

Forum: UNODC

Issue 1: The question of combating the global fentanyl trade and the role of precursor chemicals originating in Asia

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The question of combating the global fentanyl trade and the role of precursor chemicals originating in Asia

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Key Terms

Fentanyl: A synthetic opioid; the central substance of the crisis

Precursor chemicals: Elemental chemicals used to manufacture fentanyl (China is currently the principal global supplier of these precursors)

Pre-precursor: Non-scheduled chemicals that can synthesise with scheduled precursors - making it difficult to regulate without illicit drug counterfeiting

Fentanyl analogues: Chemically modified versions of Fentanyl (e.g: carfentanil) engineered to evade existing drug **scheduling** laws

Scheduling: The formal process of placing a substance under international control (In December 2024, 43 **precursor chemicals** are listed under Table I of the **1988 UN Convention**)

International Narcotics Control Board (INCB): A body of the UN responsible for monitoring the submission with drug conventions and new substances for international control.

1988 UN Convention: Foundational treaty involving international control of **precursor chemicals**

Class-based control: Regulatory strategy that covers the entire chemical classes rather than individual substances. In order to reduce loopholes for drug exploitation

Drug Trafficking Organisations (DTOs): Criminal networks (primarily Mexican cartels) that purchase Asian precursors and manufacture the finished **fentanyl** for further distribution

Darknet trafficking: Use of anonymous online platforms and cryptocurrencies to purchase and ship **fentanyl** through international mailing

Mislabeling: Disguising **precursor chemicals** with false labels to bypass detection

Counternarcotics cooperation: The use of multilateral efforts to share intelligence and enforce drug laws; a major diplomatic friction between USA and China

Overview

The global **fentanyl** trade is an ongoing transnational illicit supply chain where Asian chemical manufacturers produce precursors of ingredients, then the mass production of synthetic opioids by Mexican cartels leading to an international network to distribute the fatal drug globally. This crisis initially emerged from 2013 to 2015, drug traffickers exploited the loophole in which they could directly ship the synthetic fentanyl directly from the Chinese laboratories to the USA.

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This loophole began closing in 2019, when China classified fentanyl and its analogues as a controlled class rather than regulating them individually. Traffickers adapted to this situation by shifting the final synthesis step to Mexico, importing not the finished drug but

precursor chemicals: industrial compounds that are more difficult to regulate without disrupting lawful trade. From this, China remains the dominant precursor source, though as Chinese controls have tightened, networks have increasingly turned to India's pharmaceutical chemical industry as an alternative supplier. The diplomatic cooperation between Washington and Beijing on this issue resumed in 2023, after a string of US accusations and sanctions targeting Chinese precursor sellers, and China has since scheduled several previously unregulated precursors and synthetic opioids.

Past International Actions Made by the UN:

In 2017, the UN first subjected **fentanyl** precursors to international control, listing two precursors on Table I of the **1988 UN Convention**, with three more added in 2022 and two more in 2024, concluding to a total of over 30 **fentanyl** related substances under international control listed in 2025. A major shift redirected the situation in the CND's 67th session in March 2024, where countries voted unanimously to place 23 substances under international control, and for the first time proactively placed controls on substances not yet used illicitly, but considered to be the most probable to be exploited. That very same year, the **INCB** piloted a new law enforcement tool known as the "Scanning Novel Opioids Online Platforms" (SNOOP), designed to track and identify online sales of **fentanyl** and its analogues through web based marketplaces. Moreover, the **INCB** has led two international initiatives (Project Prism & Project Cohesion), to provide a main network for the governments to cooperate on precursor control - continuously alerting participating members of suspicious attempts of exploitation through the Precursor Incident Communication System (PICS).

Current Situation:

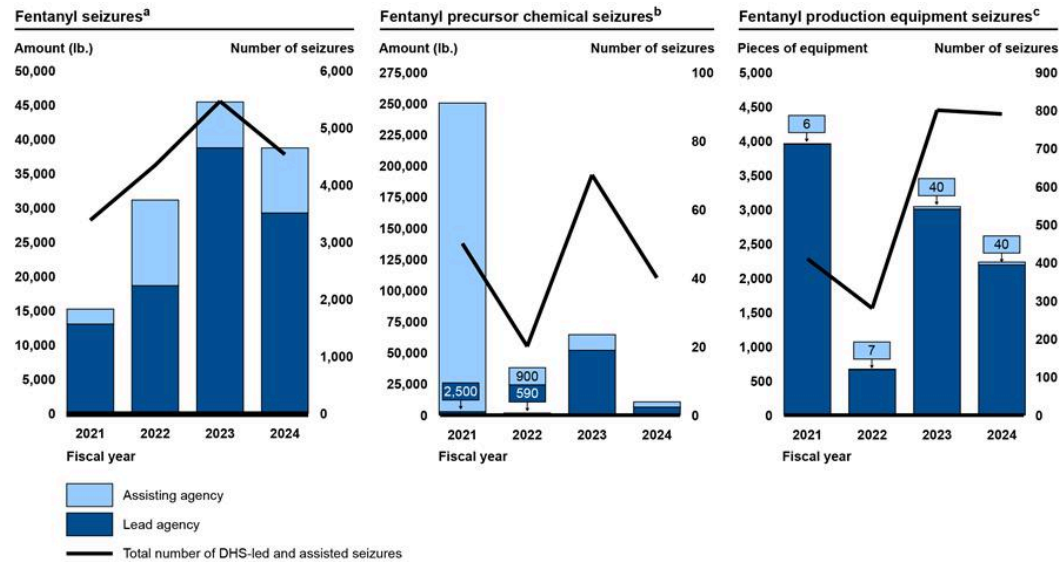
Currently, the crisis has entered a new, yet more ambiguous phase - preliminary CDC data demonstrates a prediction of the deaths caused by overdosing, approximately 70,000 US overdose deaths for the 12 months ending in December 2025. This data presents a decline of 13.9% from the year before, continuing the downward trend which commenced in mid 2023. Analysts credit several factors that might be influential: tightening of the Chinese precursor enforcement after 2023; market saturation effects; naloxone availability; shifting drug use patterns.

Further, the issue is now entangled with broader trade relations between the USA and China. Data has shown, at the October 2025 Busan summit, the presidents of each nation has tied the **fentanyl** cooperation directly to tariff relief, rare earths, and soybean purchases - a 2026 supreme court later took down the **fentanyl** related tariffs. Meanwhile, the US

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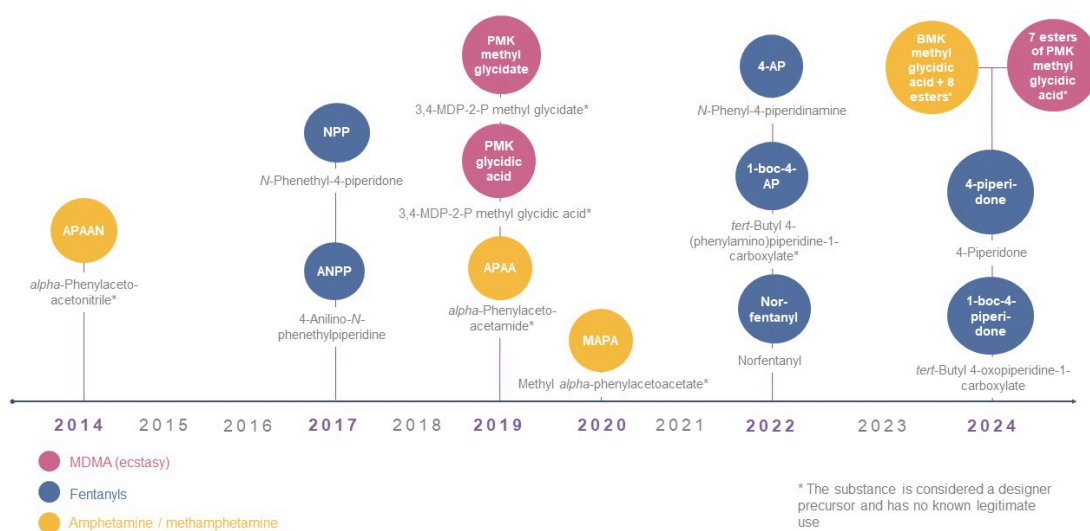
authorities still describe the Chinese enforcement as uneven, and trafficking continues diversifying precursor sourcing to India as Chinese controls tighten.

Statistics & Infographics

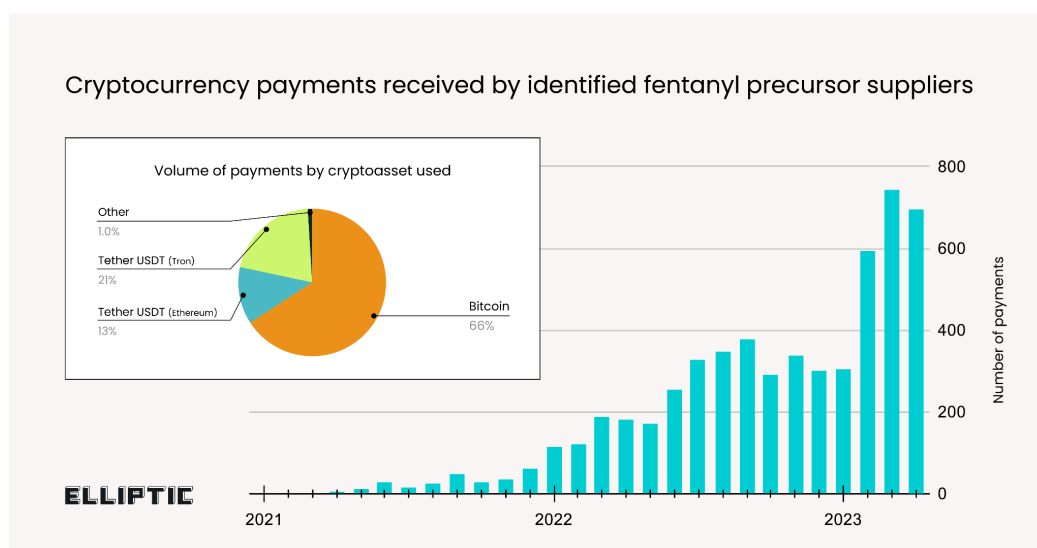


Source: GAO analysis of data from U.S. Customs and Border Protection's (CBP) SEACATS and U.S. Border Patrol's e3. | GAO-25-107667

GAO-25-107667. Published: Sep 02, 2025. Publicly Released: Sep 02, 2025. [Figure 2](#)



International control of two additional **fentanyl** precursors and two groups of amphetamine-type stimulant precursors enters into force [Figure 1](#)



Chinese businesses fueling the **fentanyl** epidemic receive tens of millions in crypto payments

[Figure 3](#)

Timeline

Phase 1: Increase of direct supply [2013 - 2018]

- **2013 - 2015:** Emergence of large scale **fentanyl** and its counterparts in the illicit US market - arrived largely as finished

	products directly from China to USA through the use of international mailing. ● <u>2016 -2017</u>: Sudden surge of deaths due to overdosing - cartels and dark web vendors dominate the lethality of the drug. This then leads to the scheduling of specific fentanyl precursors by the US government and international authorities.
Phase 2: Chinese domestic control of the precursor shift [2018 - 2021]	● <u>2018</u>: The US Drug Enforcement Administration (DEA) places illicitly manufactured fentanyl analogues in the strictest Schedule I category. ● <u>May 2019</u>: China officially classifies all fentanyl related substances as a controlled class of drugs, restricting manufacturing and export permits.
Phase 3: Escalating tension (specifically USA targeting China) and other chemical evasions [2021 - 2024]	● <u>2021 - 2023</u>: Cartels and chemical producers rapidly adapt to controls by utilising "dual use" precursor substitutes that skip international scheduling. The decentralised corporate presence in companies in Asia allow the illicit trade to flourish. ● <u>November 2023</u>: the USA and China agree to resume communication and establish cooperating working groups to restrict precursor flows.
Phase 4: Global tariff suppressions [2024 - now(2026)]	● <u>August 2024</u>: China formally adds specific precursor chemicals (4-AP, 1-boc-4-AP, and norfentanyl) to its list of controlled items. ● <u>May 2025</u>: USA unseals major accusations against Chinese companies for exporting pill presses and precursor chemicals. ● <u>Mid-2026</u>: After trade talks linking tariffs to drug enforcement, China schedules more precursor chemicals. India also tightens its own regulations and shares more intelligence to stop cartels from exploiting its pharmaceutical industry.

Major Parties

China– Acts as the principal source of **fentanyl precursor chemicals**, originally supplied through its enormous and loosely regulated chemical and pharmaceutical manufacturing sector. China's capital, Beijing, has taken real steps since 2023 - **scheduling** several previously unregulated precursors as well as the nitazene class of synthetic opioids. However, US government and authorities still state its enforcement as opaque, with many companies selling nonscheduled **precursor chemicals** whilst facing no consequences. As a response to

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the statement holding it accountable for the detrimental outcome, China claims that it is a chemical exporting country and not the site of synthesis or consumption.

United States – As the primary demand side state and the key cause of diplomatic, legal, and economic pressure; the capital, Washington, combines law enforcement tools (DEA accusations, DOJ prosecutions of Chinese suppliers, treasury sanctions on firms & banks) with trade leverage (the 2025 **fentanyl** linked tariffs) and bilateral diplomacy (the US-PRC **Counternarcotics Working Group**). It is also the country bearing the public health burden, with tens of thousands of overdose deaths annually, emphasising its urgency and willingness to escalate pressure.

Mexico – The manufacturing and transshipment hub where cartels, mainly the Sinaloa Cartel and Cartel Jalisco Nueva Generación (CJNG), converting imported precursors into finished **fentanyl** in labs, then distribute it across the US border. Mexico's complicated role is demonstrated through its limited state capacity in territories controlled by cartels, corruption, and its sensitivity to the US pressure (including past threats of US military action against cartels), making it both a target of US enforcement demands and a partner, whose cooperation is essential but politically tense.

India – An emerging alternative precursor source as Chinese controls tighten. Criminal networks have increasingly shifted toward India's large pharmaceutical chemical industry - consisting of even less regulatory enforcements than China's. India is facing, so far, less international condemnation or pressure than China, making it a key next challenge in the controversial topic.

Possible Solutions/Key Topics to Debate

I. Should China face binding international obligations to regulate **precursor chemicals**, or are the requested **scheduling** not enough?

II. Is it fair to keep pressuring China while India's chemical industry remains largely unregulated?

III. Do tariffs and trade pressure actually reduce precursor flows, or just damage diplomatic cooperation?

IV. Who is responsible for stopping cartel synthesis labs: Mexico, the US, or both?

V. Should the international community track and verify **scheduling** enforcement, not just announcements?

VI. Is supply side suppression working, or should resources shift toward demand reduction?

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VII. How should sovereignty concerns be balanced against US demands for foreign enforcement action?

VIII. Should dual use chemicals be restricted globally?

Committee Objective:

To achieve cooperative, diplomatic communication within the committee. To balance supply side enforcements with public health considerations. To produce realistic, implementable recommendations. To establish a stronger framework for precursor chemical scheduling and to reduce global drug trafficking networks and cartels.

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