EXECUTIVE SUMMARY

Operation STOP II

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

June 2022

wcoomd.org
1. **Aim and Concept**

The STOP II enforcement operation formed part of the Action Plan established by the WCO as a response to the “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. The main pillars of the operation’s success were 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.
2. Participants

The operation was coordinated by the WCO Secretariat’s Operational Coordination Unit (OCU), in close cooperation with the Organization’s Regional Intelligence Liaison Office (RILO) network. Some 160 Members initially confirmed their participation in STOP II. The operation enjoyed the support of international organizations, namely Europol, INTERPOL, the European Anti-Fraud Office (OLAF), the United Nations Office on Drugs and Crime (UNODC) and the World Health Organization (WHO), as well as the support of right holders (RHs) for COVID-19 vaccines and treatments.

3. Duration

The operation was launched on 30 April 2021 and consisted of three phases.

Phase 1
30 April - 3 June 2021

Phase 2
25 June - 30 September 2021

Phase 3
20 April - 4 May 2022
4. Analytical work

Members were provided with

- weekly newsletters during phases 1 and 2
- a daily report during phase 3
- periodical analysis reports following phases 1, 2 and 3

to inform them about new trend and risk indicators for illicit trade in medicines, vaccines and medical devices.

5. Events

Prior to the operational phases, training was dispensed to Members in close collaboration with pharmaceutical companies and partner international organizations. A total of 95 webinars and training sessions were conducted, attended by some 5,100 participants who gained the knowledge required to make the operation a success.

Accreditation workshops were also held in order to set up a pool of French and Spanish speaking Technical Operational Advisers (TOAs) on IPR capable of independently conducting IPR workshops on behalf of the WCO.

- Pre-Accreditation Workshops for French speakers from 24 to 28 January 2022 in Lomé (Togo).
- Pre-Accreditation Workshops for Spanish speakers from 7 to 11 February 2022 in Mexico City (Mexico).
# Key Figures

## Seizure Cases

<table>
<thead>
<tr>
<th>WCO Members reported seizure cases</th>
<th>Seizure reports</th>
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<tr>
<td>90</td>
<td>2,769</td>
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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

- + 273.6 million medicines
- + 214.3 million medical devices (including personal protective equipment - PPE)
- 13.5 million doses of illicit COVID-19 vaccines (the majority of seizure cases were reported at export and the absence of required documents and licences was the reason for detaining the vaccines)
During phases 1 and 2 of the operation there was a **sudden increase in small consignments of anti-infective agents**. This was related to the fact that many citizens were desperately seeking alternative coronavirus treatments due to a sharp upsurge in demand for COVID-19 vaccines worldwide and to supply chain issues with vaccine distribution.

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 Europe (EUR) and East and Southern Africa (ESA) regions, especially through e-commerce. The trend of private imports of ivermectin by mail continued during phase 3.

Further COVID-19 treatments were approved by the WHO after the conclusion of phase 2 of Operation STOP II. This resulted in seizures of illicit versions of these new treatments by some Members during phase 3. These cases show that criminals are responding rapidly to changing consumer demand and that timely training by pharmaceutical companies helps bolster Customs enforcement measures.

**Free trade zones (FTZs)** are areas of great importance for IPR border enforcement. Members participating in Operation STOP II also reported successful seizure cases in FTZs. Cases reported by Members demonstrate that criminals are indeed exploiting FTZs to trade in illicit medicines and medical devices, and that intelligence and cooperation with internal agencies may be key in controlling these zones.
8. Main findings

**AMS region**
The AMS region was the first region to report seizure cases in FTZs. The AMS region was also the first to report illicit oxygen devices used to treat COVID-19.

**EUR region**
A spike in illicit e-commerce shipments of anti-parastics (mainly ivermectin) and other medicines was noted in the EUR region. The EUR region was the first region to report illicit COVID-19 vaccine seizure cases.

**A/P region**
Many seizure cases of counterfeit face masks were reported by the A/P region. During phase 3, the A/P region also reported a new COVID-19 treatment.

**MENA region**
Many concealment cases of illicit medicines were reported by the MENA region. During phase 3, a COVID-19 treatment (remdesivir) was seized from small consignments.

**WCA region**
The majority of illicit medicines were seized from vehicles arriving from neighbouring countries in the WCA region. Customs officers succeeded in preventing the smuggling of medicines concealed in vehicle compartments.

**ESA region**
Expired and incorrectly transported COVID-19 vaccines were reported by the ESA region, as were expired COVID-19 test kits.

AMS region: South America, North America, Central America and the Caribbean
EUR region: Europe
A/P region: Far East, South East Asia, Australia and the Pacific Islands
MENA region: North Africa, Near and Middle East
WCA region: West and Central Africa
ESA region: East and Southern Africa
Cooperation with other stakeholders

Before and during the operation, worldwide webinars to raise awareness of COVID-19 vaccines and medicines were organized in collaboration with pharmaceutical companies to inform Customs about the essential characteristics and legal supply chain of WHO-approved COVID-19 vaccines and medicines (Pfizer, Moderna, Astrazeneca, Johnson & Johnson and Sinopharm, MSD and NOVAVAX). These webinars made Customs better equipped to identify counterfeit COVID-19 vaccines and curb trafficking therein.

The operation was planned and conducted in close cooperation with partner international organizations (EUROPOL, INTERPOL, OLAF, UNODC and WHO).
WCO Tools and Instruments

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 newsletters and analysis reports containing information about recent seizures, new trends in the illicit supply of COVID-19-related medicines and other interesting seizures by Members. Information from international organizations, material from RHs and best practices by Member administrations were also shared in the CENcomm Library. A mobile IPR CENcomm application was made available to National Contact Points (NCPs), while new IPR CENcomm features to facilitate the NCPs’ work were rolled out at the start of the operation.

Departure and transit Members for vaccines used the pre-notification template in IPR CENcomm to inform destination Members about legal shipments of COVID 19-vaccines.
Conclusions

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 substandard and falsified products.

The enforcement activities conducted during phases 1, 2 and 3 of STOP II were successful in protecting citizens’ health and safety, thanks to solidarity between Customs administrations, to data sharing and to joint action, despite the border disruption caused by COVID-19.

STOP II has reaffirmed the crucial role played by Customs in safeguarding public health and protecting society.