U.S. faces facing a serious fentanyl crisis and that China and Mexico are the key contributors.<sup>83</sup> The data should compel and serve as a starting point for China and Mexico to work with the U.S. (bilaterally or trilaterally) in building closer relationships, creating additional policies and fostering increased intelligence sharing focused on the illicit fentanyl problem.<sup>84</sup>

Step three of a U.S. illicit fentanyl strategy centers on curbing the supply from China and Mexico. The U.S. must first focus on regulation and policy at home and abroad and in both the government and corporate realms.<sup>85</sup> Gaps in U.S. regulation need tightening and overall international fentanyl policy needs strengthening.<sup>86</sup> Examples include: the creation of a flexible regulatory design to tackle the ever-changing fentanyl chemical composition and associated precursors, strong cyber policy to combat online illicit fentanyl sales both on the Internet and dark web, and robust trilateral shipping regulations that deter not only bulk container cargo but also smaller parcel shipment via USPS, FedEx or DHL. Subsequently, the strengthening of U.S. regulation and policy needs pairing with a vested increase in funding, manpower, and technology.<sup>87</sup> Examples include: CBP officers with advanced detection capabilities at ports of entry, automated USPS international mail inspection with tracing technology, and cyber investigators with the abilities to track, locate and pass the identities and locations of online illicit fentanyl dealers to authorized law enforcement officials.

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<sup>83</sup> Wee, Sui-lee. "Trump Says China Will Curtail Fentanyl. The U.S. Has Heard That Before." The New York Times. December 03, 2018. Accessed December 03, 2018. <https://www.nytimes.com/2018/12/03/business/fentanyl-china-trump.html>.

<sup>84</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 28. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

<sup>85</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 28. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

<sup>86</sup> Pardo, Bryce. "China's Role in the U.S. Synthetic Opioid Market." RAND Corporation. September 06, 2018. Accessed January 12, 2019. <https://www.rand.org/pubs/testimonies/CT497.html>.

<sup>87</sup> Pardo, Bryce. "China's Role in the U.S. Synthetic Opioid Market." RAND Corporation. September 06, 2018. Accessed January 12, 2019. <https://www.rand.org/pubs/testimonies/CT497.html>.

The last and arguably most important step U.S. policy makers need to address focuses on reducing America's demand for illicit fentanyl.<sup>88</sup> The U.S. should start by strengthening federal efforts aimed at demand reduction to lessen economic incentives for producers and distributors, while saving the lives of those suffering from addiction.<sup>89</sup> Demand reduction should initially include substantially improving access to existing and proven therapies, such as methadone and buprenorphine.<sup>90</sup> Simultaneously, senior U.S. policy officials should encourage the expansion of pharmacological treatments and regulations covered by private and public insurance. Subsidizing the cost of treatment to those who cannot afford it and reviewing and reducing regulatory barriers on their provision will key to this endeavor.<sup>91</sup> Lastly, U.S. policymakers should also direct federal health authorities (such as the FDA) to assess additional innovative and evidence-informed medication treatments to further curb fentanyl's devastating effects.<sup>92</sup>

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<sup>88</sup> "Fentanyl Crisis: Is China a Major Source of Illegal Drugs?" BBC News. September 24, 2018. Accessed November 17, 2018. <https://www.bbc.com/news/world-45564744>.

<sup>89</sup> Pardo, Bryce. "China's Role in the U.S. Synthetic Opioid Market." RAND Corporation. September 06, 2018. Accessed January 12, 2019. <https://www.rand.org/pubs/testimonies/CT497.html>.

<sup>90</sup> Pardo, Bryce. "China's Role in the U.S. Synthetic Opioid Market." RAND Corporation. September 06, 2018. Accessed January 12, 2019. <https://www.rand.org/pubs/testimonies/CT497.html>.

<sup>91</sup> Pardo, Bryce. "China's Role in the U.S. Synthetic Opioid Market." RAND Corporation. September 06, 2018. Accessed January 12, 2019. <https://www.rand.org/pubs/testimonies/CT497.html>.

<sup>92</sup> Pardo, Bryce. "China's Role in the U.S. Synthetic Opioid Market." RAND Corporation. September 06, 2018. Accessed January 12, 2019. <https://www.rand.org/pubs/testimonies/CT497.html>.