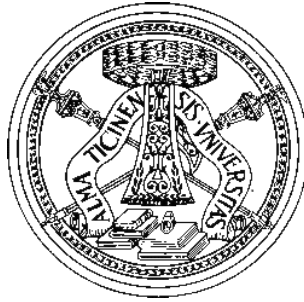


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**The Fentanyl Crisis in the United States:
China's Involvement and Response.**

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ABSTRACT

The Fentanyl crisis in the United States represents one of the most severe public health and social emergencies of today, with implications affecting healthcare, politics, economics and international diplomacy. China is the primary source of fentanyl and its precursor chemicals. Despite international pressure, gaps in China's regulatory framework and enforcement mechanisms, allow the trafficking of this substance and the consequent rise of number of overdose deaths in the United States.

This thesis explores the historical and geopolitical origins of the crisis, showing the parallels between the current fentanyl trade and the crisis of the opium trade in the 19th century, while also analyzing the evolution of U.S.-China relations. By examining the production and distribution of fentanyl, this research highlights China's key role and the involvement of trafficking networks, such as the Mexican cartels, that have an essential role in smuggling fentanyl in the United States.

The study further investigates the socio-economic impact of the crisis, focusing on its effects on the healthcare system, public safety, and workforce productivity. It examines the strategies discussed by the United States to fight the crisis, like diplomatic measures, sanctions against Chinese companies and domestic policies to control the illegal drug trade. It is shown how this crisis is not just a national security issue for the United States but a global problem that requires a coordinated and international response.

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INTRODUCTION

The bilateral relations between the United States and China are among the most significant and discussed of the twenty-first century. China is currently the world's largest exporter and one of the top three importers and plays a crucial role in economic affairs and global trade.¹ Over the years, the relations between the two powers have been characterized by periods of cooperation with periods of tension. Also, many issues have shaped their relationship throughout history and one of them is the trafficking of illicit substances, such as opium, which seem to be often used as political and economic strategies. From the First Opium War in 1839 to today's fentanyl crisis, the trafficking and production of narcotics has influenced diplomatic relations, the stability of society and also economic policies between many states. This dynamic highlights the difficult connection between history, economic motivations and contemporary security concerns which shape the way nations adopt their policies and response to drug trafficking challenges.²

The history of drug related tensions between China and the Western Hemisphere is long and complex. The two Opium Wars showed the struggle of China against foreign interference and presence in its territory, showing how opium trade became a tool of political and economic coercion, affecting China's relations with western countries for years and also alternating periods of cooperation and conflict on many other issues.³ In any case, even China once it realized the gain that the opium trade represented began to develop domestic opium production having a role in its own crisis.⁴

¹ Data from United Nations Trade and Development (UNCTAD).

² Sun, W., & Breslin, T. (2021), *A New Trade War with an Opium Component: Can the U.S. Opioids Crisis Be Solved by Banning Fentanyl in China?* Iranian journal of public health, 50(11), p. 2347.

³ Felbab-Brown, V. (2020), *Fentanyl and geopolitics: Controlling opioid supply from China*, Brookings Institution, p.3.

⁴ The Editors of Encyclopaedia Britannica (2025, January 6), *Opium Trade*, Encyclopedia Britannica. <https://www.britannica.com/topic/opium-trade>

Today a new crisis seems to have similar characteristics to the past. Just as opium during the 19th century flowed into China, having harsh consequences on society, fentanyl is fueling a public health crisis in the United States of America with serious consequences in society, politics and economics. This has significant implications for diplomacy, which intensified diplomatic disputes, since both the countries are debating over the responsibility they have, the regulation and enforcement measures.⁵

The opioid epidemic in the United States is evolving into one of the most serious public health crises of our times. The role of synthetic opioids, specifically fentanyl, has increased dramatically the number of overdose deaths related to opioid in the United States but also in many other parts of the world.

Fentanyl is the strongest opioid available for medical use in humans and it is about 100 times more potent than morphine⁶. It was first synthesized in 1959 and placed under international control as a Schedule 1 substance⁷. Initially it was used and approved to treat moderate severe pain, in particular cancer pain. However, its very high potency and relative ease of production have made it the main responsible in the current opioid epidemic. Particularly, Illicit Manufactured Fentanyl (IMF) is being synthesized in laboratories and mixed with other drugs such as heroin, methamphetamine making it even more dangerous since it is difficult to clarify how much fentanyl is contained.⁸ This has caused an exponential growth in the number of deaths related to an overdose of it. In 2024 alone, nearly 75,000 people only in the United States died from a Fentanyl

⁵ Felbab-Brown, V. (2020), *Fentanyl and geopolitics: Controlling opioid supply from China*, Brookings Institution, p.3.

⁶ Chodoff, P., & Domino, E.F. (1965), *Comparative pharmacology of drugs used in neuroleptanalgesia*, *Anesthesia and Analgesia*, 44 (5) p. 558.

⁷ A schedule 1 drug sits at the top of the hierarchy, and it is recognized as the most dangerous with a high potential for abuse and no currently accepted medical use in the United States. UNODC, *Global SMART Update Volume 17*, March 2017.

⁸ Han, Y., Yan, W., Zheng, Y., Khan, M. Z., Yuan, K., & Lu, L. (2019), *The rising crisis of illicit fentanyl use, overdose, and potential therapeutic strategies*, *Translational psychiatry*, 9(1), 282. <https://doi.org/10.1038/s41398-019-0625-0>

overdose.⁹ Another reason of concern is the accessibility of fentanyl through online marketplaces and international supply chains which complicates the efforts to control the spread of it. It is one of the main challenges and the fact that fentanyl and its related chemicals are sold through websites, often in English, is making it easy for buyers also in other countries as for example Mexico and Canada. These substances are sent with regular couriers services and often the companies also sell pill presses and equipment that allow criminal organizations to manufacture the drug independently. The ease of access to fentanyl and the lack of strict oversight have made unintentional overdose increasingly common.¹⁰

Since 2013, China has been the fundamental source of fentanyl that is filling the U.S. market, more specifically is providing the precursor agents that are necessary to produce it, playing for this reason a crucial and controversial role in this crisis.¹¹ From a legal medical use perspective, fentanyl is extremely important since it is used for treatment of cancer patients that are no longer responsive to morphine and that are in extreme pain. The problem is the fact that China seems to have a significant gap between the intent and practice of its drug control laws to stop the illicit drug and precursor flows.¹² It plays an important role in trade and production since the country has a huge chemical and pharmaceutical industry and relatively weak regulations which make it easy for illegal drug producers to operate. Indeed, many Chinese companies manufacture fentanyl and its chemical precursors, in large quantities, but while some of these produce it legally for medical use, others may intentionally sell fentanyl to drug traffickers. Differently from

⁹ Centers for Disease Control and Prevention (2025), *CDC reports decline in U.S. drug overdose deaths*.

¹⁰ Ibid.

¹¹ Felbab-Brown, V. (2020), *Fentanyl and geopolitics: Controlling opioid supply from China*, Brookings Institution, p.3.

¹² Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 18.

the U.S. China does not have a high domestic demand for fentanyl and this represents one of the reasons why authorities do not focus enough on controlling the export and production, which allows businesses to operate with little oversight.¹³

The importance and concerns of this situation for the impact it has on public health and security are reflected in the international legislative responses. Every state recognizes the fact that drug abuse is a big global problem, not just for the health of the people but because it also contributes to socio-economic and political instability, fuels organized crime and undermines global efforts to reduce poverty and violence.¹⁴

International Relations are being strongly affected by this situation, there are growing concerns related to the spread of fentanyl that is not just a domestic public health issues in the U.S. but also a crucial issue for international relations. The serious accusation of complicity of the Chinese Communist Party made by Washington is undermining the relations between the two superpowers. Indeed, Washington has accused the Chinese Communist Party of failing to address the issue, while Beijing maintains that the crisis is primarily the result of American drug consumption patterns and inadequate domestic policies.¹⁵ The announcement of the establishment of a special group and the introduction of specific sanctions against Chinese companies represents only the beginning of a larger-scale development in international relations.¹⁶

The nexus between illicit drug economies and great power competition is also a fundamental dimension of counternarcotics. The concept of great power competition emerged from realist assumptions

¹³ O'Connor, S., (2017), *Fentanyl: China's Deadly Export to the United States*, U.S-China Economic and Security Review Commission, p.5.

¹⁴ Singer M. (2008), *Drugs and development: the global impact of drug use and trafficking on social and economic development*, The International journal on drug policy, 19(6), p. 468.

¹⁵ Tresca, A. (2025), *Dalle Tensioni commerciali al Fentanyl: Lo scontro Cina-USA*, Istituto Analisi Relazioni Internazionali.

¹⁶ Ibid.

about states and describes the behavior of powerful countries that try to achieve military and economic primacy over the other. This may give a hint on why China seems unwilling to crack down the production of chemical precursor flows that is filling the West, and it is because of its broader geopolitical imperatives shaped by great power competition.¹⁷ Indeed, the Chinese government's response to the export of massive quantities of precursor chemical clearly used to produce fentanyl, is largely driven by external pressure and some experts believe that is characterized by a lack of credibility in its commitment.¹⁸

Furthermore, it is important to underline that drug trafficking also threatens security, since it is closely linked to the illegal arms trade, with profits from narcotics fueling the proliferation of illicit firearms. The links between these two factors represent a global challenge that requires integrated, multilateral responses.¹⁹

This thesis aims to explore the role of China in the fentanyl crisis and its broader implications for U.S.-China relations. Through a historical and geopolitical analysis it seeks to answer the main research question which is: What is China's role in the spread of fentanyl in the United States, and how does this issue fit into the tensions between the two powers?

To address this question, the research will examine China's role in the production and distribution of fentanyl, its legal framework and its enforcement mechanisms. Additionally, it will explore how this crisis has influenced diplomatic relations, trade policies and international cooperation between China and the United States. But also the key role of other important actors such as Mexico.

¹⁷ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 3.

¹⁸ Ibid.

¹⁹ UNODC, *Firearms and Drugs: Partners in Transnational Crime*, 2024.

To clarify the concepts that will be analyzed and used in this work, it seems important to understand the nomenclature and what it is meant with the use of the different terms.

With the term Fentanyl, it is meant the synthetic opioid that exists both as a prescription opioid and as an illicit opioid.²⁰ Analog is the term used for a compound with a chemical structure similar to another compound but with some difference in certain component, meaning drugs that are structurally similar but not identical to another drug.²¹ Counterfeit opioid is the term which is used to indicate an illicitly manufactured oral opioid pill created to look like a prescription opioid, which may have brand marks like the prescription opioid.²² The term illicit refers to activities and processes outside the scope of what is legally sanctioned and controlled, and the term illicit manufactured fentanyl (IMF) it is meant the fentanyl which is made illegally in clandestine laboratories outside of the law.²³ Prescription opioids are opioid agents manufactured legally under FDA supervision and which may be lawfully prescribed by a physician or others which have prescribing privileges.²⁴ Synthetic opioids are opioid agents made entirely in laboratory setting and can be prescription products or illicit manufactured products.²⁵

The work is structured as follows:

The first chapter provides a historical overview of diplomatic relations between the United States and China from the early 1800s until today. It highlights the key moments, difficulties and attempts at cooperation that have emerged throughout history, considering the major differences

²⁰ Pergolizzi, J., Magnusson, P., LeQuang, J. K., et al. (2021), *Illicitly Manufactured Fentanyl Entering the United States*, *Cureus*, 13(8), p. 4.

²¹ Ibid.

²² Ibid.

²³ Ibid.

²⁴ Ibid.

²⁵ Ibid.

between the two states. Moreover, it briefly covers the first Opium War, the U.S. role in it and the subsequent treaties between China and the U.S. It also examines the period of the Cold War, the birth of the People's Republic of China, the normalization of relations in the 1970s until China's entry into the World Trade organization in 2001, and finally, China's rise as a global power.

The second chapter looks at the current fentanyl crisis, which is a big threat to the safety and stability of U.S. society. It describes what fentanyl is, why it is so dangerous, and how it has spread. It also explains how Chinese groups are involved in its trafficking and how they work with Mexico, another key player. In the last part, the chapter discusses how this crisis is affecting society, especially the political and economic problems it is creating in the U.S.

The third chapter focuses on the political and international effects of the fentanyl crisis. It explores how fentanyl has become part of the tensions between the U.S. and China, including the accusations they make against each other and the actions they have taken. It also looks at global efforts to stop fentanyl trafficking, agreements between the two countries, and the role of international organizations. Finally, it examines how this issue is connected to bigger conflicts between the U.S. and China, such as the trade war and national security concerns.

The final chapter brings together the main findings of the research, showing how the relationship between the U.S. and China has affected the fentanyl crisis. It also reflects on how this problem could develop in the future and what it means for international policies.

The limitations of this work come from the fact that the problem which is analyzed is quite new, meaning that the data available is limited and the situation keeps changing over time.

CHAPTER 1

History of U.S.-China relations.

1.1 Beginning of Sino-American Relations.

Throughout the 19th century, the Sino-Americans relations have been very limited due to the restrictive practices of Chinese regulation of trade and interaction with foreigners. Often, the U.S. government followed the lead of European powers such as Great Britain and France of using power to force the decline of Qing Dynasty (1644-1912) to obtain privileges and to meet foreign demands. Through the end of the 19th and the beginning of the 20th century, a series of foreign treaties have been imposed to China, which opened their doors to foreign commerce and residence of foreigners in its territory. Moreover, allowed foreign military forces to patrol the Chinese coasts and to deploy ground forces to secure their interests. Because of these treaties, many pieces of Chinese territory have been lost to foreign ownership.²⁶ Traders and seamen were the first Americans that interacted with China, but they were confined in the Southeastern part where local officials supervised and taxed foreign traders. Americans and many other foreign merchants benefited from the trading opportunities but the treatments and interventions from the Chinese authority appeared very unjust from a Western perspective.²⁷

Like the British merchants, Americans brought opium into China, in order to balance their purchases of tea and other Chinese commodities. Even if the trading in illegal opium entering Chinese territory was mainly carried out by British, Americans were also filling Chinese opium market carrying Turkish opium to China.²⁸ Opium is produced from the opium

²⁶ Sutter, G. R. (2021), *US-China Relations: Perilous Past, Uncertain Present*, Rowman & Littlefield, p. 15.

²⁷ Ibid, p. 21.

²⁸ Ibid.

poppy, which is a flowering plant often native to Turkey. The plant's seedpod has a milky liquid that comes out when cut. This liquid, called raw opium, contains substances that relieve pain. People can eat it, mix it with liquid, or boil and dry it for smoking.²⁹ In 1729, the use of opium began to increase, and the Chinese government decided to take actions against it. When the authorities confiscated and destroyed the western opium, they caused the first opium war to break out, in which, however, the U.S. stayed out of it.

1.1.1 First and Second Opium War.

Opioid epidemics are not new, in fact ancient Egyptians traded opium, known as “joy plant” because of its painkiller effect. It is believed that it was brought into China in the 7th century from Arab merchants. Since the 18th century, foreign traders had been illegally exporting opium mainly from India to China, which grew exponentially from the beginning of the 19th century³⁰. The first de facto drug organization in the world was established between 1772 and 1850 by the British East India Company that created an opium supply chain to dominate the sales in Europe and East Asia. British tea merchants channeled raw opium into the country from India to Guangzhou, which was the only port which permitted foreign trade. The demand for tea among the British was enormous, but the income from opium was even better. This led to a growth of addicted people from 4 to 12 million by 1838 and the subsequent opium ban imposed by the Chinese emperor.³¹ Americans also quickly recognized the profitable opium trade of the British East India Company, and they soon followed their footsteps. It seems, in fact, that opium constituted from

²⁹ Miron, J.A., Feige, C. (2008) *The opium wars, opium legalization and opium consumption in China*. Applied Economics Letters, p.911.

³⁰ Realuyo, C. B., (2019), *The New Opium War: A National Emergency*. PRISM, 8(1), p.133. Available at: <https://www.jstor.org/stable/26597315>.

³¹ Ibid.

twenty to thirty percent of the commodities which Americans carried to China between 1800's and 1860's.³² This trade was highly lucrative, and smoking opium had become very popular in Asia and Europe during the 19th century.³³

In 1814 and 1831, the emperor passed stricter laws against the import and sale of opium, it was clear that the economy of the state was in recession and the balance of trade had turn against China. Chinese authorities recognized that opium was bankrupting its treasury and destroying its people, and the Emperor Daoguang sent in 1836 a letter to the king of England setting a deadline for an end to the opium trade. ³⁴

Moreover, the Emperor held many 'Opium Debates' between those favoring suppression and those who supported opium legalization. Legalizers argued that by doing so, it would generate tax revenues while the other group believed that legalization would result in everyone smoking and a destroyed society. ³⁵ After these debates, opium addiction became a capital offense, and the major focus of the emperor was eliminating the internal trade.

This situation led to the first Opium War happened from 1839 to 1842 between the United Kingdom and Quing Dynasty of China. After the UK won it, the treaty of Nanjing was signed, with which they forced the Dynasty to allow British merchants to sell Indian-grown opium in China and Hong Kong was assigned to them. Amoy, Fu-chow, Ningpo and Shanghai were declared open to foreign trade and an indemnity of 21,000,000\$ had to be paid to the British as restitution for destroyed opium. Soon, the French and Americans took advantage of the weakness

³² Mark, G. Y. (1975), *Racial, Economic and Political Factors in the Development of America's First Drug Laws*, Issues in Criminology, 10(1), p. 50.

³³ Realuyo, C. B., (2019), *The New Opium War: A National Emergency*. PRISM, 8(1), p. 133 Available at: <https://www.jstor.org/stable/26597315>.

³⁴ Nakayama D., K. (2024), *The Opium Wars of China in the Nineteenth Century and America in the Twenty-First*, The American Surgeon. p.327.

³⁵ Miron, J.A., Feige, C. (2008) *The opium wars, opium legalization and opium consumption in China*. Applied Economics Letters, p.911.

of the dynasty, demanding and obtaining trade concessions. The U.S. appointed Caleb Cushing as commissioner to China to negotiate the Treaty of Wang-hsia with China in 1844. With this treaty, Americans obtained the same privileges and rights that Britain had gained with the war.³⁶ Shanghai was one of the ports selected by Western countries to be opened to foreigners because of its strategic position. Already in 1843, within weeks of the official opening, more than eleven foreign firms had begun operating in the city.³⁷

In 1856, China was again engaged in an armed conflict, the second opium War, against Great Britain and France, known as the Arrow War. The British were seeking to extend even more their trading rights in China. Again, the Europeans won, also thanks to the indirect support received by the Americans diplomat and merchants, meaning the spread of Western influence due to their presence in the region. Indeed, after each conflict, American interests were never ignored. One of the concessions that China made to the imperialistic powers was to make opium trade legitimate. The opium trade harm the Chinese economy by draining off Chinese silver and it also had disastrous effect on the general state of health of the Chinese people.³⁸ The treaty of Tientsin was signed in 1858, it contained no reference to the opium trade but further opened legal trade for the British. Moreover, after the peace, the British supported the idea of legalizing opium, seeing it as the only way to control the trade. Consequently, China allowed to legalize opium with a tariff of 8%.³⁹ These two conflicts arose from China's attempts to eliminate the opium trade and led to the start of

³⁶ Sutter, G. R. (2021), *US-China Relations: Perilous Past, Uncertain Present*. Rowman & Littlefield, p. 21.

³⁷ Keller, W., Li, b., & Shiue, C. H. (2013), *Shanghai's Trade, China's Growth: Continuity, Recovery, and Change since the Opium Wars*. IMF Economic Review, 61(2), p.340.

³⁸ Shijie, G. (1987). *Chartism and the First Opium War*. History Workshop, 24, p.18.

³⁹ Miron, J.A., Feige, C. (2008) *The opium wars, opium legalization and opium consumption in China*. Applied Economics Letters, p.912.

an era of unequal treaties and other incursions which helped weaken and defeat the Qing Dynasty in the early 20th century.

This period that goes from the First Opium War in 1839 to the establishment of the People's Republic of China in 1945 is remembered in China as the "Century of Humiliation" and it represents for them a painful lesson on how the West behaved toward China⁴⁰. The large scale of opium that was imported from Americans began to cease only by the late 1880s due to the American Civil War but also to the opening of the opium trade that led to a small competition rise.⁴¹ In 1911, a revolution ended the Quing Dynasty and the period between 1912-1937 saw a temporary period of industrial expansion and prosperity, with the industrialization of 1920 centered in Shanghai.⁴²

1.1.2 Opiates in the US.

On the other side, also in the U.S., opium use began to spread after the Civil War, especially between veterans addicted to morphine as pain relief for their wounds. The association of opium to the Chinese played an important function in the development of the racist anti-Chinese movement especially among working class whites in the American West. Many people saw opium as the natural curse of the Chinese where the U.S. and other nations had nothing to do with opium addiction in China. American society showed deep prejudice against Chinese people, and it led to the spread of movement which fought to stop Chinese immigration in the U.S.⁴³

⁴⁰ Kaufman, A. A. (2011), *The "century of humiliation," then and now: China's national narratives* [Report], U.S.-China Economic and Security Review Commission, p. 2.

⁴¹ Mark, G. Y. (1975), *Racial, Economic and Political Factors in the Development of America's First Drug Laws*, *Issues in Criminology*, 10(1), p. 52.

⁴² Keller, W., Li, b., & Shiue, C. H. (2013), *Shanghai's Trade, China's Growth: Continuity, Recovery, and Change since the Opium Wars*, *IMF Economic Review*, 61(2), p.340.

⁴³ Sutter, G. R. (2021), *US-China Relations: Perilous Past, Uncertain Present*, Rowman & Littlefield, p. 24.

An important legislation in the United States concerning opium was passed in 1840 to tax opium imports. The change on pattern uses and attitudes towards opium happened especially when Chinese laborers' immigrants moved to the western U.S. in fact, opium smoking spread from Chinese to Americans, especially to those who frequented the Chinese ghettos, created due to racist residential restrictions. The use of drugs in this context was also encouraged by the fact that in these Chinatowns, there were very few women and many young men, a demographic situation favorable to gambling, prostitution and recreational use of drugs.⁴⁴

Americans took legal and illegal actions as riots and the murder of many Chinese in the United States. In 1892, the Geary Act required all the Chinese to always carry with them a certificate showing their right to stay in the U.S. and if they failed to prove it, the punishment would have been hard labor and deportation.⁴⁵ The first U.S. ordinance against opium smoking was passed in San Francisco, but the selling and importing was still not defined as a criminal act. This ordinance clearly never attempted to stop the importation and the use of opium because instead served to intimidate the people who were using it, usually Chinese. This contributed to picture the Chinese as criminals. The beginning of the 20th century was a period of rapid economic growth, class inequalities, waves of immigration and progressive reforms. The legislation on narcotics was part of the period's impulse to reform at national and international levels.

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⁴⁴ Brown, R. H. (2002), *The Opium Trade and Opium Policies in India, China, Britain, and the United States: Historical Comparisons and Theoretical Interpretations*. Asian Journal of Social Science. p.639.

⁴⁵ Sutter, G. R. (2021), *US-China Relations: Perilous Past, Uncertain Present*, Rowman & Littlefield, p. 24.

⁴⁶ Brown, R. H. (2002). *The Opium Trade and Opium Policies in India, China, Britain, and the United States: Historical Comparisons and Theoretical Interpretations*, Asian Journal of Social Science, p.644.

1.1.3 Law & treaties.

Opium became a major concern in international relations, and this is demonstrated by the importance that the U.S. and Asian countries gave to opium treaties. By the end of the 19th century, addiction became a huge crisis that was affecting both urban and rural areas. The first formal policy concerning opium was between the United States and Siam (Thailand) that in 1833 prohibited to American citizens to engage in any form of opium trade with Siam. Later in 1858 a treaty was also signed prohibiting Americans from importing opium to Japan.⁴⁷

In 1868 the Burlingame Treaty was signed which established formal friendly relations between the nations, and it lifted the restrictions to emigrate from China to the United States⁴⁸. In 1880, a revision of this treaty was dealing with two major problems from the perspective of the United States: first the termination of Chinese Immigration to the US, second to review certain commercial clauses. In particular, one of the commercial clauses stated that Americans could no longer import, sell and transport to and in China and at the same time China's citizens could no longer import opium in the US, reducing Chinese to the role of distributors or sellers. This treaty became law on February 23, 1887, and it stated⁴⁹:

“The Governments of China and of the United States mutually agree and undertake that Chinese subjects shall not be permitted to import opium into any of the ports of the United States, and citizens of the United States cannot be permitted to import opium into any of the open ports of China; to transport from one open port to any other open port. Or to buy

⁴⁷ Mark, G. Y. (1975), *Racial, Economic and Political Factors in the Development of America's First Drug Laws*, Issues in Criminology, 10(1), p. 52.

⁴⁸ Shih-Shan, H. T. (1986), *The Chinese Experience in America*, Bloomington Indiana University Press.

⁴⁹ Mark, G. Y. (1975), *Racial, Economic and Political Factors in the Development of America's First Drug Laws*, Issues in Criminology, 10(1), p. 54.

and sell opium in any of the open ports of China . . . “(U.S. National Archives, 1880)

Chinese officials in the Chinese delegation in Washington, often protested against the discrimination and persecution of Chinese in the U.S, finding repeatedly US actions in violation of obligations and agreements. US violations seriously undermined diplomatic relations between the two countries in the 1890s. The mistreatment of Chinese people, led to the rise of many anti-American movements organized by students and merchants and later in 1905 a boycott closed a lot of Chinese cities to US goods.⁵⁰

In 1909 the Congress passed the *Opium Exclusion Act*⁵¹, the first drug prohibition law, to ban its imports for smoking purposes, while the medicinal opium could still be imported. Much of the impetus of this law came with the Progressive Movement from a cross-section of America’s religious groups, businessmen, universities. Their main goal was to stop opium traffic. The control of opium offered a way for the U.S to show other nations its goodwill and international sincerity compared to other colonial powers. In particular the policy aimed to place America at a distinct advantage with China with the purpose of increasing trades between them.⁵²

President Roosevelt chose Dr. Wright as the nation’s first Opium Commissioner to lead an American delegation to the First International Opium commission in Shanghai in 1909 and another in 1912 in The Hague that created the first global attempt to regulate narcotics. This act was the opening shot in the US war on drugs.⁵³ The crackdown produced short-

⁵⁰ Sutter, G. R. (2021), *US-China Relations: Perilous Past, Uncertain Present*, Rowman & Littlefield, p. 24.

⁵¹ Gieringer, D., (2009), *The opium exclusion act of 1909*, Drugs-Forum Addiction Help & Harm Reduction.

⁵² Mark, G. Y. (1975) *Racial, Economic and Political Factors in the Development of America’s First Drug Laws*, *Issues in Criminology*, 10(1), p. 58.

⁵³ Gieringer, D., (2009). *The opium exclusion act of 1909*, Drugs-Forum Addiction Help & Harm Reduction.

term dramatic results on prices and on people dying because they were forced to abstain, but soon it became clear that the opium trade had not stopped, rather had been taken over by criminal traffickers. Due to the escalation of the war on drugs many users decide to move to other more potent forms of opium, like morphine, which paradoxically was more legal and readily available. Later, in 1914, the Congress passed the Harrison Act, which prohibited all non-medical use of opium and morphine.⁵⁴ Specifically it was a tax measure, designed for the control and marketing of opium, morphine, heroin and other drugs. The three central parts of the Act stated that: first, anyone engaged in production or distribution must register with the federal government and keep records of all transactions involving drugs. Second, anyone handling the drugs must pay a tax. Third, unregistered people could purchase drugs only with the prescription from physicians, legitimate for medical use.

The importance that the states gave to the regulation of opium consumption and trade shows the significant impact that opium had on health and society but also on an international level for multilateral relations.

1.2 US-People's Republic of China relations.

In the early 20th century things began to change in China because the fact that it started to modernize politically and economically, made the state more resistant to foreign incursions and influence. Moreover, after the American Civil War the United States started to be against the British hegemony in the region and its quasi-monopoly opium trade.

The People's Republic of China was established in Beijing on October 1st, 1949, by the Chinese Communist Party and its leader Mao Zedong. After the defeat of the Nationalist government of Chiang Kai-shek, which after

⁵⁴ Ibid.

the defeat moved to Taiwan with thousands of his troops⁵⁵. This represents the beginning of the period of tension between the United States, which supported the Chiang's exiled Republic of China government in Taipei, and the People's Republic of China.

One of the first issues which the new government had to deal with was the society addiction to opium and for this reason, within a year the Communists instituted a comprehensive program designed to eliminate the problem. This plan first aimed to change the ideology of young people. Second was to make a massive land reform, coordinated with elimination of poppy growth.⁵⁶ A very important action to overcome the narcotic problem was the individual reformed addict. They organized some city-wide antiopium committees for addict rehabilitation including treat meant to break the habit at home, clinics and hospitals. Moreover, the former addict was fully accepted back in society without prejudice.⁵⁷ What remains uncertain is what would happen to those that didn't make it to rehabilitate.

The official narrative Chinese antagonism towards opium was rooted in hostility towards the foreigners who imported it, because in China, the traffic undermined the Emperor politically, ideologically and financially.⁵⁸

China and the United States have one of the most important and complex bilateral relationship in the world. In fact, since 1949, the countries have experienced period of tension but also cooperation over many different issues. To understand the current dynamics of relations

⁵⁵ Council on Foreign Relations, (2024), *US-China relations*. Available at: <https://www.cfr.org/timeline/us-china-relations>.

⁵⁶ Lowinger, P., (1973), *How China solved the Drug Problem*. The New York times Archives. Available at: <https://www.nytimes.com/1973/06/02/archives/how-china-solved-the-drug-problem.html>.

⁵⁷ Ibid.

⁵⁸ Brown, R. H. (2002), *The Opium Trade and Opium Policies in India, China, Britain, and the United States: Historical Comparisons and Theoretical Interpretations*, Asian Journal of Social Science, p. 633.

between the two countries, it is important to have a picture of what their relationship has been like in the past. Moreover, the evolution of trade from 1949 can be divided into the years before and after the market reforms of 1978.⁵⁹

In June 1950, the Korean War broke out and this was the first big conflict between the two states. In particular, the Soviet Union and China supported North Korean People's Army while the United States and the United Nations strongly supported South Korea's defense.⁶⁰

In 1954, Taiwan was the main scene of tensions between the two states, with the first strait crisis. When President Dwight Eisenhower lifted the US navy blockade of Taiwan in 1953, led Chiang Kai-shek to deploy soldiers to the Quemoy and Matsu Islands in the Taiwan strait and mainland China's People's Liberation Army responded to this act by selling the islands. After Washington decided to sign a mutual defense treaty with Taiwan, in 1955 the United States threatened a nuclear attack on China, after which decides to negotiate, claiming a limited victory after the Nationalists' withdrawal from Dachen Island.⁶¹

1964 represents an important year for China: it conducted the first atomic bomb test. It happens in a fragile moment in which the United States were involved in the Vietnam War.⁶² The fact that China had also developed the atomic bomb created great concern in the United States, which lost its monopoly on the atomic bomb first to the Soviets and now also to the Chinese.

Things began to change towards the end of the 1960s. Sino-Soviet relations started to deteriorate due to differences over security, ideology

⁵⁹ Keller, w., li, b., & Shiue, c. H. (2013), *Shanghai's Trade, China's Growth: Continuity, Recovery, and Change since the Opium Wars*, IMF Economic Review, 61(2), p.344.

⁶⁰ Council on Foreign Relations, (2024), *US-China relations*. Available at: <https://www.cfr.org/timeline/us-china-relations>.

⁶¹ Council on Foreign Relations, (2024), *US-China relations*. Available at: <https://www.cfr.org/timeline/us-china-relations>.

⁶² Ibid.

and especially due to the China's radical industrialization policies, known as "The Great Leap Forward".⁶³ The situation led the Soviet Union to take distance from China and in 1969 disagreements between the two were too strong, culminating in some border fights. Washington was no longer the biggest threat for China, now it was Moscow's turn. The so-called Sino-Soviet split contributed to Beijing's rapprochement with the United States.⁶⁴

1.2.1 Normalization of diplomatic relations

The roots of contemporary relationship between U.S. and China began in a very unexpected moment. In a period of China's unprecedented isolation, during the Vietnam War in which the U.S. had more than five hundred thousand troops fighting a Communist-led adversary supported by China.⁶⁵ With the election of Richard Nixon as the 37th president of the United States, diplomatic relations between the two states saw a marked and further improvement. In 1972, he spent eight days in China and meet Mao Zedong. The Nixon administration expressed its willingness to change American policy towards China. He signed the *Shanghai communiqué* with Premier Zhou Enlai, which sets the stage for improved U.S.-Sino relations and allowed them to discuss difficult issues as the case of Taiwan. Nixon started to refer to China as the People's Republic of China for the first time and soon the Department of State removed all the restrictions on the use of U.S. passports for travel to China.⁶⁶ Anyway, the first contact between the PRC and a major American corporation took

⁶³McDougall, W.A. (2025), *20th-century international relations*, Encyclopedia Britannica. Available at: <https://www.britannica.com/topic/20th-century-international-relations-2085155>.

⁶⁴ Hartmann, F. H. (1967), *The meaning and implication of the sino-soviet split*, Naval War College Review, 20(4), p.27.

⁶⁵ Sutter, G. R. (2021), *US-China Relations: Perilous Past, Uncertain Present*, Rowman & Littlefield, p. 24.

⁶⁶ U.S. Mission China, *History of the U.S. and China*. Embassy and consulates in China. Available at: <https://china.usembassy-china.org.cn/history-of-the-u-s-and-china/>

place before Nixon's visit to China. It happened when the Chinese contacted RCA to install a satellite communication earth station in preparation for the visit. Americans soon understood the potential of U.S.-China trade and in 1973 they established the National Council for U.S.-China Trade in Washington.⁶⁷ For much of the decade the normalization of relations between the two countries has made slow progress.⁶⁸ This period marked the beginning of warmer relations between the US and China, which symbolically started when members of China's ping-pong team invited members of the US team to China in April 1971. Since 1949, journalists that accompanied U.S. players were the first Americans allowed to enter China. Moreover, of significant importance has been Henry Kissinger's visit to China, after which the People's Republic of China was formally recognized by the United Nations and the permanent Security Council seat was given to PRC and taken away from Taiwan.⁶⁹

On January 1st, 1979, under the presidency of Jimmy Carter in the U.S., the two sides agreed to normalize relations, and China was granted full diplomatic recognition, acknowledging China's mainland One-China principle and cutting normal ties with Taiwan. Shortly after, Chinese vice premier Deng Xiaoping became the first leader of the PCR to visit the United States.⁷⁰

Normalization did not mean the end of all disputes, but it brought a new emphasis on the use of diplomacy to deal with disagreements instead of unilateral antagonistic statements. These diplomatic channels allowed the U.S.-China relations to move forward and guide the nations towards areas of growing common interest. Prior to this period, all of trade was

⁶⁷ Ibid.

⁶⁸ Council on Foreign Relations, (2024), *US-China relations*. Available at: <https://www.cfr.org/timeline/us-china-relations>.

⁶⁹ Ibid.

⁷⁰ U.S. Mission China, *History of the U.S. and China*, Embassy and consulates in China. Available at: <https://china.usembassy-china.org.cn/history-of-the-u-s-and-china/>

controlled by the central government through state-owned Foreign Trade Companies.

Despite these changes, in April, the U.S. Congress approved the Taiwan Relations Act⁷¹, allowing Taiwan and the U.S. to continue with commercial and cultural relations. This act also required Washington to provide defensive arms to Taipei.

In 1982, Ronald Reagan administration issues the “Six assurances” to Taiwan but also signs a third joint communiqué with the People’s Republic of China to normalize the relations. The president supported the both ideas of having stronger ties with Taiwan but also improving U.S.-China relations by letting them purchase U.S. military equipment.

1.3 China admission to the WTO.

Even if diplomatic contact had been restored, American businessmen in the beginning had little idea on how to restart trade relations. After the Cultural Revolution (1966-1971), a period of trade and import growth started. Specifically, things began to change in 1975 when a delegation from one of China’s foreign trade corporations visited the United States to understand what kind of products American would buy from them. Thanks to this, trade between them grew from 5\$ million in 1972 to 142\$ million in 1978 and individuals began to come in contact and exchange knowledge with each other’s⁷². This process of reforms and opening initiated with Deng Xiaoping has been a fundamental factor in pushing trade to the forefront. His plan was to obtain Western technology to modernize China’s defense and industrial capabilities. To do so, Chinese doctors and scientists were sent to the United States for study and training and U.S. engineers were brought to China as advisers. To further promote

⁷¹ H.R.2479 - 96th Congress (1979-1980): *Taiwan Relations Act*. (1979, April 10)

⁷² U.S. Mission China, *History of the U.S. and China*, Embassy and consulates in China. Available at: <https://china.usembassy-china.org.cn/history-of-the-u-s-and-china/>

trade and foreign investment in the PRC, the Chinese established Special Economic Zones and joint ventures. This model became the standard one for any foreign company that wanted to set up its production in China. In this system, while the Chinese side made all the legal and logistic arrangements, the foreign side would provide the capital, technology and export distribution to open new factories. Big American companies such as Coca-Cola, but also smaller companies and individual entrepreneurs, rushed to create joint ventures and create a foothold in China. By 1986, more than 300 U.S. companies had signed contracts in China.⁷³ Bilateral trade expanded dramatically in the 1980s but commercial relations have not always been smooth. When the Tiananmen Square massacre happened in 1989, the U.S. suspended military sales to Beijing and froze relations⁷⁴.

In the 1990s, the most significant trade issue for China was gaining admission to the World Trade Organization (WTO) because the admission would have meant large economic advantages but also being included in the world's largest trading organization, which had a big symbolic value. China had to wait until May 2000 in order to receive from U.S. Congress the status of Permanent Normal Trade Relation and in 2001 joined the WTO.⁷⁵

The World Trade Organization is the global-rule setting institution which promotes free trade with lower and predictable trade barriers. China wanted to join the WTO because it would give access to new trading partners, better tariffs, and it would give China a seat at the table in a globalizing world. This would also give hopes to the United States of a new China, far from its communist model and closer to the liberal-democratic order.⁷⁶ Moreover, the U.S. thought that China's membership

⁷³ Ibid.

⁷⁴ Ibid.

⁷⁵ Ibid.

⁷⁶ Council on Foreign Relations (2025), *What happened when China joined the WTO?* CFR Education. Available at: <https://education.cfr.org/learn/reading/what-happened-when-china-joined-wto>.

would also legitimize the WTO itself, since China was one of the biggest trading country and the WTO without it could not claim to be a global organization.

Reality shows that instead of conforming, China seems to be using the WTO in order to obtain its own advantages. Many accusations were made against China, believing that is promoting its exports while remaining closed to foreign good. More specifically, the cases of accuses that are made against China can be divided in three categories. The first accusation concerns the provision of illegal state subsidies in order to be an exporting country. The second concern the fact that China is discriminating against foreign goods and suppliers to prioritize domestic manufacturing and the third concern State control of supply chains, it favors exporting finished products instead of intermediate goods.⁷⁷

1.4 Historic Importance

Clearly, in shaping the opium policies in history, at national and international levels, we have seen the interaction of economic, political and ideological forces. One of the main motivations appears to be controlling profits. Moreover, in the case of the United States the restriction has been used as a method to regulate and repress a minority community, achieved through laws against a particular practice favored by a certain group. The effectiveness of the attempts to reduce consumption worked differently in diverse states. In the case of the United States, the criminalization has reduced consumption but with indirect social costs. China had two different approaches, before and after the rise of Chinese Communist Party. In the first attempt there was little popular interest in suppressing the drug because of the strong interests of merchants and the central government was going through an administrative decline, losing

⁷⁷ Ibid.

legitimacy and was giving much importance to this issue. By contrast, with the rise of the CCP which had a more stable organizational structure, opium was pictured as a corrupting poison brought by Western barbarians. Being anti-opium was being also pro-Chinese independence from foreigners. An efficient authoritarian government could efficiently suppress opium.⁷⁸

The difference with which the two states have dealt with the challenge of the spread of opium in history is reflected in part in the issue of a new epidemic, characterized by a powerful new type of drug that is challenging many states, but particularly the United States. The framework of China-U.S. relations throughout history helps us better understand the dynamics that characterize the collaboration between the two states today in dealing with an emergency such as the spread of Fentanyl today. In the next chapter we will delineate the characteristics of this phenomenon, presenting and comparing the two different approaches and roles played by the two states.

As shown in this chapter, the history of the international relations between the two countries has long been shaped also by the trade of controversial substances as opium. These wars demonstrated how the flow of narcotics could influence diplomatic relations but also economic policies and social stability. It characterized their attitudes over the centuries, alternating cooperation and competition, and also creating the conditions for economic integration. The new crisis characterized by the spread of fentanyl seems to have similar characteristics to the opium crisis as the impact on the society and the implications for diplomacy. The integration of China in the world order since it joined the World Trade Organization in 2001 also may have facilitated the spread of new

⁷⁸ Brown, R. H. (2002), *The Opium Trade and Opium Policies in India, China, Britain, and the United States: Historical Comparisons and Theoretical Interpretations*, Asian Journal of Social Science, p. 633.

transnational threats, such as the trafficking of chemicals used to produce fentanyl.

In the next chapter, we will discuss how this dynamic contributed to the fentanyl crisis, analyzing the origins of the phenomenon, the role of China, and the impact on American society.

CHAPTER 2

Fentanyl

2.1 Fentanyl crisis.

Innovation has changed the landscape of both supply and demand for the opioid market. The new fentanyl crisis highlights the evolving scenario of the global drug trade. In the past, most illicit drugs were produced from natural plants, such as opium poppies. To produce opium, big lands, labor, and a lot of time were necessary but today fentanyl can instead be manufactured quickly in small laboratories, located everywhere, making it harder to track and regulate.⁷⁹

Dr. Paul Janssen was born in Belgium in 1926 and at the age of 27 he founded his independent research lab where he discovered many fundamental things. He recognized the relationship between a compound's chemical structure and its action as a medicine and synthesized many revolutionary drug compounds, including a breakthrough treatment for psychotic disorders.⁸⁰ Fentanyl was first structurally designed by Janssen in 1960 and introduced into clinical practice in Europe as an analgesic agent in 1963. It is an opioid medication generally prescribed to patients with cancer who experience severe pain. It is so potent that just the amount of the size of a few grains of sand is enough to kill someone.⁸¹ In fact, this synthetic opioid is 50-100 times more powerful than morphine and 25-50 times more than heroin.⁸² Currently, fentanyl is the reason of strong and growing concerns and at the heart of the US opioids crisis.

⁷⁹ United Nations International Drug Control Programme. (1998), *Economic and Social Consequences of Drug Abuse and Illicit trafficking*, U.S. department of justice, p.36.

⁸⁰ Marglin, E. (2017), *Meet Dr. Paul Janssen a legend in Pharmacology*, Johnson & Johnson. Available at: <https://www.jnj.com/our-heritage/meet-dr-paul-janssen-a-legend-in-pharmacology>.

⁸¹ Sidner, S. (2017), *Fentanyl: The Powerful Opioid That Killed Prince*, CNN. Available at: <https://edition.cnn.com/2016/05/10/health/fentanyl-new-heroin-deadlier/index.html>.

⁸² Walton, A. G. (2016). *Why Fentanyl Is So Much Deadlier Than Heroin*, FORBES. Available at: <https://www.forbes.com/sites/alicegwalton/2016/04/09/why-fentanyl-is-so-much-more-deadly-than-heroin/>.

In general, opioids are drugs that reduce pain by acting like opium and attaching to parts of the brain that control pain and feelings. By bounding these receptors they trigger the release of dopamine, leading to a euphoric feeling. Dopamine is a neurotransmitter that increases each time we feel rewarded, prompting us to look again for the same response.⁸³ Once our brain becomes used to this feeling, it needs more quantity of the opioid to trigger the same level of pain relief. Tolerance increases because the person relies on opioids to avoid withdrawal symptoms, which happen when the drug's effects fade.⁸⁴

In many cases, the addiction to opioids begins with the improper use of legally prescribed medication such as: morphine, oxycodone or hydrocodone.⁸⁵ An additional problem consists of the fact that opioids drugs are often cheaper than their safer alternatives.⁸⁶ To produce 25 grams of finished fentanyl the cost is about 810\$.⁸⁷ Once users develop a tolerance to prescription opioids, they struggle to find enough to “*get high*” and consequently they turn to stronger illicit drugs as fentanyl or heroin. In the case of the United States, this incorrect behavior is leading to the deadliest drug epidemic in American history.⁸⁸

⁸³ Opium addiction is not an issue of will but rather a neurochemical issue within the most primitive part of the brain. *Fentanyl: The Drug Deadlier Than Heroin*, VICE VIDEO (2016), available at: <https://video.vice.com/enus/video/fentanyl-the-drug-deadlier-than-heroin/57169d30dbb30e8656f09c76>.

⁸⁴ CNN Editorial Research (2024), *Opioid Crisis Fast Facts*, CNN.

Available at: <http://www.cnn.com/2017/09/18/health/opioid-crisis-fast-facts/index.html>.

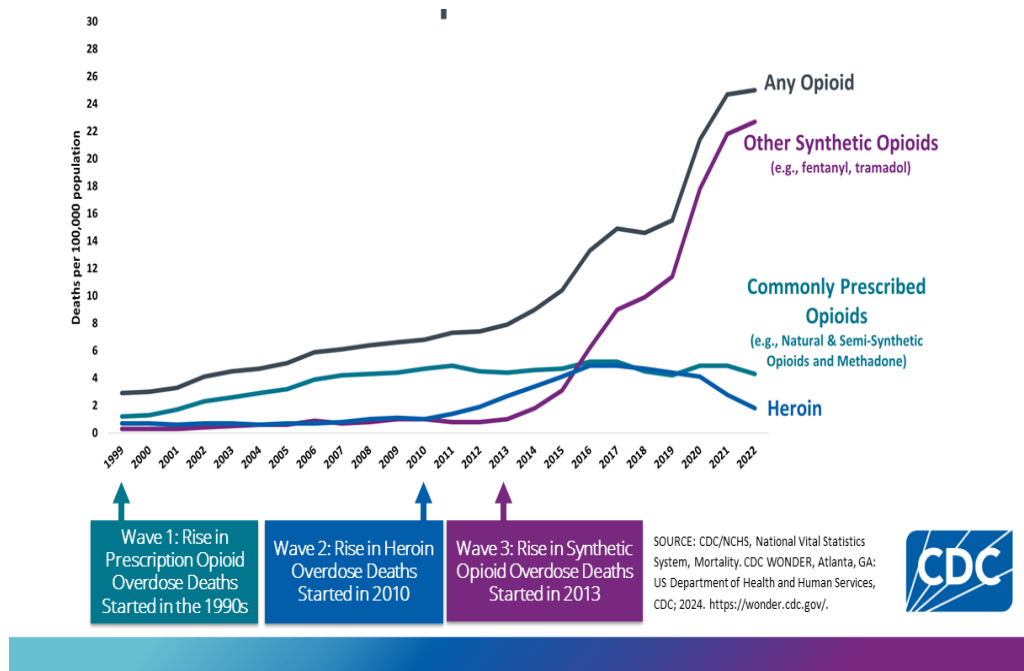
⁸⁵ Ibid.

⁸⁶ Thomas, K., & Ornstein, C. (2017) *Amid Opioid Crisis, Insurers Restrict Pricey, Less Addictive Painkillers*, New York Times.

⁸⁷ O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p. 3.

⁸⁸ Battiloro, C. (2019), *Fentanyl: how china's pharmaceutical loophole are fueling the united states' opioid crisis*, Syracuse Journal of International Law and Commerce, 46(2), p. 347.

Figure 1: The opioid epidemic in the United States defined by three distinct waves.



As shown by figure 1, in the United States, scholars identify three main waves of the opioid crisis, first with the release and promotion of OxyContin, second with heroin and third with the illicit manufactured fentanyl (IMF).⁸⁹ Beginning with the ‘third wave’ of overdose mortality, there has been an increase in deaths associated with synthetic opioids which started around 2013. Indeed, Fentanyl and its analogs appeared on the street around 2013, when heroin traffickers started to mix them, setting homegrown labs to synthesize compound. The variety of quality and dosages made fatal overdoses a constant risk, in fact, by 2016 the number exceeded those of all traffic related deaths.⁹⁰

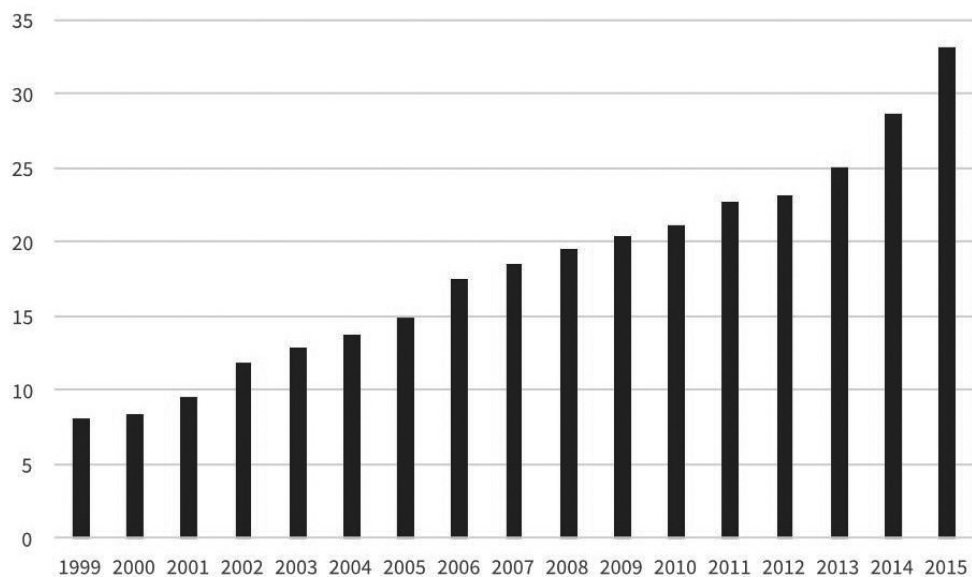
⁸⁹ Nakayama D. K., (2024), *The Opium Wars of China in the Nineteenth Century and America in the Twenty-First*, The American Surgeon, p.329.

⁹⁰ Gardner, E. A., McGrath, S. A., Dowling, G., Bai, D. (2022), *The opioid crisis: prevalence and markets of opioids*, Forensic Sci Rev, p. 43-70.

From 1999-2022, almost 727,000 people died because of an opioid overdose, including prescription and illegal opioids.⁹¹

In October 2017, President Donald Trump declared the opioid crisis a public health emergency in the U.S.⁹² He directed all executive agencies to use every appropriate emergency authorities to fight the crisis and include interdiction, treatment and prevention efforts.⁹³ His declaration was based on the fact that the number of deaths overdose has been escalating from 1999 to 2015, as shown in the following figure 2.

Figure 2: Opioid Overdose Death, 1999-2015.⁹⁴



Source: CDS Wonder Database, Multiple Cause of Death Files.

According to other statistics, the annual death number of opioid overdoses increased even to more than 42,000 in 2016. In Figure 3, are

⁹¹ Centers for Disease Control and Prevention (2024), *Understanding the opioid overdose epidemic*, U.S. Department of Health & Human Services. Available at: <https://www.cdc.gov/overdose-prevention/about/understanding-the-opioid-overdose-epidemic.html>.

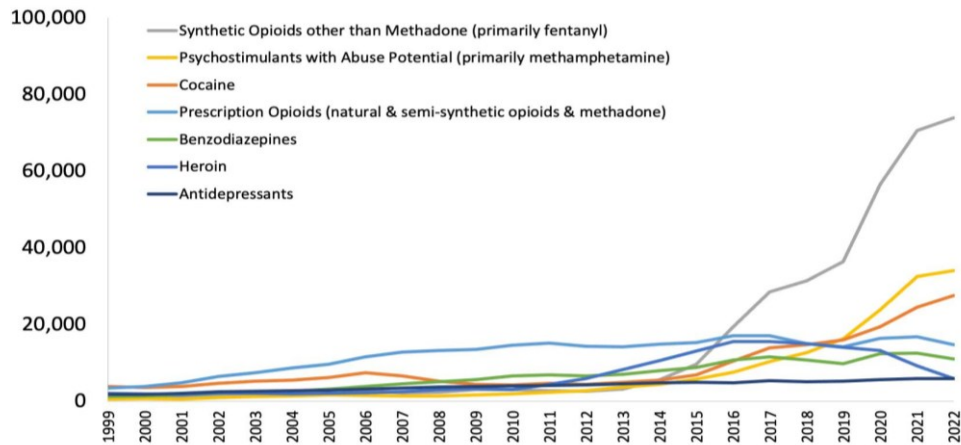
⁹²The White House (2017), *Ending America's Opioid Crisis*. Available at: <https://trumpwhitehouse.archives.gov/opioids/>.

⁹³ Realuyo, C. B., (2019), *The New Opium War: A National Emergency*, PRISM, 8(1), p. 137. <https://www.jstor.org/stable/26597315>.

⁹⁴ Source: CDS Wonder Database, Multiple Cause of Death Files.

shown the U.S. Overdose Deaths rate*, the figure clearly shows how deaths rose also from 2016 to 2022.

Figure 3: Multiple Cause of Death 1999-2022.⁹⁵



*Includes deaths with underlying causes of unintentional drug poisoning (X40–X44), suicide drug poisoning (X60–X64), homicide drug poisoning (X85), or drug poisoning of undetermined intent (Y10–Y14), as coded in the International Classification of Diseases, 10th Revision. Source: Centers for Disease Control and Prevention, National Center for Health Statistics. Multiple Cause of Death 1999-2022 on CDC WONDER Online Database, released 4/2024.

Only in 2022, nearly 108,000 people died from drug overdose and about 76% involved opioids, meaning 10 times the number of 1999 and an average of 224 deaths per day.⁹⁶

The fatality costs number are shocking but also the non-fatality costs should not be ignored since in 2015 alone in the United States they were USD 72.3 billion.⁹⁷ In the beginning of 2018, President Trump authorized programs to fight the opioid crisis in the federal budget for \$6 billion.⁹⁸

⁹⁵ Source: Centers for Disease Control and Prevention, National Center for Health Statistics. Multiple Cause of Deaths 1999-2022 on CDC WONDER Online Database.

⁹⁶ Centers for Disease Control and Prevention (2024). *Understanding the opioid overdose epidemic*. U.S. Department of Health & Human Services. Available at: <https://www.cdc.gov/overdose-prevention/about/understanding-the-opioid-overdose-epidemic.html>.

⁹⁷ The Council of Economic Advisers (2017), *The Underestimated Cost of the Opioid Crisis*, Center for Health Decision Science. Available at: <https://www.whitehouse.gov/sites/whitehouse.gov/files/images/The%20Underestimated%20Cost%20of%20the%20Opioid%20Crisis.pdf>.

⁹⁸ Realuyo, C. B., (2019), *The New Opium War: A National Emergency*. PRISM, 8(1), p. 137 Available at: <https://www.jstor.org/stable/26597315>.

The epidemic in the U.S. and also in other parts of the world has been caused by multiple factors such as the health-care system, regulatory regime, culture and socio-economic trends. President Trump has applied an approach called “all-of Government” to face the crisis. It refers to a strategy which requires joint activities performed by ministries, public administrations and public agencies to create a common solution. This approach consists of two modules: reducing demand and cutting down on illicit domestic and international supply. To stop the illegal flow of opioids like fentanyl, Trump introduced tariffs as a way to pressure China into taking stronger actions against it⁹⁹. The reason of it lies in the evidence that about 97% of fentanyl and precursor compounds seized from international mail in 2016 and 2017 came from China.¹⁰⁰ With the COVID-19 restrictions, a decrease in distribution routes of traditional opioids as heroin and fentanyl was observed. When travelling went back to normal with the end of the pandemic, fentanyl again inundated the country and the effect was devastating.¹⁰¹

Fentanyl is currently a schedule II drug¹⁰², which means that it is legally available only through a non-refillable prescription.¹⁰³ In 2014, doctors in the United States wrote about 6.65 million fentanyl prescriptions. After this period, the recreational use of it, obtained illicitly,

⁹⁹ Zhang, L., An, J. (2020), *Revisiting the regimes of public international law and the WTO law on countering narcotic drug trafficking China & WTO Review*, 6(1). p. 194.

¹⁰⁰Gardner, E. A., McGrath, S. A., Dowling, G., Bai, D. (2022), *The opioid crisis: prevalence and markets of opioids*, *Forensic Sci Rev*, p. 43-70.

¹⁰¹Felbab-Brown, V. (2023), *China's role in the fentanyl crisis*, The Brookings Institution. Available at: <https://www.brookings.edu/articles/chinas-role-in-the-fentanyl-crisis/>.

¹⁰² *Schedule II drugs, substances, or chemicals are defined as drugs with a high potential for abuse, with use potentially leading to severe psychological or physical dependence. These drugs are also considered dangerous. Some examples of Schedule II drugs are: combination products with less than 15 milligrams of hydrocodone per dosage unit (Vicodin), cocaine, methamphetamine, methadone, hydromorphone (Dilaudid), meperidine (Demerol), oxycodone (OxyContin), fentanyl, Dexedrine, Adderall, and Ritalin.* United States Drug Enforcement Administration. March, 2025.

¹⁰³NIDA. (2021). *Fentanyl*. NIDA. Available at: <https://nida.nih.gov/research-topics/fentanyl>.

led the DEA, issuing an alert for health and public safety in March 2015 and 2016 on the dangers of this new synthetic drug.¹⁰⁴

The first seizure of illicit fentanyl was reported in April 2016 at the US border with Mexico when the DEA seized hundreds of counterfeit oxycodone tablets that contained Illicit Manufactured Fentanyl.¹⁰⁵

According to the Center for Disease Control and Prevention Morbidity and Mortality Weekly report of December 2016, but also as shown in Figure 3, the death rate from synthetic opioids other than methadone, which includes fentanyl, increased by 72.2%.¹⁰⁶ Anyways, new provisional data from CDC's National Vital Statistics System have predicted a nearly 24% decline in drug overdose deaths before September 2024, compared to the previous year. Showing that there have been about 87,000 deaths from October 2023 to September 2024, meaning 114,000 less compared to the previous year.¹⁰⁷ The decline is surely an encouraging new but the overdose remains the leading cause of death for American between 18-44 years old, which highlights the importance of sustain the efforts.¹⁰⁸

As shown by the data, it is extremely important to consider the challenges that the spread of this drug poses to society and politics in countries affected by it.

¹⁰⁴O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p. 3.

¹⁰⁵DEA, (2016), *Hundreds of counterfeit oxycodone tablets seized at port of entry contained ultra-deadly fentanyl*, DEA. Available at: <https://www.dea.gov/press-releases/2016/04/15/hundreds-counterfeit-oxycodone-tablets-seized-port-entry-contained-ultra>

¹⁰⁶Milione, L. J., (2017), *Fentanyl: the next wave of the opioid crisis*, U.S. department of Justice, p.2.

¹⁰⁷Centers for Disease Control and Prevention. (2025), *CDC reports nearly 24% decline in U.S. drug overdose deaths*, U.S. Department of Health & Human Services.

¹⁰⁸Ibid.

2.1.1 Current challenges identified by the DEA.

In this context, it is important to clarify that the DEA (Drug Enforcement Administration) refers to Illicit Manufactured Fentanyl, including analogs and not prescription fentanyl.

As already mentioned, the spread of this drug poses big new challenges for the world but in particular for the United States that have to deal with a completely new, extremely deadly threat, and is being affected more than any other country.

The first challenge, identified by the Drug Enforcement Administration, concerns the adaptation of traffickers to the Law. Even if many fentanyl-related compounds have been controlled in Schedule I or Schedule II of the Controlled Substances Act (CSA), entrepreneurs procure new synthetic compounds very easily. The DEA has identified over the past years, many fentanyl class substances from eight different drug classes, which the majority are produced in China. Very often, as soon as the DEA takes action in order to schedule a substance, traffickers begin to sell new versions of the products that contain compounds which are new and unregulated. The challenge consists in the manufacturers and distributors which continue and can stay one step ahead of any banning or control passed by the state by introducing each time a new product not listed in any of the controlled substance schedules.¹⁰⁹

The second main challenge is linked to the Internet and the ease with which you can find the compounds often available in the darknet markets and the industrial pill press machines are easily available on the open internet. In fact, the tools to manufacture pills containing fentanyl or analogues are available online and often inexpensive. This allows even

¹⁰⁹ Milione, L. J., (2017), *Fentanyl: the next wave of the opioid crisis*, U.S. department of Justice, p.3.

single individuals to be able to start trafficking fentanyl without an affiliation to a cartel¹¹⁰.

The third challenge identified by the DEA is the fact that to smuggle this drug are often used couriers, which mail fentanyl and its analogues from China. Some investigations made by the DEA revealed that the original supplier provides the package to a courier company or individual who transfers it to another courier company which takes custody and presents the package to customs for export. This chain of multiple transfers makes it very difficult for law enforcement to track them.¹¹¹

Unlike previous opioid epidemic, the case of fentanyl sold in the U.S. add a challenge due to the fact that it is processed by many individual distributors across the country, creating a diffused problem which is making it even more difficult for law enforcement to contain.

All these challenges identified by the DEA, are to be considered in order to succeed in stopping traffic within the United States. But other challenges, such as the impact to society, security, and the economy are equally important and deserve careful attention.

2.2 China's Role: production and distribution.

“According to DEA investigations, illicit fentanyl, fentanyl analogues, and their immediate precursors are often produced in China. From China, these substances are shipped through mail carriers directly to the United States or alternatively shipped directly to transnational criminal organizations (TCOs) in Mexico, Canada, and the Caribbean. Once there, fentanyl or its analogues are prepared to be mixed into the U.S. heroin supply domestically, or pressed into a pill form, and then moved to the illicit U.S. market where demand for prescription opioids and heroin remain at epidemic proportions. In some cases, traffickers have

¹¹⁰ Ibid.

¹¹¹ Ibid.

industrial pill presses shipped into the United States directly from China and operate fentanyl pill press mills domestically. Mexican TCOs have seized upon this business opportunity because of the profit potential of synthetic opioids, and have invested in growing their share of this market. Because of its low dosage range and potency, one kilogram of fentanyl purchased in China for \$3,000 - \$5,000 can generate upwards of \$1.5 million in revenue on the illicit market.”¹¹²

According to U.S. law enforcement and drug investigators, China is the main supplier of fentanyl precursors to the United States, Mexico and Canada.¹¹³ Their chemical manufacturers export different fentanyl products to the United States, such as raw fentanyl, fentanyl precursors, fentanyl analogues and fentanyl-laced counterfeit prescription drugs like oxycodone but also pill presses and machinery necessary to produce fentanyl.¹¹⁴ It is the principal supplier of fentanyl for the medical sector which is crucial for procedures like surgery anesthesia and effective against extreme pain for patients which suffer of cancer which often don't respond anymore to painkillers as morphine. Since 2013, China is responsible of doing so, both legally and illegally, initiating the third phase of the opioid epidemic in the United States.¹¹⁵

China's pharmaceutical industry is one of the most powerful and government-supported sectors in the country. It includes over 5,000 companies and is one of the world's largest exporter of basic chemical ingredients and precursors. The sector produces more than 2,000 different products, with an annual output of more than 2 million tons¹¹⁶. In 2023 the

¹¹² Ibid, p.1.

¹¹³ O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p. 5.

¹¹⁴ Ibid.

¹¹⁵ Felbab-Brown, V. (2023), *China's role in the fentanyl crisis*, The Brookings Institution, p.7. Available at: <https://www.brookings.edu/articles/chinas-role-in-the-fentanyl-crisis/>

¹¹⁶ O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p.7.

leading exporters of Chemical Products were the United States(\$239B), China (\$226B) and Germany (\$225). In 2024, China exported \$194B of chemical Products and the first main destination was the United States (\$18B).¹¹⁷

Some of these Chinese manufacturers operate illegally or use shell companies to conceal their activities. A significant number can produce fentanyl and disguising it in the country's massive chemical production. The chemical industry, like the pharmaceutical sector, holds a strong political influence. It contributes around 3% to China's national economy and generates about \$100 billion in yearly profits¹¹⁸.

Fentanyl for the illegal U.S. market is made by legitimate companies that secretly produce and sell it illegally and also by smaller underground operations that have informal connections to the official pharmaceutical and chemical industries.¹¹⁹

What makes it easier for this drug to be exported is its potency to weight ratio, which allows it to be transported via mail and courier services. The direct sales that would happen through websites and the ease with which can be sent contributed to make this emergency even worse. Fentanyl and its precursors agents are hidden and trafficked from China to the United States in legal cargo, and similarly to Mexico and Canada, the routes are shown in Figure 4.¹²⁰

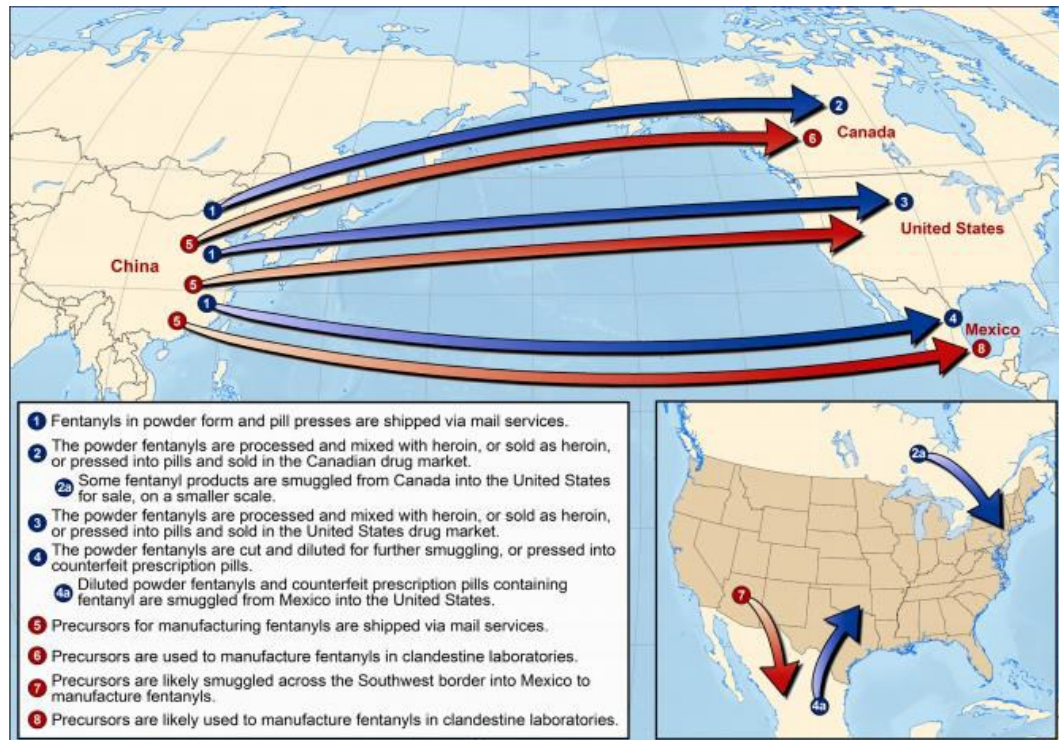
¹¹⁷ OEC, (2025), *Chemical products: Product trade, exporters and importers*. <https://oec.world/en/profile/bilateral-product/chemical-products/reporter/chn>.

¹¹⁸ Market Monitor (2017), *Focus on chemical performance and outlook*, Atradius. https://group.atradius.com/documents/mm_chemicals_july_2017.pdf.

¹¹⁹ Deprez, E., Hui, L., Wills, K., (2018), *Deadly Chinese fentanyl is creating a new era of drug kingpins*, Bloomberg. Available at: <https://www.bloomberg.com/news/features/2018-05-22/deadly-chinese-fentanyl-is-creating-a-new-era-of-drug-kingpins>.

¹²⁰ Felbab-Brown, V. (2023), *China's role in the fentanyl crisis*, The Brookings Institution, p.8 Available at: <https://www.brookings.edu/articles/chinas-role-in-the-fentanyl-crisis/>.

Figure 4: Illicit Fentanyl and Fentanyl Precursor Flows from China.¹²¹



Source: U.S. Drug Enforcement Administration, “Counterfeit Prescription Pills Containing fentanyls: A Global Threat,” July 2016, 3.

As shown in the figure above, Chinese fentanyl exports are also directed to Canada and Mexico, even though Mexico is usually not the final destination of these shipments, here the products are repacked and smuggled into the U.S.

On the other hand, Mexican cartels represent the primary conduit for the drug destined for the United States, adding a challenge to the containment of the spread. Indeed, the illicit nature of these operations makes it difficult to quantify the volume of fentanyl flows from Mexico to

¹²¹ Source: U.S. Drug Enforcement Administration (2016). Counterfeit Prescription Pills Containing fentanyls: A Global Threat. *DEA Intelligence Brief*. p. 3. <https://www.dea.gov/docs/Counterfeit%20Prescription%20Pills.pdf>.

the U.S. According to DEA officials, fentanyl trafficking from Canada is very limited compared to the Mexican.¹²²

China, as mentioned before, has very vast chemical and pharmaceutical industries, and its pharmaceutical market is the second largest in the world. The difference between the Chinese and American market is that while the U.S. produces high-value compounds, China's pharmaceutical industry relies on mass production of generic and usually inexpensive drugs and ingredients.¹²³ The Chinese government has prioritized pharmaceutical production as a "high-value-added industry", it even provided tax rebates to encourage the exports of pharmaceutical companies. As a result of these kind of attitudes and policies, China is currently the largest manufacturer and top exporter in the world of pharmaceuticals ingredients.¹²⁴

A big problem comes from this situation where as a consequence, Chinese law enforcement and drug investigators are unable to regulate the high volume of drugs and chemicals produced in the country and criminals take advantage of inadequate enforcement protocols to reduce unregulated chemicals. Only in 2014, China's State Administration of Work Safety implemented new regulations as an attempt to have more control of nonpharmaceutical business. Anyway, Chinese pharmaceutical and chemical companies continued to shift chemical from legitimate pharmaceutical uses.¹²⁵

The role of China in fentanyl production and export has had serious consequences for public health and safety in the U.S. but also in many

¹²² O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p.6.

¹²³ U.S.-China Economic and Security Review Commission. (2014), "*China's Health Care Industry, Drug Safety, and Market Access for U.S. Medical Goods and Services*", 2014 Annual Report to Congress, Chapter 1, Section 3, p. 127.

¹²⁴ O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p.6.

¹²⁵ *Ibid.* p.8.

other countries. As mentioned before, the easy availability of fentanyl has led to a dramatic increase in overdoses and deaths.

2.2.1 Role of Mexico

To fully understand the crisis, it is important to analyze and consider also the role of Mexico as a key player in this scenario, particularly the Mexican-based Transnational criminal organizations also known as “cartels”.¹²⁶

Historically the country was known for the production and trafficking of natural drugs such as marijuana and heroin. In recent years, with the rise of the demand for synthetic opioids in the U.S. and the chemical precursors arriving from China have transformed Mexico’s role in the drug trade.¹²⁷ There are two main Mexican cartels which are fundamental and have a key role in the production and distribution of Fentanyl: the Sinaloa Cartel, which for years was run by El Chapo, and the Jalisco New Generation Cartel (CJNG).¹²⁸ They are using their well-established networks to export the drug in the U.S. market and import the chemicals from China. Fentanyl production does not rely on plantations but instead cartels operate clandestine laboratories where they synthesize fentanyl using chemical precursors arriving from China. This ability to manufacture fentanyl in small and hidden locations allowed cartels to expand their operations with a low risk of detection. Mexican cartels recruit chemists and sometimes they even fund chemistry degrees for their members to improve techniques. Often, they mix fentanyl with other substances, like heroin or other counterfeit prescription pills, which makes

¹²⁶ Pergolizzi, J., Magnusson, P., LeQuang, J. K., et al. (2021), *Illicitly Manufactured Fentanyl Entering the United States*, *Cureus*, 13(8). p. 6.

¹²⁷ Ricart, P. A. C., Garcia, I. A., (2023), *La Transición Hacia El Fentanilo Cambios y Continuidades Del Mercado de Drogas En México (2015-2022)*, *Revista de Ciencias Sociales*, p.21.

¹²⁸ Ibid.

it more difficult for authorities to detect and control shipments. The potency of fentanyl means that even small quantities can generate a big profit, incentivizing cartels to prioritize its production over traditional drugs.¹²⁹

Experts have spent a lot of time trying to figure out how drug profits move between China, Mexico and the U.S. in a world that operates completely underground where money laundry represents a fundamental aspect that allows the Mexican cartels to make a profit and sustain the business.¹³⁰ For example, the city of Los Angeles is a principal hub for drug money laundering back into Mexico because of its historical ties with it and its strong economy. Cash is often transported by individuals that hide it in cars or in luggage checked on airplanes.¹³¹ Money laundering is extremely complex to trace due to its constantly evolving methods, such as the emergency and rise of cryptocurrencies and anonymous financial transactions.¹³²

The role of Mexico in the fentanyl trade is evident in both the rise of overdose deaths in the U.S. and growing tensions in U.S.-Mexico relations. The Mexican government has taken some measures to combat fentanyl trafficking, including increased seizures and shut down clandestine labs but clearly the enforcement is still inconsistent. Moreover, the fact that IMF and its immediate precursors are sent by express, courier or mail from China to Mexico makes it even more difficult to take control of it. Factors as corruption, weak regulation and the influence of cartels make it very difficult to control fully the production and smuggling of fentanyl. As a result of all these factors, the U.S. continues to pressure Mexico to take more strong and efficient action which is posing a big

¹²⁹ Ibid. pp.27-28.

¹³⁰ Pergolizzi, J., Magnusson, P., LeQuang, J. K., et al. (2021), *Illicitly Manufactured Fentanyl Entering the United States*, *Cureus*, 13(8), p.7.

¹³¹ Ibid.

¹³² Ibid.

diplomatic challenge and a lot of discussions on cross-border security cooperation.¹³³

The appeal of fentanyl to these criminal organizations lies in its low production costs and extreme potency, making it more profitable than traditional drugs like heroin or cocaine. As a result, competition between cartels has intensified, leading also to increased violence and instability in Mexico. This situation has complicated diplomatic relations between the U.S. and Mexico, as Washington pressures the Mexican government to take stronger action against drug cartels. However, Mexico faces significant challenges in combating drug trafficking, as corruption, limited law enforcement resources, and the deep entrenchment of organized crime in its political and economic systems¹³⁴.

The profit potential of Illegally Manufactured Fentanyl is a huge motivation for cartels, who can purchase one kilogram of illicit fentanyl from China for about 5.000 dollars and convert it into products that have a value of 1.5 million dollars.¹³⁵

2.3 Overdose crisis in Canada.

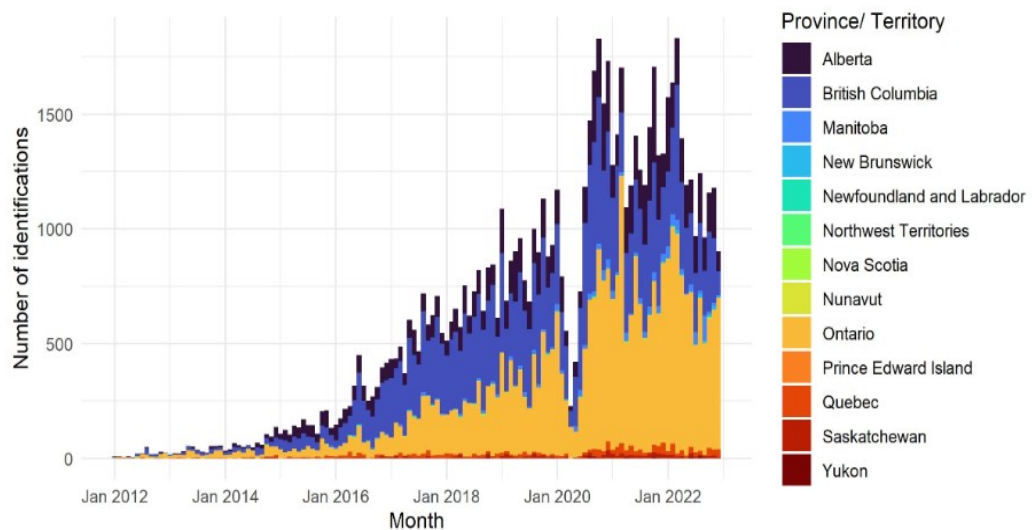
Fentanyl was first identified in Canada in 1989 but it is since 2016 that there has been a sharp increase in the number of fentanyl identifications in the country, as shown by figure 5.

¹³³ Ricart, P. A. C., Garcia, I. A., (2023), *La Transición Hacia El Fentanilo Cambios y Continuidades Del Mercado de Drogas En México (2015-2022)*, Revista de Ciencias Sociales, pp.27-28.

¹³⁴ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, pp. 16-17.

¹³⁵ Pergolizzi, J., Magnusson, P., LeQuang, J. K., et al. (2021), *Illicitly Manufactured Fentanyl Entering the United States*, Cureus, 13(8), p.6.

Figure 5: Fentanyl identifications across time, per province or territory 2012-2022.¹³⁶



Source: Government of Canada. (2023). The evolution of fentanyl in Canada: An 11-year analysis. *Health Canada*.

Clearly, Canada is also strongly being affected by the fentanyl crisis, showing that the problem is much wider and can become a problem elsewhere in the world. The Government reported that the overdose crisis continues to cause serious harm to Canadian families and communities¹³⁷. There are several factors that contribute to the high overdose rates in Canada including the fact that the drug supply is highly toxic and unpredictable, the difficulty for some people to access harm reduction services, treatment and support and often the stigma around substance use prevents people from seeking help.¹³⁸

The government of Canada is addressing the crisis with a public health and safety approach, with the goal of reduce harm, save lives and

¹³⁶ Source: Government of Canada. (2023). *The evolution of fentanyl in Canada: An 11-year analysis*. Health Canada.

¹³⁷ Government of Canada. (2023). *The evolution of fentanyl in Canada: An 11-year analysis*. Health Canada.

¹³⁸ Health Canada (2024), *Federal Actions on the overdose crisis*, Government of Canada.

provide people with enough support. The number of the crisis are scary and show that since 2016 there have been¹³⁹:

- Over 49,105 opioid-related deaths
- Over 45,707 opioid-related hospitalizations
- Over 187,511 opioid-related emergency department visits
- 3 out of 4 opioid-related deaths were among males
- The toxicity and unpredictability of the illegal drug supply continues to be a driver for the crisis and 75% of opioid-related deaths involving fentanyl and/or fentanyl analogues.

Since 2017, the Government has committed more than \$1 billion, in addition to the Bilateral Agreements with provinces, directly to address the illegal toxic drug and overdose crisis. It also implemented programs for prevention and education efforts which support communities and raise awareness to influence the health and well-being of people living in Canada.¹⁴⁰

2.4 Effects on society.

Drug abuse is often seen as a personal struggle, but its effects expand far beyond the individual. It impacts families, communities, and society in ways that raise difficult social and ethical questions. Understanding these broader consequences is crucial for governments that have to develop effective policies and responses.¹⁴¹

The use and abuse of drugs brings many social and ethical issues which are made even more complex because of conflicting views and values in modern societies. Values can be influenced by many factors like religion, society, culture and personal views. Drug abuse has long been a world challenge, but the fentanyl crisis has intensified its impact,

¹³⁹ Ibid.

¹⁴⁰ Ibid.

¹⁴¹ Steiner, W., G., (2025), *Social and ethical issues of drug abuse*, Encyclopaedia Britannica.

especially in the United States. According to the World Drug Report of 2022¹⁴², the most lethal group of drugs remain opioids, with fentanyl playing a major role, responsible for two-thirds of drug related deaths worldwide. In 2021, among U.S. overdose deaths, fentanyl was the top killer for all of the country, ages, race and ethnic groups¹⁴³.

One of the key findings of experts is that prescription opioids, even if in the beginning are intended for legitimate medical use, play a major role in fueling addiction. Many patients who were initially prescribed opioids for pain management later turned to more dangerous and unregulated substances such as heroin and fentanyl. Very often official statistics underestimate the real number of opioid-related deaths because some overdose cases are not properly recorded. Adjusting for underreporting, the CEA estimates that the real number of fatalities in 2015 could be over 41,000 instead of 33,000¹⁴⁴.

Fentanyl is even more of growing concern not only because of its mortality, but also for its effects in society and economy. What is even worrying is the rise of deaths between young people in which the overdoses doubled between 2019 and 2021. Experts believe that the reason for this is to be found in the ease with which through social media they are able to purchase counterfeit pills.¹⁴⁵ Drug abuse in general occurs frequently among young people in the 15-35 age group, which includes those who are about to enter or have already entered the workforce. Illicit drug consumption limits the chances of entering the workforce and it may

¹⁴² UNODC (2022), *World Drug Report 2022*, United Nations publication.

¹⁴³ Spencer, M. R., Warner, M., Cisewski, J. A., Miniño, A., Dodds, D., Perera, J., & Ahmad, F. B. (2023), *Estimates of drug overdose deaths involving fentanyl, methamphetamine, cocaine, heroin, and oxycodone: United States, 2021 (Vital Statistics Rapid Release, Report No. 27)*, National Center for Health Statistics. Available at: <https://dx.doi.org/10.15620/cdc:125504>

¹⁴⁴ The Council of Economic Advisers (2017), *The Underestimated Cost of the Opioid Crisis*, Center for Health Decision Science, p.4. Available at: <https://www.whitehouse.gov/sites/whitehouse.gov/files/images/The%20Underestimated%20Cost%20of%20the%20Opioid%20Crisis.pdf>.

¹⁴⁵ Steiner, W., G., (2025), *Social and ethical issues of drug abuse*, Encyclopaedia Britannica.

create a dangerous vicious cycle.¹⁴⁶ The links between low productivity and drug taking behavior are well established, depending on type and quantities of drug and the performance requirements of the job. Not only young people but also other demographics are more vulnerable to be harmed by opioids, such as military veterans, people with disabilities, renters, those without health insurance.¹⁴⁷

Another immediate consequence of drug abuse is the impact on public health systems. Treating addiction, overdoses and long-term health complications requires many medical resources. Healthcare systems are overwhelmed by fentanyl-related emergencies. Very often hospitals struggle to keep up with the rising demand of treatments for overdose. The crisis is also contributing to the spread of other diseases, such as HIV and hepatitis.¹⁴⁸

This also affects public safety since illicit drug markets are often linked to violence and organized crime which contribute to the instability of affected communities. Many addicts, desperate to sustain their habits, turn to theft, fraud and violent crime. At the same time, the illegal drug trade fuels organized crime, corruption and dangerous black markets. This creates a cycle where communities with high addiction rates often experience higher crime, making neighborhoods unsafe and undermining trust in law enforcement.¹⁴⁹

In fact, law enforcement faces challenges in controlling the distribution of the drug and a lot of cities have reported an increase in drug-related crimes, as theft and violent incidents.¹⁵⁰

¹⁴⁶ United Nations International Drug Control Programme (1998) *Economic and Social Consequences of Drug Abuse and Illicit trafficking*, U.S department of justice, p.16.

¹⁴⁷ Steiner, W., G., (2025), *Social and ethical issues of drug abuse*, Encyclopaedia Britannica.

¹⁴⁸ UNODC (2022), *World Drug Report 2022*, United Nations publication.

¹⁴⁹ Steiner, W., G., (2025), *Social and ethical issues of drug abuse*, Encyclopaedia Britannica.

¹⁵⁰ United Nations International Drug Control Programme (1998) *Economic and Social Consequences of Drug Abuse and Illicit trafficking*, U.S department of justice, p.3.

2.4.1 Economic and political impact.

Based on studies made before 1995, the United States Department of Labor suggested that drug use in the workplace was going to cost to American business 1.4% of GDP.¹⁵¹ According to many reports, scholars calculated that the opioid epidemic costs the United States nearly 1.5\$ trillion in 2020, so 7% of gross domestic product (GDP). Representing an increase of one-third compared to the year 2017.¹⁵² The reason of this sharp increase is because of the COVID-19 pandemic which disrupted access to treatment, support services and in general put a lot of pressure on the U.S. health care system.¹⁵³ This sum includes the price of health care to treat overdoses, the cost of fighting fentanyl trafficking and pursuing criminal justice efforts, and also lost productivity in the workforce, the economic costs of human lives lost to overdose and the reduced value of life for overdose survivors.¹⁵⁴

In November 2017, the Council of Economic Advisers of the United States published a report on the *Underestimated Cost of the Opioid Crisis*. After an analysis conducted on the year 2015, data showed that in that year over 50,000 Americans died of a drug overdose, of which 63% involved opioids.¹⁵⁵ This report provides a clear analysis of the financial and social impact of the opioid epidemic and highlights the fact that for many years, estimates underestimated the true cost of the crisis. That happened because they did not fully account for the economic value of lives lost due to opioid overdoses. The CEA uses the “value of a statistical

¹⁵¹ Ibid. p.17.

¹⁵² Joint Economic Committee (2022), *JEC analysis finds opioid epidemic cost U.S. nearly \$1.5 trillion in 2020*, United States Congress. Available at: <https://beyer.house.gov/news/documentsingle.aspx?DocumentID=5684>.

¹⁵³ Ibid.

¹⁵⁴ Klobucista, C., Ferragamo, M., (2023), *Fentanyl and the U.S. opioid Epidemic*, Council on foreign relations.

¹⁵⁵ The Council of Economic Advisers (2017), *The Underestimated Cost of the Opioid Crisis*, Center for Health Decision Science, p.2. Available at: <https://www.whitehouse.gov/sites/whitehouse.gov/files/images/The%20Underestimated%20Cost%20of%20the%20Opioid%20Crisis.pdf>.

life” (VSL), which is a standard economic method used by U.S. federal agencies, to measure the total loss caused by opioid-related deaths.¹⁵⁶

Using this method, the report estimates that the cost of the opioid epidemic in 2015 was approximately \$504 billion, equivalent to 2.8% of the U.S. GDP for that year. This means more than six times higher than earlier calculations, which mainly focused on healthcare costs, lost wages, and criminal justice expenses. The report argues that while these previous studies provided useful insights, they failed to reflect the full economic damage caused by opioid addiction, particularly the devastating impact of overdose-related deaths.

The opioid crisis has placed a significant burden on the U.S. economy and there are areas where the crisis has had major financial consequences. One of the most significant is the increased demand for healthcare services. People struggling with opioid addiction require frequent medical care, including emergency treatments for overdoses, long-term addiction therapy, and mental health support. Hospitals and emergency services are overwhelmed by the high number of overdose cases, leading to rising healthcare costs for both individuals and the government¹⁵⁷. Additionally, the criminal justice system has had to allocate more resources to addressing opioid-related crimes, including drug trafficking, illegal distribution, and theft committed by individuals struggling with addiction. Law enforcement agencies have increased efforts to combat the spread of opioids, but the scale of the crisis makes it difficult to fully contain the problem¹⁵⁸. Law enforcement agencies indeed must allocate significant resources to deal with the fentanyl trafficking, arrest individuals and manage the growing prison population linked to substance abuse.¹⁵⁹

¹⁵⁶ Ibid, p.3.

¹⁵⁷ Ibid, p.4.

¹⁵⁸ Ibid. p.5

¹⁵⁹ UNODC (2022), *World Drug Report 2022*, United Nations publication.

Another major economic consequence is the impact on workforce productivity. Many individuals suffering from opioid addiction are unable to maintain stable employment, leading to higher unemployment rates and lower overall productivity. Businesses face challenges as employees dealing with addiction experience absenteeism, lower performance, and increased healthcare costs. The loss of productivity has negative effects across industries, affecting economic growth and putting more pressure on public resources. Indeed, the loss of workforce productivity happens because many individuals are unable to maintain stable employment, leading to higher unemployment rates and economic instability in affected regions.¹⁶⁰ According to the CEA, the total cost of non-fatal opioid misuse, which includes lost wages, healthcare expenses, and criminal justice costs, was estimated at \$72.3 billion in 2015 alone. However, experts emphasize that fatal overdoses remain the most costly aspect of the crisis, as the economic loss caused by premature deaths is heavier than other financial impacts.¹⁶¹

The U.S. government has taken many actions to combat the crisis, including stricter regulations on opioid prescriptions, increased funding for addiction treatment programs, and efforts to disrupt illicit drug trafficking. The CEA report's economic analysis underline the idea that the opioid crisis is not just a public health emergency but also a major economic and geopolitical challenge that requires coordinated efforts at both the national and international levels.¹⁶² Also, it highlights how the opioid epidemic has evolved into one of the most pressing issues facing the United States. It demonstrates that the crisis extends beyond individual addiction and affects the economy, healthcare system, workforce, and law enforcement.

¹⁶⁰ Ibid.

¹⁶¹ The Council of Economic Advisers (2017), *The Underestimated Cost of the Opioid Crisis*, Center for Health Decision Science, p.7.

¹⁶² Ibid.

This crisis has also influenced domestic politics within the United States, where policymakers debate between stricter border controls and stricter penalties for drug traffickers versus expanding access to addiction treatment and harm reduction programs. The issue is today a focal point in political campaigns, where leaders propose different strategies to combat the epidemic.

The city of San Francisco in the state of California, is an important case study of how this drug is devastating cities with a huge impact in the society. It is easy to observe that one of the richest cities in the world is going through a humanitarian disaster, where every day two people on average die from a drug overdose.¹⁶³ By just walking on the streets, you can see a large number of people abusing it, and almost everywhere fentanyl consumption is evident. Politicians have long been debating on how to deal with this emergency, some arguing that more investments are needed in mental health care and housing, others fighting for a harder and less permissive approach¹⁶⁴. In 2020 and 2021, the city recorded approximately 1,310 drug overdose deaths, double the fatalities from the COVID-19 emergency during the same period.¹⁶⁵

The impact of fentanyl abuse is most visible in neighborhoods like the Tenderloin and South of Market, where many victims have been found within a few blocks of each other. These areas have long struggled with social challenges and the fentanyl crisis aggravated the issues.¹⁶⁶

The crisis extends beyond individual health, and it is currently affecting the whole community. The presence of open-air drug markets, especially in Tenderloin is clear. This leads to increased crime and pressure

¹⁶³ BBC News (2022), *A city in crisis: How fentanyl devastated San Francisco [Video]*, YouTube. <https://www.youtube.com/watch?v=GWBzxr3c29s>.

¹⁶⁴ Associated Press (2024), *San Francisco grants new mayor 'unprecedented' powers to battle fentanyl crisis*, AP News. <https://apnews.com/article/a9ddcc1cc726551403c4245d88d91e79>.

¹⁶⁵ Thadani, T., Jung, Y. (2022), *A disaster in plain sight*, San Francisco Chronicle, p. 1.

¹⁶⁶ Ibid.

on city resources. Moreover, it deepened political divisions over how to address the issue effectively.

The current mayor of the city Daniel Lurie expressed the intention to add more shelter beds and hire health and safety workers without long delays. At the same time, Supervisor Matt Dorsey wants a stricter approach, such as increasing the number of arrests of those who abuse it on the streets. Clearly an idea of a one-size-fits-all approach to the problem is difficult but the city hopes to get the fentanyl problem under control by mixing law enforcement, public health efforts and expert advice¹⁶⁷.

One of the major challenges in addressing the fentanyl crisis in the U.S. is the limited access to effective treatments for opioid use disorder. According to NIDA, National Institute on Drug Abuse, medications like methadone and buprenorphine are very effective to help people recover from opioid addiction, but their use is still too low.¹⁶⁸ Methadone has shown promising results in treating individuals addicted to fentanyl and studies indicate that patients who start the treatment while using fentanyl are more likely to remain in treatment compared to those who don't receive medication assisted therapy.¹⁶⁹

However, methadone is still very restricted in the U.S. and patients are required to visit specialized opioid treatment programs regularly. These restrictions create barriers for some people, such as those living in rural areas, which may struggle to reach centers to receive treatment.¹⁷⁰

The stigma associated with Methadone is an issue because it discourages people from seeking treatment, increasing the risk of continued drug use and overdose deaths. Expanding access to methadone could help reduce fentanyl-related deaths, concerns about a potential

¹⁶⁷ Associated Press (2024), *San Francisco grants new mayor 'unprecedented' powers to battle fentanyl crisis*, AP News. <https://apnews.com/article/a9ddcc1cc726551403c4245d88d91e79>.

¹⁶⁸ Volkow, D., (2024), *To address the fentanyl crisis, greater access to methadone is needed*, National Institute on Drug Abuse, p.4.

¹⁶⁹ Ibid.

¹⁷⁰ Ibid.

misuse and overdose have worried policymakers to loosen restrictions.¹⁷¹ However, many researchers suggested that increased availability of methadone do not lead to higher overdose rates. This suggests that making methadone more accessible could be a safe and effective strategy for the crisis.¹⁷²

Understanding the international dimension of the fentanyl crisis is essential to fully understand also its impact. The next chapter analyzes the global efforts to regulate fentanyl production and distribution. By examining the legal frameworks, enforcement strategies and negotiation it will be easier to understand whether cooperation or confrontation will define the future of U.S.-China relations.

¹⁷¹ Ibid.

¹⁷² Ibid.

CHAPTER 3

Transnational Cooperation and efforts

3.1 Evolution of International Efforts against Drug Trafficking in History.

In public international law, over the past two centuries, the anti-narcotics-regime has shifted from a liberalized model to an administrative model and later to a prohibitionist model. As mentioned in the first chapter, during the 19th century the United Kingdom was the leader in terms of opium supplier through international trade. The British Empire made enormous profits by exporting opium to other countries as China. When the Quing Dynasty attempted to ban opium the First Opium War broke down, in order to protect their economic interests. Indeed, many powerful nations at the time saw narcotics trade as a business and would do anything in order to resist restrictions and protect their profits.

In the beginning of the 20th century, the Western attitude towards narcotics changed a lot. Many countries recognized the danger of widespread drug use and in response to it, many international agreements were introduced to regulate the production and sale of drugs: first the *1912 Hague Convention* limited the production, sale, and use of drugs like opium, heroin, morphine and cocaine.¹⁷³ Later, the *1925 Geneva Convention* obligated countries to report their import and export statistics for controlled substances.¹⁷⁴ The *1931 Geneva Convention* which expanded regulations by restricting the trade even with non-signatory

¹⁷³International Opium Convention, 1912, (1912). Available at: <https://www.unodc.org/unodc/en/frontpage/the-1912-hague-international-opium-convention.html>.

¹⁷⁴International Opium Convention, 1925, (1925). Available at: https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=VI-5&chapter=6&clang=en.

countries¹⁷⁵, and the *1948 Paris Protocol* which required nations to monitor and report on new synthetic drugs that could be dangerous or addictive¹⁷⁶.

Clearly, during this period, the focus was mainly on administrative control, meaning that governments regulated narcotics for medical use, but drug trafficking was not yet criminalized.

The second half of the 20th century represents a change towards a much stricter law that went from regulation to criminalization of the illicit drug trade. During this period several major agreements were made such as the *1961 Single Convention on Narcotic Drugs*, which limited the production and trade of narcotics to medical purposes and required countries to criminalize illegal drug production and trafficking.¹⁷⁷ In addition, the *1988 United Nations Convention Against Illicit Drug Trafficking* expanded criminal offenses, making activities such as money laundering, possession and distribution of drug-related funds illegal. This convention transformed the anti-narcotics approach from the administrative model to the prohibitionist model against illicit production and trade of narcotics.¹⁷⁸ Finally, *the 2000 convention against transnational organized crime* strengthened the fight against drug trafficking by making participation in criminal drug organizations and corruption punishable offences¹⁷⁹.

¹⁷⁵ Convention for limiting the Manufacture and regulating the Distribution of Narcotic Drugs, July 13, 1931. Available at: <https://archives.ungeneva.org/convention-pour-limiter-la-fabrication-et-reglementer-la-distribution-des-stupefiants-geneve-13-juillet-1931-texte-de-la-convention-du-protocole-et-de-lacte-final>.

¹⁷⁶ Protocol Bringing under International Control Drugs Outside the Scope of the Convention of 13 July 1931 for Limiting the Manufacture and Regulating the Distribution of Narcotic Drugs, Nov. 19, 1948.

¹⁷⁷ Single Convention on Narcotic Drugs. Art. 3, (1961). Available at: <https://www.unodc.org/unodc/en/treaties/single-convention.html>.

¹⁷⁸ Zhang, L., An, J. (2020), *Revisiting the regimes of public international law and the WTO law on countering narcotic drug trafficking*, China & WTO Review, 6(1). p. 196.

¹⁷⁹ Convention against Transnational Organized Crime and the Protocols Thereto. (2000). Available at: <https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>.

In general, the rise of global trade has also led to a global increase in illicit trade in counterfeit and pirated goods and consequently also in narcotics trafficking, with the WTO promoting free trade and indirectly facilitating it. In 2019, global illicit trade amounted to USD 464 billion, meaning 2,5% of world trade.¹⁸⁰ The world is indeed experiencing a remarkable explosion in trade. For these reasons, some mechanisms have been developed in order to allow countries to fight illegal drug trafficking, but they also come with some weaknesses. All these agreements represent a global commitment to treating drug trafficking as a serious crime rather than just an administrative issue. Anyway, the application and respect of these agreements depends strongly on each country's national laws and desire to cooperate. Many nations struggle with weak enforcement, corruption and limited resources which makes it difficult to implement international drug policies. Other nations may see the problem as far and not significant for their security and safety, having less interest in cooperate.

3.2 U.S.-China cooperation over fentanyl

The U.S. Drug Enforcement Administration (DEA) established a formal relationship with its Chinese counterpart which is the National Control Bureau in 2002. Since the beginning of the spread, the U.S. government adopted a series of internal policies to combat drug trafficking and tried to work bilaterally with China to suppress the production and trafficking. In recent years they created also bilateral working groups, such as the U.S.-PRC Bilateral Drug Intelligence Working Group and the Counter Narcotics Working Group. Over the years, their meetings

¹⁸⁰OECD (2021), *Global trade in fakes: A worrying threat*, OECD Publishing. https://www.oecd.org/en/publications/global-trade-in-fakes_74c81154-en.html.

produced some results, but deeper cooperation has remained constrained.

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National U.S. policies included the establishment of the Drug Enforcement Administration's (DEA) Heroin/Fentanyl Task Force and Fentanyl Signature Profiling Program, which created a database of substances that contain fentanyl, collects samples from U.S. seizures and it's used to trace a fentanyl product to a region of China. Moreover, they adopted in 2017 an act called "Stop the Importation and Trafficking of Synthetic Analogues" which later was incorporated into the 2018 "Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities Act", a law that allowed the provision of electronic data of international mail shipments to help intercept illicit fentanyl.¹⁸²

During the Obama administration, the U.S. tried to engage China on regulation and enforcement of illicit drug sales into the United States and after many efforts he persuaded China to start scheduling some fentanyl analogues. Moreover, they convinced China to change domestic regulations to allow damage done in another country to be a criterion for regulating a drug domestically, which was a fundamental step for the collaboration between the two countries.¹⁸³

On the other hand, during the last ten years, the trade war between China and the U.S. has been escalating and worsening. Especially since the election of President Donald Trump, that during his first term announced the intention to impose additional tariffs on Chinese imports.¹⁸⁴ Indeed, in fall 2018, the U.S. diplomats in Beijing identified only two subjects' areas of cooperation: wildlife trafficking and counternarcotics.

¹⁸¹ Felbab-Brown, V. (2023), *China's role in the fentanyl crisis*, The Brookings Institution, p.22. Available at: <https://www.brookings.edu/articles/chinas-role-in-the-fentanyl-crisis/>

¹⁸² Ibid. p.8.

¹⁸³ Ibid.

¹⁸⁴ Ibid. p.22.

Also, the beginning of the pandemic COVID-19 which originated in China, further pushed the two countries towards a “new Cold War”.¹⁸⁵

One of the reasons for applying these new tariffs, among other things, is that the U.S. government believed that the Chinese government has not done enough to stop the illicit flow of fentanyl into the United States, according to what they declared. After this, countering narcotic drug trafficking has been put under the attention of the international community.¹⁸⁶ This approach highlights the connection between international trade and drug control efforts. Some experts argue that this type of economic pressure could help reduce the illegal trafficking, others that might hurt diplomatic relations and economic stability without actually stopping the illegal drug flow.¹⁸⁷

Anyways, as shown by the experience, international cooperation is fundamental to address the crisis. In recent years, the U.S. and China have made some slow progress in working together and the two governments have been trying to take steps in order to fight against the illicit chemical flows. Their cooperation over this problem has become a major issue in their diplomatic relations. They have done some major actions which are important to underline.

For example, in October 2015, China added 116 synthetic chemicals to its list of controlled chemical substances.¹⁸⁸ From 2015 to 2018, China has banned 175 chemicals related to synthetic drugs, 26 of which were fentanyl analogues and several of which were fentanyl precursor agents.¹⁸⁹ Then, after the G20 summit of September 2016, China

¹⁸⁵ Ibid.

¹⁸⁶ O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p.6.

¹⁸⁷ Ibid.

¹⁸⁸ Ibid. p.6

¹⁸⁹ Madison, D. K., (2018), *Tackling Fentanyl: The China Connection*. Congressional testimony, Washington DC. p.8. Available at: <https://docs.house.gov/meetings/FA/FA16/20180906/108650/HHRG-115-FA16-Transcript-20180906.pdf>.

committed to targeting U.S.-bound exports of substances controlled in the U.S. but not in China. During the summit, they also agreed to improve coordination and information sharing on controlled substances and chemicals of concern.¹⁹⁰ In 2017, the Chinese government have done some efforts in order to close online vendors and according to their own reports, they managed to close 1,700 websites and arrested 21,000 people. Moreover, the same year Chinese law enforcement agencies destroyed 317 clandestine labs that were producing a variety of illicit drugs after investigating 140,000 drug cases which also led to 169,000 arrests.¹⁹¹

In 2018, the same agencies investigated 109,600 drug-related cases, destroyed 268 clandestine labs and made 137,400 arrests and seized 11,000 metric tons of precursors agents.¹⁹² Under U.S. request, the Chinese government also increased inspections of postal shipments and signed an agreement with U.S. Postal Service to provide advanced electronic data on parcels that were sent to the United States. However, the piecemeal approach to the ban and scheduling frustrated U.S. law enforcement officials, because illegal manufacturers could easily circumvent the ban by slightly changing the chemical formula.¹⁹³

A big change in China regulations arrived in 2019, when they classified all fentanyl related substances as controlled drugs, banning the production and sales within China and abroad without a specific and special license issued by the authorities. In April 2019, before new regulations took effect on May 1, Liu Yuejin, deputy director of China's

¹⁹⁰ O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p.6.

¹⁹¹ "2019 International Narcotics Control Strategy Report — Volume I: Drug and Chemical Control," (*Washington, DC: U.S. Department of State, March 28, 2019*), p. 134.
<https://www.state.gov/2019-international-narcotics-control-strategy-report/>.

¹⁹² "2020 International Narcotics Control Strategy Report — Volume I: Drug and Chemical Control," (*Washington, DC: U.S. Department of State, March 2, 2020*), p. 118.
<https://www.state.gov/2020-international-narcotics-control-strategy-report/>.

¹⁹³ Felbab-Brown, V. (2023), *China's role in the fentanyl crisis*, The Brookings Institution, p.9. Available at: <https://www.brookings.edu/articles/chinas-role-in-the-fentanyl-crisis/>

National Narcotics Control Commission (NNCC), announced some enforcement measures that included:

- Investigating illegal fentanyl production sites.
- Removing online content related to fentanyl and other illegal substances.
- Blocking online communication and transactions used by criminals.
- Requiring parcel delivery services to verify sender identities and increasing inspections of international shipments.
- Creating special teams to investigate fentanyl production and trafficking.
- Enhancing cooperation and information-sharing with other countries, including the U.S., to combat drug smuggling networks.
- Improving technology to detect and identify controlled substances.¹⁹⁴

If properly enforced, these measures could have supported U.S.-China cooperation in fighting illegal synthetic opioid production and trafficking. However, despite stricter regulations and China's stated commitment to enforcement, the system remains weak. The rapid growth of chemical production businesses, the large scale of inspections needed, limited resources for monitoring, and a fragmented regulatory system make enforcement challenging.¹⁹⁵

After declaring in 2022 the stop of collaboration due to some sanctions posed by the US onto Chinese companies, more recently, at the 2023 Woodside Summit, U.S. and Chinese leaders agreed to resume

¹⁹⁴ Sacco L. N., Finklea, K., Lawrence, S. V., Rosen, W. L., Seelke, C. R. (2019), *The Opioid Epidemic: Supply Control and Criminal Justice Policy*, Congressional Research Service. pp. 27-28. <https://crsreports.congress.gov/product/pdf/R/R45790>.

¹⁹⁵ Felbab-Brown, V. (2023), *China's role in the fentanyl crisis*, The Brookings Institution, p.9. Available at: <https://www.brookings.edu/articles/chinas-role-in-the-fentanyl-crisis/>

collaboration on counter-narcotics enforcement.¹⁹⁶ This cooperation has led to a slight decrease in fentanyl-related deaths in the U.S., showing that joint efforts can have a real impact. But challenges remained and political tensions between the two nations have sometimes slowed the progress.

Later, in the beginning of December 2024, the Biden administration posed a ban on the sales of semiconductor manufacturing equipment to China, listing also 140 Chinese companies to a list of companies with which U.S. cannot do business, both individuals or companies. It seems that the objective of the Chinese government is to reduce the commercial trades as a response to the American sanctions against the Chinese companies.¹⁹⁷ In response to these measures, China soon put restrictive measures on the sale of minerals to the U.S. as gallium, germanium and antimony which are essential materials for semiconductor manufacturing, infrared technology, fiber optic cables and solar cells. This move has a big impact on the U.S, economy since they depend on imports from China for 54% of germanium and gallium and 63% of antimony consumption.¹⁹⁸ This could cost 3.4\$ billion to the United States, with economic losses that would impact the previous mentioned manufacturing industries, leading to a significant increase in mineral prices.

The fentanyl issue again ties in with this scenario. In the same December 2024, the United States announced that they intended to institute bipartisan legislation, with the support of both Democrats and Republican, which blames China for the fentanyl crisis¹⁹⁹. The U.S. government believes that China is not doing enough to stop the illegal production. Specifically, the Chinese Communist Party makes itself

¹⁹⁶ Arsenault, M. (2025), *China-US Cooperation on the Fentanyl Crisis Is Very Possible*, The Diplomat, p. 2.

¹⁹⁷ Tresca, A. (2025), *Dalle Tensioni commerciali al Fentanyl: Lo scontro Cina-USA*, Istituto Analisi Relazioni Internazionali.

¹⁹⁸ Lu, M., Rao, P. (2023) *U.S. Geological Survey, Mineral Commodity Summaries*. USGS Publications Warehouse. p.78.

¹⁹⁹ Tresca, A. (2025), *Dalle Tensioni commerciali al Fentanyl: Lo scontro Cina-USA*, Istituto Analisi Relazioni Internazionali.

responsible for directly subsidizing precursors and analogs, without prosecuting or monitoring exporters and platforms which are responsible for the sale of these substances.²⁰⁰ While Washington has increased cooperation with Mexico on border security and counternarcotics operations, efforts to completely engage with China on the issue have clearly been far more difficult.

The ongoing U.S.-China trade war and diplomatic tensions over other issues, such as technology, U.S. military presence in the Pacific, and Taiwan, have made cooperation on fentanyl regulation even more complicated. As a result, the fentanyl crisis remains a significant point of conflict in U.S.-China relations, with both sides blaming each other for the problem while failing to find a lasting solution.²⁰¹

On January 2, 2025, China announced new restrictions on 28 U.S. companies, which helped to worsen even more the relations between the two states. The measures specifically include a ban on Chinese companies to sell dual-use items, civilian and military, to U.S. companies targeted by the measure. Some of them are working in the defense sector as *Lockheed Martin*, *General Dynamics*, *Raytheon* and others. Through the Ministry of Commerce of China's Announcement, these companies were added to the list, moreover, the Ministry announced the addition of 10 U.S. defense companies to China's Untrustworthy Entities List that prohibits them from doing business with the country. The Ministry justify these decisions as a way to safeguard national security and interests, fulfill international obligations especially those related to nonproliferation.²⁰²

The official statement of the government of China over the U.S.-China cooperation on drug control is:

²⁰⁰ Ibid.

²⁰¹ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 20.

²⁰² Tresca, A. (2025), *Dalle Tensioni commerciali al Fentanyl: Lo scontro Cina-USA*, Istituto Analisi Relazioni Internazionali.

*“Drug law enforcement is a central focus of cooperation between China and the US. China upholds a clear and principled position on this matter: It is committed to cooperation based on equality and mutual respect but firmly opposes the US imposition of unlawful sanctions and unreasonable pressure on China on the pretext of responding to fentanyl-related issues. The drug law enforcement agencies of both sides have jointly cracked major cases of smuggling, manufacturing, and trafficking, including the Wang *xi case and the Chen *ping case, and arrested relevant suspects in their respective territories and sentenced them in accordance with the law. These are all successful examples of cooperation between law enforcement agencies of the two countries.”²⁰³*

This scenario shows that international cooperation has had important results, but much more efforts are needed to disrupt fentanyl supply chains and reduce demand.

3.3 Problems in China’s approach.

China is an example of the challenge of how international laws are applied differently depending on each country’s own laws. Even if the country has strict domestic drug laws as the RANP, Regulation on the Administration of Narcotic Drugs and Psychotropic Drugs²⁰⁴, and the CLC, Criminal Law Code²⁰⁵, the application of them remains difficult. Agencies like the National Medical Products Administration (NMPA) are responsible for regulating the production of legal drugs, but there are few inspectors to monitor the thousands of pharmaceutical companies that operate in China. Moreover, corruption and poor oversight in the chemical

²⁰³ Xinhua. (2025), *Controlling Fentanyl-Related substances- China’s Contribution*, The State Council Information office, the people’s republic of China. Available at: http://english.scio.gov.cn/whitepapers/2025-03/05/content_117746462_9.html

²⁰⁴ The PRC State Council, Regulation on the Administration of Narcotic Drugs and Psychotropic Drugs (2005).

²⁰⁵ The PRC National People’s Congress, Criminal Law Code (2017).

industry allows some of them to sell illegally precursor chemicals that are used to manufacture drug, for example to Mexican cartels which as previously seen use it to manufacture fentanyl.²⁰⁶ China has very strict drug laws, and in serious cases, drug traffickers can even face the death penalty. However, the gaps in the law and weak enforcement made it easier for people to produce synthetic opioids like fentanyl without being noticed by the authorities.²⁰⁷

Another major issue is the lack of specialized drug enforcement personnel. In 2014 China only had 16,000 drug enforcement officers across 660 municipality security offices, which means that each city had fewer than 30 officers dedicated to drug control. This situation made it difficult to combat large-scale drug trafficking.²⁰⁸ Very often, there are government agencies with overlapping responsibilities and a lack of coordination. Inspections on pharmaceutical facilities have usually been concentrated in big coastal cities, but illicit production is present also in poor rural areas.²⁰⁹

The impression that experts have is that national level enforcement in China tends to be selective and deployed particularly as a method to strengthen central power rather than a mechanism to sustain the rule of law and enforce regulations.²¹⁰

Furthermore, China's approach to drug trafficking in the West is influenced by its economic and geopolitical priorities. The Chinese government has made the growth of the pharmaceutical and chemical

²⁰⁶ Zhang, L., An, J. (2020), *Revisiting the regimes of public international law and the WTO law on countering narcotic drug trafficking*, China & WTO Review, 6(1), p. 197.

²⁰⁷ Myers, S. L. (2019) *China Cracks Down on Fentanyl. But Is It Enough to End the U.S. Epidemic?* The New York Times. Available at: <https://www.nytimes.com/2019/12/01/world/asia/china-fentanyl-crackdown.html>.

²⁰⁸ Zhang, L., An, J. (2020), *Revisiting the regimes of public international law and the WTO law on countering narcotic drug trafficking*, China & WTO Review, 6(1), p. 197.

²⁰⁹ O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p.8.

²¹⁰ Felbab-Brown, V. (2023), *China's role in the fentanyl crisis*, The Brookings Institution, p.11. Available at: <https://www.brookings.edu/articles/chinas-role-in-the-fentanyl-crisis/>

industries part of its “*Made in China 2025*” industrial policy, which is an initiative that aims to make China a leader in high-tech manufacturing, including biopharmaceuticals.²¹¹ The plan proposes a three-step strategy to transform China into a leading manufacturing power by the year 2049, year that marks the 100th anniversary of the founding of the People’s Republic of China. This will cover 10 specific key production sectors including biomedicine and high-end medical equipment.²¹²

Consequently, the Chinese pharmaceutical and chemical industries have grown rapidly due to strong government support, through subsidies, tax incentives and financial support from the central government.²¹³ According to China Food and Drug administration’s 2018 Annual Report on Drug Supervision Statistics, China has 4,441 drug manufacturing firms and more than 500,000 businesses that are involved in the pharmaceutical supply chain.²¹⁴ Moreover, the Chinese government with its Five Years Plan (2015-2020), has planned to make the biotech sector to contribute at least 4% of the GDP, and in order to achieve this goal, China has encouraged large-scale exports of pharmaceuticals and chemical precursors.²¹⁵ By doing so, China’s economic and geopolitical ambitions are supported and the U.S. dominance in high-tech manufacturing is challenged.

There are companies that apparently operates within the Chinese law but that are violating international export controls by shipping

²¹¹ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 16.

²¹² The State Council of the People's Republic of China. (2015), ‘*Made in China 2025 plan issued.*’ The State Council. Available at: https://english.www.gov.cn/policies/latest_releases/2015/05/19/content_281475110703534.htm

²¹³ Westhoff, B., (2019), *Fentanyl, Inc.: How Rogue Chemists Are Creating the Deadliest Wave of the Opioid Epidemic*, Atlantic Monthly Press, p. 275.

²¹⁴ “What Are the Changes in the 2018 Annual Report on Drug Regulatory Statistics Compared with the Previous Year?,” *Pharmaceutical Station*, May 13, 2019, <http://3g.menet.com.cn/Article/Detail?aid=138774>.

²¹⁵ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 17.

restricted substances to overseas markets. The three main types of Chinese companies that are involved in synthetic drug production are²¹⁶:

- I. Precursor Chemical Producers: which are companies that legally produce chemical precursors and more substances that are usually banned in the Western Hemisphere but that remain legal in China.
- II. New Psychoactive Substance Suppliers: which are companies that operate legally in China but manufacture drugs like synthetic cannabinoids that are illegal in the Western Hemisphere and remain unregulated under Chinese law.
- III. Illegal Drug Manufacturers: which are those who illegally produce synthetic drugs which are illegal both in China and in the Western Hemisphere.

All this evidence supports the beliefs of those who think that this government support has also facilitated the illegal drug suppliers that provide Mexican cartels and drug trafficking organizations with the material to manufacture and distribute fentanyl and in general synthetic drugs across the Western Hemisphere.²¹⁷

3.3.1. Why does China seem unwilling to cooperate enough?

According to Jorge Guajardo, the Mexican Ambassador to China between 2007 and 2013, Chinese authorities were not interested in controlling precursor exports before 2015. He stated that Chinese officials saw no reason to limit their own chemical industry's exports to Mexico and showed no intention to cooperate in restricting the flow of chemicals.

²¹⁶ Westhoff, B., (2019), *Fentanyl, Inc.: How Rogue Chemists Are Creating the Deadliest Wave of the Opioid Epidemic*, Atlantic Monthly Press, p. 275.

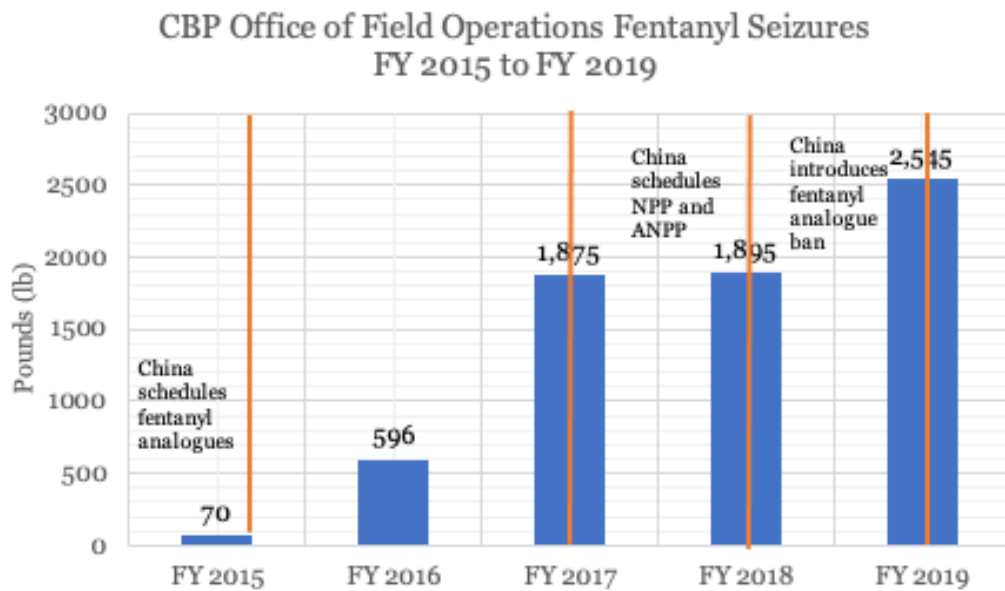
²¹⁷ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 18.

²¹⁸ Today, the Chinese government's reaction to the export of large quantities of illegal drugs and precursor chemicals is primarily influenced by external pressure and is marked by a lack of credible commitment to curtail the flow of these substances.²¹⁹

While China has since introduced stricter regulations and stronger enforcement rhetoric, these efforts have had little impact compared to what the U.S. was expecting. In fact, between 2015 and 2019, the amount of methamphetamine trafficked across the U.S.-Mexico border increased by 230%, showing that the new policies failed to slow down drug production.

²²⁰

Figure 6: Fentanyl seizures at ports of entry at the U.S.-Mexico border from CBP’s Enforcement Statistics, 2012-2019.²²¹



Source: U.S. Customs and Border Protection.

²¹⁸ Westhoff, B., (2019), *Fentanyl, Inc.: How Rogue Chemists Are Creating the Deadliest Wave of the Opioid Epidemic*, Atlantic Monthly Press, p. 288.

²¹⁹ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 3.

²²⁰ Ibid. p. 19.

²²¹ Note: Year to date seizure in FY 2020 are on par, if not slightly higher, then seizures in FY 2019. The orange line represents a year when enforcement action was taken.

Between 2018 and 2019, fentanyl trafficking through Mexico rose by 34% and seizures in 2020 exceeded those of 2019. One of the possible reasons for China's increased attention to fentanyl control can be its connection to trade negotiations with the U.S. that began in 2018.²²² The Chinese government claims to be committed to international drug control by introducing regulatory measures to limit the export of dangerous chemicals but these efforts often conflict with China's economic goals.

As mentioned, only in 2019 China's change in regulations, controls have been imposed on the entire class of fentanyl substances but before that both fentanyl and others synthetic drugs were easily accessible, and anyone could buy it even from a website. Throughout 2019, the United States and China cooperated in three joint investigations, which is a very tiny number compared to the level of U.S.-Mexican counternarcotics actions.²²³ In order to develop these investigations what represented a problem was the fact that Chinese officials, required an exaggerated amount of evidence on any suspicion of illicit fentanyl production before they could proceed with the investigation.

It seems clear that despite the efforts made by the Chinese government to strengthen drug control, like adding more synthetic drug precursors to its controlled substances list, the amount of fentanyl smuggled into the U.S. from Mexico has continued to rise over the years, specifically until 2020.²²⁴ Presidents of the United States as Obama, Trump and Biden, exercised much diplomatic pressure in order to induce the Chinese to break down fentanyl trafficking, but it seems that there is a

²²² Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 20.

²²³ Felbab-Brown, V. (2024), *US-China relations and fentanyl and precursor cooperation in 2024*, Brookings Institution. Available at: <https://www.brookings.edu/articles/us-china-relations-and-fentanyl-and-precursor-cooperation-in-2024/>

²²⁴ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 18.

fundamental difference between the two countries and their diplomatic approach.

In 2022, China officially announced its suspension of all counternarcotic and law enforcement cooperation with the United States. The failure of Chinese drug control efforts seems to be not just a problem of weak enforcement but rather a systemic issue. The Chinese government's push for dominance in high-tech manufacturing created economic incentives that makes it difficult to regulate the pharmaceutical and chemical industries effectively. The desire to have a stronger innovation-based sector compared to the United States has resulted in a regulatory system that allows precursor chemicals to move freely. As a result, its economic priorities continue to undermine its enforcement efforts in the fentanyl crisis.²²⁵

Some scholars even interpret China's approach to domestic and drug control as rooted or at least connected to the country's defeat during the Opium Wars. Its defeat against Western Powers forced the country to free trade and created strict dependence on foreign goods that almost destroyed the country's economy.²²⁶ The People's Republic of China was able to eliminate the opium trade largely due to mass public support for the government's anti-drug policies.²²⁷ Mao's government made people see drug control as part of a new national identity, moving away from the humiliating image of China as the "sick man of Asia" after the Opium Wars.²²⁸ The government clearly made drug control a key part of its state-building efforts and promoted the idea that helping to eliminate drugs was an act of patriotism.

²²⁵ Ibid. p. 20.

²²⁶ Ibid. p. 7.

²²⁷ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 7.

²²⁸ Lu, H., Miethe, T.D., & Liang, B. (2009), *China's Drug Practices and Policies: Regulating Controlled Substances in a Global Context*, Routledge, p.77. <https://doi.org/10.4324/9781315571706>.

Some experts believe that China's current drug policies still reflect the same political and social ideas that shaped Mao's strategy since the 1949. The government continues to view drug trafficking as a serious threat to national security, economic stability and social order.²²⁹ Indeed, many researchers argue that China's anti-drug efforts today still rely on propaganda campaigns, reminding citizens of the shame of the Opium Wars.²³⁰ In addition, as noted earlier, the Chinese government often uses the narrative that the U.S. is responsible because of its drug culture.²³¹

Other scholars disagree with this view and argue that China's focus on drug control has gone through a decline overtime. Since 1980s with Deng Xiaoping, China introduced economic reforms, allowing more private businesses, foreign trade and market competition. The government became more focused on economic development rather than drug control, explaining why China didn't take stronger actions against the rising level of drug consumption and trafficking following trade liberalization.²³² Today, China has about 2.5 million registered drug users, most of whom are young, unemployed men without higher education.²³³ Although drug abuse is seen as an important social issue, is not the country's top priority, since the government seems to be more focused on economic growth and political stability. Moreover, the fact that illicit fentanyl is not widely used in China gives a hint on which can be the reason why authorities place very little emphasis on controlling its production and export.²³⁴

²²⁹ Ibid.

²³⁰ Zhang, Sheldon X. and Chin, Ko-lin (2016), *A People's War: China's Struggle to Contain Its Illicit Drug Problem*, The Brookings Institution, p. 9.

²³¹ Felbab-Brown, V. (2024), *US-China relations and fentanyl and precursor cooperation in 2024*, Brookings Institution. Available at: <https://www.brookings.edu/articles/us-china-relations-and-fentanyl-and-precursor-cooperation-in-2024/>

²³² DeLisle, J., Goldstein, A., (2019) *To Get Rich Is Glorious: Challenges Facing China's Economic Reform and Opening at Forty*. The Brookings Institution Press, pp. 3-5.

²³³ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 8.

²³⁴ O'Connor, S. (2017), *Fentanyl: China's deadly export to the United States*, U.S.-China Economics and Security Review Commission, p.5.

The fact that the government prioritizes economic and political goals is particularly evident if we observe the chemical precursor industry. China during the economic reforms of the 1980s changed its fiscal system allowing local governments to keep a larger share of revenue to support economic growth.²³⁵ This reform has created a conflict of interest, local officials are rewarded for promoting economic development even when it comes at the cost of weaker enforcement of drug control laws. As a result, some chemical companies that commit violations are still allowed to operate.²³⁶

China's involvement in Myanmar's illegal drug trade is an example of how its geopolitical interests shape its approach to drug control. China is the largest supplier of methamphetamine precursors to Myanmar which is also one of the world's biggest drug production areas, from where arrives 95.2% of the methamphetamine seized in China.²³⁷

In the past, China worked closely to Myanmar to stop drug production and trafficking but today almost no precursor chemicals are seized at the border, suggesting that drug traffickers can transport them more freely.²³⁸

The lack of strong drug enforcement in China reflects a delicate balancing act in the Indo-Pacific region. While China officially opposes drug trafficking, the illegal drug economy in Shan State has become even larger the legal economy of Myanmar. This situation benefits China because it helps stimulate economic growth in Yunnan Province, which is a key region in China's trade strategy.²³⁹ Yunnan is indeed the starting

²³⁵ Zhao, M., (2019), *The Illicit Distribution of Precursor Chemicals in China: A Qualitative and Quantitative Analysis*, International Journal for Crime, Justice and Social Democracy. p.116.

²³⁶ Ibid.

²³⁷ Zhang, Sheldon X. and Chin, Ko-lin (2016), *A People's War: China's Struggle to Contain Its Illicit Drug Problem*, The Brookings Institution, p.4.

²³⁸ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 9.

²³⁹ International Crisis Group, (2019), *Fire and Ice: Conflict and Drugs in Myanmar's Shan State*. <https://www.crisisgroup.org/asia/south-east-asia/myanmar/299-fire-and-ice-conflict-and-drugs-myanmars-shan-state>.

point of the China-Myanmar Economic Corridor (CMEC), a major project that consist on a high speed rail connecting Yunnan to Myanmar's ports located on the Indian Ocean. This project if successful, will strengthen China's economic and political influence in Myanmar, pulling the country further under its sphere of influence. Moreover, having access to Myanmar's ports would give China a strategic advantage in its competition with the United States in the Indo-Pacific region.²⁴⁰

However, it is important to highlight that so far, there is no concrete evidence of the Chinese Communist party supporting directly and subsidizes the production of fentanyl as a drug for export to the United States. On the other hand, it is at the same time well known that China has been the major source of fentanyl and precursors for the United States. This case shows that illicit drug economies should not be ignored in geopolitical analysis because drug trafficking is not just a law enforcement issue but a clear and important strategic tool in great power competition.²⁴¹ From the analysis made it is clear that the spread of illicit drugs, fentanyl in this case, is a problem that causes a very high cost from an economic and societal stability point of view.

3.4 Drug as a political weapon.

The experience of the late 19th and early 20th century became a fundamental turning point for China. An American author wrote: "The Chinese have one very broad generalization about their own history: they think in terms of 'up to the Opium War' and 'after the Opium war'."²⁴² This seems to remain true until today because this period was crucial for Chinese to define their relations with the Western Countries. At the time,

²⁴⁰ Ibid.

²⁴¹ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 8.

²⁴² Harris, R., (1959), "China and the West," *International Affairs*, p. 162.

many scholars believed that the West's invasion and subjugation of China was a natural course of history and of national strength. And many of them conclude that the way for China to grow in the international arena was to become more like the West, with new form of government, values and social structures.²⁴³

Only later, a diversity of views began to crystallize into a consensus in China that the problem lay not with China but with the West. By the 1920 this began the perfect rhetoric for China's emerging parties to appeal to the angry nationalism of China's new popular movements. They started to talk about "unequal treaties" and blaming them for China impossibility to gain power under that international law.²⁴⁴ In a sense, this narrative has become a key legitimizer for the Chinese Communist Party rule, which is portrayed as the only modern Chinese political party that was able to successfully stand up to foreign aggression.

The ongoing fentanyl crisis in the U.S. has become a major point of contention in U.S.-China relations, reflecting broader tensions in the era of strategic competition between the two powers. Since 2017, the concept of 'strategic competition' has shaped U.S. foreign policy toward China. Initially the term was mainly used to define military and economic rivalries, but overtime it has expanded to include transnational security threats, such as drug trafficking.²⁴⁵

The competition between global powers plays a crucial role in shaping international counternarcotics efforts. China's involvement in the fentanyl crisis seems deeply connected to its broader geopolitical and economic interests rather than a strong commitment to stopping the flow of synthetic drugs. Even if the Chinese government has taken regulatory

²⁴³ Kaufman, A. A., (2011), *The "century of humiliation," then and now: China's national narratives [Report]*. U.S.-China Economic and Security Review Commission. p.3

²⁴⁴ Wang, D., (2003), *The Discourse of Unequal Treaties in Modern China*, Pacific Affairs pp. 399-425.

²⁴⁵ Winkler, S. C. (2023), *Strategic Competition and US-China Relations: A conceptual analysis*, The Chinese Journal of International Politics.

steps in response to U.S. pressure, the American government still believes that the enforcement remains weak, and large quantities of fentanyl precursors continue to reach drug cartels in Mexico. China's reluctance to take stronger action does not seem to be only a failure of regulation but rather a strategic decision influenced by its competition with the U.S. and its economic priorities.²⁴⁶

As seen before, China's chemical and pharmaceutical industries play a significant role in the global drug supply chain, advantaged from the loopholes. Beijing has been criticized for this lack of control but is still hesitant to impose stricter controls on the production and export of fentanyl precursors.²⁴⁷ China's economic policies prioritize industrial growth, including its pharmaceutical sector, which makes strict drug enforcement a secondary priority. Additionally, the profits generated by these industries contribute to China's broader economic influence, particularly in Latin America, where Chinese investments in infrastructure and trade have grown in recent years, but also in other regions like in Myanmar.²⁴⁸

This situation creates a complex dynamic in which drug enforcement efforts are often secondary to strategic geopolitical and financial interests.

At the same time, the U.S. is dealing with shocking costs due to the illicit opioid epidemic. As reported from the White House in 2023, the cost for Americans due to illicit opioids, primarily fentanyl, cost Americans an estimated 2.7\$ trillion, equivalent to 9.7% of GDP. ²⁴⁹ In detail, the

²⁴⁶Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 6.

²⁴⁷Ibid.

²⁴⁸Ibid, p.9.

²⁴⁹ The White House (2025), *The Staggering Cost of the Illicit Opioid Epidemic in the United States*. The White house.

breakdown of the cost estimates, all expressed in December 2024 dollars is²⁵⁰:

- Loss of life: 1.11\$ trillion
- Loss of quality of life: 1.34\$ trillion.
- Healthcare system: 107\$ billion.
- Loss of labor force productivity: 107\$ billion.
- Crime-related: 63\$ billion.

The White House declared that the huge economic cost of the epidemic to Americans, estimated at \$2.7 trillion in 2023 alone, highlights the need to have stricter control of the lethal drugs pouring in from foreign countries, since the human suffering and financial burden are unsustainable.²⁵¹

As seen before, the United States, starting with Trump administration, has attempted to pressure China into taking stronger action by imposing trade restrictions and sanctions on Chinese companies linked to fentanyl trafficking. These measures have had limited success since and while China officially banned certain fentanyl-related substances in 2019, traffickers have quickly adapted by slightly modifying the chemical composition of these drugs to bypass regulations. So, manufacturers constantly adjust formulas to evade law enforcement and even when the Chinese government enforces bans, enforcement remains inconsistent, with many companies continuing to operate through online platforms and secret supply chains.²⁵²

The concept of great power competition arises from realist theories about state behavior, describing how powerful states strive to

²⁵⁰ Ibid.

²⁵¹ Ibid.

²⁵² U.S.-China Economic and Security Review Commission. (2021). *Illicit fentanyl from China: An evolving global operation*. p.3. Available at: https://www.uscc.gov/sites/default/files/2021-08/Illicit_Fentanyl_from_China-An_Evolving_Global_Operation.pdf

counterbalance each other to attain military and/or economic dominance within an anarchic international system.²⁵³

With the Trump administration it was stated in the 2017 National Security Strategy that “China and Russia are challenging American power, influence and interests, attempting to erode American Security and prosperity”.²⁵⁴ Then, in 2018 the U.S. National Defence Strategy was mentioned great power competition: “Long-Term strategic competitions with China and Russia are the principal priorities for the Department, and require both increased and sustained investment, because of the magnitude of the threats they pose to U.S. security and prosperity today, and the potential for those threats to increase in the future”²⁵⁵

The analysis highlights the difficulty that arises from cooperation between two powers such as China and the United States, moved not only by the desire to cooperate but also by issues of power. Clearly, the costs of the spread of fentanyl in the United States highlight the threat it poses to the country's stability. Despite this, there is currently no firm evidence to say that CCP is actively supporting the production and export of fentanyl but doubts are supported by often insufficient and controversial approaches as analyzed. What is important is that common ground can be found that is useful in combating the spread and saving thousands of lives.

3.5. Broader impact.

In March 2025, for the first time, the annual threat assessment lists foreign illicit drug actors as the very first threat to the United States and

²⁵³ Waltz, K. N. (1993), *The Emerging Structure of International Politics*, International Security, p.50.

²⁵⁴ “National Security Strategy of the United States of America,” (Washington, D.C.: White House, December 2017): 2, [https:// www.hsdl.org/?abstract&did=806478](https://www.hsdl.org/?abstract&did=806478)

²⁵⁵ “National Defense Strategy of the United States of America: Sharpening the American Military’s Competitive Edge” (Washington, D.C.: Department of Defense, 2018): 2, <https://dod.defense.gov/Portals/1/Documents/pubs/2018-National-Defense-Strategy-Summary.pdf>.

fentanyl has been elevated by the Trump administration as a top concern, even ahead of other national security threats from countries such as Iran, North Korea and Russia.²⁵⁶

In February 2025, Peter Navarro, which is a senior trade advisor to U.S. President Donal Trump, stated that the U.S. government's tariff threats against Canada and Mexico were part of a larger effort to stop fentanyl entering the country. He specified that the administration saw these tariffs not only as economic measure but also as a way to fight the opioid crisis.²⁵⁷ Moreover, Navarro emphasized that this is "*a drug war, not a trade war*", meaning that the government believed tariffs can pressure other countries to take stronger actions against drug trafficking. The United States is struggling with illegal fentanyl imports from foreign countries and every past administration have used different approaches to solve the crisis. This new Trump Administration, according to Navarro, want to use trade policies as a way to force cooperation on stopping the production and distribution of fentanyl.²⁵⁸

On March 7th 2025, the Chinese foreign Minister Wang Yi, which is also a member of the Political Bureau of the Communist Party of China Central Committee, attended a press conference on external relations in Beijing. Over the fentanyl issue, he stated that China has consistently taken actions against the problem of trafficking and production, underlying again China's commitment of 2019 of scheduling all fentanyl-related substances.²⁵⁹ He also stated that the abuse of fentanyl in the US is a problem that must be resolved by the U.S. itself, meaning that the U.S should examine its loopholes and issues in its regulatory system instead of

²⁵⁶ Naylor, B. (2025). *Gabbard, Trump say they'd use military to fight cartels — how that could work*. NPR. <https://www.npr.org/2025/03/25/nx-s1-5339847/fentanyl-gabbard-trump-cartels>

²⁵⁷ Navarro, P. (2025). *Navarro on Trump's tariff threats: 'It's a drug war, not a trade war'*. POLITICO. Available at: <https://www.politico.com/news/2025/02/04/navarro-trump-tariffs-drug-war-00202337>

²⁵⁸ Ibid.

²⁵⁹ Global Times (2025), *China criticizes U.S. tariffs over fentanyl issue*. Global Times. Available at: <https://www.globaltimes.cn/page/202503/1329680.shtml>.

blaming China²⁶⁰. By saying so, he reminded us of the words of Liu Yuejin, the vice commissioner of the NNCC (National Narcotics Control Commission), which in April 2019, stated that “even if China scheduled all the fentanyl-class drugs, the United States is the main cause of the problem of the abuse of fentanyl in their country”, referring to a weak enforcement and a culture of addiction.²⁶¹

As of April 2025, China’s enforcement of its policies concerning fentanyl and other synthetic opioids has shown progress but also many challenges. Infact, in March 2025, China released a document called “*Controlling Fentanyl-Related Substances- China’s Contribution*”²⁶² in which they explain in detail all the measures that have been taken from the government such as: Investigating illegal fentanyl production sites, Removing online content related to fentanyl sales, blocking online communications used by traffickers, requiring real-name registration for parcel deliveries and increasing inspections, establishing special teams for criminal investigations into fentanyl manufacturing and trafficking, supporting international cooperation to dismantle transnational drug smuggling networks, developing technology for identifying controlled substances, as previously seen.

Based on this report, since implementing full control of fentanyl-related substances, China has not detected any further cases of smuggling abroad of substances related to fentanyl. However, tensions between China and the U.S. have contributed to complicate the collaborative efforts. After the announcement of the implementation of tariffs on Chinese goods,

²⁶⁰ Ibid.

²⁶¹ Felbab-Brown, V. (2024), *US-China relations and fentanyl and precursor cooperation in 2024*, Brookings Institution. Available at: <https://www.brookings.edu/articles/us-china-relations-and-fentanyl-and-precursor-cooperation-in-2024/>

²⁶² State Council Information Office of the People's Republic of China. (2025), *Controlling Fentanyl-Related Substances: China's Contribution*. http://english.scio.gov.cn/whitepapers/2025-03/05/content_117746462.html

China has criticized the measures as “tariff pressure and blackmail” warning that they could affect negatively cooperation on drug control.²⁶³

This situation shows that even though China has created stricter rules and shared progress in fighting the fentanyl crisis, ongoing political tensions and difficulties in enforcing the rules mean that the problem is still complicated and continues to be widely discussed.

The numerous restrictions on exports on both sides contribute to the backdrop of economic tensions between China and the U.S but could also trigger chain reactions which would impact different sectors. The restrictions on materials as gallium, antimony and germanium can deeply affect the supply chains and lead to an increase in the cost of the production of high-tech devices, impacting the consumers. Moreover, the U.S. deterrence capability can be put under serious pressure due to the reduction in defense industry arms production. The effects of this scenario are numerous but two are the most important. The first result is the potential harm to the entire global trade ecosystem. The second is the rise of new alliances and the detachment from China in terms of production and trade. This could create alternative alliances with countries such as Japan and India but at the same time could fragment the global market and trigger many geopolitical tensions.²⁶⁴

In conclusion, today’s economic and political actions, such as mutual sanctions, are part and key elements of a larger geopolitical conflict that is shaping the 21st century. These protectionist policies and could lead to deeper global division and a more fragmented international system. The future will likely be defined by a more complex and strategic

²⁶³ Associated Press (2025), *China renews threat to retaliate against US tariffs*, AP News. <https://apnews.com/article/fentanyl-tariffs-china-us-trump-e410bb1d23f05f0f75e6d10b27640958>

²⁶⁴ Tresca, A. (2025), *Dalle Tensioni commerciali al Fentanyl: Lo scontro Cina-USA*, Istituto Analisi Relazioni Internazionali.

competition, where not only economic power matters, but also soft power, diplomacy, and global alliances.

CONCLUSIONS

The fentanyl crisis is one of the most urgent public health emergencies in the United States today and its impact goes far beyond drug addiction. As analyzed, it has become a key issue in U.S.-China relations, since China plays a crucial role in the production and distribution of fentanyl and its precursor chemicals. Despite some efforts by both countries to address the problem, tensions remain high and an effective and total cooperation has been difficult to achieve.

This work has examined the historical context of Sino-American relations on which the foundations of cooperation between the two states were laid, setting as a starting point that of a historical period marked by a major opium export and a subsequent crisis that forever left an open wound that still seems to be affecting the relations between China and the West today, showing that drug-related tensions between China and the Western World are not new.²⁶⁵ The Opium Wars of the 19th century had an impact and some long-lasting effects on China's national identity. Indeed, some scholars believe that China's current approach to drug control efforts is still influenced by the same political and social events that emerged during that period.²⁶⁶

The two wars also showed the devastating and problematic effects of narcotic addiction on the stability of politics. In the case of China, Qing Dynasty was defeated and lost sovereignty to the British, leaving it open to more than 100 years of exploitation by European powers, the United States and Japan. Chinese today, call it the "Century of Humiliation".²⁶⁷

Just as opium once almost devastated Chinese society, fentanyl is now causing harm in the United States. The parallels with the previously

²⁶⁵ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 6.

²⁶⁶ Clarke, R. (2008), *Narcotics Trafficking in China: Size, Scale, Dynamic and Future Consequences*. *Pacific Affairs*, 81(1), p.88. <http://www.jstor.org/stable/40377483>

²⁶⁷ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies, p. 7.

mentioned period seem obvious, creating a situation where both countries accuse each other of responsibility in the crisis. Washington is blaming Beijing for not doing enough to regulate its chemical and pharmaceutical industries, China argues that the main reason why the American society is struggling in this crisis is because of the high demand for fentanyl in the U.S. and the failure of American drug policies.

Despite these diplomatic tensions, some steps have been taken to address the issue. In fact in 2019, China agreed to classify all fentanyl-related substances as controlled substances making their production and distribution illegal without government authorization. But the enforcement has not been consistent and the Chinese companies that produce chemicals continue to find ways to evade restrictions by modifying chemical formulas or changing products names²⁶⁸.

This has also allowed Mexican cartels to continue importing the necessary precursor chemicals to illegally manufacture fentanyl, which later is smuggled into the United States. The DEA, in fact, has reported that most of the fentanyl which was found in the U.S. originates from Mexico, but the chemicals that are necessary to produce it come from China primarily.

China's role as the primary fentanyl precursors supplier, facilitated by regulatory gaps and despite US pressure, led to diplomatic tensions while causing escalating overdose deaths and economic damage in US cities.

Economically, the fentanyl crisis put the United States under pressure. The opioid epidemic costs are enormous due to health care expenses, law enforcement efforts and the loss of productivity. Cities such as San Francisco are going through some serious social and economic

²⁶⁸ Gilroy, C. (2020), *Great Power Competition and Counternarcotics in the Western Hemisphere*, William J. Perry Center for hemispheric defense studies. pp.19-20.

consequences, due to the rising of crime rates, number of homeless people and an overcrowded healthcare system.

The crisis has filled political debates, with some advocating for stricter border controls and harsher penalties for traffickers while others call for an expanded access to addiction treatment and harm reduction programs. While the Obama administration tried to engage China within a multilateral framework, the Trump administration took a more confrontational approach which led also to an escalation on trade tensions.

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Around the world the crisis is affecting differently the states and their response depends on national laws and interest on cooperate. However, the crisis cannot be solved through law enforcement alone. As the National Institute on Drug Abuse highlights, addressing fentanyl addiction requires a public health approach, with greater investment in treatment options like methadone.²⁷⁰ So, while the U.S. has now implemented policies to control fentanyl trafficking, it must also focus on improving addiction treatment and reducing barriers. A comprehensive strategy that includes international cooperation and expanded medical treatment is much needed.

On the international scene, the crisis has further strained U.S.-China relations, which were already tense due to trade disputes, military competition and different political ideologies. The United States has imposed sanctions on Chinese companies involved in the illicit drug trade and China responded to it by limiting cooperation on counternarcotics efforts. This situation is making it difficult to progress in combat fentanyl

²⁶⁹ Felbab-Brown, V. (2024), *US-China relations and fentanyl and precursor cooperation in 2024*, Brookings Institution. Available at: <https://www.brookings.edu/articles/us-china-relations-and-fentanyl-and-precursor-cooperation-in-2024/>

²⁷⁰ Volkow, D., (2024), *To address the fentanyl crisis, greater access to methadone is needed*, National Institute on Drug Abuse, p.5.

trafficking and highlights the bigger challenge of managing the relationship between the two superpowers.

The health emergency is affecting the United States but could soon affect also other Western countries. This crisis is not just a U.S.-China problem, instead is a global issue that requires cooperation from multiple countries. For this reason, all of them should develop international collaboration aimed at countering the spread of this deadly drug. Without stricter regulations and better enforcement, drug traffickers will continue to find ways to produce and distribute fentanyl.

Solving the fentanyl crisis will require an approach that goes beyond diplomatic pressure. It requires strong enforcement, better international cooperation, and commitment from as many countries as possible. The United States, China, Mexico and other countries must work together to develop effective solutions because without coordinated efforts, the fentanyl crisis will continue to have devastating social, economic and political consequences. Mexico in particular must be included in any long-term solution, which expect to dismantle cartel operations and improve border security.

As we observed, the international legal system against drug trafficking has evolved toward strict criminalization, but the effectiveness of this system depends on the ability and the commitment of each country to enforce the laws. China's struggle with enforcing even its own drug regulations illustrates how even a strong law can fail without a proper implementation. This scenario highlights the need for better international cooperation, stronger enforcement of mechanisms and also more funding for drug control efforts.²⁷¹

The scenario that emerges is characterized by an uncertain future for their relations and the increase in sanction and economic measures

²⁷¹ Zhang, L., An, J. (2020), *Revisiting the regimes of public international law and the WTO law on countering narcotic drug trafficking*, *China & WTO Review*, 6(1), p. 199.

could have a negative impact also on the countries that depend on U.S. and China for trade and access to global resources. This could lead to a stronger polarization in economic and political blocs.²⁷² The economic and political measures are a reflection of the geopolitical scenario of the 21st century, where protectionism can lead to a more fragmented world and the pressure for a new global order can lead to the rise of new international agreements with a less polarized view.

Even if to date it is impossible to say that China is actively and secretly supporting IMF export to the U.S. it is important not to underestimate the role that China plays in the production and sale of precursors. Evidence also shows that the efforts put in place are swinging and often seems to be depending and influenced by power strategies. Very often China's omissions have violated the law of states, helping to strengthen its strategic and economic interests.²⁷³

However, the United States should not judge the extent of China's cooperation by the number of deaths in the United States. Even if China were to robustly cooperate, deaths may not dip: In illicit drug markets, there are always many months or years between effective supply measures and retail changes. Besides, Mexican cartels have stockpiles of precursors; they can source them from other sources, such as India or South Africa.²⁷⁴

In conclusion, the fentanyl crisis is not just a bilateral issue but rather a global challenge that requires a coordinated international response. Effective U.S.-China cooperation on fentanyl control remain uncertain since power games and larger strategies are hidden behind the desire to stop the illicit drug trade.

²⁷² Tresca, A. (2025), *Dalle Tensioni commerciali al Fentanyl: Lo scontro Cina-USA*, Istituto Analisi Relazioni Internazionali.

²⁷³ O'Brien, P., (2024), Traffico di Droga nell'arcipelago. *Internazionale*. p.1. Available at: <https://www.internazionale.it/magazine/patricia-o-brien/2024/05/02/traffico-di-droga-nell-arcipelago>

²⁷⁴ Felbab-Brown, V. (2024), *US-China relations and fentanyl and precursor cooperation in 2024*, Brookings Institution. Available at: <https://www.brookings.edu/articles/us-china-relations-and-fentanyl-and-precursor-cooperation-in-2024/>

The failure to address this crisis will continue to have devastating consequences for public health, economic stability and diplomatic relations. Worsening bilateral relations makes structured and long-term cooperation much more difficult. Policymakers should prioritize collaboration over conflict and work towards solutions that can balance law enforcement and public health initiative.

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