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MULTILATERAL EVALUATION MECHANISM (MEM)

*Evaluation Report on Drug Policies:
Measures to Control and Counter the Illicit
Cultivation, Production, Trafficking, and
Distribution of Drugs, and to Address their
Causes and Consequences*

Canada

Inter-American Drug Abuse Control Commission (CICAD)
Secretariat for Multidimensional Security (SMS)

2022



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CANADA

**Evaluation Report on Drug Policies:
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EIGHTH EVALUATION ROUND

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PREFACE

The Multilateral Evaluation Mechanism (MEM), established by a mandate from the Second Summit of the Americas (Santiago, Chile - 1998), is a unique multilateral evaluation tool designed to measure the progress made and challenges faced by the member states of the Organization of American States (OAS) in implementing the Hemispheric Plan of Action on Drugs of the OAS Hemispheric Drug Strategy, currently in force.

The Inter-American Drug Abuse Control Commission (CICAD) of the Secretariat for Multidimensional Security (SMS) is the OAS specialized agency in charge of implementing this Mechanism.

The current MEM round is based on the objectives of the Hemispheric Plan of Action on Drugs 2021-2025 of the Hemispheric Drug Strategy 2020 and their respective priority actions. These documents take into account the recommendations of the outcome document of the United Nations General Assembly Special Session on the World Drug Problem (UNGASS 2016) and the United Nations 2030 Agenda on Sustainable Development, as well as cross-cutting issues, such as the gender perspective and human rights, cultural context, and social inclusion approaches, among others.

Seven evaluation rounds have been completed from 1998 to 2019 and, during 2020, the MEM Intergovernmental Working Group (IWG), composed of member state delegates, agreed on a new methodology for the eighth round, consisting of annual thematic evaluations with the support of independent technical consultants, as follows: 2021 – Measures for Prevention, Treatment, and Recovery Support; 2022 – Measures to Control and Counter the Illicit Cultivation, Production, Trafficking, and Distribution of Drugs, and to Address their Causes and Consequences; 2023 – Institutional Strengthening; Research, Information, Monitoring, and Evaluation; International Cooperation; and 2024 – Comprehensive Evaluation based on updated information from all thematic areas.

MEM evaluations are carried out based on information provided by the member states' National Coordinating Entities (NCEs), which is analyzed by the MEM Governmental Expert Group (GEG), composed of experts designated by the countries, who do not participate in their own country's evaluation, thus ensuring the transparency and impartiality of the process. The GEG is always supported by the group of independent technical consultants and the MEM Unit. The eighth round represents a more rigorous evaluation process, in which countries are requested to provide valid means of verification to support the information submitted and ensure compliance of each priority action.

Specifically, the GEG's work for the thematic assessment for the area of "Measures to Control and Counter the Illicit Cultivation, Production, Trafficking, and Distribution of Drugs, and to Address their Causes and Consequences" was conducted during 2022, and covers the 2019 to 2022 period (unless otherwise specified). This work was adapted to the COVID-19 pandemic with

the use of technology and virtual tools, as well as taking it into consideration in the evaluation assessments.

Finally, it should be noted that one of the main purposes of MEM evaluation reports is to serve as a useful diagnostic tool to identify opportunities for improvement in drug policies and strategies, both at the national and regional levels.

OBJECTIVE**1**

DEVELOP AND/OR STRENGTHEN NATIONAL- AND REGIONAL-LEVEL INTERDICTION CAPACITY, AS WELL AS THE CAPACITY TO REDUCE THE ILLICIT CULTIVATION, PRODUCTION, TRAFFICKING, AND DISTRIBUTION OF PLANT-BASED AND SYNTHETIC DRUGS THROUGH THE USE OF COMPREHENSIVE AND BALANCED PROGRAMS IN ACCORDANCE WITH THE REALITIES OF EACH COUNTRY'S DOMESTIC LEGISLATION AND RESPECT FOR HUMAN RIGHTS.

Priority Action 1.1: Develop or strengthen intelligence and interdiction capabilities to detect, investigate, and dismantle laboratories or facilities used in the illicit manufacture of drugs.

Canada implements ongoing training programs to detect, investigate, and dismantle laboratories or facilities used in the illicit manufacture of drugs, for personnel involved in interdiction operations. Said programs include the Royal Canadian Mounted Police (RCMP) providing training on clandestine laboratory and investigations related to the production of chemical drugs.

The country does not have protocols or operating procedures to detect, investigate, or dismantle clandestine laboratories or facilities for the illicit processing or manufacture of drugs.

Priority Action 1.2: Implement policies that promote gender mainstreaming in agencies and organizations in charge of drug control.

Agencies in charge of drug control in Canada implement policies that promote gender mainstreaming. The Government of Canada's suite of substance use-related policies and programs, including the Canadian Drugs and Substances Strategy (CDSS), incorporates Gender-based Analysis Plus (GBA Plus), recognizing the impact that determinants of health may have on substance use. These include sex, gender, age, ethnicity, housing stability, and employment, among other factors. GBA Plus directly supports the development and implementation of policies and programs to respond to the specific needs of diverse and at-risk populations.

Public Safety Canada incorporates gender considerations into its policy efforts to address the illegal supply of drugs. For example, gender considerations are incorporated into the agenda of its series of Law Enforcement Roundtables on Drugs, a forum to share knowledge and good practices in addressing the illegal drug supply.

In line with Canada's Feminist International Assistance Policy, Canada ensures that its funding partners conduct and apply ongoing gender analyses to all projects funded by Canada's Anti-Crime Capacity Building Program, which builds the capacity of beneficiary states to prevent and respond to threats posed by transnational organized crime, including illicit drug trafficking, particularly within security sector institutions. Canada continues to emphasize gender diversity as a performance driver within security sector institutions, as integrating and promoting women in the security sector increases the overall effectiveness of the forces, along with allowing for a gender based analytical perspective to be incorporated. Through its Anti-Crime Capacity Building

Program, Global Affairs Canada provides support to CICAD's Inter-American Program for Strengthening Gender Equality in Counterdrug Law Enforcement Agencies (GENLEA) initiative, which seeks to increase gender equality in member states' counter drug law enforcement agencies to strengthen their capacity to counter drug trafficking and ensure a gender perspective is included in response to drug crime.

Priority Action 1.3: Design, implement, and strengthen programs aimed at land, riverine, maritime, and aerial interdiction.

Canada has programs and strategies aimed at land, riverine, maritime, and aerial interdiction, through monitoring, inspections, or checkpoints.

Priority Action 1.4: Review and update, as appropriate, legal frameworks related to the use of specialized investigation tools and techniques.

Canada has the Controlled Drugs and Substances Act and the Customs Act providing for the use of specialized investigation tools and techniques to prevent and reduce drug trafficking. In that sense, Canada has broad regulatory frameworks to control analogues, derivatives, and classes of substances. This regulatory framework has proven effective in capturing new psychoactive substances, which are defined both externally and internally as deemed appropriate.

Priority Action 1.5: Review and/or update mechanisms countries use to monitor the evolution of drug trafficking and related crimes, for the purpose of identifying and responding to new trends and threats.

Canada does not have updated assessments or studies to identify new trends and threats on drug trafficking and related crimes.

Priority Action 1.6: Define and implement coordinated actions between national and regional entities to dismantle organized criminal groups involved in drug trafficking and related crimes.

Canada implements actions to identify organized crime groups involved in drug trafficking and related crimes. In this sense, organized crime is a priority of the RCMP Federal Policing and the identification of organized crime (OC) groups and their criminal activities, including drug trafficking, is part of the federal policing (FP) mandate.

The country does not implement inter-institutional collaboration or cooperation mechanisms to coordinate activities aimed at dismantling organized crime groups involved in drug trafficking and related crimes.

Canada has not participated in operations or investigations in cooperation with other countries aimed at dismantling organized criminal groups involved in drug trafficking and related crimes.

Priority Action 1.7: Enhance the capacity of national and regional forensic laboratories or similar investigation entities to analyze and identify chemical substances, precursors, pharmaceutical products, and synthetic drugs, including new psychoactive substances (NPS) and facilitate information sharing with global repositories and across governmental counterparts.

Canada Drug Analysis Service (DAS) is responsible for, and capable of, analyzing chemical substances, precursors, pharmaceutical products, and synthetic drugs, including new psychoactive substances (NPS).

The country has the following ongoing training programs for personnel involved in the analysis of chemical substances, precursors, pharmaceutical products, and synthetic drugs, including NPS:

- DAS' training is commodity based (drug – type and related substances) and continual training occurs as an analyst matures and handles more complicated sample composition. The laboratory program uses a categorizing technique of analytical requirements for positive analysis and this list is updated by a science committee and the analysts are informed on the new entries or changes in requirements. The same applies for targeted methods employed such as Liquid Chromatography -Quadrupole Time-of-Flight (LC-QTOF) or Liquid Chromatography Mass Spectrometry (LC-MS/MS) analyses. Clandestine chemists are trained through Clandestine Laboratory of Investigating Chemists (CLIC).

The Canada Border Services Agency (CBSA) offers the following Internal training to implicated personnel:

- Respiratory Protection Program (RPP) (H3044-P)
- Transportation of Dangerous Goods (S7017-P)
- Workplace Hazardous Materials Information System (H3003-P)
- Lonscan 500DT (S7112-N) (in classroom training)
- Naloxone nasal spray administration (S7174-P)
- Donning and Doffing of PPE (H3047-P)
- Designated Safe Examination Area (DSEA) (X2010-P)

Canada has the following mechanisms to facilitate and share information at the national level across relevant governmental counterparts, as well as with global repositories on chemical substances, precursors, pharmaceutical products, and synthetic drugs, including NPS:

- DAS shares by email a Raw Data file containing information about substances identified in analyzed samples monthly with people included in a distribution list

- DAS distributes by email the Analyzed Drug Report on a quarterly basis which highlight most frequently identified substances over the period; this report is also available on the DAS InfoBase web platform
- DAS shares Drug Notification, which is a letter, sent by email to relevant jurisdiction to inform about the identification of a new substance; a page on the DAS Infobase web platform to show the mapping of this information is in development
- DAS reports New Psychoactive Substances (NPS) monthly through the United Nations Office on Drugs and Crime (UNODC) web portal
- All those products are shared at the national level across governmental counterparts, most of that information is available on the web
- DAS is participating in several working groups to facilitate the sharing of information at various levels
- Participating agencies include: UNODC, U.S. Drug Enforcement Administration (DEA), North American Dialogue on Drug Policy (NADD), CLIC, RCMP, CBSA, other Health Canada (HC) groups, Public Health Agency of Canada (PHAC), Public Safety Canada (PS), Canadian Community Epidemiology Network on Drug Use (CENDU)
- The Government of Canada has put in place a robust governance structure to facilitate whole-of-government coordination in implementing a comprehensive federal response to the overdose crisis. Each department/agency will be responsible for leading its respective initiatives and providing updates to the interdepartmental Assistant Deputy Minister (ADM) level Working Group on Opioids chaired by the Associate-ADM of Health Canada's Controlled Substances and Cannabis Branch. This working group is used as a forum for information and consultation on next steps toward a comprehensive, collaborative federal response to the overdose crisis. Updates and decisions from this working group feed into the federal, interdepartmental Deputy Ministers Task Force on the Opioid Crisis as required. This Task Force, chaired by the Deputy Minister of Health Canada, serves as a time-limited forum to provide leadership and oversight of federal initiatives to respond to the overdose crisis. The Task Force will remain an established committee until such time that the public environment no longer requires it
- The Government is committed to ongoing collaboration and consultation with provincial and territorial partners. Departments and agencies will provide updates to, and consult with, provincial and territorial colleagues as required through the federal/provincial/territorial (FPT) ADM-level Problematic Substance Use and Harms Committee (PSUH), co-chaired by Health Canada and British Columbia and comprised of ADMs responsible for drug policy in their jurisdiction. They will also provide updates to and consult with PT colleagues as required through the FPT Special Advisory Committee on the Epidemic of Opioid Overdoses (SAC), co-chaired by the Chief Public Health Officer of Canada and Saskatchewan's Chief Medical Officer of Health and comprising Chief Medical Officers of Health from each jurisdiction. While the PSUH is an established committee intended as a long-term forum for drug policy discussions, the SAC is a time-limited mechanism for public health collaboration and information sharing between jurisdictions related to the overdose crisis in Canada. Efforts are underway to transition activities of the SAC that require ongoing FPT collaboration to permanent structures, either under the PSUH or the Pan-Canadian Public Health Network (PHN)

- CBSA participates in various bi-lateral and multilateral written collaborative arrangements, Memorandums of Understanding, and treaties with various internal and external agencies

Priority Action 1.8: Enhance the capacity of relevant drug control and financial regulatory competent authorities to identify and address new challenges whereby synthetic drugs and their precursors and pharmaceutical products, being illicitly sold online and shipped through land, riverine, maritime, and aerial means.

Canada has mechanisms to investigate and disrupt drug trafficking through the Internet. In this sense, the RCMP is actively engaged in cyber investigations aimed at disrupting drug trafficking through the internet. The CBSA likewise works closely with its domestic and international partners via information sharing agreements. In addition to using general open-source intelligence information, CBSA uses Dark and open web data collection tools that can be obtained through a commercially available paid subscription improve its analysis and operational capacities to understand and combat smuggling, particularly in the realm of synthetic opioids.

Priority Action 1.9: Enhance coordination with private sector entities to prevent diversion of chemical substances and precursors and deny criminals access to the materials, platforms, and services of the licit supply chain, which are exploited by criminal organizations for the illicit manufacture, sale, and trafficking of drugs.

Canada does not have partnerships or information exchange mechanisms with private sector entities to prevent access to materials and services exploited for illicit drug trafficking purposes.

The country uses tools and resources of the International Narcotics Control Board (INCB) to strengthen cooperation with the private sector to prevent the diversion of chemicals. In this sense, various agencies use the online tools made available by the INCB.

Priority Action 1.10: Enhance capacities for forfeiture, seizure, and management of assets, tools, or products related to illicit drug markets.

Canada does not have national authorities with the appropriate budget, human and material resources, as well as ongoing training for the forfeiture, seizure, and management of assets, tools, or products related to illicit drug markets.

The country's competent personnel do not receive ongoing training for the forfeiture, seizure, and management of assets, tools, or products related to illicit drug markets.

OBJECTIVE

2

STRENGTHEN NATIONAL MEASURES TO ADDRESS THE CHALLENGES POSED BY NPS AND ILLICIT SYNTHETIC DRUGS, AND THE THREAT OF FENTANYL-RELATED SUBSTANCES, NON-MEDICAL SYNTHETIC OPIOIDS, AND ILLICIT AMPHETAMINE DERIVATIVES.

Priority Action 2.1: Establish and/or strengthen early warning systems (EWS) at the national level to promote collaboration and the exchange of information with other existing regional or international systems.

Canada has an early warning system (EWS) to identify and trace new psychoactive substances (NPS), illicit synthetic drugs, and the threat of fentanyl-related substances, non-medical synthetic opioids, illicit amphetamine derivatives, and other substances subject to international control. This information is shared with other global systems. Drug Analysis Service (DAS) is participating in various initiatives related to EWS through data sharing and DAS does not operate an EWS by itself. Although DAS does not have a formalized EWS with external partners, DAS provides timely Drug Notifications which is letter sent by email to relevant jurisdiction to inform about the identification of a new substance or substance in a new form or counterfeit in a given geographical location; a page on the DAS Infobase web platform to show the mapping of this information is in development. DAS reports New Psychoactive Substances (NPS) monthly through the United Nations Office on Drugs and Crime (UNODC) web portal; this information is also shared with partners at various level of government.

Priority Action 2.2: Improve domestic capabilities to detect and analyze NPS by making resources and tools available for those responsible in this area.

Canada improves its capabilities to detect and analyze NPS through the use of special investigative techniques, updated equipment, and/or acquisition of technology. In this sense, DAS: 400MHz Nuclear Magnetic Resonance (NMR), Liquid Chromatography Mass Spectrometry (LC-MS/MS), Liquid Chromatography -Quadrupole Time-of-Flight (LC-QTOF). The Canada Border Services Agency (CBSA) prioritizes the health and safety of its officers. CBSA officers follow the Handling of Suspected Highly Toxic Substances Standard Operating Procedures. High risk/volume ports of entry are equipped with designated safe sampling areas equipped with NARCAN, personal protective equipment and ductless fume hoods in addition to fentanyl programmed Lonscans (500DT).

Priority Action 2.3: Design and implement, when appropriate, national regulatory tools to address the challenges posed by NPS and national controls on emerging illicit synthetic drugs and their precursor chemicals.

Canada has the following regulatory frameworks or guidelines to identify and address the challenges posed by the onset of NPS and emerging synthetic drugs:

- Core Structure Guidance Documents for Fentanyl's and Benzodiazepines which are published Canada.ca
- Other guidance documents are in development for morphinans as well as a variety of precursor substances

Priority Action 2.4: Promote participation in the Project ION Incident Communication System (IONICS) to facilitate real-time communication of incidents involving suspicious shipments of, trafficking in, or illicit manufacture or production of NPS, including fentanyl-related substances and other non-medical synthetic opioids and amphetamine derivatives.

Canada participates in the International Narcotics Control Board (INCB)'s Project ION (International Operations on NPS). The CBSA serves as the focal point.

Priority Action 2.5: Develop innovative regulatory approaches, such as generic controls, analogue legislation, and temporary or emergency controls, to enhance national controls on synthetic opioids for non-medical use, and NPS, particularly when scheduling fentanyl-related substances by class.

Canada has the Controlled Drugs and Substances Act (CDSA) as an innovative legislation to control synthetic opioids for non-medical use and NPS.

OBJECTIVE

3

STRENGTHEN OR DEVELOP LEGAL AND INSTITUTIONAL FRAMEWORKS FOR THE EFFECTIVE MONITORING AND CONTROL OF ESSENTIAL CHEMICAL SUBSTANCES AND PRECURSORS TO PREVENT DIVERSION OF THESE SUBSTANCES TO THE MANUFACTURING OF ILLICIT DRUGS AND COUNTER ITS TRAFFICKING, INCLUDING PERIODICALLY UPDATING NATIONAL LISTS OF CONTROLLED CHEMICAL SUBSTANCES.

Priority Action 3.1: Promote inter-agency coordination with industry to prevent diversion of controlled chemical substances.

Canada has the Controlled Substances Directorate of Health Canada as the competent national authority responsible for developing guides, codes of conduct, or other instruments to inform the industry and users in general of controlled chemical substances.

The country has the Status Confirmation Service to inform the industry and users in general of applicable controls and cooperation methods, to prevent the diversion of controlled chemical substances.

Canada has an updated register of all individuals and corporations handling controlled chemical substances.

The country's competent authorities carry out regular inspections and audits of the establishments of individuals and corporations authorized to handle controlled chemical substances, as listed in the table below:

Name of the competent national authority	Does it carry out regular inspections and audits?	Is it responsible for controlling domestic trade?	Does it consider the CICAD Model Regulations?
Health Canada	Yes	Yes	Yes

In this sense, the inspection frequency of establishments authorized to handle controlled chemical substances is not pre-set or on predetermined cycle but rather based on the overall risk profile of the establishment. Several criteria are considered in determining the inspection frequency, one of which is the potential risk of diversion, which would be associated with a more frequent inspection cycle. The Inspection Strategy for Licensed Dealers of Controlled Substances and Class A Precursors (CS-POL-002) provides details on the inspection frequency of inspections for licensed dealers.

Priority Action 3.2: Conduct analyses, including through existing mechanisms of information exchange, on substances, their analogues, and precursors, which pose a threat to public health in member states, to identify substances for expedited international control.

Canada carries out analyses that include the exchange of information through existing international mechanisms of substances, their analogs, and precursors, which pose a threat to public health. In this sense, information is exchanged in a variety of ways. The Office of Drug Policy and Science – Science Team meets annually (or more often) with the United States Drug Enforcement Administration (DEA) to discuss shared concerns for controlled and non-controlled substances as well as related pharmacology.

Science Team participates in the North American Drug Dialogue Science calls with official from Canada, U.S., and Mexico sharing information related to recent developments and trends in the illicit drug market. Project NAILER: Canada is participating in this U.S. led project on precursor chemicals with the goal of creating a living document outlining each nation’s controlled status for precursors.

Priority Action 3.3: Strengthen the existing international control system to prevent the diversion of controlled chemical substances, pharmaceutical products, and precursors used in the illicit manufacture of drugs, as well as interdiction to counter the trafficking of chemical substances.

Canada has the Precursor Control Regulations made under the legislative authority of the Controlled Drugs and Substances Act incorporating the control measures in Article 12, Paragraphs 8 and 9 of the 1988 United Nations Convention to prevent diversion of controlled chemical substances towards illicit activities.

Priority Action 3.4: Strengthen or develop appropriate domestic controls over precursors including measures to control the international trade in precursor chemicals and other controlled chemical substances, consistent with the framework established in the United Nations Drug Conventions, and law enforcement measures.

Canada has implemented the following control measures listed in Article 12, Paragraph 8 of the 1988 United Nations Convention:

Control measures	Yes	No
Control of all persons and enterprises engaged in the manufacture and distribution of controlled chemical substances	x	
Control, under license, the establishment and premises in which manufacture or distribution of controlled chemical substances may take place	x	
Require that licensees obtain a permit for manufacturing or distributing controlled chemical substances	x	
Prevent the accumulation of controlled chemical substances in the possession of manufacturers and distributors, in excess of the quantities required for the normal conduct of business and the prevailing market conditions	x	

The country has implemented the following control measures listed in Article 12, Paragraph 9 of the 1988 United Nations Convention:

Control measures	Yes	No
A system to monitor international trade in controlled chemical substances to facilitate the identification of suspicious transactions	x	
The monitoring system shall be used by manufacturers, importers, exporters, wholesalers, and retailers to inform the competent authorities of suspicious orders and transactions	x	
Any controlled substance is seized if there is sufficient evidence that it will be used in the illicit manufacture of narcotics or psychotropic substances	x	
The competent authorities are notified, as soon as possible, if there is reason to believe that the import, export, or transit of a substance is destined for the illicit manufacture of narcotic drugs or psychotropic substances, including, in particular, information about the means of payment and any other essential elements which led to that belief	x	
Requirements to ensure that imports and exports are properly labelled and documented. Commercial documents such as invoices, cargo manifests, customs, transport, and other shipping documents must include the names of the substances, the quantity, and the name and address of the exporter, the importer and, when available, the consignee. These documents are kept for a period of no less than two years and may be made available for inspection by competent authorities	x	

Canada complies with the request for information in Article 12, Paragraph 10 of the 1988 United Nations Convention.

In general, all control measures in Canada are set out in the Precursor Control Regulations under the Controlled Drugs and Substances Act (CSDA).

Priority Action 3.5: Promote participation in the Pre-Export Notification (PEN) Online system and Precursor Incident Communication System (PICS) to facilitate information exchange on controlled chemical substances.

Canada uses the International Narcotics Control Board's (INCB) information system for pre-export notifications (PEN Online) of controlled chemical substances.

The country uses the INCB's Precursor Incident Communication System (PICS).

Priority Action 3.6: Train relevant drug investigation, control and interdiction personnel and researchers on the identification and handling of precursors and other controlled chemical substances used in the illicit manufacture of drugs.

Canada receives the following training for drug control personnel and for the identification and handling of controlled chemical substances:

Training Programs	Institution in charge (national or international)
Designated Safe Examination Area (DSEA)	Canada Border Services Agency (CBSA)
Lonscan 500DT	
Naloxone nasal spray administration	
Donning and Doffing of PPE	
Respiratory Protection Program (RPP)	
Transportation of Dangerous Goods	
Handling of Suspected Highly Toxic Substances Standard Operating Procedures	
General Duty policing	Royal Canadian Mounted Police (RCMP)
Drug Investigative Training Course (DITC)	RCMP Canadian Police College (CPC)
Clandestine Laboratories Investigation Course (CLIC)	

Priority Action 3.7: Allocate resources to acquire necessary equipment and supplies for the preliminary identification of substances, and the protective equipment required by personnel in charge of these tasks.

In Canada there are budgetary mechanisms to ensure allocation of resources to acquire necessary equipment and supplies for the preliminary identification of substances and the protective equipment required by personnel in charge of these tasks. In this sense, there are various government mechanisms to secure funding, through various budget and financial processes. There is no single mechanism.

Priority Action 3.8: Use, as appropriate, CICAD’s Model Regulations for the control of Chemical Substances Used in the Illicit Production of Narcotic Drugs and Psychotropic Substances (2019) in the formulation of national chemical control regulations.

Canada uses the OAS/CICAD Model Regulations for the Control of Chemical Substances Used in the Illicit Manufacture of Narcotic Drugs and Psychotropic Substances. In this sense, the Office of Controlled Substances, Health Canada assisted in drafting the Model Regulations based on the Canadian regulations for chemical precursors.

OBJECTIVE

4

ENSURE ADEQUATE AVAILABILITY AND ACCESSIBILITY OF SUBSTANCES SUBJECT TO INTERNATIONAL CONTROL FOR MEDICAL AND SCIENTIFIC PURPOSES, WHILE ALSO PREVENTING THEIR DIVERSION TOWARDS ILLICIT ACTIVITIES, IN ACCORDANCE WITH INTERNATIONAL DRUG CONTROL CONVENTIONS.

Priority Action 4.1: Streamline, in accordance with national legislation and international obligations, the process for issuing authorizations for national production, and to import and export controlled substances for medical and scientific purposes.

Canada has special processes for issuing authorizations for the national production, import, and export of substances subject to international control for medical and scientific purposes. The following table indicates how long it takes, on average, for an import or export authorization to be issued:

Product type	Average time to issue import permits	Average time to issue export permits
Narcotic or psychotropic raw materials for the manufacture of medicines	45 calendar days	45 calendar days
Medication containing narcotic or psychotropic drugs	45 calendar days	45 calendar days
Analytical patterns classified as narcotic or psychotropic	45 calendar days	45 calendar days
Medication classified as narcotic or psychotropic for the personal use of travelers entering or leaving the country	5 calendar days	5 calendar days

The country has an updated register of individuals or companies importing and exporting substances subject to international control for medical and scientific purposes.

Priority Action 4.2: Adopt measures, in accordance with national laws, to train competent authorities and health professionals on ensuring access to substances subject to international control for medical and scientific purposes.

Canada does not have training or awareness activities for competent national authorities and health professionals on the proper access to substances subject to international control solely for medical and scientific purposes.

Priority Action 4.3: Improve access to controlled substances for medical and scientific purposes by addressing existing barriers, including those related to laws, regulations, and measures to promote access and build capacity for health care systems.

Canada has the Controlled Drugs and Substances Act and its Regulations to govern the acquisition

of substances subject to international control for medical and scientific purposes.

OBJECTIVE
5

ADOPT OR STRENGTHEN CONTROL MEASURES TO PREVENT DIVERSION OF CONTROLLED PHARMACEUTICAL PRODUCTS CONTAINING NARCOTIC DRUGS AND/OR PSYCHOTROPIC SUBSTANCES, AND THOSE CONTAINING PRECURSOR SUBSTANCES USED IN THE PRODUCTION OF CONTROLLED SUBSTANCES.

Priority Action 5.1: Strengthen or implement control measures on pharmaceutical products containing precursor substances, narcotics, or controlled psychoactive substances, to prevent their diversion for non-medical purposes, abuse, and trafficking.

Canada does not have an updated register of individuals or corporations handling pharmaceutical products containing precursor substances, narcotics, or psychotropic substances.

The country issues licenses to manufacturers and distributors authorizing the handling of pharmaceutical products containing precursor substances, narcotics, or psychotropic substances.

Canada carries out regular inspections and audits of the establishments of individuals and corporations authorized to handle pharmaceutical products containing precursor substances, narcotics, or psychotropic substances.

Priority Action 5.2: Update existing and other regulations and control measures to prevent diversion of pharmaceutical products containing narcotic drugs and/or psychotropic substances.

Canada has the following penalties for infractions or violations by individuals or corporations that handle pharmaceutical products containing precursor substances, narcotics, or psychotropic substances:

Type of Penalty	Year when it was last updated
Criminal	1997
Administrative	1997

Priority Action 5.3: Strengthen national capacity and regional cooperation to prevent trade in and diversion of materials and equipment for illicit production or manufacture of narcotic drugs and psychotropic substances, including pill presses and encapsulating equipment.

Canada does not offer periodic training programs for personnel responsible for preventing trade in and diversion of materials and equipment for illicit production or manufacture of narcotic drugs and psychotropic substances.

The country shares the following information with other global systems on the diversion of materials and equipment for illicit production or manufacture of narcotic drugs and psychotropic

substances:

- The Royal Canadian Mounted Police (RCMP) will share information on new trends with other law enforcement partners via United Nations Office on Drugs and Crime (UNODC), International Criminal Police Organization (INTERPOL), European Union Agency for Law Enforcement Cooperation (EUROPOL) and via its international liaison officer network or under existing bilateral relationships.

Priority Action 5.4: Promote the incorporation of competent national authorities to the International Import and Export Authorization System (I2ES) of the International Narcotics Control Board, a secure online platform, ready to issue, load, and exchange expeditiously import and export authorizations of narcotic drugs and psychotropic substances for medical use, between countries.

Canada does not use the International Narcotics Control Board's (INCB) International Import and Export Authorization System (I2ES). However, it has alternative mechanisms that are ready to issue, load, and exchange expeditiously import and export authorizations of narcotic drugs and psychotropic substances for medical use. In this sense, the country has the National Drug Control System.

The country has received training on the INCB's I2ES.

OBJECTIVE

6

STRENGTHEN OR DEVELOP SPECIFIC OPERATIONAL AND INTELLIGENCE GATHERING AND SHARING MECHANISMS TO DETECT METHODS USED BY CRIMINAL ORGANIZATIONS, INCLUDING THE EXPLOITATION OF LAND, RIVERINE, MARITIME, AND AERIAL ROUTES.

Priority Action 6.1: Train law enforcement personnel involved in drug investigations in specialized investigative techniques and intelligence collection, analysis, and operations, including through the use of existing information systems and intelligence data exchanges.

Canada implements the following periodic training programs for personnel involved in drug investigations in specialized investigative techniques and intelligence collection, analysis, and operations:

- Royal Canadian Mounted Police (RCMP) Federal Policing Criminal Operations - Security Operations Centre (FPCO SOC): Basic training, DITC, Clan Lab, annual certifications
- Federal Policing National Intelligence - Intelligence Standards and Program Development (FPNI)-ISPD: Intelligence analysts within RCMP can complete the Intelligence Analyst Understudy Program (IAUP) which is a combination of mentoring, on the job training (OJT) tasks and formal training courses. The 3 courses that are specific to intelligence analysis are:
 - Criminal Intelligence Foundations Course
 - Tactical Intelligence Analysis Course
 - Strategic Intelligence Analysis Course
- RCMP intelligence analysts are also able to complete further intelligence analysis training with the Privy Council Office – Intelligence Analyst Learning Program
- The GI program is responsible for providing the Operational Intelligence Analysis Course (OIAC), which consists of training modules pertaining to the Intelligence Process/Cycle, open-source intelligence (OSINT) analysis, financial analysis, communication data analysis techniques (CDAT), information evaluation and sourcing, analysis and critical thinking and using IBM I2 analyst notebook and excel.

Priority Action 6.2: Enhance the capabilities of law enforcement agencies that investigate and counter drug trafficking and the crimes that facilitate and are associated with trafficking, such as corruption and money laundering, through ongoing training of the involved personnel.

Canada implements and participates in the following periodic training programs and other capacity-building activities to investigate and counter crimes associated with drug trafficking, such as corruption and money laundering:

- Over the years, The Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) has contributed to the development of training programs for the Egmont Center of Financial

Intelligence Units (FIU) Excellence and Leadership (ECOFEL). For example, FINTRAC engaged in a number of virtual Egmont events in 2020–21 focused on money laundering related to the COVID-19 global pandemic and large-scale cross-border money laundering schemes

- FC3: Public Safety’s Financial Crime Coordination Centre (FC3) hosted its inaugural virtual conference on money laundering in December 2021, which brought together investigators, prosecutors and other experts from across Canada to discuss anti-money laundering enforcement efforts. Welcoming more than 850 attendees, it was the first large scale conference of anti-money laundering professionals in this country. Key areas of discussion included:
 - COVID-19’s impact on money laundering trends
 - sophisticated and current money laundering tactics including the use of virtual currency
 - information sharing and investigational challenges and best practices
 - prosecutorial perspectives and lessons learned
- RCMP: Federal Policing Criminal Operations - Security Operations Centre (FPCO SOC): The RCMP, via the Canadian Police College, have dedicated training courses for the above noted topics. The RCMP also relies on other training mechanisms like United Nations (UN), International Criminal Police Organization (INTERPOL), and the public/private sector
- FPNI: The RCMP Analysts Deployed Overseas (ADOs) are involved in CB initiatives with local partners at post. In 2021, the following initiatives were completed:
 - Panama – open-source intelligence (OSINT) for intelligence analysis course; IBM I2 Analyst Notebook training; Intelligence Cycle module. (Law Enforcement Partners in Panama and Costa Rica)
 - The Dominican Republic - IBM I2 Analyst Notebook training (Dominican National Police - Human Trafficking and Human Smuggling Unit and Dominican Navy Intelligence)
 - Thailand – OSINT for intelligence analysis course June 2021 and March 2022 (JCLEC – Indonesia)
 - The Hague – Human Smuggling Course; includes Corruption and Money Laundering content (JCLEC – Indonesia x 4)
 - Kenya – communication data analysis techniques (CDAT) training December 2021 (Kenyan National Intelligence Service)

Priority Action 6.3: Strengthen cooperation and the exchange of information among the domestic, regional, and international law enforcement agencies to carry out operations and investigations to counter drug trafficking and related crimes.

Canada has information gathering mechanisms to exchange intelligence information, at a domestic, regional, and international level, to detect routes and methods used by drug trafficking criminal organizations. In this sense, regular communication in the form of shared secure websites to upload intelligence and information, working groups at the local, regional, and national level on a variety of intelligence topics, and bi-weekly, month and semi-annual focused

discussion on intelligence topics of key concern.

The FPNI-GI Program has 14 RCMP analysts (ADO) posted around the world whose role is to collect and generate intelligence and identify operational targets and opportunities for disruption/investigation. The ADOs develop and foster partnerships with foreign law enforcement contacts to enhance information/intelligence sharing and assist overseas capacity building related to partner's intelligence analysis tools and techniques.

Priority Action 6.4: Promote and strengthen the exchange of information and intelligence on matters of drug interdiction and effective border control measures to prevent drug trafficking by land, river, sea, and air.

Canada has tools that promote and strengthen cooperation and the exchange of information and intelligence among domestic law enforcement agencies responsible for drug interdiction and effective border control. In this sense, Canada uses various communication tools to exchange relevant information among domestic law enforcement agencies, including a variety of information sharing mechanisms such as Memorandums of Understandings (MOUs) to share information and increase cooperation. These tools include:

- RCMP - CBSA Memorandum of Understanding, and ADOs can exchange/request information under Section 107 of the Customs Act (Part VI – Enforcement). An official is authorized to use customs information:
 - a) for the purposes of administering or enforcing this Act, the Customs Tariff, the Excise Act, 2001, the Special Imports Measures Act or Part 2 of the Proceeds of Crime (Money Laundering) and Terrorist Financing Act or for any purpose set out in subsection (4), (5) or (7)
 - b) for the purposes of exercising the powers or performing the duties and functions of the Minister of Public Safety and Emergency Preparedness under the Immigration and Refugee Protection Act, including establishing a person's identity or determining their inadmissibility; or
 - c) for the purposes of any Act or instrument made under it, or any part of such an Act or instrument, that the Governor in Council or Parliament authorizes the Minister, the Agency, the President or an employee of the Agency to enforce, including the Agriculture and Agri-Food Administrative Monetary Penalties Act, the Feeds Act, the Fertilizers Act, the Health of Animals Act, the Plant Protection Act, the Safe Food for Canadians Act and the Seeds Act
- If requesting personal information from passport details, visa applications, or travel history, a letter can be submitted to CBSA citing Request for Personal information under paragraph 8 (2)(a) of the Privacy Act
- FPCO SOC: Intelligence is shared with domestic law enforcement agencies via internal communication, CACP, and other related working groups

- **FPCO Border Integrity:** The main mechanism that allows the RCMP to share information with domestic agencies is the Privacy Act. This Act permits the sharing of information for cases where the purpose for which the information was obtained or compiled by the institution or for a use consistent with that purpose; and for any purpose in accordance with any Act of Parliament or any regulation made there under that authorizes its disclosure. The RCMP Act is an enabler to cooperate, including the sharing of information, with domestic partners as it states that it is the duty of members who are peace officers, subject to the orders of the Commissioner to:
 - a) Perform all duties that are assigned to peace officers in relation to the preservation of the peace, the prevention of crime and of offences against the laws of Canada and the laws in force in any province in which they may be employed, and the apprehension of criminals and offenders and others who may be lawfully taken into custody
 - b) Execute all warrants, and perform all duties and services in relation thereto, that may, under this Act or the laws of Canada or the laws in force in any province, be lawfully executed and performed by peace officers
 - c) Enforce all Acts of Parliament and regulations and render assistance to departments of the Government of Canada as the Minister directs
- Some of the formal arrangements which are used as mechanisms for cooperation with other domestic agencies relative to border integrity are:

Cross Border Law Enforcement Advisory Committee (CBLE-AC):

The CBLE-AC is a committee composed of representatives from each of the U.S.-Canada core agencies, inclusive of CBSA and RCMP. The CBLE-AC endeavors to carry out the vision and mission of securing and maintain the integrity of the shared border from a national perspective to ensure cross border law enforcement operations are successful in securing the border and identifying and dealing with any threats and/or gaps. The RCMP and CBSA have a shared responsibility in this regard for Canada and actively cooperate at the headquarters and regional levels.

Regional Joint Management Team Meetings:

The core U.S. and Canadian agencies establish a regional or local Joint Management Team (JMT) in respect to their areas of responsibility. CBSA and the RCMP are the core Canadian agencies who work with their U.S. counterparts in carrying out their responsibilities for policy and program delivery at the shared border. The RJMT meet as often as necessary to jointly: oversee the implementation of CBLE-AC initiatives; determine local and regional operational priorities; develop operational plans and analytical assessments respecting operational targets and practices; and review and assess operational effectiveness.

Integrated Border Enforcement Team (IBET) Charter:

An overarching formal IBET Charter was developed and signed off by all U.S.-Canadian core cross border law enforcement agencies. The charter solidified the concept and modus

operandi of cross border law enforcement operations and philosophy as multidisciplinary, intelligence and enforcement that do not specifically concentrate on any given commodity, but focus on national security, organized crime, and other unauthorized activities between the ports of entry. It also provided principles governing cross border law enforcement operations in the regions and headquarters levels including the establishment of RJMT's and the executive level CBLE-AC.

RCMP/CBSA MOU – Joint Border Strategy (Way Forward Together):

The RCMP and CBSA have a shared responsibility for securing, protecting, and ensuring the integrity of the Border through the administration and enforcement of the Customs Act, The Immigration and Refugee Protection Act and other Acts and Regulations. Having such similar responsibilities allows for the enhanced sharing of information and cooperation through the consistent use principle. Both agencies fall under the Minister of Public Safety Canada. Recognizing this, both agencies committed to working together to work towards greater cooperation at the strategic, operational, and tactical levels. The expectation is that such efforts will result in: reduced interagency gaps; improved communication at all levels; enhanced service delivery to all Canadians; and, ultimately, strengthened border security. To this end, the Joint Border Strategy (JBS) has been created to provide an organizational-wide plan to guide operations, policies, and priorities in pursuit of our shared objectives: Protect Canada's border from threats – pre-border environment; Pillar 2 - Safeguard the flow of lawful trade and travel – at the border environment; and Pillar 3 - Ensure safety for all Canadians – post-border environment. The MOU collaborates and reinforces this commitment, as it is a formal mechanism which defines in detail the collaboration and responsibilities including investigations, sharing of information, controlled deliveries, and covert operations to name a few.

Marine Security Operations Centre (MSOC):

There are three MSOCs in Canada: Halifax Nova Scotia, Niagara on the Lake, Ontario, and Esquimalt-Victoria, Vancouver Island, BC. Co-located within each MSOC are the Department of National Defense (DND), RCMP, CBSA, Transport Canada and Department of Fisheries and Oceans (DFO) /Canadian Coast Guard (CCG) who collaboratively develop Maritime Domain Awareness (MDA) and intelligence. The MSOCs were established as an element of the 2004 National Security Policy; at the time focused primarily on terrorism and responded to information integration concerns.

MSOC partners collaborate to generate and disseminate accurate, coherent, relevant, and timely situational awareness and enables intelligence-led operations by generating a single unified view of Canada's maritime approaches and leveraging allies' marine domain awareness (MDA) and intelligence for federal partners. The MSOCs are the Government of Canada primary tool to provide MDA by identifying and reporting on maritime activities that represent a potential threat to sovereignty, security and safety of Canada and Canadians.

Priority Action 6.5: Improve the information systems on drug trafficking and related crimes, including alerts on changing behavior patterns and modus operandi of criminal drug trafficking organizations.

Canada has a national information system on drug trafficking and related crimes, including alerts on changing behaviors and modus operandi of criminal organizations. The agencies which provide information for the system is the Canada Border Services Agency (CBSA) which has an internal system to achieve this, the RCMP, and all Canadian police forces are contributors to the information systems.

CBSA uses the IMS case management system, the intelligence library, and the Integrated Customs Enforcement System (ICES) for lookouts. RCMP - Various systems exist, ranging from operational occurrences to criminal record repository, to human source information.

OBJECTIVE
7

ESTABLISH, UPDATE, OR REINFORCE, AS APPROPRIATE, THE LEGISLATIVE AND INSTITUTIONAL FRAMEWORKS IN THE AREAS OF PREVENTION, DETECTION, INVESTIGATION, PROSECUTION, AND CONTROL OF MONEY LAUNDERING DERIVED FROM DRUG TRAFFICKING, SUCH AS THE RECOMMENDATIONS OF THE FINANCIAL ACTION TASK FORCE (FATF).

Priority Action 7.1: Strengthen implementation of the legal, regulatory, and operational frameworks in the areas of prevention, detection, investigation, prosecution, and control of money laundering associated with drug trafficking.

Canada has strengthened the legislative frameworks to counter money laundering derived from drug trafficking. In this sense, the country has legislative frameworks and national instruments.

Priority Action 7.2: Develop and implement specialized ongoing training in areas of prevention, detection, investigation, prosecution, and control of money laundering derived from drug trafficking, consistent with known and emerging risks.

Canada has the following periodic training programs for officials and those in vulnerable sectors on prevention, detection, investigation, and prosecution of money laundering derived from drug trafficking:

- While Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) is an arm's length financial intelligence unit, the Centre maintains productive working relationships with Canada's police, other law enforcement authorities and national security agencies to ensure that its financial intelligence is relevant, timely and valuable. In 2020–21, FINTRAC conducted dozens of virtual outreach presentations across the country with disclosure recipients, including with the Canadian Police College's Financial Investigators Course; the Ontario Police College's Fraud Course, Internet Child Exploitation Course and Drug Investigators Course; the Privy Council Office's Intelligence Analyst Learning Program; the Royal Canadian Mounted Police's Proceeds of Crime Course, Terrorist Financing Investigators Course and Counter Proliferation Course; York Regional Police Service's Financial Crimes Investigators Course; a Financial Crime Course at *École nationale de police du Québec*; and the Canadian Armed Forces National Counter Intelligence Unit's Intake Training Course
- The Public Prosecution Service of Canada (PPSC) offers ongoing training to prosecutors on all areas of relevant criminal law, including as part of the professional requirements on lawyers' Continued Legal Education. Those prosecutors involved in drug prosecutions - a large portion of Crown Attorneys given that PPSC carries out most of Canada's drug prosecutions - receive relevant ongoing training through various education platforms, e.g., our School for Prosecutors, law societies, universities, senior practitioners
- FC3
Public Safety's Financial Crime Coordination Centre (FC3) hosted its inaugural virtual conference on money laundering in December 2021, which brought together investigators,

prosecutors, and other experts from across Canada to discuss anti-money laundering enforcement efforts. Welcoming more than 850 attendees, it was the first large scale conference of anti-money laundering professionals in this country. Key areas of discussion included:

- COVID-19's impact on money laundering trends
 - sophisticated and current money laundering tactics including the use of virtual currency
 - information sharing and investigational challenges and best practices; and
 - prosecutorial perspectives and lessons learned
- In 2018, FINTRAC published an operational alert for reporting entities, identifying indicators relevant to their sector in tandem with low-level drug trafficking indicators to effectively identify potential money laundering activities associated with the trafficking of fentanyl

Priority Action 7.3: Enhance investigations by competent authorities into drug trafficking cases linked to money laundering and illicit use of assets.

Canada has protocols that enable the authorities to conduct financial and asset investigations parallel to drug trafficking investigations. In this sense, there is the Criminal Code of Canada:

Laundering the Proceeds of Crime

462.31 (1) Every one commits an offence who uses, transfers the possession of, sends or delivers to any person or place, transports, transmits, alters, disposes of or otherwise deals with, in any manner and by any means, any property or any proceeds of any property with intent to conceal or convert that property or those proceeds, knowing or believing that, or being reckless as to whether, all or a part of that property or of those proceeds was obtained or derived directly or indirectly as a result of

- (a) the commission in Canada of a designated offence; or
- (b) an act or omission anywhere that, if it had occurred in Canada, would have constituted a designated offence.

Possession of Property Obtained by Crime

s.354 (1) Everyone commits an offence who has in his possession any property or thing or any proceeds of any property or thing knowing that all or part of the property or thing or of the proceeds was obtained by or derived directly or indirectly from

- (a) the commission in Canada of an offence punishable by indictment; or
- (b) an act or omission anywhere that, if it had occurred in Canada, would have constituted an offence punishable by indictment.

Forfeiture of Offence-related Property

490.1 (1) Subject to sections 490.3 to 490.41, if a person is convicted, or discharged under section

730, of an indictable offence under this Act or the Corruption of Foreign Public Officials Act and, on application of the Attorney General, the court is satisfied, on a balance of probabilities, that offence-related property is related to the commission of the offence, the court shall:

(a) if the prosecution of the offence was commenced at the instance of the government of a province and conducted by or on behalf of that government, order that the property be forfeited to Her Majesty in right of that province to be disposed of or otherwise dealt with in accordance with the law by the Attorney General or Solicitor General of that province; and

(b) in any other case, order that the property be forfeited to Her Majesty in right of Canada to be disposed of or otherwise dealt with in accordance with the law by the member of the Queen's Privy Council for Canada that is designated by the Governor in Council for the purpose of this paragraph.

Priority Action 7.4: Strengthen interagency coordination and cooperation in relation to the development of national anti-money laundering strategies, including through coordinating committees and task forces.

Canada has the following mechanisms allowing for inter-agency coordination and cooperation in the area of preventing and controlling money laundering:

- FINTRAC supports investigations of Canada's police, law enforcement and national security agencies, including drug trafficking cases, by producing and sharing actionable financial intelligence. FINTRAC also generates valuable strategic financial intelligence, including specialized research reports and trends analysis, for regime partners and policy decision-makers, businesses, and international counterparts.

Since 2016, FINTRAC has worked closely with Canada's financial institutions and law enforcement agencies via public-private operational partnerships that have resulted in improved cooperation and effectiveness in the effort to combat money laundering with respect to certain predicate offences. For example, through Project Protect, Project Guardian, and Project Chameleon, FINTRAC has increased awareness and understanding of money laundering in relation to human trafficking in the sex trade, the trafficking of illicit fentanyl, and romance fraud, respectively. As part of these projects, FINTRAC - in collaboration with Canada's major banks and law enforcement - have developed Operational Alerts on these specific issues and their associated money laundering indicators. These public-private partnerships (PPPs) have led to increased suspicious transaction reporting from reporting entities and have resulted in considerable increases in the number of disclosures of actionable financial intelligence to Canada's municipal, provincial, and federal police forces in support of their investigations.

In January 2018, FINTRAC published an Operational Alert on the laundering of proceeds of fentanyl trafficking. This Alert triggered the launch of Project Guardian on February 1,

2018. Since the launch of this Project, FINTRAC has been producing disclosures to municipal, provincial, and federal law enforcement partners. In 2020-2021, FINTRAC generated 181 disclosures of actionable financial intelligence, including thousands of transaction reports, in support of the money laundering and fentanyl/drug trafficking investigations of Canada's municipal, provincial, and federal police agencies.

Every year, FINTRAC's tactical financial intelligence is recognized for its valuable contribution to several investigations.

FINTRAC also produces strategic financial intelligence products that are contributed to enhancing collaboration with a variety of partners.

FINTRAC also supports the work of the Public-Private Collaboration Steering Committee, which was created to provide a coordination of efforts to improve efficiency and effectiveness within existing legislative authorities. The committee is currently focused on establishing priorities, enhancing information sharing between businesses, and between the public and private sectors, and leveraging technology in appropriate situations to increase automation, strengthen analytical capabilities and enhance the financial intelligence that is disclosed to police, law enforcement and national security agencies.

FC3

Canada's Financial Crime Coordination Centre (FC3) is a five-year pilot initiative led by Public Safety Canada and is part of the Government's efforts to strengthen inter-agency collaboration and capacity-building. FC3 brings together anti-money laundering professionals from across jurisdictions, and coordinates support through:

- Training and expertise development
- Analysis of emerging money laundering threats and responses
- Legislative and policy initiatives
- Knowledge sharing on enforcement tools and resources
- Providing partner support and best-practice resources

The Financial Crime Coordination Centre provides policy and operational support to Canada's anti-money laundering (AML) and anti-terrorist financing (ATF) Regime partners. FC3 delivers this support through operationally focused contributions to AML Regime policies and priorities; the enhancement of anti-money laundering knowledge, skills and expertise; and the strengthening of federal and regional coordination. Tailored to operate within the Canadian legislative regime, the FC3 is providing a collaborative public-to-public model of developing policy, advancing learning, and supporting stronger enforcement outcomes.

Additionally, Budget 2019 announced funding of \$28M over five years and \$10M ongoing for the CBSA's Trade Fraud and TBML Centre of Expertise. This initiative will bring together CBSA experts in both National Headquarters and regional offices across Canada to improve the Agency's ability to identify, interdict, and investigate the customs trade fraud offences that

allow TBML to occur. It will also allow CBSA to generate increased intelligence and referrals to federal partners, including the RCMP.

RCMP

The RCMP has multiple formal and informal interagency partnerships with other police services and government departments such as Canada Border Services Agency, The Financial Transactions and Reports Analysis Centre of Canada, and the Department of Finance to address money laundering.

Priority Action 7.5: Strengthen the exchange of financial intelligence as related to money laundering, including through the standardization of information systems.

Canada has the FINTRAC as its Financial Intelligence Unit.

Canada has information systems aimed at the investigation and prosecution of money laundering in analyzing cases deriving from drug trafficking. In this sense, the RCMP uses record management systems such as E&R and NUIX.

Priority Action 7.6: Identify and analyze money laundering threats to mitigate risks through public policies that strengthen the regime for preventing and countering money laundering, in accordance with applicable international instruments.

Canada has mechanisms for analyzing money laundering risks, in accordance with the Financial Action Task Force (FATF) recommendations. In this sense, consistent with international standards outlined by the FATF, the Government of Canada conducted an assessment to identify inherent money laundering and terrorist financing (ML/TF) risks in Canada. The report, entitled 'Assessment of Inherent Risks of Money Laundering and Terrorist Financing in Canada', also includes a process to update this assessment over time. The report provides an overview of the risks of money laundering and terrorist financing before the application of any mitigation measures. Those measures include a range of legislative, regulatory, and operational actions that prevent, detect, and disrupt money laundering and terrorist financing. RCMP - Canada's Department of Finance conducts a National Risk Assessment.

Priority Action 7.7: Strengthen partnerships with the financial industries to identify and investigate illicit transactions and money laundering operations related to the proceeds of drug trafficking activities.

Canada has established partnerships with the financial industries to identify and investigate illicit transactions and money laundering operations related to the proceeds of drug trafficking activities. In this sense, as part of its core mandate, FINTRAC administers a comprehensive, risk-based compliance program to assist and ensure that thousands of businesses fulfill their

obligations under the Proceeds of Crime (Money Laundering) and Terrorist Financing Act and associated Regulations. These obligations allow for certain economic activities to be more transparent, which helps deter criminals and terrorists from using Canada's financial system to launder the proceeds of their crimes or to finance terrorist activities.

Compliance with the legislation also ensures that FINTRAC receives the information that it needs to generate actionable financial intelligence for Canada's police, law enforcement and national security agencies. Parties involved in the above Act:

- Accountants
- Agents of the Crown
- British Columbia notaries
- Casinos
- Dealers in precious metals and stones
- Financial entities
- Life insurance
- Money services businesses
- Real estate
- Securities dealers

FINTRAC also works closely with Canada's financial institutions and law enforcement agencies via public-private operational partnerships that have resulted in improved cooperation and effectiveness in the effort to combat money laundering with respect to certain predicate offences. Through Project Protect, Project Guardian, and Project Chameleon, FINTRAC has increased awareness and understanding of money laundering in relation to human trafficking in the sex trade, the trafficking of illicit fentanyl, and romance fraud, respectively.

FC3 - The Advisory Committee on Money Laundering and Terrorist Financing (ACMLTF) is a high-level discussion forum to address emerging issues and provide general advice for Canada's overall anti-money laundering and anti-terrorist financing (AML/ATF) policy. Members advise on Canada's AML/ATF Regime both within a domestic context, including its effectiveness and efficiency, and in support of international AML/ATF developments. As well, it provides an opportunity for the Government to provide valuable feedback to the private sector on overall AML/ATF trends and efforts. Link to further committee information: [Advisory Committee on Money Laundering and Terrorist Financing \(ACMLTF\)](#).

RCMP - Financial institutions must report certain transactions to FINTRAC, Canada's Financial Intelligence Unit.

OBJECTIVE

8

ESTABLISH AND/OR STRENGTHEN AGENCIES FOR THE ADMINISTRATION AND DISPOSITION OF SEIZED AND/OR FORFEITED ASSETS IN CASES OF DRUG TRAFFICKING, MONEY LAUNDERING, AND OTHER RELATED CRIMES, IN LINE WITH APPLICABLE INTERNATIONAL LAW, AND IN LINE WITH RELEVANT STANDARDS, SUCH AS THE FATF RECOMMENDATIONS AND THE RECOMMENDATIONS ON PREVENTIVE FREEZING OF ASSETS.

Priority Action 8.1: Establish and/or strengthen, as appropriate, national entities responsible for the administration and disposition of assets seized and/or forfeited in cases of drug trafficking, money laundering, and other related crimes.

Priority Action 8.2: Establish specialized agencies and appropriate mechanisms for the transparent administration of seized and forfeited assets, in accordance with national laws and international standards.

Canada has the Seized Property Management Directive (SPMD) as the designated competent authority responsible for the administration and disposition of seized and forfeited assets, through the Seized Property Management Act of Canada.

The country has the Seized Property Management Act to facilitate the accountability and transparency of the management of seized and forfeited assets.

Priority Action 8.3: Develop and implement specialized, ongoing training programs for law enforcement officials charged with the administration and disposition of seized and forfeited assets.

Canada does not offer nor participate in specialized, periodic training programs for the management and disposition of seized and forfeited assets.

Priority Action 8.4: In accordance with each country's constitutional principles, apply legislative and regulatory measures to facilitate the seizure, forfeiture and management of assets, instruments, or products of illicit drug-related activities.

Canada has the Criminal Code in accordance with international conventions and treaties, to facilitate the seizure, forfeiture, and management of assets and instruments derived from drug trafficking and other related crimes.

OBJECTIVE

9

DESIGN, IMPLEMENT, AND STRENGTHEN COMPREHENSIVE AND BALANCED NATIONAL PROGRAMS TO REDUCE THE ILLICIT CULTIVATION, PRODUCTION AND MANUFACTURE OF DRUGS THROUGH THE ADOPTION OF EFFECTIVE MEASURES, SUCH AS COMPREHENSIVE AND SUSTAINABLE ALTERNATIVE DEVELOPMENT, ENHANCED LAW ENFORCEMENT COOPERATION, AND OTHER APPROPRIATE POLICIES AND PROGRAMS, TAKING INTO ACCOUNT THE PARTICULAR NEEDS OF SUB-NATIONAL REGIONS OF EACH COUNTRY, RESPECTING HUMAN RIGHTS.

Priority Action 9.1: Design, implement, and update national policies and programs to prevent and decrease illicit cultivation, production, and manufacture of drugs.

Canada, through the Health Canada and Royal Canadian Mounted Police has updated national policies and programs to prevent and decrease illicit cultivation, production, and manufacture of drugs. There are various legal and regulatory components to Canada's policies in preventing or decreasing illicit production and manufacture of drugs. These can be found in the Controlled Drugs and Substances Act.

Priority Action 9.2: Establish budgetary mechanisms to ensure sufficient and consistent allocation of resources to counternarcotics programs.

Canada has direct budgetary allocations towards financing counternarcotics programs. In that sense, resources are provided to a range of Departments and Agencies under the Canadian Drugs and Substances Strategy and support for federal actions to address the opioid overdose crisis.

Priority Action 9.3: Promote supply reduction measures that take into account licit traditional uses, whenever there is historical evidence of such uses, as well as environmental protection.

Canada does not take into account the licit traditional use in designing and implementing policies and programs to reduce the illicit supply of drugs.

The country does not include environmental protection measures in its policies and programs to reduce the illicit supply of drugs.

Priority Action 9.4: Strengthen interagency cooperation to provide a comprehensive response against the illicit production of drugs, including collaboration among the public and private sectors and the international community.

Canada has not established mechanisms for interinstitutional cooperation between public and private institutions to provide a comprehensive response to the illicit production of drugs.

Priority Action 9.5: Support supply reduction programs with crime prevention initiatives, in cooperation with civil society and other stakeholders, as appropriate, to address social and economic risk factors.

Canada supports the development of supply reduction programs with drug-related crime prevention initiatives that address social and economic risk factors, which includes the participation from civil society and other social stakeholders:

- Through the National Crime Prevention Strategy (NCPS), Canada invests over \$40M annually in community-based crime prevention programs that address risk factors and build protective factors in an aim to increase community safety and wellbeing and decrease the likelihood that vulnerable populations will become involved in future criminal activities and violence, such as drug-related crimes and youth gangs. NCPS projects are multi-sectoral and engage partners from a variety of sectors including education, social services, and law enforcement. Intervention activities implemented through these projects are tailored to meet the specific needs of targeted populations and may include counselling, case management, family support, employment training, mental health, and drug and addiction education programming

OBJECTIVE

10

DESIGN, IMPLEMENT OR STRENGTHEN LONG-TERM ALTERNATIVE DEVELOPMENT PROGRAMS, INCLUDING RURAL AND URBAN ALTERNATIVES, COMPREHENSIVE AND SUSTAINABLE ALTERNATIVE DEVELOPMENT PROGRAMS, AND, AS APPROPRIATE, PREVENTIVE ALTERNATIVE DEVELOPMENT, IN ACCORDANCE WITH THE POLICIES, LAWS AND NEEDS OF EACH COUNTRY, AS APPROPRIATE, WHILE RESPECTING HUMAN RIGHTS.

Priority Action 10.1: Design and implement comprehensive and sustainable alternative development programs, including preventive alternative development, as appropriate, while respecting human rights.

Canada has not designed or implemented comprehensive and sustainable alternative development programs or preventive alternative development, as appropriate, as part of the strategies to control and reduce illicit crops.

Priority Action 10.2: Exchange experiences and best practices in the design and implementation of comprehensive and sustainable alternative development programs, including preventive alternative development, as appropriate.

Not applicable.

Priority Action 10.3: Promote and disseminate the results of comprehensive and sustainable alternative development programs, and the benefits they provide to affected communities.

Not applicable.

Priority Action 10.4: Design and/or strengthen monitoring and evaluation systems for comprehensive and sustainable alternative development programs aimed at reducing illicit crop cultivation and improving the well-being of communities, through the use of indicators that measure programs' effectiveness.

Not applicable.

Priority Action 10.5: Strengthen state presence in areas affected by or at risk of illicit drug cultivation, consistent with the circumstances of each member state.

Not applicable.

Priority Action 10.6: Promote, in accordance with national realities, the participation of local communities and relevant organizations in the development of comprehensive and sustainable alternative development programs, taking into account their needs and capabilities.

Not applicable.

Priority Action 10.7: Promote partnerships and innovative cooperative initiatives with the private sector, civil society, and international financial institutions to spur investment and job creation in areas and communities affected by or at-risk of illicit drug cultivation and production, and share related practices, lessons learned, expertise, and skills.

Not applicable.

OBJECTIVE**11****DESIGN AND IMPLEMENT PLANS AND/OR PROGRAMS TO MITIGATE AND REDUCE THE IMPACT OF ILLICIT CROPS AND DRUG PRODUCTION ON THE ENVIRONMENT, IN COOPERATION WITH LOCAL COMMUNITIES AND NATIONAL POLICIES OF MEMBER STATES.**

Priority Action 11.1: Conduct research and studies on the environmental impact of illicit crop cultivation and illicit production of drugs.

Canada has not carried out, during the evaluation period (2019-2022), research or studies to determine the characteristics and extent of the environmental impact caused by the illicit cultivation of crops and illicit drug production.

Priority Action 11.2: Design and implement specific research-based plans to mitigate the environmental impact of illicit crop cultivation and drug production, with the participation of local communities.

Not applicable.

Priority Action 11.3: Promote and strengthen the use of environmental management tools, as appropriate.

Not applicable.

OBJECTIVE
12**ADDRESS THE EFFECTS OF SMALL-SCALE DRUG TRAFFICKING ON PUBLIC HEALTH, THE ECONOMY, SOCIAL COHESION, AND CITIZEN SECURITY.**

Priority Action 12.1: Develop and implement local approaches for controlling micro-trafficking and related crimes.

Priority Action 12.4: Encourage the development and implementation of comprehensive intervention strategies to counter local illicit distribution and sale of drugs.

Canada has not developed or implemented approaches for controlling micro-trafficking or related crimes, that take into account effects on public health, the economy, social cohesion, or citizen security.

Priority Action 12.2: Promote the interagency exchange of information at the national level to better understand the scope and adverse effects of small-scale drug trafficking, including on health, society, the economy, and security.

Canada does not promote the interagency exchange of information on the effects of small-scale drug trafficking in the health, social, economic, or security sectors.

Priority Action 12.3: Promote programs and strategies to prevent the exploitation of at-risk populations by drug trafficking networks, at the national and international level.

Canada does not have programs or strategies that prevent the exploitation of at-risk populations affected by drug trafficking networks, at the national and international level.

EVALUATIVE SUMMARY

Objective 1

Develop and/or strengthen national- and regional-level interdiction capacity, as well as the capacity to reduce the illicit cultivation, production, trafficking, and distribution of plant-based and synthetic drugs through the use of comprehensive and balanced programs in accordance with the realities of each country's domestic legislation and respect for human rights.

CICAD notes that Canada implements ongoing training programs to detect, investigate, and dismantle laboratories or facilities used in the illicit manufacture of drugs, for personnel involved in interdiction operations; however, the country does not have protocols or operating procedures to detect, investigate, or dismantle clandestine laboratories or facilities for the illicit processing or manufacture of drugs. CICAD observes with satisfaction that the agencies in charge of drug control in Canada implement policies that promote gender mainstreaming. Additionally, CICAD notes that the country has programs and strategies for land, riverine, maritime, and aerial interdiction of drugs through monitoring, inspections, and checkpoints. CICAD also observes that Canada has laws providing for the use of specialized investigation tools and techniques to prevent and reduce drug trafficking. However, CICAD notes that the country does not have updated assessments or studies to identify new trends and threats related to drug trafficking and related crimes. Additionally, CICAD observes that Canada implements actions to identify organized crime groups involved in drug trafficking and related crimes but does not implement inter-institutional collaboration or cooperation mechanisms to coordinate activities aimed at dismantling organized crime groups involved in these crimes and has not participated in operations or investigations with other countries aimed at dismantling these organized criminal groups. On the other hand, CICAD notes that the country has an institution that is responsible for, and capable of, analyzing chemical substances, precursors, pharmaceutical products, and synthetic drugs, including new psychoactive substances (NPS) and has ongoing training programs for personnel involved in the analysis of these substances. Further, CICAD observes that Canada has mechanisms to facilitate and share information at the national level across government counterparts, as well as with global repositories on these substances. CICAD notes that the country has mechanisms to investigate and disrupt drug trafficking through the Internet. However, CICAD observes that the country does not have partnerships or information exchange mechanisms with private sector entities to prevent access to materials and services exploited for illicit drug trafficking purposes, but it uses tools and resources of the INCB to strengthen cooperation with the private sector to prevent the diversion of chemicals. CICAD further notes that Canada does not have national authorities with the appropriate budget, human and material resources for the forfeiture, seizure, and management of assets, tools, or products related to illicit drug markets nor does its competent personnel receive ongoing training on this area.

Objective 2

Strengthen national measures to address the challenges posed by NPS and illicit synthetic drugs, and the threat of fentanyl-related substances, non-medical synthetic opioids, and illicit amphetamine derivatives.

CICAD observes with satisfaction that Canada has an early warning system (EWS) to identify and trace new psychoactive substances (NPS), illicit synthetic drugs, and the threat of fentanyl-related substances, non-medical synthetic opioids, illicit amphetamine derivatives, and other substances subject to international control. Further, CICAD notes that the country improves its capabilities to detect and analyze NPS through the use of special investigative techniques, updated equipment, and acquisition of technology. CICAD also observes that Canada has regulatory frameworks to identify and address the challenges posed by the onset of NPS and emerging synthetic drugs. Additionally, CICAD notes that the country participates in the INCB's Project ION. CICAD also observes that Canada has innovative legislation to control synthetic opioids for non-medical use and NPS.

Objective 3

Strengthen or develop legal and institutional frameworks for the effective monitoring and control of essential chemical substances and precursors to prevent diversion of these substances to the manufacturing of illicit drugs and counter its trafficking, including periodically updating national lists of controlled chemical substances.

CICAD notes with satisfaction that Canada has a competent national authority responsible for developing guides, codes of conduct, and other instruments to inform the industry and users in general of controlled chemical substances and has developed such instruments and mechanisms. CICAD further observes that the country has an updated register of all individuals and corporations handling controlled chemical substances, and its competent authorities carry out regular inspections and audits of the establishments of individuals and corporations authorized to handle these substances. CICAD notes that Canada carries out analyses that include the exchange of information through existing international mechanisms of substances, their analogs, and precursors, which pose a threat to public health. CICAD further observes that Canada has legislation incorporating the control measures in Article 12 of the 1988 United Nations Convention to prevent diversion of controlled chemical substances towards illicit activities, which includes all the control measures listed in Paragraphs 8 and 9, and requests for information set forth in Paragraph 10. CICAD notes that the country uses the INCB's PEN Online system to issue pre-export notifications of controlled chemical substances as well as using the PICS system. CICAD observes that Canada receives training for drug control personnel and for the identification and handling of controlled chemical substances. CICAD also notes that the country has budgetary mechanisms to ensure allocation of resources to acquire necessary equipment and supplies for the preliminary identification of substances and the protective equipment required by personnel in charge of these tasks. Further, CICAD observes that Canada uses the OAS/CICAD Model Regulations for the Control of Chemical Substances Used in the Illicit Manufacture of Narcotic Drugs and Psychotropic Substances.

Objective 4

Ensure adequate availability and accessibility of substances subject to international control for medical and scientific purposes, while also preventing their diversion towards illicit activities, in accordance with international drug control conventions.

CICAD notes that Canada has special processes for issuing authorizations for the national production, import, and export of substances subject to international control for medical and scientific purposes and that it has an updated register of individuals or companies importing and exporting substances subject to international control for medical and scientific purposes. However, CICAD observes that the country does not have training activities for competent national authorities and health professionals on proper access to substances subject to international control solely for medical and scientific purposes. On the other hand, CICAD notes that the country has a regulatory framework to govern the acquisition of substances subject to international control for medical and scientific purposes.

Objective 5

Adopt or strengthen control measures to prevent diversion of controlled pharmaceutical products containing narcotic drugs and/or psychotropic substances, and those containing precursor substances used in the production of controlled substances.

CICAD notes that Canada does not have an updated register of individuals or corporations handling pharmaceutical products containing precursor substances, narcotics, or psychotropic substances; however, the country issues licenses to manufacturers and distributors of these products, and it carries out regular inspections and audits of the establishments of individuals and corporations authorized to handle them. CICAD observes that the country has criminal and administrative penalties for infringements or violations by individuals or corporations that handle pharmaceutical products containing precursor substances, narcotics, or psychotropic substances. CICAD notes that Canada does not offer periodic training programs for personnel in charge of preventing the trade and diversion of materials and equipment for the illicit production or manufacture of narcotic drugs and psychotropic substances; however, it shares information with other global systems on this matter. Furthermore, CICAD observes that the country does not use the INCB's I2ES system, but it has an alternative, expeditious mechanism in place that is ready to issue, upload, or exchange import and export authorizations between countries for narcotic drugs and psychotropic substances for medical use and Canada has received training in the use of the I2ES system.

Objective 6

Strengthen or develop specific operational and intelligence gathering and sharing mechanisms to detect methods used by criminal organizations, including the exploitation of land, riverine, maritime, and aerial routes.

CICAD notes with satisfaction that Canada implements periodic training programs for personnel

involved in drug investigations in specialized investigative techniques and intelligence collection, analysis, and operations. Furthermore, CICAD observes that the country participates in periodic training programs and other capacity-building activities to investigate and counter crimes associated with drug trafficking, such as corruption and money laundering. Additionally, CICAD notes that Canada has information gathering mechanisms to exchange intelligence information, at a domestic, regional, and international level, to detect routes and methods used by drug trafficking criminal organizations. CICAD also observes that the country has tools that promote and strengthen cooperation and the exchange of information and intelligence among domestic law enforcement agencies responsible for drug interdiction and effective border control. Moreover, CICAD notes that Canada has a national information system on drug trafficking and related crimes, including alerts on changing behaviors and modus operandi of criminal organizations.

Objective 7

Establish, update, or reinforce, as appropriate, the legislative and institutional frameworks in the areas of prevention, detection, investigation, prosecution, and control of money laundering derived from drug trafficking, such as the recommendations of the Financial Action Task Force (FATF).

CICAD notes with satisfaction that Canada has strengthened its legislative frameworks to counteract money laundering derived from drug trafficking. Furthermore, CICAD observes that the country has periodic training programs, targeting authorities and those in other vulnerable sectors, on the prevention, detection, investigation, and prosecution of money laundering derived from drug trafficking. Additionally, CICAD notes that Canada has protocols that enable authorities to conduct financial and asset investigations parallel to drug trafficking investigations. CICAD also observes that the country has mechanisms that allow for interagency coordination and cooperation in the prevention and control of money laundering. CICAD notes that Canada has a Financial Intelligence Unit and has information systems geared to the analysis of cases in the investigation and prosecution of the crime of money laundering derived from drug trafficking. CICAD further observes that the country has mechanisms for analyzing money laundering risks, in accordance with FATF recommendations. Additionally, CICAD notes that Canada has established partnerships with financial industries to identify and investigate illicit transactions and money laundering operations related to the proceeds of drug trafficking activities.

Objective 8

Establish and/or strengthen agencies for the administration and disposition of seized and/or forfeited assets in cases of drug trafficking, money laundering, and other related crimes, in line with applicable international law, and in line with relevant standards, such as the FATF recommendations and the recommendations on preventive freezing of assets.

CICAD notes that Canada has a competent authority for the administration of seized and forfeited assets and has legal provisions that facilitate the accountability and transparency of the

management of seized and forfeited assets. However, CICAD observes that the country does not offer or participate in specialized, periodic training programs for the management and disposition of seized and forfeited assets. On the other hand, CICAD notes that Canada has legislation, in accordance with international conventions and treaties, to facilitate the seizure, forfeiture, and management of assets and instruments derived from drug trafficking and other related crimes.

Objective 9

Design, implement, and strengthen comprehensive and balanced national programs to reduce the illicit cultivation, production and manufacture of drugs through the adoption of effective measures, such as comprehensive and sustainable alternative development, enhanced law enforcement cooperation, and other appropriate policies and programs, taking into account the particular needs of sub-national regions of each country, respecting human rights.

CICAD notes that Canada has updated national policies and programs to prevent and decrease illicit cultivation, production, and manufacture of drugs. Furthermore, CICAD observes that the country has direct budgetary allocations towards financing counternarcotics programs. However, CICAD notes that Canada does not take into account licit traditional uses when designing and implementing policies and programs to reduce the illicit supply of drugs nor does it include environmental protection measures in these policies and programs. Moreover, CICAD observes that the country has not established mechanisms for interinstitutional cooperation between public and private institutions to provide a comprehensive response to the illicit production of drugs. However, CICAD notes that Canada supports the development of supply reduction programs with drug-related crime prevention initiatives that address social and economic risk factors, which includes the participation from civil society and other social stakeholders.

Objective 10

Design, implement or strengthen long-term alternative development programs, including rural and urban alternatives, comprehensive and sustainable alternative development programs, and, as appropriate, preventive alternative development, in accordance with the policies, laws and needs of each country, as appropriate, while respecting human rights.

CICAD notes that Canada has not designed or implemented comprehensive and sustainable alternative development programs or preventive alternative development, therefore the priority actions of this objective are not applicable.

Objective 11

Design and implement plans and/or programs to mitigate and reduce the impact of illicit crops and drug production on the environment, in cooperation with local communities and national policies of member states.

CICAD notes that Canada did not carry out research or studies to determine the characteristics

and extent of the environmental impact caused by the illicit cultivation of crops and illicit drug production, therefore, the priority actions of this objective are not applicable.

Objective 12

Address the effects of small-scale drug trafficking on public health, the economy, social cohesion, and citizen security.

CICAD notes with concern that Canada has not developed or implemented approaches for controlling micro-trafficking and related crimes that take into account effects on public health, the economy, social cohesion, or citizen security. CICAD also observes that the country does not promote interagency exchange of information on the effects of small-scale drug trafficking in the health, social, economic or security sectors. Additionally, CICAD notes that Canada does not have programs or strategies to prevent the exploitation of at-risk populations affected by drug trafficking networks, at the national or international level.



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