EXECUTIVE SUMMARY

Operation STOP II
The WCO’s response to illegal trafficking linked to COVID-19

30 April – 30 September 2021
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The STOP II enforcement operation is part of the Action Plan established by the WCO as a response to "Resolution of the Customs Co-operation Council on the Role of Customs in Facilitating the Cross-Border Movement of Situationally Critical Medicines and Vaccines" of December 2020.

The main aim of the operation was to intercept cross-border consignments of illicit vaccines, medicines, medical supplies and other illicit goods linked to the ongoing COVID-19 pandemic, while facilitating the legal supply chain of COVID-19 vaccines. Real-time information exchange between Customs administrations via the secure Intellectual Property Rights (IPR) CENcomm platform and cooperation with other stakeholders involved in controlling the supply chain of medicines and medical supplies were the main pillars of this operation's success.

The operation was coordinated by the WCO Secretariat’s Operational Coordination Unit (OCU), in close cooperation with the WCO’s Regional Intelligence Liaison Office (RILO) network. Some 146 members initially confirmed their participation in STOP II. The operation had the support of international organizations such as Europol, INTERPOL, OLAF, the UNODC and the WHO, in addition to the support of five (5) right holders (RHs) that had developed a vaccine already approved as a COVID-19 treatment by the WHO at the time of the operation.

The operation was launched on 30 April 2021 and consisted of two (2) phases.
04. KEY FIGURES

SEIZURE CASES

- 83 Members reported seizure cases
- 2,360 cases reported, as reflected in 3,434 seizure reports. One case can comprise more than one seizure report, e.g. if a case contains different types of medicines, then each type of medicine is considered a separate seizure.

SEIZED PIECES

- + 195.5 million medicines
- + 156.7 million medical devices (including personal protective equipment - PPE)
- = 13.5 million doses of illicit COVID-19 vaccines (with the majority of seizure cases being reported at export and the absence of required documents and licences being the reason for detaining the vaccines)

IN TOTAL: + 365.7 million seized pieces

ILLEGAL MEDICINES AND MEDICAL DEVICES SEIZURES

For the purposes of this operation, the term “illicit” covers medicines and medical goods that are smuggled/not declared; that are not accompanied by the required documents; counterfeit medicines/medical goods; expired medicines/medical goods; and medicines/medical goods transported in inappropriate conditions.

- 57% of the total number of seized pieces are Medicines
- 43% of the total number of seized pieces are Medical devices

- 36% of the total number of seized items are anti-infective agents (category with the highest number of pieces)
- 3.7% are COVID-19 vaccines
- 36% are face masks

IN TOTAL: 20 categories of illicit medicines and medical devices were seized.
STOP II used its secure communication tool (IPR CENcomm Group) for data exchange on counterfeit medical supplies and fake medicines to enable timely sharing of information among Members. Thanks to the IPR CENcomm Library, Members were able to consult the weekly Newsletters containing information about recent seizures, new trends in the illicit supply of COVID-19-related medicines and other interesting seizures by Members, including a research report on the illicit supply chain of face masks. Information from international organizations, material from RHs and best practices from Member administrations were also shared in the CENcomm Library. A mobile IPR CENcomm application was made available to NCPs, while new IPR CENcomm features to facilitate NCPs’ work were rolled out at the start of the operation.

Information from RHs were also shared in the CENcomm Library. Departure and transit Members for vaccines used the pre-notification template in IPR CENcomm to inform the destination Member(s) about a legal shipment of COVID-19 vaccines.

E-COMMERCE-RELATED SEIZURES

1,220 e-commerce-related seizures reported
1.2 million pieces seized

Europe
76% of e-commerce seizure cases (mainly medicines). Anti-parasitics, especially ivermectin, accounted for 28% of these seizures. Hypnotics and sedatives, antituberculosis antibiotics and painkillers were also frequent in e-commerce seizures.

North of Africa, Near and Middle East
Painkillers accounted for the most frequent e-commerce seizures.

South America, North America, Central America and the Caribbean
4% of e-commerce seizures. One of these seizures comprised illicit COVID-19 vaccines. Some 34% of the AMS region’s seizures entailed COVID-19 tests, 28% entailed face masks and 9% entailed vaccination record cards.

East and Southern Africa
40% of e-commerce seizures, most of which were for anti-parasitics, especially ivermectin.

Far East, South and South East Asia, Australasia and the Pacific Islands
14% of e-commerce seizure cases of which half involved face masks.

4% of the total reported seizures confirmed as involving IPR infringements (1% of the total number of seized pieces). Face masks were the most frequently reported item involving IPR infringements.
Before and during the operation, worldwide webinars on COVID-19 vaccine awareness were organized in close collaboration with five (5) pharmaceutical companies to inform Customs about the essential characteristics and legal supply chain of WHO-approved COVID-19 vaccines (Pfizer, Moderna, AstraZeneca, Johnson & Johnson and Sinopharm). These webinars made Customs better equipped to identify counterfeit COVID-19 vaccines and curb trafficking therein.

OLAF provided one report containing its findings. The WHO shared alerts and threat assessment reports related to COVID-19 incidents. INTERPOL contacted its National Central Bureau in some of the participating Members to obtain more information on cases in which the Police was involved, in an attempt to identify the criminal organizations behind illicit shipments.

From the seizures reported in IPR CENcomm, there has been a marked boom in the number of anti-infective agents seized by Members, including anti-malarials, antibacterials/antibiotics, anti-parasitics and anti-viral agents. Anti-parasitic agents, such as ivermectin, have been approved as a COVID-19 treatment by some Members and this has boosted the illicit supply chain of these medicines worldwide, with major spikes in the EUR and ESA regions, especially through e-commerce. Some 94% of ivermectin seizures were concealed in mail parcels. One of the reasons behind this increase in private imports of ivermectin is probably related to people refusing COVID-19 vaccine. This is because ivermectin is being praised on the internet by anti-vaxxers as a “miracle cure” for COVID-19. In response to public demand, a set of three different medicines (ivermectin, doxycycline and zinc) believed to be effective against COVID-19 is even being sold, though some Members stopped their sale during phase 2 of Operation STOP II.

Oxygen-related medical devices (such as oxygen concentrators, oxygen cylinders, ventilators and oxygen regulators) have become in-demand commodities during the pandemic. The rather limited supply chain and the urgent need for devices to treat COVID-19 patients have also paved the way for the illicit trade in these devices. They already represent 5% of the total pieces of medical devices seized. Some 92% of the illicit pieces of oxygen devices were seized in the AMS region. An absence of the required documents accounted for 66% of seizures. Along the same lines, there was also an increase in seizures of illegal oximeters. With many Members endorsing “COVID-19 vaccination record cards”, an increase in consignments of falsified record cards is to be expected. Members reported several cases concealed in mail parcels.

Free trade zones (FTZs) are an area of great importance for IPR border enforcement. Members participating in Operation STOP II also reported successful seizure cases in FTZs. The seizures related to face masks and COVID-19 test kits detected through intelligence. This case shows that criminals are indeed exploiting FTZs to trade in illicit medical devices, and that intelligence may be key in controlling FTZs.

It is worth stressing that criminal organizations are highly inventive when it comes to concealing illicit medicines, with the latter being discovered in barrels of pickled fruit and hidden under egg cartons. Additionally, foodstuffs and small compartments in vehicles are often used as concealment places for illicit medicines. Many cases of concealment were reported by Members during STOP II. The skills displayed by Member Customs officers often prevented the smuggling.

+ 131.6 million face masks accounted for the largest number of pieces of medical devices, equating to 84% of illicit medical devices.

11% of medical devices are gloves

= 1 million COVID-19 test kits were seized at a relatively high frequency.

**Main Findings**

**North of Africa, Near and Middle East**
In the MENA region, illicit medicines were found in mail parcels. Illicit medicines were also found in vehicles travelling between neighbouring countries in the region. Most seizures of illicit medicines involved painkillers (analgesics), while the largest number of seizures in terms of incidents involved antibacterials/antibiotics.

**South America, North America, Central America and the Caribbean**
In the AMS region, COVID-19 vaccination record cards were found in mail parcels. A total of 86% of all seizure cases were reported at import. The AMS region was also the first region to report illicit oxygen devices. The main reason for these devices being seized was an absence of the required documents.

**West and Central Africa**
The majority of illicit medicines seized were consignments in vehicles departing from other Members in the same region. A total of 56% of the reported cases involved seizures made during smuggling attempts.

**Europe**
A spike in illicit e-commerce shipments of anti-parasitics (mainly ivermectin) and other medicines was noted in the EUR region. Some 90% of the illicit medical devices reported by the EUR region were detected through risk profiling. Vials of COVID-19 vaccines were also being smuggled out of the region.

**Far East, South and South East Asia, Australasia and the Pacific Islands**
Some 95% of the seizures cases in the A/P region were reported at import. COVID-19 test kits were found in mail parcels.

**Food, drinks, textiles and machinery are used around the world as cover loads for illicit medicines and medical devices.**

Trends, modi operandi and concealment methods used in certain regions may signal future trends in other regions.
The increase in demand for medicines and medical products to address the COVID-19 pandemic has led to an expansion of the trade in substandard and counterfeit medicines and medical products. Organized criminal groups have exploited uncertainties surrounding the virus by filling the gap in demand for scarce medical products with sub-standard and falsified products. Customs must, at all times, keep abreast of the latest trends, adjust risk indicators and take appropriate measures. Coordination at national level with other competent authorities is crucial to identify the perpetrators of offences and dismantle criminal networks.

**STOP II has reaffirmed that Customs plays an important role in protecting society and citizens' health. A further phase of this operation is strongly recommended to ensure the protection of citizens' well-being and to emphasize the importance of Customs in the supply chain of medicines and medical equipment related to COVID-19, from both an enforcement and a facilitation perspective.**