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Existing actions to combat illicit trade

This chapter illustrates how governments, businesses and civil society have responded to the challenges posed by illicit alcohol trade in various ways, some of which are discussed in the section on the effects of the pandemic on the markets for illicit alcohol. There is also a summary of some other key actions taken at the governmental and intergovernmental levels, and by other key players.

Country policies designed to address illicit trade

At the governmental level, the WHO reports that some 80 countries (more than half of the 165+ reporting jurisdictions) have written national alcohol policies (WHO, 2018^[1]). Most national policies include provisions that address informal or illicit production of beer and wine (79%) and spirits (84%). In addition, 81% have a national policy regarding sales of informal or illicit beer, while 84% have such a policy for wine sales, and 88% have a policy that applies to sales of spirits. In the case of the United Kingdom, the country has developed a standalone alcohol policy that aims at enhancing efforts to combat fraud, while improving and strengthening tax collection mechanisms (HM Revenue & Customs, 2016^[2]); the strategy complements the country's overall alcohol strategy, which contains related provisions, albeit to a lesser extent (HM Government, 2012^[3]).

However, although illicit alcohol may be addressed in national policies, enforcement is poor in many countries, particularly lower-income countries where the illicit alcohol market is large. Many countries that do not have national policies nonetheless have national legislation governing the production and sale of informal and illicit alcohol. In all, more than 118 countries surveyed have legislation governing the production of unrecorded alcohol, while more than 125 countries have legislation covering the sale of the illicit or informal products. A large number of countries (144) reported having a system to track informally produced and illicit alcohol. The most common methods for the tracking were police investigations (121 responding countries), complaint systems (83 countries) and case-by-case reporting (80 countries). Active surveillance (67 responding countries) and tracking by the liquor licensing authority (66 countries) were also used in some jurisdictions.

Intergovernmental work on enforcement

At the intergovernmental level, actions have been taken by INTERPOL and Europol to disrupt illicit trade globally.

INTERPOL-Europol

INTERPOL and Europol launched Operation OPSON in 2011 as a joint operation targeting counterfeit and substandard food and beverages. It initially involved the participation of 9 EU countries, plus Turkey.¹ Its original principal objectives were to i) raise awareness of the dangers posed by counterfeit and substandard food and drink, ii) establish partnerships with the private sector to provide a cohesive response to this type of crime and iii) protect consumers by seizing and destroying substandard foods and identifying the actors behind these networks. These objectives have since been further elaborated over time and now include i) protecting public health, ii) fighting against organized crime groups involved in the trade of fake and substandard food, iii) enhancing international co-operation, iv) enhancing national co-operation between local enforcement agencies and food regulatory agencies, and v) enhancing co-operation with private partners from the food and beverage industry.

The OPSON operations have been carried out regularly, with a growing number of countries taking part. The most recent campaign, OPSON X, took place between December 2020 and July 2021, with the participation of some 72 countries.² The operation netted 15,451 tonnes of illegal products, with an estimated street value of EUR 53.8 million. Nearly 68 000 checks were carried out, resulting in more than 1 000 criminal cases being opened. The enforcement actions uncovered new leads for future investigations. More than 600 arrest warrants were issued, resulting in the disruption in the activities of about 42 organized crime groups around the world. The most seized goods were alcohol and food supplements, followed by cereals and grain products. Alcoholic drinks were the products that were most commonly counterfeited.

A more comprehensive assessment was published on the OSON IX campaign, which took place between 1 December 2019 and 15 June 2020 (INTERPOL/Europol, 2021^[4]). Some 77 countries, including six G7 countries (Canada, France Germany, Italy, the United Kingdom and the United States), participated in the campaign. The countries carried out checks throughout their national territory, focusing on the whole chain of supply. Seizures being made at production sites, during the transport phase or at the distribution and selling points of illicit foods and drinks. All channels of distribution, including online sales, were covered. The operation resulted in:

- the seizure of 12 000 tonnes of products, valued at USD 40 million (of which alcoholic beverages was the leading good seized, at USD 5.8 million); and
- the disruption in the operations of 19 organised crime groups, 407 arrest warrants, the execution of 235 search warrants, 408 criminal cases and 2 980 administrative cases.

The number of checks were about 39 per cent of what the countries reported in OPSON VIII, while criminal cases were 13 per cent of the OPSON VIII level, most likely reflecting the effects of COVID-19 on operations.

The operation confirmed that alcohol is a highly targeted product for smuggling, adulteration and counterfeiting, and, in terms of food crime, it continues to be one of the main global threats to the health and life of the consumers, and also to the revenues of state budgets (Box 5.1). Alcoholic beverages were, in fact, the second most seized commodity in OPSON IX, totalling about 1 613 tonnes of products. Of the total seized, almost 1 300 tonnes were wine. The other types of alcohol present in higher quantities amongst seizures were vodka and whiskey respectively. Countries which reported notable seizures in this regard were France with more than one million litres of wine, Italy with more than 45 000 litres of wine in two large seizures, Portugal with 21 000 litres of wine in one seizure, Greece with more than 70 000 litres of wine, ethyl alcohol and whiskey in five large seizures and Spain with one large seizure of 18 000 litres of wine. In all other cases the average volume of alcohol seized was about 94 litres per seizure. In total, 54 arrests, 31 search warrants and 4 organised criminal groups (OCGs) were reported in connection with this illicit commodity and the total value of the goods seized is around USD 20.3 million.

Box 5.1. Examples of seizures of alcohol in OPSON VIII and IX campaigns

Albania.-- Some 8 000 litres of wine valued at USD 20 000 were seized as the goods, which originated in Italy, lacked proof of customs declaration. Two arrest warrants were issued.

Belarus.-- Belarusian nationals were found to be transporting alcohol in bottles or cans without excise stamps, using personal vehicles, minivans or trucks. The alcohol was intended for local markets and/or possibly for transit to neighboring countries. In total, more than 14 000 litres of illicit alcohol were seized.

Eswatini.-- Border controls revealed counterfeit alcohol, especially whiskey and vodka, and counterfeit condiments. In all cases, the actors involved were local persons, with international connections.

Greece.-- One case involved an OCG importing alcoholic beverages and raw materials (ethyl alcohol) for the production of the fake spirits for the domestic market. The spirits were bottled with forged brand name labels, and then distributed as genuine products to liquor stores, grocery shops, bars and night clubs. The OCG used international transport trucks vehicles to import illegal alcoholic beverages, comingling them with genuine products, in order not to be easily detected by the LEA. One subgroup of the OCG was primarily responsible for the storage of the products and replacing foreign labels with fake Greek logos. The fake products were then sold as Greek products with virtual invoices with the OCG gaining large profits from the differences in the taxes imposed. A second subgroup was responsible for the production, storage and distribution of the substandard alcohol. In support of their illegal activities, the OCG had set up two fully equipped laboratories and four warehouses in Attica. On

20th of February 2020, a police operation was carried out, which resulted in the arrest of 14 individuals, including a top OCG operative, and the seizure of 21 901 bottles of alcoholic beverages and 22 500 litres of raw materials (ethyl alcohol).

Italy.-- Operation “Vuoti a rendere”, which was launched in January 2018, in the framework of OPSON VII and finalized during OPSON IX, focused on Italian counterfeiters responsible for food fraud, including the counterfeiting of prestigious wines. The investigation revealed a fraud based on the reuse of original primary packaging (empty wine bottles) and secondary packaging (wooden boxes). The bottles were refilled with cheap products from different origins, purchased online or at discount stores. Packaging films and false masking guarantee seals were applied to conceal the lack of distinctive signs on the capsules used for the counterfeit units. Once a contact with a buyer was established via e-commerce, the counterfeiters further increased their promotional offers, setting prices significantly below the market price for genuine products.

The Italian police, supported by Europol, took down the network of wine counterfeiters with raids in eight Italian provinces. Following the raids, an illegal storehouse, where the refilling activity was being performed, was found. Eleven individuals were referred to the Judicial Authority for participation in wine counterfeiting and food fraud. Close to 1 200 bottles were seized, the most expensive of which a Bordeaux wine worth EUR 4 200.00.

Russian Federation.-- The police dismantled an underground facility used for producing alcoholic beverages. The laboratory analysis showed that the products were substandard, lacking the physico-chemical parameters required, thereby posing a threat to public health.

South Africa.-- Authorities seized more than 6 000 litres of traditional Asian alcoholic beverages, which were transported by sea containers for illegal importation into the country. In another operation, dismantling of a counterfeiting network resulted in the arrest of 2 Chinese and 1 Mozambique traders. The silver caps on the alcohol bottles marking the products for export were replaced with counterfeit ones, in order to hide the origin of the products and their intended destination. After switching the caps, the products were distributed in South Africa, with the perpetrators pocketing significant sums via tax evasion.

Finally, South African authorities intercepted a consignment of imported counterfeit labels, which arrived by air. Authorities raided the final destination premises, finding large quantities of counterfeit labels and alcohol, which was to be relabeled for sale in the domestic market. Six Chinese national were arrested and equipment, unused labels and alcohol were seized.

Source: (INTERPOL/Europol, 2020^[5]) and (INTERPOL/Europol, 2021^[4]).

The 12 000 tonnes of seizures in OPSON IX were significantly lower than in OPSON VIII, which were at record levels, with seizures of 33 000 tonnes (valued at about USD 59 million). Alcoholic beverages were the most seized product in that operation; they were reported in 633 cases, by 23 countries (INTERPOL/Europol, 2020^[5]) and (INTERPOL/Europol, 2021^[4]). In OPSON VIII, a total of 433 arrests and 423 searches were recorded, with LEAs disrupting 34 organized crime groups (OCGs), of which 15 were directly involved in the production or distribution of counterfeit products. Twelve persons were prosecuted and 433 persons were identified as suspects for involvement in illicit deeds involving alcoholic beverages.

The report on OPSON IX further confirmed a previous trend relating to alcohol smuggling from Eastern European countries to the European Union, namely, frequent shipping of small quantities of the products (INTERPOL/Europol, 2021^[4]). With respect to the nature of the illicit activities, intellectual property right (IPR) violations accounted for 8.5% of the seizures, for those cases where the type of infringement was reported. The report on OPSON VIII provides more detail in this regard (INTERPOL, Europol, 2020). In that campaign, seizures of products that were designed to deceive consumers accounted for 88% of the

volume of products seized (but only 2% of the number of reports). Seizures of products associated with fiscal fraud, on the other hand, was present in 66% of the reports on seizures (but only 1% of the volume of products seized). Thus large quantities of products that were designed to deceive consumers were seized in a handful of cases, while small quantities of products involving fiscal fraud were seized in a large number of cases. With respect to counterfeiting, 6.5% of reports were linked to counterfeit products (0.13% by quantity).

Looking forward, the report on OPSON IX calls for increasing international co-operation in exchanging reliable operational information, which is essential in understanding new developments and the real impact that the pandemic is having on the global food chain security. The disruption caused by the pandemic showed that opportunistic crime is ready to take advantage of the vulnerabilities of the regional and global supply chains; contingency planning is viewed as of crucial importance in order for LEAs to respond in a timely manner. It is further recommended that Operation OPSON remain global, with, however, a more pronounced regional focus. To this end, it is recommended that member countries ask for or participate in regional case meetings organized by INTERPOL and Europol, taking full advantage of tools for organizing virtual meetings.

Private partners have been invited to support the operation based on their presence in the different markets (Europe, USA, Middle East, Africa, South America, Asia), prioritizing those most affected by the threat of counterfeiting. Their participation was made on a voluntary basis and did not imply any specific action from the law enforcement agencies. The participation of the private partners consisted of:

- Providing intelligence and risk assessments on their products during the pre-operational phase, including during training sessions tailored for law enforcement services;
- Participating in preparatory meetings organized at the national level; and
- Providing expertise in legal proceedings when needed.

In OPSON VIII, twenty-two private partners took part, including 8 companies or associations representing the interests of alcoholic beverage producers (INTERPOL/Europol, 2020^[5]).

WCO

As indicated earlier, illicit trade in alcohol is a major concern of customs authorities, and the WCO, working with its member countries, is actively engaged in activities to disrupt the illegal trade. In response to the growing danger posed by illicit trade in alcohol, Project SHOT was launched in 2016 to monitor global trends in alcohol fraud (WCO, 2019^[6]) and (WCO, 2021^[7]). The primary objectives of the project are to:

- Exchange information on alcohol seizures among the 183 WCO Member States within the 11 Regional Intelligence Liaison Offices (RILO);
- Produce a report reviewing alcohol-smuggling activities covering all the geographical regions of the existing 11 RILOs;
- Improve the quantity and quality of data incorporated into the Customs Enforcement Network (CEN) system;
- Improve the quality of the common analytical products;
- Promote co-operation within the RILO Network; and
- Identify areas of risk.

Initially, the project was foreseen for the first half of 2017, but it was later extended through 2020 (WCO, 2021^[7]). The project focuses on the illicit turnover of both genuine and counterfeit alcohol, as well as information on seizures of machinery and components utilized in the illegal production of alcohol. Additionally, cases involving illegal alcohol factories are considered (WCO, 2019^[6]).

Involvement in the operations has increased over time, rising from 42 countries (in 7 RILOs) in 2018, to 58 countries (in 11 RILOs) in 2019. The countries taking part reported on 4,726 cases, in which 37.3 million litres of alcohol were seized, in 2019. Saudi Arabia and Ireland together accounted for close to 60% of the total cases reported, with no other country accounting for more than 7% of the total (WCO, 2021^[7]). Land borders were involved in more than half the cases (52.2%), followed by seaports (27%), inland (11.4%) and airports (7.6%).

WCO-INTERPOL

On 23-27 July 2012, WCO and INTERPOL carried out a joint operation against illicit trafficking in Africa.³ Operation Meerkat saw customs and police authorities carry out some 40 raids at seaports, inland border crossing points, markets and shops in Angola, Kenya, Mozambique, Namibia, South Africa, Tanzania and Zimbabwe. More than 32 million cigarettes, 134 tonnes of raw tobacco and almost 3 000 litres of alcohol were seized, resulting in national authorities initiating a number of administrative investigations into tax evasion and other potential criminal offences.

WHO

The work of the World Health Organization (WHO) on alcohol has included significant attention to the challenges posed by unrecorded products, much of which is illicit. In 2010, the WHO, in consultation with stakeholders, developed a *Global strategy to reduce the harmful use of alcohol* (WHO, 2010^[8]). One of the 10 policy areas identified for action concerned measures that could be taken to reduce the public health impact of illicit alcohol and informally produced alcohol. The report notes the importance of addressing the health risks posed by illicit and informal alcohol due to their higher ethanol content and potential contamination with toxic substances, such as methanol. It also notes that the illicit and informal products could also hamper governments' abilities to tax and control legally produced alcohol. Recommended policy interventions were six-fold:

- establishing good quality control with regard to production and distribution of alcoholic beverages;
- regulating sales of informally produced alcohol and bringing it into the taxation system;
- establishing an efficient control and enforcement system;
- developing or strengthening tracking and tracing systems for illicit alcohol;
- ensuring necessary co-operation and exchange of relevant information on combating illicit alcohol among authorities at national and international levels; and
- issuing relevant public warnings about contaminants and other health threats from informal or illicit alcohol.

At the same time, in its *Handbook for action to reduce alcohol-related harm* (WHO, 2019^[9]), the WHO recommends that consideration be given to undercutting the market for illicit alcohol, by adopting government efforts to control these markets and tax policies that make lower-alcohol forms of culturally preferred beverages more accessible to consumers.

A follow-up draft report on *Global alcohol action plan 2022-2030 to strengthen implementation of the Global Strategy to Reduce the Harmful Use of Alcohol*, notes that limited progress had been made in developing and implementing strategies in countries (WHO, 2021^[10]). In the case of illicit alcohol, the report further notes that the capacity of governments to deal with illicit production, distribution and consumption of alcohol, including safety issues, is limited or inadequate, particularly in jurisdictions where unrecorded alcohol makes up a significant proportion of all alcohol consumed.

The report cites the need for research on the consumption of informally and illegally produced alcohol and its health consequences and sets out an action plan for boosting the effective implementation of the global strategy during 2022-30. This includes a proposal to develop and support the implementation of activities

for reducing the public health impact of illicitly or informally produced alcohol, taking into consideration the differences in strategies to address informally and illegally produced alcohol, including activities related to the assessment of the level of unrecorded alcohol consumption in populations, the efficient control of alcohol production and distribution, raising awareness of the associated health risks and community mobilization.

A submission by industry to WHO on the draft action plan recommends that consideration be given to inclusion of measures that control alcohol markets without stimulating demand for illicit products and the consequential health risks associated with illicit products. The recommended measures include:

- Regulating and controlling the supply of raw materials, particularly ethanol.
- Monitoring production sites and requiring health and sanitary permits for manufacturers.
- Strengthening national borders and law enforcement departments to identify and prevent illicit activity.
- Strengthening penalties for illicit activity to increase their deterrent effect.
- Improving a country's overall business environment to encourage businesses to operate legitimately.
- Raising level of awareness of the threat of the illicit trade and its consequences.

Industry stakeholders

A number of private stakeholders have been addressing issues concerning illicit alcohol trade and have developed policy recommendations and tools to this end. These include the International Alliance for Responsible Drinking (IARD) and the Transnational Alliance to Combat Illicit Trade (TRACIT).

IARD

The IARD, in which 13 leading producers of wine, beer and spirits participate, has conducted considerable work on unrecorded and illicit alcohol. This includes case studies on the situation in the Baltic States (IARD, 2018^[11]), Botswana (IARD, 2018^[12]), India (IARD, 2018^[13]) and Vietnam (IARD, 2018^[14]), as well as a report on the situation with non-commercial alcohol in nine countries (Belarus, Botswana, Brazil, China, India, Kenya, Mexico, Russia, and Sri Lanka) (IARD, 2012^[15]). Additional reports include an assessment of the situation worldwide, with recommendations for the actions that stakeholders should take to address the situation (see Annex A) (IARD, 2018^[16]), and a policy brief.⁴

The organisation's work also includes the development of an online toolkit⁵ for assessing the scope of the unrecorded alcohol market, the aim of which is to:

- serve as a resource for those interested in gaining a better understanding of the issue of unrecorded alcohol;
- provide a menu of approaches that can be used to investigate the unrecorded alcohol market, depending on the research question, context, and existing data and resources available; and
- provide a road map for achieving, to the greatest extent possible, consistency and uniformity across studies so that results can be compared in a sound manner.

On the policy front, in recognition of the growing role of e-commerce in alcohol market, the organisation entered into partnership with 12 (now 14) major global and regional online retailers and ecommerce and delivery platforms operating in six continents, to work on establishing global standards for improved policing of the online sale and delivery of alcohol beverages.⁶ The partnership, which was announced in January 2021, resulted in the issuance of standards in May (IARD, 2021^[17]). The standards are aimed at:

- verifying that sales are made to parties meeting the legal purchase age;

- preventing delivery to those who are underaged, intoxicated, or where delivery is prohibited by law;
- providing training tools, information, and education for drivers;
- enhancing consumer information and control; and
- putting in place effective monitoring of the situation.

TRACIT

The Transnational Alliance to Combat Illicit Trade (TRACIT) is an organisation which is actively involved in i) analysing illicit trade, with specific attention to alcohol and ii) proposing actions to combat illegal activities (Box 5.2). Its member companies encompass 1 500 global brands and subsidiaries, which operate in 190 countries. Work on alcohol includes country reports on Costa Rica (TRACIT, 2019^[18]), India (TRACIT, 2019^[19]) and South Africa (TRACIT, 2019^[20]). The organisation has also done related work on the impact that illicit trade can have on sustainable development goals, with specific reference to the situation of illicit alcohol (TRACIT, 2019^[21]) and (TRACIT, 2021^[22]) and has assessed the effects of the pandemic on illicit trade in alcohol (TRACIT, 2021^[23]).

Box 5.2. TRACIT policy recommendations

Governments employ a variety of regulatory and legal mechanisms to control harmful consumption of alcohol and to combat illicit alcohol, with differing degrees of success. Many frameworks are ineffectively designed, offer only partial solutions, or are inadequately enforced or resourced. Some mechanisms may even unintentionally boost illicit alcohol consumption by making it more difficult for consumers to access or afford licit beverages. TRACIT recommends that governments consider a portfolio of recognized policy and regulatory controls that can help control illicit alcohol:

Raise awareness of illicit alcohol, particularly at the grassroots level with emphasis on the severe health risks associated with consumption of illicit alcohol. Awareness campaigns should educate consumers the negative economic impacts, such as lost tax revenues that could have been invested in schools, roads or other much needed infrastructure. Consumers should also be educated on how they are likely aiding criminal organisations when they buy illicit alcohol. Moreover, awareness campaigns must also consider the harmful drinking patterns that are associated with consumption of unrecorded alcohol.

Improve accessibility of legal products at affordable prices and increase the density of legal outlets to stem demand for illicit products. Increasing the number of legal retail outlets that sell legitimate alcohol is an effective way to curb the sale of illicit alcohol. Effective monitoring of retail outlets is also crucial to ensure that these units do not trade in illicit alcohol. Strategies that seek to effectively regulate the commercial availability of alcohol are also important ways to reduce the general level of harmful use of alcohol. This is especially true in rural areas where the density of shops is particularly low and the ease of access to unregulated alcohol is high.

Enforce laws and impose sanctions and penalties at levels sufficient to deter criminal activity. Effective enforcement of laws requires co-ordination among border countries, national government agencies (revenue, border, police, health, etc.) and different levels of government. Moreover, imposing administrative, criminal and civil penalties for illicit trade in alcohol should be a priority to prohibit illicit traders from exploiting markets with the weakest penal regimes. Consideration must also be given to rescinding business licenses from retailers, manufacturers and distributors involved in illegal trade. As contraband beverages such as whiskey and vodka are the most common form of illicit alcohol, it is necessary to assess more carefully their origin.

Rationalize tax policies and subsidies to ensure that they do not incentivize illicit trade, smuggling, adulteration and theft. Tax policies need to account for various demand-related factors including overall consumption, price, income levels and the ensuing affordability of products.

Control the production and importation of ethanol. Countries with very low levels of counterfeit alcohol have effective systems in place to control the trade of ethanol. Ethanol meant for non-consumption purposes (such as pharmacy alcohol, beauty and personal care products, and industrial use) should be denatured and is not levied excise tax. Countries such as Colombia and Peru have new legislation in place to control the ethanol market. These efforts have achieved positive results in controlling the flow of local and smuggled ethanol diverted to the illicit market to produce illicit distilled beverages.

Promote the creation of local private-public partnerships to bring key industry and government stakeholders together to define strategies including: developing and deploying technology solutions based on internationally recognized open standards to protect the integrity of products and supply chains; ensure easy sharing of intelligence and data to improve risk assessment and border control; improving awareness; expanding the knowledge base; and finding new ways to tell apart legal from illicit beverages.

Multi-sector engagement is necessary because no one sector by itself can address the complexities of illicit trade. Like endeavours in other areas, efforts to reduce the harmful effects of alcohol and reduction of illicit alcohol can benefit from working together.

In addition to the above, there are a number of other international organisations that are active in specifically combatting illicit trade in alcohol. The *Alliance Against Counterfeit Spirits (AACS)* represents the world's major international spirits producing companies.⁷ The organisation, which has been in operation since the early 1990s, has been actively engaged in the training of law enforcement officials, and in supporting enforcement actions, which have resulted in the seizure of millions of counterfeit bottles, caps and labels. One of the principal objectives of the *World Spirits Alliance*, which was formed in 2019 with the participation of producers of spirits worldwide, is to support the development of ambitious strategies to combat illicit alcohol.⁸

The World Wine Trade Group (WWTG) is an informal grouping of governments and industry representatives from wine-producing countries that address wine-related matters affecting the wine trade: Argentina, Australia, Canada, Chile, Georgia, New Zealand, the United States, and South Africa. Founded in 1998, the Group aims to facilitate international trade in wine through information sharing, discussion of regulatory issues in wine markets, and joint actions for the removal of trade barriers. The WWTG has negotiated three agreements and one MOU that promote international wine trade, including a 2017 *Arrangement on Information Exchange, Technical Cooperation and Counterfeiting*.^{9,10}

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Notes

¹ See www.europol.europa.eu/newsroom/news/tonnes-of-illicit-foods-seized-across-europe-in-interpol-europol-led-operation.

² See www.interpol.int/en/News-and-Events/News/2021/Illicit-food-and-drink-worth-EUR-53-million-seized-in-global-operation.

³ See www.wcoomd.org/en/media/newsroom/2012/august/wco-and-interpol-joint-operation-against-illicit-trafficking-in-africa-leads-to-tobacco-and-alcohol-seizures.

⁴ See www.iard.org/getattachment/d76b085b-6a26-4080-b846-ca5df14e301e/pr-unrecorded.pdf.

⁵ See <http://iardunrecordedtoolkit.org/home>.

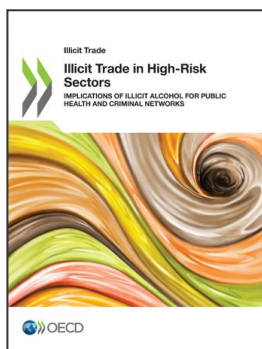
⁶ See www.iard.org/IARD/media/Documents/29012021-E-commerce-partnership-announcement.pdf. The global and regional online retailers and ecommerce and delivery platforms include Coles (Australia), Cornershop (Canada, Latin America, United States), Drizly (United States), Endeavour Group (Australia), Glovo (Africa, Europe, Latin America, Middle East), Grab (Southeast Asia), HipBar (India), JD.com (China), Jumia (Africa), Minibar Delivery (United States), Mercado Libre (Latin America), Retail Drinks Australia (Australia), ReserveBar (United States) and Uber Eats (six continents).

⁷ See <https://aacs-global.com/>.

⁸ See www.worldspiritsalliance.com/.

⁹ See <https://legacy.trade.gov/td/ocg/wwtg.htm> and www.wwtg-gmcv.org/

¹⁰ See <https://legacy.trade.gov/td/ocg/2017WWTGArrangement.pdf>



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