



CBP Strategy to Combat Opioids



U.S. Customs and
Border Protection

Ethos of U.S. Customs and Border Protection

We are the guardians of our Nation's borders.

We are America's frontline.

We safeguard the American homeland at and beyond our borders.

We protect the American people against terrorists and the instruments of terror.

*We steadfastly enforce the laws of the United States while fostering
our Nation's economic security through lawful international trade and travel.*

We serve the American people with vigilance, integrity, and professionalism.



**U.S. Customs and
Border Protection**



Message from the Commissioner

Across our Nation, communities are suffering the scourge of an opioid epidemic that is challenging law enforcement, healthcare, and social service resources. Virtually all of these opioids, whether finished heroin or increasingly potent synthetics, such as fentanyl and its analogues, come across our international border, trafficked by Transnational Criminal Organizations. While interdiction efforts must be coupled with demand reduction and treatment as the President and Homeland Security Secretary have stated, U.S. Customs and Border Protection (CBP) has a unique responsibility and critical role in preventing these poisons that threaten the public from entering our country.

In response to this growing and complex challenge, CBP has developed, in collaboration with our myriad governmental, commercial, and non-governmental partners, a comprehensive and integrated strategy across multiple lines of effort. The strategy calls for international engagement to reduce the supply at the source through joint operational efforts and diplomatic approaches. CBP will continue to advance counternetwork operations in order to effectively target and interdict the organizations involved in smuggling opioids at each node of the supply chain, based on data-driven intelligence. CBP will focus on our core mission of border interdiction and enhance our ability to detect opioids entering through our ports of entry and through parcels in express consignment and mail facilities through analytics, operations, and non-intrusive inspection technology enhancements. Lastly, CBP will focus on analysis and safety to improve testing and personnel protection equipment across opioid identification, forensics, examination procedures, and naloxone accessibility.

My commitment to this critical and dangerous issue for America remains undeterred – CBP will strengthen our federal, state, local, tribal, commercial, and international partnerships to combat opioids. We will work alongside law enforcement, postal, legislative and executive branch offices to meet this crisis head on and relentlessly target and interdict the transnational organizations and individuals producing and trading these poisons.

A handwritten signature in black ink, appearing to read 'K. McAleenan', followed by a long horizontal line.

Kevin K. McAleenan
Commissioner

U.S. Customs and Border Protection

This page intentionally left blank

Contents

Executive Summary	2
Introduction	2
Background	5
Purpose	8
Strategic Goals	9
Goal 1: Enhance collaboration and information-sharing to combat illicit opioids	10
Goal 2: Produce actionable intelligence on illicit opioids	13
Goal 3: Target the opioid supply chain	16
Goal 4: Protect CBP personnel from exposure to opioids	19
Conclusion	21

U.S. Customs and Border Protection Strategy to Combat Opioids

Executive Summary

This strategy to combat opioids serves as an action plan encompassing what U.S. Customs and Border Protection (CBP) will accomplish with partners in aggressively identifying and interrupting the opioid supply chain. It is a living document that provides a blueprint to mobilize and prioritize resources in the fight against opioids while allowing for adjustments to be made as the environment evolves. Based on the deadly threat posed by fentanyl, its analogues, and other synthetic opioids, CBP is committed to dedicating its resources to thwart the illicit opioid supply chain and the networks promoting it. As the guardians of our nation's borders, CBP has developed four strategic goals to combat illicit opioids and protect Americans.

- Goal 1: Enhance collaboration and information-sharing to combat illicit opioids.
- Goal 2: Produce actionable intelligence on illicit opioids.
- Goal 3: Target the opioid supply chain.
- Goal 4: Protect CBP personnel from exposure to opioids.

The safety of the American people remains of utmost importance to us. Our job involves taking necessary risks to protect them, and this strategy aims to adapt our traditional enforcement tactics to the ever-changing environment. Our success is dependent not only on the work that our agents, officers, scientists, and other supporting personnel do on a daily basis, but on collaborating with our law enforcement partners across the United States and around the world to tackle this global problem that is responsible for a staggering number of lives lost due to fatal overdoses.

This vast network of partnerships that CBP has cultivated will assist us to conduct inter- and intra-agency operations that will lead to actionable information and intelligence to better target the opioid supply chain while ensuring the safety of our personnel and canines.

Introduction

The recent and marked increase in demand for opioids by Americans has had a detrimental impact on this country as seen by the sharp rise in overdoses and the increased strain placed on law enforcement, healthcare, and social service providers. Drug overdoses are now the leading cause

CBP Strategy to Combat Opioids

of accidental death in the United States with an estimated 175¹ Americans dying daily from a drug overdose.² The deaths are a consequence of an escalating public health crisis - opioid addiction, which has become deadlier because of an influx of illicit fentanyl, its analogues, and other opioids.

The unprecedented levels of opioid misuse, addiction, and overdose significantly threaten this country and prompted President Trump to declare the nation's opioid crisis "A national health emergency", which was the recommendation of the President's Commission on Combatting Drug Addiction and the Opioid Crisis.

CBP is the premier law enforcement agency in the country enhancing the Nation's safety, security, and prosperity through collaboration, innovation, and integration. CBP is on the frontlines everyday securing the border, and as such, has considerable equities in disrupting the opioid supply chain from entering the country.

On a typical day, CBP welcomes nearly one million visitors, screens more than 67,000 cargo containers, arrests more than 1,100 individuals, and seizes more than one ton of illicit drugs. Yet despite the staggering number of illegal drugs seized daily, virtually all of the illicit opioids, whether finished heroin or increasingly potent synthetics such as fentanyl and its analogues, enter the country through our international land, air, and sea borders, including through international mail facilities. This includes 475 million international mail and express consignment parcels entering the United States in FY17, or 1.4 million daily.



A table full of fentanyl and other designer drugs sits on display at the Chicago International Mail Facility. These illicit drugs illustrate a snapshot of what CBP officers assigned to the Area Port of Chicago find in mail shipments each week at the facility.

¹ Note: This number reflects all drug overdoses and is not limited to opioid overdoses. "Remarks by President Trump on Combatting Drug Demand and the Opioid Crisis" White House, Office of the Press Secretary, 26 October 2017. <https://www.whitehouse.gov/the-press-office/2017/10/26/remarks-president-trump-combatting-drug-demand-and-opioid-crisis>, accessed 28 October 2017.

² Trump, Donald J. "Remarks by President Trump on Combatting Drug Demand and the Opioid Crisis" White House, Office of the Press Secretary, 26 October 2017. <https://www.whitehouse.gov/the-press-office/2017/10/26/remarks-president-trump-combatting-drug-demand-and-opioid-crisis>, accessed 28 October 2017.

CBP Strategy to Combat Opioids

As this nation grips with the staggering impact the opioid epidemic is having on the fabric of our society and the challenges it poses; CBP finds itself uniquely positioned to help combat this crisis. The men and women of CBP are the front lines of this battle to prevent deadly substances from infiltrating our borders and finding its way into the hands of beloved family members, friends, neighbors, and co-workers throughout the United States.

As the nature of this health crisis reaches epidemic levels, CBP has focused its resources to tackle the changing landscape of the opioid crisis and the mass influx and use of synthetic opioids, primarily produced outside the continental United States.

To address this growing and complex crisis, CBP developed this strategy to combat opioids. It is a comprehensive and integrated approach across multiple lines of effort, including:

- Enhanced collaboration;
- Actionable intelligence;
- Targeting; and
- Personnel Safety.

Collectively, these efforts will aid in the reduction of the opioid supply through joint operational efforts and collaboration with federal, state, local, and tribal law enforcement entities; including governments, private sector, and medical community partners which will yield actionable intelligence and help target and interdict the organizations involved in smuggling opioids at each node in the supply chain. This strategy also focuses on our ability to detect opioids entering the country through and between our ports of entry on both our northern and southern borders, as well as through parcels in express consignment and mail facilities through analytics, operations, and non-intrusive inspection technology enhancements and narcotic detection canine teams trained to detect the presence of opioids such as fentanyl and its analogues. The fourth pillar of this strategy focuses on the safety of our personnel by ensuring they have the necessary personnel protection equipment, emergency medical training, access to naloxone, and awareness about fentanyl facts.



CBP, Office of Field Operations, K9 officer Ken Hoffman rewards his dog, after locating narcotics hidden in a package at the International Mail Facility in Chicago.

Background

The prevalence of illicit opioids in the United States has wreaked havoc in communities across the country. The most jarring statistics include the fact that drug overdoses are now the leading causes of accidental deaths in America, with fentanyl the leading cause of overdose deaths nationwide, killing more than 20,000 people last year.³ The total number of overdose deaths in the United States last year reached approximately 64,000, basically the equivalent of the number of men and women who work at CBP, the nation's largest law enforcement agency. Almost one-third of these overdose deaths involved a synthetic opioid other than methadone, a category that includes the powerful drug fentanyl and its analogues.⁴

The rising death toll and the recommendation of The President's Commission on Combatting Drug Addiction and the Opioid Crisis were contributing factors in President Donald J. Trump's declaration of the opioid epidemic as, "A Nationwide Public Health Emergency."

"Last year, we lost at least 64,000 Americans to overdoses. That's 175 lost American lives per day. That's seven lost lives per hour in our country. Drug overdoses are now the leading cause of unintentional death in the United States by far. More people are dying from drug overdoses today than from gun homicides and motor vehicles combined. Think of it -- motor vehicle crashes, gun homicides, more people by far from drug overdoses."⁵

- President Donald J. Trump

The rise in overdose deaths is largely due to the proliferation of illicitly made fentanyl, a highly potent synthetic opioid, and its analogues. Over the past fifteen years drug poisoning deaths have risen exponentially and contributed to a 700 percent increase in the number of heroin overdose deaths.⁶ Likewise, the overall heroin seizures have steadily risen over the past decade.

³ Vergano, Dan. "Fentanyl is Now the Leading Cause of US Overdose Deaths," BuzzFeed News, 12 October 2017, based on provisional data from the CDC.

⁴ Provisional Counts of Drug Overdose Deaths, CDC/NCHS, as of 8/6/2017. Note: Provisional overdose death counts for 2016-2017 are based on data available for analysis as of the date specified. Provisional counts may be incomplete, and causes of death may be pending investigation.

⁵ Trump, Donald J. "Remarks by President Trump on Combatting Drug Demand and the Opioid Crisis" White House, Office of the Press Secretary, 26 October 2017. <https://www.whitehouse.gov/the-press-office/2017/10/26/remarks-president-trump-combatting-drug-demand-and-opioid-crisis>, accessed 28 October 2017.

⁶ (U) CDC, Wonder Database, <https://wonder.cdc.gov/>, accessed 8 December 2016, extracted information classification is (U), overall document classification is U//FOUO/LES.

CBP Strategy to Combat Opioids

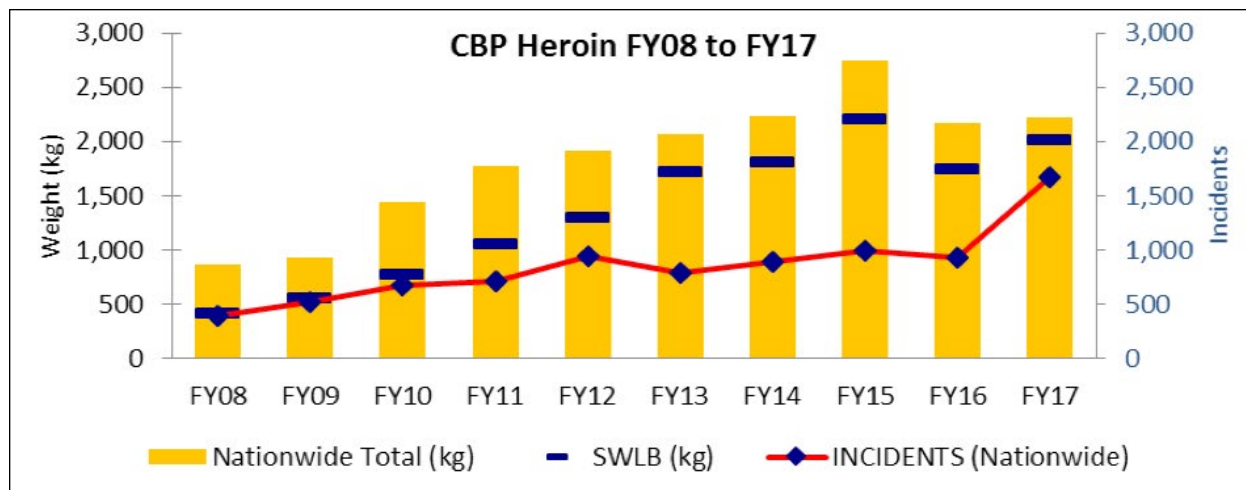


Figure 1: CBP Heroin Seizures

When looking at the heroin seizure data in Figure 1, it is important to note that seizures are a factor of both flow and enforcement activity. These figures along with the ripple effect that an increase in the use and abuse of illicit opioids led to a Presidential Memorandum for the Heads of Executive Departments and Agencies on Combatting the National Drug Demand and Opioid Crisis. This memo states that “the heads of executive departments and agencies, as appropriate and consistent with law, shall exercise all appropriate emergency authorities, as well as other relevant authorities, to reduce the number of deaths and minimize the devastation the drug demand and opioid crisis inflicts upon American communities.”⁷

In response to the President’s guidance and declaration of the opioid crisis as a Public Health Emergency, CBP developed this strategy to leverage its resources to tackle this systemic nationwide problem.

The Presidential Memo identified three factors that are driving the opioid crisis, and highlighted the efforts of CBP to seize opioids, such as fentanyl.

“First, since the 1990s, there has been a dramatic rise in opioid pain medication prescriptions. Second, heroin from Mexico has flooded the country. Third, the illicit manufacture and illegal importation of fentanyl -- an extremely deadly synthetic opioid -- and its analogues and related compounds have proliferated. Fentanyl is currently manufactured almost exclusively in China, and it is either shipped into the United States or smuggled across the southern border by drug traffickers. Between 2013 and 2016, the amount of fentanyl seized by Customs and Border Protection at the border increased more than 200 times over. Dealers are increasingly lacing fentanyl into other drugs and pressing it into counterfeit opioid pills. Because fentanyl is lethal in even miniscule doses, this is an extremely deadly tactic, as it too often causes users to ingest a fatal amount unknowingly.”⁸

⁷ Trump, Donald J., “Presidential Memorandum for the Heads of Executive Departments and Agencies: Combatting the National Drug Demand and Opioid Crisis”, 26 October 2017. <https://www.whitehouse.gov/the-press-office/2017/10/26/presidential-memorandum-heads-executive-departments-and-agencies>, accessed 28 October 2017.

⁸ Trump, Donald J., “Presidential Memorandum for the Heads of Executive Departments and Agencies: Combatting the National Drug Demand and Opioid Crisis”, 26 October 2017. <https://www.whitehouse.gov/the-press-office/2017/10/26/presidential-memorandum-heads-executive-departments-and-agencies>, accessed 28 October 2017.

CBP Strategy to Combat Opioids

The preponderance of illicit opioids consumed in the United States are smuggled into the country via the Southwest Border (SWB) and through international mail and express consignment hubs. Significant increases in poppy cultivation and heroin production in Mexico, the primary source of heroin for the U.S. market, allow traffickers to provide a steady stream of high-purity, low-cost heroin to markets throughout the United States. Proximity to Mexico and the sheer volume of cross-border traffic is also a major contributing factor to this epidemic, with more than 74 million personally-owned vehicles and 5.54 million commercial trucks crossing the SWB from Mexico in 2015.⁹

A majority of the illicit fentanyl in the United States is manufactured in clandestine labs in China and possesses strong opioid properties that make it an attractive drug of abuse. Further underscoring this particular drug threat, the Centers for Disease Control reports that there was a 73 percent increase in deaths involving such synthetic opioids from 5,544 in 2014 to 9,580 in 2015. The actual number of fentanyl – or fentanyl analogue-related deaths likely is higher as these deaths may have been incorrectly attributed to other causes.

As noted in Figure 2 below, the total Office of Field Operations (OFO) seizures have increased significantly (by weight) from FY16 to FY18, nearly quadrupling. This increase is driven by the dramatic rise in fentanyl seizures in the express consignment and mail environments.

Office of Field Operations (OFO) Fentanyl Seizures by Mode								
Mode of Transport	Fiscal Year 2016		Fiscal Year 2017		% Change (weight)	Fiscal Year 2018		% Change (weight)
	Weight	Total Incidents	Weight	Total Incidents		Weight	Total Incidents	
POV - Land	321.7 lbs (145.92 kgs)	14	899.1 lbs (407.83 kgs)	73	179%	1,321.1 lbs (599.27 kgs)	136	47%
Other - Land	56.1 lbs (25.42 kgs)	6	140.1 lbs (63.53 kgs)	14	150%	120.7 lbs (54.73 kgs)	46	-14%
Express Consignment	47.0 lbs (21.34 kgs)	39	236.3 lbs (107.21 kgs)	117	402%	116 lbs (52.62 kgs)	76	-51%
Mail	33.7 lbs (15.28 kgs)	50	96 lbs (43.56 kgs)	221	185%	136.1 lbs (61.72 kgs)	455	46%
Air (other)	0.3 lbs (0.15 kgs)	5	0 lbs (0.01 kgs)	1	-91%	110.4 lbs (50.06 kgs)	2	5,418%
TOTAL	458.8 lbs (208.1 kgs)	114	1,371.6 lbs (622.14 kgs)	426	199%	1,804.2 lbs (818.4 kgs)	698	32%

Figure 2: CBP Fentanyl Seizures¹⁰

These changing dynamics which include suppliers relying on express consignment and international and domestic mail to transport illicit opioids has prompted CBP to enhance collaboration with other federal agencies and international partners, including state and local governmental partners, to focus tactics and targeting efforts on suppliers and source countries.

The advent of e-commerce has added another layer of complexity to this problem. Illicit opioids can now be purchased online from the comfort of one's home. Opioids entering the country through express consignment or international mail have a substantially higher purity level than the opioids entering along the Southwest Border (SWB). In many cases, trace amounts of fentanyl are part of mixed loads passing through the SWB, or mixed by dealers here in the United States, thus unsuspecting users are not aware of the potency of the products they have purchased. Anecdotal

¹⁰ Note: U.S. Border Patrol (USBP) did not track fentanyl seizures until July 2016. From July 7, 2016 – September 30, 2016, USBP seized 104.54 pounds of fentanyl. In FY17, USBP seized 181 pounds of fentanyl, and in FY18, USBP seized 388 pounds of fentanyl.

CBP Strategy to Combat Opioids

evidence suggests overdoses occur with the opioid abuser completely unaware of the dangers and true contents of the drugs they used.

CBP's focus is wide ranging from the direct interdiction of key precursor chemicals used to make illicit substances to imported uncut pure substances and intercepting cut or "finished products" and seizing pill presses that traffickers use in this country to make tablets containing illicit substances.

By focusing on a multi-tiered approach and leveraging partnerships, resources, and information, CBP's goal is to disrupt the supply chain by reducing the amount of illicit opioids from entering the country which in turn would lead to a decrease in lives lost to this epidemic and a potential reduction in the number of CBP personnel exposed to synthetic opioids.



CBP, Office of Field Operations, Officer Monika Branska Carlos inspects a package with possible illegal narcotics at the International Mail Facility at Chicago O'Hare International Airport. The facility is the second busiest location in the country for fentanyl seizures with 82 packages seized last year.

Purpose

To establish a comprehensive approach for CBP to anticipate, identify, mitigate, and disrupt the illicit opioid supply chain.¹¹ CBP serves as the nation's frontline of defense against contraband moving through clandestine means across our borders and throughout the interior of the United States. This strategy will bring the unique and formidable capabilities of CBP to bear on the illicit opioid trade and build capacity with our partners globally to ensure the safety of Americans.

Mission Statement

To protect Americans from the dangers of illicit opioids through enhanced collaboration,

¹¹ This strategy is consistent with the Heroin Availability Reduction Plan (HARP) and the President's forthcoming National Drug Control Strategy as well as the Administration and Department goals to combat opioids.

CBP Strategy to Combat Opioids

intelligence gathering, and interdiction efforts, while steadfastly ensuring the safety of CBP personnel.

Vision Statement

CBP leads national targeting and interdiction efforts to connect the dots to prevent illicit opioids from entering the United States.



Officers in CBP's Office of Field Operations conduct global observations of air traffic and trade activities at the National Targeting Center, a key component in CBP's response to the national opioid crisis.

Strategic Goals

Goal 1: Enhance collaboration and information-sharing to combat illicit opioids.

Goal 2: Produce actionable intelligence on illicit opioids.

Goal 3: Target the opioid supply chain.

Goal 4: Protect CBP personnel from exposure to opioids.

Strategic Goals and Associated Objectives

Goal 1: Enhance collaboration and information sharing to combat illicit opioids.

Goal 1 – Overview

The first goal in CBP's Strategy to Combat Opioids recognizes the value of establishing and enhancing collaboration with key stakeholders, both here at home and abroad. Because the opioid epidemic is a global problem, it is imperative that CBP partners with foreign governments to identify and exchange opioid related-data with our partners to enhance intelligence products, targeting initiatives and inter-agency operations.

While much attention is being paid to transit countries such as Mexico and source countries such as China, incumbent in this goal is to prioritize source and transit countries and to increase collaboration and operational efforts to thwart the production and distribution of fentanyl.

Objective 1.1

Identify and advance partnerships with international stakeholders.

The proliferation of illicit opioids is an international problem and CBP, with its global work force and vast partnerships, is well-positioned to address the threat of opioids entering the country. The U.S.-Mexico border serves as a primary entry point for many illicit opioids, including fentanyl, crossing into the United States. Mexican Transnational Criminal Organizations operating on both sides of the U.S.-Mexico border are responsible for the majority of the heroin, methamphetamine, cocaine, and foreign-produced marijuana available in U.S. illicit drug markets,¹² some of which is now laced with fentanyl. CBP will continue to work closely with the Government of Mexico (GOM) and Office of National Drug Control Policy (ONDCP) to provide support to the GOM on enforcement operations. CBP will also be active participants in the U.S. Embassy's Mexico Heroin and Fentanyl Working Group.

While Mexico serves as a primary route for fentanyl to enter the U.S., the purity level of fentanyl entering from the southwest border is approximately 7% pure. By contrast, fentanyl arriving from China via express consignment and international mail facilities is nearly 90% pure thus more lethal. CBP, in partnership with our federal partners, has been engaging Chinese counterparts to engage in efforts to disrupt the supply of fentanyl and other synthetic opioids that are flooding into this country from China. CBP was one of the supporting agencies in DOJ's federal indictment of two Chinese nationals and their North American based traffickers and distributors for separate conspiracies to distribute large quantities of fentanyl and fentanyl analogues and other opiate

¹² DRAFT National Drug Control Strategy, 27 October 2017, page 42

CBP Strategy to Combat Opioids

substances in the United States.¹³

By collaborating with CBP's foreign partners, including the Chinese government and other federal entities, CBP will exchange information about illicit opioid global supply networks in an effort to garner more indictments and other enforcement actions.

Objective 1.2

Mature and sustain information sharing partnerships with federal, state, local, and tribal law enforcement entities – including governments, private sector, and medical community partners.

CBP will continue to foster relationships with national law enforcement organizations, the High Intensity Drug Trafficking Areas (HIDTA) Program, non-profits, and national organizations representing mayors, city managers, governors, tribal nations, first responders, and other key stakeholders to share information about CBP's capabilities and current efforts to combat the opioid epidemic, as well as contribute to intelligence products and information sharing on trends frontline personnel are seeing in CBP's interdiction. As a leading law enforcement agency in the United States, other public safety agencies at the federal, state, local, and tribal level often turn to CBP to learn more about current operations. As such, CBP's subject matter experts will present at national and local conferences, symposiums, forums, and trainings to help share CBP's experiences, successes, and lessons learned in the fight against opioid abuse and use. In addition, CBP will identify and seek information from these partners that may be beneficial to CBP's efforts to anticipate and disrupt the opioid supply chain. CBP will continue to support the International Cargo Fellowship Program at CBP's National Targeting Center in which information is shared and received from the participating fellows who represent several countries including Mexico. Most importantly, CBP will develop and strengthen relationships at the local level to facilitate the sharing of information – so that CBP stays apprised of trends state and local law enforcement partners are encountering and our state and local partners are apprised of trends CBP is encountering. It takes a network to defeat a network.

Another valuable partnership CBP is leveraging to combat opioids is the sharing of real-time information and intelligence among the Border Five (B5) countries¹⁴ to target express and postal consignments which leads to enhanced targeting and the identification of individuals and organizations involved in the illicit opioid trade.

¹³ "Justice Department Announces First Ever Indictments Against Designated Chinese Manufacturers of Deadly Fentanyl and Other Opiate Substances," U.S. Department of Justice, 18 October 2017. <https://www.justice.gov/opa/gallery/justice-department-announces-first-ever-indictments-against-designated-chinese> accessed 31 October 2017 and <https://www.justice.gov/opa/speech/deputy-attorney-general-rod-j-rosenstein-delivers-remarks-enforcement-actions-stop-deadly> accessed 31 October 2017.

¹⁴ The Border Five (B5) countries include the United States, Canada, Australia, New Zealand, and the United Kingdom.

Objective 1.3

Collaborate with the U.S. Postal Service and private sector shipping companies.

While most illicit drug smuggling attempts occur at Southwest land Ports of Entry (POEs), the smuggling of illicit synthetic drugs in the mail and Express Consignment Carrier (ECC) environment is a growing threat that CBP is addressing. Several different types of illicit synthetic drugs, or “designer drugs”, including synthetic opioids such as fentanyl, synthetic cannabinoids, and synthetic cathinones are currently being sold and shipped to end-users in the United States. CBP seizures of fentanyl, the most frequently seized synthetic opioid, remain relatively small compared to other opioids such as heroin, but have significantly increased over the past three years, from approximately two pounds seized in Fiscal Year (FY) 2013 to more than 530 pounds seized in FY 2017.

CBP and the USPS formalized a Memorandum of Understanding (MOU) on September 1, 2017 in which both agencies will collaborate together on day-to-day operations, strategic planning, and other initiatives related to the inspection of goods imported and exported through the mail. In addition, CBP will also collaborate with ECC’s and the USPS to improve enforcement operations at ECC and USPS facilities.

Goal 2: Produce actionable intelligence on illicit opioids.

Goal 2 – Overview

The focus of this goal is to collaborate with inter-agency partners to produce actionable intelligence and products that inform policy makers, agency leadership, and the intelligence community and provide timely information that can lead to interdiction operations through the identification of tactics, techniques, and the flow of drug trafficking including the activity of Transnational Criminal Organizations (TCOs). Critical data points include accurate seizure data and confirmed laboratory test results, particularly as it relates to fentanyl and its analogues. It is vital that CBP has timely and accurate information about drug seizures, drug identification, and drug purity to better understand the synthetic opioids trends entering the country and drug market. This goal focuses on the accuracy of seizure data based on confirmed laboratory test results to ensure that we have the most accurate information possible. Having accurate information is not only essential, but so is the need to update data bases when confirmed laboratory drug results are received that either validate or invalidate the presumptive field testing.

Objective 2.1

Advance CBP's intelligence operations through seizure data and other relevant information from intra-agency, inter-agency, and key external stakeholders.

CBP will continue to collaborate and strengthen ties with our investigative partners from the U.S. Postal Inspection Service, Homeland Security Investigations, Drug Enforcement Administration, Federal Bureau of Investigations, the regional High Intensity Drug Trafficking Areas (HIDTAs) and other key partners to conduct joint enforcement initiatives including intelligence-driven special operations designed to identify and disrupt drug smuggling. These operations have led to arrests, prosecutions, controlled shipments, and the disruption of regional distributors.

While CBP has robust relationships with our federal partners, we seek to enhance information sharing and collaboration efforts with the 28 regional HIDTAs. The HIDTAs purpose is to reduce drug trafficking and production in the United States by enhancing law enforcement intelligence sharing among federal, state, local, and tribal law enforcement agencies, as well as implementing coordinated enforcement activities. The HIDTAs cumulatively bring together more than 800 initiatives and more than 6,000 federal agents and analysts and 15,000 state, local, and tribal officers and analysts.¹⁵ CBP plans to increase participation in HIDTA activities that target drug trafficking organizations and collaborate with HIDTAs on commercial parcel services to enhance interdiction efforts.

In addition, to collaboration with key stakeholders related to CBPs intelligence operations, CBP

¹⁵ DRAFT National Drug Control Strategy, 27 October 2017, p. 8.

CBP Strategy to Combat Opioids

also shares information about the drug trends we are seeing at the border. A CBP scientist leads a monthly call for federal, state, local, and tribal law enforcement, coroners, forensic and medical examiners, and toxicologists to provide awareness of newly discovered designer drugs as well as any noted trends based on submissions to the LSS laboratories.

Objective 2.2

Improve the accuracy of data reporting and analysis.

Law enforcement collaboration and information-sharing is an essential tool to effectively produce actionable intelligence that can assist CBP and our partners identify targets and interdict illicit opioids from entering the country. Critical data points include accurate seizure data from each of CBP's operational components and confirmed laboratory test results, particularly as it relates to fentanyl and its analogues. Part of the challenge is insuring there are consistent data reporting processes across CBP, and that confirmed laboratory test results are captured in CBP databases, particularly from non-CBP laboratories. One identified gap that this strategy seeks to address is to ensure that presumptive field test results are updated in databases once the confirmed laboratory test results are received.

Another identified gap is that CBP databases such as Seized Assets and Case Tracking System (SEACATS) need to be updated to include more drug classification categories to more accurately capture present and future seized drugs. Based on the current system, it is not unusual to see fentanyl analogues captured in an "other" category because the correct class is not listed. And, the final gap identified regarding seizure data is to raise awareness among CBP personnel that all fentanyl seizures need to be entered into the El Paso Intelligence Center's (EPIC) National Seizure System (NSS). While there are no thresholds for fentanyl weight, it needs to be entered into NSS to get a Federal Drug Identification Number (FDIN).

One capability CBP is using to close intelligence gaps related to the opioid supply chain is palynology, more commonly referred to as pollen analysis. Pollen analysis is conducted by CBP's Laboratories and Scientific Services (LSS) scientists on illicit narcotic shipments that have been seized by CBP Officers and Border Patrol Agents at the border. The pollen testing has been used to determine the origin of illicit opioid shipments which has been used to help identify transit routes of illicit opioids. CBP has developed intelligence products based on the pollen analysis and shared it with relevant partners.

Objective 2.3

Partner with other federal entities and international organizations to improve targeting data to intercept fentanyl, its analogues, and other synthetic opioids.

CBP will partner with the U. S. Postal Service (USPS) and the U.S Food and Drug Administration to form an Interagency Work Group (IWG) that will focus on improving the federal government's ability to disrupt illicit supply chains that exploit the international and mail environment.

CBP Strategy to Combat Opioids

Together the IWG will focus on the increased sharing of Advance Electronic Data (AED) to help identify shipments that are potentially at a higher risk of containing contraband. Currently, 38 foreign postal services provide some advance data on international mail shipments as part of a joint CBP-USPS Pilot Program. The IWG will encourage foreign postal operators to provide EAD. The U.S. Government will provide best practices and training to those that request it. The IWG will encourage global partners to enhance regulations concerning the manufacturing of finished pharmaceutical products regarding fentanyl and other synthetic opioids. CBP will also partner with the USPS and the Universal Postal Union (UPU) to standardize the use of barcode tracking technology among participating postal services which will enhance targeting efforts and operations.

Goal 3: Target the opioid supply chain.

Goal 3 – Overview

The President’s Commission on Combating Drug Addiction and the Opioid Crisis Interim Report called the United States efforts to prevent fentanyl and its analogues from entering the country, “a losing battle.” The report called for “Key federal agencies, including the DEA, DHS, FBI, and DOJ, should coordinate pursuant to the Controlled Substances Act to intercept fentanyl (and other synthetic opioids) in envelopes and packages at mail processing distribution centers, and increase detection efforts using enhanced technology, more manpower, and expanded narcotic detection canine deployment. This goal focuses on changing this from a losing battle to a winning battle by targeting the opioid supply chain through enhancing counter network operations, targeting efforts, increased staffing, and enhanced detection efforts including technology and canines.

CBP’s National Targeting Center (NTC) is where advance data and access to law enforcement and intelligence records converge to facilitate the targeting of travelers and items of cargo that pose the highest risk to our security — in all modes of inbound transportation. The NTC takes in large amounts of data and uses sophisticated targeting tools and subject matter expertise to analyze, assess, and segment risk at every stage in the cargo/shipment and travel life cycles. NTC leverages classified, law enforcement, commercial, and open-source information in unique, proactive ways to identify high-risk travelers and shipments at the earliest possible point prior to arrival in the United States and plays a key role in targeting the opioid supply. The NTC works closely with interagency federal and international partners on joint initiatives aimed at targeting the opioid supply chain.

Objective 3.1

Enhance detection, interdiction, deterrence, and disruption of the illicit opioid supply chain.

One of the challenges to detecting fentanyl in the mail environment is the trace amounts that are being sent and the illicit manufacturers ability to manipulate the fentanyl composition thereby creating a multitude of fentanyl analogues. CBP’s Laboratories and Scientific Services (LSS) Directorate has seen 19 of the 25 known fentanyl analogues. CBP is often the first federal agency to see many of these analogues. CBP promptly shares that information with partner agencies.

This objective includes leveraging presumptive field test results from deployed technology to generate law enforcement actions, including arrests, convictions, and the dismantling of fentanyl laboratories. The purpose of presumptive field testing is to rapidly identify illicit courier hub and international mail shipments to produce more successful controlled deliveries, while simultaneously allowing for the quick release of non-offending, detained importations.

CBP participates in many joint task forces and inter-agency working groups that have yielded results including arrests, convictions, and the dismantling of regional fentanyl distributors. CBP will also collaborate with the USPS and FDA on counter network capabilities, including analysis

CBP Strategy to Combat Opioids

for specific cases identified in partnership with state and local law enforcement. CBP will also host a threat targeting work group to leverage joint interagency expertise to improve CBPs targeting rule set and to look for additional opportunities to apply advanced analytic tools. CBP will also enhance its risk segmentation based on data analytics and data mining by expanding an advanced data pilot in the international mail environment. Other efforts include prioritizing targeting efforts to disrupt, degrade, and dismantle TCOs and illicit networks producing and distributing fentanyl and its analogues include identifying and mapping transnational criminal organizations and other networks or regional distributors.

Objective 3.2

Improve targeting processes and investigative efforts.

This objective focuses on enabling a risk-based enforcement to increase operational efficiency and enhance processes to support investigative efforts. Due to the rapid growth of e-commerce as a method of importing, CBP is changing the way it does business and placing more emphasis on small, low-value packages. CBP will revise its existing protocols, technology, and staffing methodologies to better account for the e-commerce industry and allow for more effective targeting, enforcement, and deterrence. These changes will create a more agile, dynamic workforce that utilizes state-of-the-art techniques and technology to better identify and target high-risk shipments. CBP will also work with its federal partners to provide intelligence and information that can assist in the shutting down internet and dark web sites that sell illicit opioids.

CBP will also work with HSI and state authorities to leverage intelligence to increase controlled deliveries. In addition, CBP will work the U.S. Attorney's Office to reconsider prosecution thresholds since trace amounts of seized fentanyl can be deadly.

Objective 3.3

Improve detection of fentanyl and its analogues.

Much of the current drug detection technology was developed decades ago before there was an influx of fentanyl, its analogues, and other synthetic opioids coming through America's borders. In order to improve detection capabilities, CBP is seeking new NII technology that can be used to identify fentanyl without the need to open each package. In addition, efforts are underway for the development of an immunoassay presumptive narcotic test kit which can be used to more accurately identify fentanyl and its analogues in the field. If and when this technology becomes available, and is proven effective, CBP will add the immunoassay test kit to its arsenal of presumptive testing resources available to front line personnel, scientists, and other personnel who would benefit from its use. While CBP is exploring new technology innovations, we also intend to evaluate the effectiveness of currently deployed presumptive field testing devices to determine if the expansion of equipment to more locations is warranted.

In addition, CBP uses handheld devices in the field to screen packages using either Raman

CBP Strategy to Combat Opioids

spectroscopy or infrared spectroscopy. The Raman technique uses a laser to analyze a substance, in some cases without an officer opening the package thereby reducing possible exposure. This device allows field personnel to presumptively identify substances in real time. The device has a library of 1400 chemical substances and If the device yields an inconclusive result, or if confirmatory testing is required - the sample can be sent to a LSS laboratory for testing. This technology has increased officer capacity to not only test for narcotics, explosives and chemical warfare agents, but also for trade enforcement and manifest verification when dealing with chemical substances.

In the mail arena, CBP is exploring a High Throughput Parcel Scanning (HTPS) capability to identify the presence of opioids, including fentanyl, in the bulk parcel environment. Improved technology to detect fentanyl and its analogues also serves a dual purpose to protect CBP personnel and canines.

While CBP will continue to aggressively explore new technology innovations, additional presumptive field testing devices and training classes have been purchased and will be deployed to additional locations throughout Fiscal Year 2018. Narcotic detection canines represent another asset in CBPs fight against opioids. CBP personnel process mail and packages at nine ports with international mail facilities and fourteen ports with express consignment facilities which receive millions of letters and packages daily. To help handle this high volume, CBP's Office of Field Operations (OFO) National Canine Program, in coordination with Laboratories and Scientific Services Directorate (LSSD), assessed the feasibility of safely and effectively added fentanyl as a trained odor to deployed narcotic detection canine teams.

On June 23, 2017, the Office of Training and Development's CBP Canine Training Program successfully completed its first Fentanyl Detection Pilot Course. This added the odor of fentanyl and fentanyl analogues to OFO canine handler teams in the international mail and ECC environments. Beginning October 1, 2018, all new OFO canine handler teams graduating from the CBP Canine Training Program will have successfully completed a comprehensive CBP canine detection team certification to include the odor of fentanyl and fentanyl analogs. Today, all OFO concealed human and narcotic detection canine teams across all of OFO's operational environments have completed fentanyl training. Canine operations are an invaluable component of CBP's counternarcotic operations. CBP OFO canine teams work at international mail facilities to examine millions of foreign mail shipments coming into the United States from all parts of the world. Synthetic opioids present unique challenges to canine teams due to the associated risks of the health and safety of the canines and their canine officers.

The CBP Laboratories and Scientific Services (LSS) Directorate is an integral resource in efforts to combat opioids. LSS is the forensic/scientific arm of CBP and provides, among other things, suspected controlled substance analysis. Due to the increasing flow of opioids to the United States, CBP plans to evaluate the feasibility of increasing more LSS satellite and mobile laboratories throughout the country. CBP continues to conduct special research to determine the detection and identification of signature odor profiles for fentanyl related compounds to aid in our detection capabilities.

These efforts coupled together – technology, canines, and laboratory testing – will greatly enhance CBPs ability to detect the presence of illicit opioids crossing our air, sea, and land borders and thereby inform targeting efforts.

Goal 4: Protect CBP personnel from exposure to opioids.

Goal 4 – Overview

The safe handling of opioids, such as fentanyl is essential to mitigate potential risk of exposure, as with all chemicals of concern and unknown substances that CBP frontline personnel encounter on a daily basis. CBP will take a comprehensive approach to promote safe handling, with an emphasis on personal protective equipment (PPE) and post-exposure processes, through the sustainment of effective protocols and procedures.

To ensure the proper use of PPE, CBP will update and enhance protocols and training regarding PPE use during potential exposure to opioids. To ensure implementation of appropriate post-exposure procedures, CBP will review and update workplace post-exposure protocols, procedures, and training. To ensure adoption of safe handling practices, CBP will develop and deliver training to key personnel to include, but not limited to scientists, officers and agents at our ports of entry and contractors who tear apart vehicle compartments where drugs are stashed. In order to align efforts and identify best practices, CBP will continue participation on DHS and NSC committees regarding the safe handling of opioids such as fentanyl.

Objective 4.1

Establish effective protocols and procedures for safe handling, Personal Protective Equipment (PPE), and post-exposure treatment to mitigate opioid exposure risks.

In order to ensure the protection of CBP personnel and canines from exposure to opioids, the safe handling of opioids, such as fentanyl, is essential. CBP will take a comprehensive approach to promote safe handling, with an emphasis on personal protective equipment (PPE) and post-exposure processes, through the establishment of effective protocols and procedures.

To ensure the proper use of PPE, CBP will update and enhance protocols and training regarding PPE use during potential exposure to opioids. CBP will regularly monitor use and efficacy of PPE and adjust protocols and procedures as necessary to ensure personnel safety. To ensure implementation of appropriate post-exposure procedures, CBP will review and update workplace post-exposure protocols, procedures, and training and will assess the efficacy of their utilization in practice. To ensure adoption of safe handling practices, CBP will develop and deliver training to key personnel. In order to align efforts and identify best practices, CBP will continue participation on DHS and NSC committees regarding the safe handling of opioids such as fentanyl and will make adjustments to policies and procedures as appropriate.

Objective 4.2

Expand naloxone programs governing the storage, control, accountability, administration, disposal, and reporting of naloxone use in response to suspected opioid exposure.

In order to ensure the protection of CBP personnel and canines from opioid exposure, the proper utilization of naloxone is essential along with emergency medical training. In the setting of increasing potential for accidental exposure to harmful opioids such as fentanyl, which could lead to overdose or death, naloxone is an essential tool for ensuring the protection of CBP personnel and canines. When administered properly in the face of an opioid overdose, naloxone is highly effective at rapidly reversing drug effects and saving lives. CBP strategy is to push naloxone availability and capabilities as far forward as possible through comprehensive programs directed to personnel and canines at risk for accidental exposure.

CBP, in coordination with DHS/OHA, has already launched initial naloxone programs and will continue to expand these to operational locations as warranted. CBP naloxone programs will ensure appropriate administrative oversight including accountability, control, and storage of naloxone. CBP naloxone programs will ensure thorough training in the proper utilization of naloxone, as well as disposal practices. CBP naloxone programs will also ensure proper reporting of naloxone use incidents.

Objective 4.3

Conduct comprehensive outreach and awareness campaign for CBP personnel regarding safe handling of opioids, such as fentanyl and its analogues.

In order to ensure protection of CBP personnel from opioid exposure, it is essential that CBP leadership and personnel, especially those at risk for accidental exposure to harmful opioids, are fully aware of opioid exposure risks and mitigation efforts. CBP will develop and conduct comprehensive outreach and awareness campaigns addressing potential risk of opioid exposure, and serve as reminders that adhering to safety protocols will protect CBP employees.

These outreach and awareness efforts will be tailored to leadership as well as front-line personnel with highest risk for accidental opioid exposure. The outreach and awareness efforts will emphasize the potential risk of opioid exposure, with an emphasis on facts versus myth; safe handling procedures, including an emphasis on PPE use and post-exposure protocols; and naloxone use. CBP will work with appropriate stakeholders to establish a working group to plan a comprehensive, tiered awareness and outreach campaign for internal and external audiences.

Objective 4.4

Conduct ongoing analysis of causal factors leading to suspected opioid exposure and analysis of efficacy of risk mitigation efforts.

In order to ensure protection of CBP personnel and canines from exposure to opioids, CBP will

CBP Strategy to Combat Opioids

continue to monitor exposure data and risk mitigation efforts and adjust approaches as warranted.

CBP will conduct ongoing analysis, including input from appropriate stakeholders, regarding causal factors in accidental opioid exposure. A key element of this ongoing analysis is verification of suspected exposure. CBP will enhance efforts to verify accidental exposure in order to better inform analysis of causal factors and efficacy of risk mitigation efforts.

Another key element is accurate and timely reporting of suspected and confirmed exposures as well as naloxone use and post-exposure procedures. CBP will work with OHA to ensure proper reporting of potential exposure incidents in order to inform analysis of causal factors and efficacy of risk mitigation efforts.

CBP will engage with internal and external stakeholders to assess causal factors in opioid exposure and efficacy of risk mitigation efforts. CBP will collaborate across components, US government agencies, and state/local counterparts to identify best practices and lessons learned related to elimination of causal factors and prevention of accidental opioid exposure. CBP will also engage these stakeholders in ongoing analysis of efficacy of risk mitigation efforts, such as PPE use and naloxone use, in order to identify best practices and lessons learned to enhance risk mitigation efforts.

Conclusion

CBP's combination of interdiction and intelligence capabilities, complemented by its border search authorities and canine detection teams, places it at the forefront of the U.S. Government's efforts to combat the opioid crisis. CBP will continue to collaborate with domestic and international partners to thwart the flow of illicit opioids by enhancing information-sharing efforts, producing actionable intelligence, targeting the opioid supply chain, and protecting CBP's personnel from exposure to opioids. Together we can make a difference in combatting this scourge that is ravaging communities and lives throughout the nation.