



## The Domestic Fentanyl Crisis in Strategic Context:



### Part III—Responding to China’s Drug Warfare



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*Editor's Note:* The views expressed in this report are those of the author and do not reflect the official position of the United States Military Academy, Department of the Army, or Department of Defense.

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### Introduction

This is the third report in a three-part series that examines the role of the People's Republic of China (PRC) in the ongoing fentanyl crisis in the United States. The first volume established the causes of the crisis and the international origins of the drug. It also described the negative consequences of the fentanyl epidemic on US national security.<sup>1</sup> The second volume argued that, despite some seemingly cooperative diplomatic and law enforcement overtures, PRC domestic and foreign policy continues to facilitate production and global trade in fentanyl and its precursors.<sup>2</sup> The objective of this final volume is to recommend policy considerations to counter the PRC's strategic exploitation of fentanyl, mitigating the drug's threat to US national security and domestic legitimacy.

This report argues that the PRC's role in the fentanyl crisis is consistent with a broader strategy of asymmetric warfare intended to undermine American interests. The PRC's efforts to conceal direct evidence of its role in fentanyl operations should not divert attention from a larger pattern of strategic behavior. Its documented involvement in a wide range of asymmetric campaigns—from intellectual property (IP) theft and corporate espionage to cyber intrusions and economic coercion—demonstrates a consistent strategy of advancing national objectives through unconventional means. Nor are these asymmetric tactics strategically insignificant, as Figure 1's comparison of the cost to the American economy of Chinese IP theft and major wars shows. Given the depth and coordination of these efforts, the Chinese Communist Party (CCP) may view the fentanyl crisis as another vector to further its strategic interests by undermining US society. The intent appears to be advancing internal initiatives that disproportionately benefit the PRC while causing significant harm to the United States.

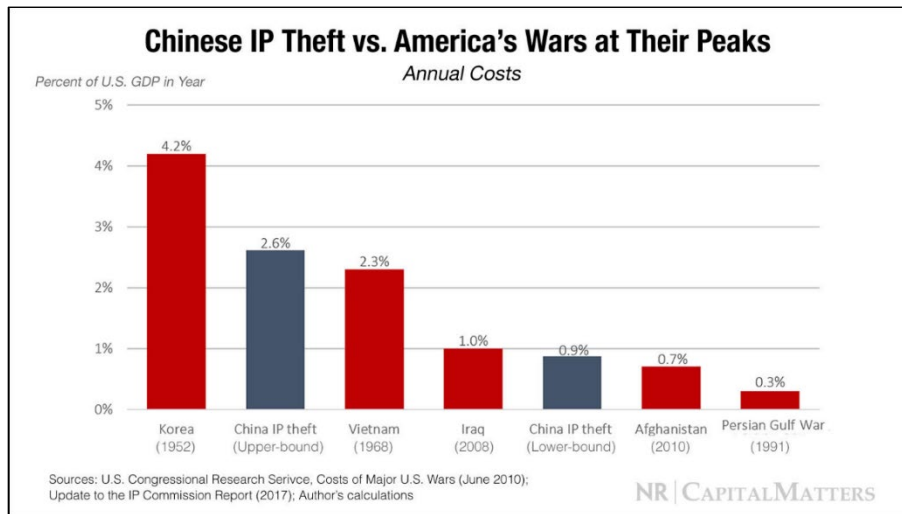
This calls for an urgent recalibration of American strategy. The analysis now turns to the evidence that the CCP's approach to fentanyl is consistent with the framework of

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<sup>1</sup> Nicholas Dockery, "The Domestic Fentanyl Crisis in Strategic Context, Part I: From Prescription to National Security Epidemic," The Modern War Institute, December 2024, <https://mwi.westpoint.edu/the-domestic-fentanyl-crisis-in-strategic-context-part-i-from-prescription-to-national-security-epidemic/>.

<sup>2</sup> Nicholas Dockery, "The Domestic Fentanyl Crisis in Strategic Context, Part II: China and the Fentanyl Supply Chain," The Modern War Institute, January 2025, <https://mwi.westpoint.edu/the-domestic-fentanyl-crisis-in-strategic-context-part-ii-china-and-the-fentanyl-supply-chain/>.

asymmetric warfare. It begins with a consideration of the evolution of asymmetric warfare frameworks to contextualize how the CCP employs asymmetric warfare tactics. It then presents evidence that Chinese strategic thinkers and policymakers view illicit drugs as a tool of asymmetric warfare. Finally, it presents policy recommendations to undermine this asymmetric campaign, mitigating the negative consequences of the fentanyl crisis for US national security and minimizing or preventing further harm to American civilians.



**Figure 1: The Cost of Chinese IP Theft<sup>3</sup>**

### Asymmetric Warfare and the Drug Trade

The concept of “asymmetric warfare” itself remains controversial and variably defined. Andrew J. R. Mack introduced the term in his 1975 article “Why Big Nations Lose Small Wars,” describing a significant power disparity between conflict participants. Despite its earlier origins, the term did not make its explicit debut in US joint military doctrine until 1995, marking a shift in formal military strategic thinking.<sup>4</sup> Initially defined narrowly as engagements between dissimilar forces, it expanded in the 1995 National Military Strategy

<sup>3</sup> Joseph W. Sullivan, “From the Chartroom: The Cost of China’s Intellectual-Property Theft,” *National Review*, July 2020, <https://nationalreview.com/2020/07/china-intellectual-property-theft-counting-costs-united-states/>.

<sup>4</sup> Stephen Metz and Douglas V. Johnson II, “Asymmetry and US Military Strategy: Definition, Background, and Strategic Concepts” (Carlisle, PA: Strategic Studies Institute, US Army War College, 2001) p. 2-3; Joint Chiefs of Staff, “Joint Warfare of the Armed Forces of the United States,” Joint Publication 1, January 10, 1995, p. 10-11.

to include terrorism, weapons of mass destruction (WMDs), and information warfare. The 1997 Quadrennial Defense Review forewarned that US conventional military supremacy might drive adversaries toward asymmetric tactics.<sup>5</sup> Mack's analysis gained renewed relevance in the post-Cold War era, with scholarly interest intensifying during the early 2000s. The Global War on Terrorism period saw a proliferation of terminology centered on asymmetry in academic discourse and the concept of asymmetric warfare had expanded significantly, encompassing a diverse spectrum of threats. This broadened perspective included nonstate actors and the specter of catastrophic terrorism and expanded to encompass guerrilla warfare and insurgency.<sup>6</sup> Asymmetric warfare has ignited sustained debate within academic and military circles evolving to subsume a range of related strategies, variously termed “new generation warfare”, “competition short of conflict,” “active measures,” and “gray zone” activities.<sup>7</sup> Asymmetric tactics, as outlined by US military doctrine, include disinformation, deception, sabotage, economic coercion, proxies, guerrilla warfare, and covert operations.<sup>8</sup> US special operations forces commonly refer to these actions as “gray zone” tactics.<sup>9</sup>

Despite nuanced differences, these terms collectively describe a strategy of projecting power and influence beyond a state's borders, primarily through nonmilitary means. In this context, the most widely accepted definition of asymmetric warfare is a campaign or series of tactics constituting a deliberate effort by a markedly weaker nation or state actor to pursue strategic objectives while engaging a more militarily powerful

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<sup>5</sup> William S. Cohen, “Report of the Quadrennial Defense Review,” US Dept. of Defense, May 1997, Section II.

<sup>6</sup> Andrew Mack, “Why Big Nations Lose Small Wars: The Politics of Asymmetric Conflict,” *World Politics* 27, No. 2 (1975): 175–200, <https://doi.org/10.2307/2009880>.

<sup>7</sup> Gray Zone tactics are coercive activities conducted by state and non-state actors that fall between traditional notions of peace and war. These actions are designed to advance strategic interests while remaining below the threshold of armed conflict.; Christopher S. Chivvis, “Testimony Understanding Russian 'Hybrid Warfare' And What Can Be Done About It,” Testimony presented before the House Armed Services Committee, March 22, 2017, published by RAND Corporation, Santa Monica, California. [https://rand.org/content/dam/rand/pubs/testimonies/CT400/CT468/RAND\\_CT468.pdf](https://rand.org/content/dam/rand/pubs/testimonies/CT400/CT468/RAND_CT468.pdf).

<sup>8</sup> Despite its military superiority, the United States often employs asymmetric tactics in complex scenarios where conventional approaches may be ineffective or counterproductive. This strategic flexibility is particularly evident in counterinsurgency and counterterrorism operations, allowing the U.S. to adapt to diverse security challenges and unconventional adversaries.

<sup>9</sup> See supra 7 definition of Gray Zone activities

opponent below the threshold of kinetic action.<sup>10</sup> This can allow weaker actors to accomplish national objectives without eliciting a conventional military reaction.<sup>11</sup>

As contemporary geopolitical challenges evolve, it is increasingly important to understand and identify asymmetric warfare in all its forms. This is a critical step to developing counterstrategies to modern asymmetric warfare in an era of global competition with near-peer adversaries like the PRC and Russia, along with rising threats from nations like Iran, North Korea, and other nations sympathetic to their rise.<sup>12</sup> Reports from the Department of Defense (DoD) reveal that many adversaries, including the PRC, Iran, North Korea, and Russia, unsurprisingly utilize asymmetric tactics more overtly, as well. Whether through military, political, economic, or psychological means, asymmetric warfare seeks to erode the opponent's legitimacy and influence.<sup>13</sup>

This section argues that the PRC engages the United States in a form of asymmetric warfare through the illicit drug trade, bypassing conventional armed conflict. While this strategy does not involve direct military confrontation, it leads to widespread harm by causing substantial fatalities, destabilizing communities, draining federal and local resources, overburdening healthcare systems, and diverting attention from law enforcement and regulatory priorities.<sup>14</sup> By uniquely analyzing the PRC's approach, policymakers can more effectively anticipate and counter these nontraditional threats.

The deliberate and harmful nature of the PRC's actions highlights the urgency of a strategic response that addresses current unconventional challenges and improves forecasting to identify emerging vectors where the PRC may seek to exploit advantages. While the CCP may never explicitly admit to these asymmetric strategies, the alignment and

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<sup>10</sup> Lautaro N. Rubbi, Victoria Álvarez Magañini, Lucas Nascimento, and Dana Sager, "Asymmetric Warfare: Exploratory Study on the Non-Conventional Military Developments of the People's Republic of China in the Period 2012–2018," *Revista SAAP* 14, no. 1 (2020): 181–200, <https://doi.org/10.46468/rsaap.14.1.N3>.

<sup>11</sup> *Ibid.*

<sup>12</sup> Scholars, academics, and theorists frequently engage in debates over nuanced definitions, often overlooking the practical evolution and application of historical ideas. While the United States and its adversaries may employ asymmetric warfare through different methodologies, their intended outcomes exhibit significant convergence. Recognizing this alignment is imperative for the development of effective counterstrategies.

<sup>13</sup> Emile Simpson, "Redefining Irregular Warfare: Legitimacy, Coercion, and Power," *Modern War Institute*, February 2, 2022, <https://mwi.westpoint.edu/redefining-irregular-warfare-legitimacy-coercion-and-power/>.

<sup>14</sup> L. Kennedy, and Madelaine Coelho. "Absolutely the Worst Drug I've Ever Seen': Risk, Governance, and the Construction of the Illicit Fentanyl 'Crisis.'" *Theoretical Criminology* 24, no. 4 (2020): 612–632. <https://doi.org/10.1177/1362480619841907>; Ken Itakura, "Evaluating the Impact of the US–China Trade War." *Asian Economic Policy Review*, 2020. <https://onlinelibrary.wiley.com/doi/10.1111/aep.12286>.



catastrophic consequences irrefutably point to a deliberate, albeit undeclared, act of aggression.

### *Asymmetric Strategy and Tactics in Chinese Military Thought*

Western analysts' enduring dependence on classical strategic frameworks like Sun Tzu's *Art of War* systematically distorts their interpretation of the CCP's evolving military doctrine, primarily due to confirmation bias—a cognitive tendency that prioritizes familiar historical paradigms over contemporary innovations. While Sun Tzu's principles continue to exert influence on Chinese military thought, they fail to fully encapsulate the PRC's sophisticated modern strategic approach.<sup>15</sup> In fact, overemphasizing these classical models can lead to a distorted view, where the PRC's contemporary actions are framed through an outdated philosophical lens, which fails to account for the broader range of factors shaping its strategy.

By anchoring assessments in antiquated texts rather than current doctrinal materials like the revised *Science of Military Strategy*, published by the People's Liberation Army (PLA), and other critical documents addressed later in the report, observers often misinterpret adaptive policymaking processes as monolithic strategies, underestimate the integration of China's aggressive pursuit of battle networks, and reduce political warfare tactics to conventional psychological operations. Such analytical rigidity fosters reactive policies based on outdated assumptions, obscuring how the CCP's synthesis of Marxist dialectics and use of Western-style warfare redefines operational art in other emerging dimensions of warfare.

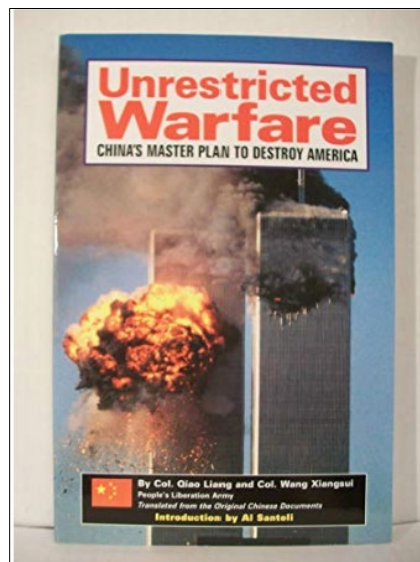
The PRC's current maneuvers are driven by economic power, technological advancements, and a sophisticated approach to international relations, all of which go far beyond the teachings of Sun Tzu. To accurately assess and respond to the PRC's actions, we must move beyond classical models and incorporate insights from contemporary analytical

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<sup>15</sup> Sun Tzu, *The Art of War*, a treatise on military strategy and tactics, written during the Warring States period (roughly 5th century BCE), offers guidance on leadership, strategy, psychology, and conflict management. While it has had lasting influence in and beyond China, Confucian works like *The Analects* had a broader impact on Chinese society, shaping ethics, governance, and education. Additionally, texts such as *Tao Te Ching* and Legalist writings played a significant role in influencing Chinese philosophy and statecraft, becoming central to Chinese thought beyond military matters.

thinkers. This will allow for a more nuanced and comprehensive understanding of Chinese strategy, one that acknowledges historical influences and modern complexities.

An analysis of official CCP publications reveals the strategic importance the PRC applies to asymmetric warfare. Scholars examining the CCP's evolving strategic doctrine have increasingly focused on the influence of key publications approved by the CCP, like *Unrestricted Warfare* (see Figure 2) or the Central Military Commission's endorsement of the *Three Warfares* doctrine (psychological, public opinion, and legal warfare). These documents highlight the PRC's belief that traditional military dominance alone is insufficient to compete with Western nations. They specifically cite "drug warfare" and "criminal" proxies, demonstrating the CCP's staunch support for strategies that exploit Western norms, values, and vulnerabilities to achieve strategic objectives without direct military confrontation. The prevalent anti-Western rhetoric in these publications indicates endorsement of these strategies at the highest levels of government.



**Figure 2: Cover of *Unrestricted Warfare*, depicting the 9/11 attacks in the United States**

Authored in 1999 by two PLA officers, Qiao Liang and Wang Xiangsui, *Unrestricted Warfare* outlines their novel, eponymous approach to national security, advocating for the utilization of unconventional methods. *Unrestricted Warfare* doctrine emphasizes using

nonmilitary tools alongside military force, effectively blurring the boundaries of traditional warfare.<sup>16</sup> According to the authors, the PRC must expand its strategic tool kit to include political, economic, diplomatic, cultural, technological, criminal, informational, and legal warfare to rise above the West.<sup>17</sup> Its concepts break down the boundaries between traditional warfare and other domains. The doctrine fundamentally challenges traditional warfare boundaries, emphasizing that “there is nothing in the world today that cannot become a weapon” and that “soldiers no longer have a monopoly on war.” It emphasizes using economic pressure, technological advancements, and psychological manipulation alongside military force to achieve a nation’s objectives.<sup>18</sup>

Qiao and Wang emphasized the critical need to integrate new concepts into CCP’s military education system, ensuring future generations of strategists could navigate the complexities of modern conflict. Interestingly, they acknowledged the limitations of historical figures like Napoleon, who failed to adapt. They highlighted how British General J. F. C. Fuller, eventually filled this gap by developing foundational principles for modern strategy.<sup>19</sup> The book’s emphasis on applying nonmilitary tools aligns with contemporary CCP policies such as the Belt and Road Initiative, which uses economic investment to cultivate strategic partnerships and expand the PRC’s global influence, suggesting a clear link between the book and evolving strategic doctrine.

Indeed, the publication of *Unrestricted Warfare* can be viewed as a catalyst for a shift in PRC strategic thinking. Its authors stirred intense debate in military strategy circles with suggestive tactics that diverged from the classical Clausewitzian doctrine of “using armed force to compel the enemy to submit to one’s will.”<sup>20</sup> Instead, they championed a paradigm shift, urging the CCP to adopt a more versatile and controversial approach to national security. The post-Cold War era of the mid to late 1990s, particularly the US dominance in Operation Desert Storm, alarmed many senior CCP officials. The advent of precision-guided

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<sup>16</sup> Vincent Wei-Cheng Wang and Gwendolyn Stamper, “Asymmetric War? Implications for China’s Information Warfare Strategies,” *American Asian Review* 20, no. 4 (Winter 2002): 167–178.

<sup>17</sup> Lucas Moers, “The Art of War Without Limits: Analyzing China’s ‘Unrestricted Warfare’ in the Context of Ukraine,” *Atlantisch Perspectief* 47, no. 1 (2023): 26–31, <https://www.jstor.org/stable/48732411>.

<sup>18</sup> Liang Qiao and Xiangsui Wang, *Unrestricted Warfare: China’s Master Plan to Destroy America* (Shadow Lawn Press, 2017).

<sup>19</sup> Qiao and Wang, *Unrestricted Warfare*.

<sup>20</sup> Carl von Clausewitz, *On War*, trans. J.J. Graham (London, 1873), <http://www.clausewitz.com/readings/OnWar1873/BK1ch01.html>.

munitions, nonlethal weapons, and blurred lines between military and nonmilitary tactics signaled a fundamental shift in the character of conflict.

The new battlefield Qiao and Wang supported encompassed not just traditional military strength but a sophisticated blend of economic, technological, and psychological tools. They argued that the CCP should allocate resources to innovative technologies like robotics and biotechnology to maintain a competitive edge in modern warfare.<sup>21</sup> This approach aimed to avoid the potentially disastrous consequences of direct military confrontation while leveraging the full spectrum of modern technology and information tools to advance the PRC's interests and establish dominance.

*Unrestricted Warfare* marked the public endorsement of a counter-Western strategy that warned against adopting historical conventional warfare approaches. Its ideas resonated widely, prompting further exploration of diverse warfare strategies and paving the way for the later adoption of the *Three Warfares* doctrines.<sup>22</sup> The concept of *Three Warfares* represents a strategic recalibration of asymmetric tactics by the CCP, which exude deep connections to the themes of *Unrestricted Warfare*. In 2003, the PLA officially promulgated the doctrine of *Three Warfares* as part of its political and information operations, integrating it into the amended *People's Liberation Army Political Work Regulations*.<sup>23</sup> The amended directives unveiled a strategic arsenal for wartime political operations by outlining public opinion, psychological, and legal warfare methods.<sup>24</sup>

While initially conceived for wartime application, the *Three Warfares* quickly evolved into a peacetime strategy. By 2006, the Central Military Commission concluded that conventional modernization was "incompatible" with winning "local wars under informatised conditions," leading to greater emphasis on developing *Three Warfares*

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<sup>21</sup> Qiao and Wang, *Unrestricted Warfare*.

<sup>22</sup> Qiao and Wang posit that psychological operations (psyops) wield a decisive influence in eroding an adversary's morale and resolve to engage in combat. Through disseminating misinformation, instigating confusion, and fomenting discord within enemy factions, psyops can internally debilitate an opponent. They also expound upon the concept of 'lawfare,' which entails exploiting legal systems and international law as instruments of warfare. By capitalizing on adversarial legal loopholes, initiating legal proceedings, and leveraging international institutions, the CCP can attain strategic objectives without resorting to conventional military force.

<sup>23</sup> Mark Stokes and Russell Hsiao, "The People's Liberation Army General Political Department: Political Warfare with Chinese Characteristics," *Project 2049 Institute*, October 14, 2013, [https://project2049.net/documents/PLA\\_General\\_Political\\_Department\\_Liaison\\_Stokes\\_Hsiao.pdf](https://project2049.net/documents/PLA_General_Political_Department_Liaison_Stokes_Hsiao.pdf).

<sup>24</sup> Ibid.

capabilities. By 2010, revised regulations mandated that all military personnel receive training in these methods, with specific requirements that military propaganda incorporate public opinion warfare, that liaison work include psychological warfare, and that political/judicial work integrate legal warfare.<sup>25</sup>

The Office of Net Assessment, a division within DoD whose primary role was to conduct long-term strategic assessments to identify emerging threats, opportunities, and trends that could impact US national security, assessed that the *Three Warfares* represents a “dynamic three dimensional war-fighting process that constitutes war by other means.”<sup>26</sup> *Three Warfares* doctrine echoes the ideas championed in *Unrestricted Warfare*, emphasizing warfare beyond conventional military means (e.g., hybrid warfare, information dominance, and expanding conflict beyond the battlefield). In essence, the *Three Warfares* doctrine is a practical application of *Unrestricted Warfare*'s core principles, highlighting the PLA's evolving strategy and increasing reliance on nontraditional methods to achieve its goals.<sup>27</sup>

### *Fentanyl as a Tool of Asymmetric Warfare*

Although the PRC is doubtful to acknowledge using fentanyl as a deliberate tool of asymmetric warfare, an analysis of Chinese military strategy suggests otherwise. The PRC's documented study of Western military doctrines, particularly its adoption of principles from *Unrestricted Warfare* and the *Three Warfares* doctrine, indicates the CCP is not simply passive but also complicit in the use of fentanyl in a calculated campaign of asymmetric warfare. This is supported by the PRC's reluctance to curb the distribution of fentanyl,

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<sup>25</sup> Pawel Behrendt, “San Zhong Zhanfa or 'Three Warfares': Chinese Hybrid Warfare,” *Boym Institute*, accessed March 6, 2025, <https://instytutboyma.org/en/san-zhong-zhanfa-or-three-warfares-chinese-hybrid-warfare/>; Yasuyuki Sugiura, “The PLA's Pursuit of Enhanced Joint Operations Capabilities,” *NIDS China Security Report 2022* (Tokyo: National Institute for Defense Studies, 2022), [https://nids.mod.go.jp/publication/chinareport/pdf/china\\_report\\_EN\\_web\\_2022\\_A02.pdf](https://nids.mod.go.jp/publication/chinareport/pdf/china_report_EN_web_2022_A02.pdf); Peter Mattis, “China's 'Three Warfares' in Perspective,” *War on the Rocks*, January 30, 2018, <https://warontherocks.com/2018/01/chinas-three-warfares-perspective/>.

<sup>26</sup> Stefan Halper, “China: The Three Warfares for Andy Marshall Director, Office of Net Assessment Office of the Secretary of Defense Washington, D.C.,” *University of Cambridge*, May 2013, <https://cryptome.org/2014/06/prc-three-wars.pdf>.

<sup>27</sup> Elsa Kania, “The PLA's Latest Strategic Thinking on the Three Warfares,” *China Brief* 16, no. 13 (2016): last modified August 22, 2016, <https://jamestown.org/program/the-plas-latest-strategic-thinking-on-the-three-warfares/>.

connections to organized crime syndicates, and obfuscation in international law enforcement efforts.<sup>28</sup>

Understanding PRC involvement in the global drug trade requires, at a minimum, acknowledging the impact of the Opium Wars on modern China. The Opium Wars, instigated by Western powers in the mid-nineteenth century to enforce the opium trade, marked the beginning of what is known as China's century of humiliation. The consequences deeply disrupted Chinese society and governance for generations, and the decades of forced treaties and military defeats weakened the Qing Dynasty, leading to the eventual collapse of more than two millennia of dynastic rule. In turn, this ushered in an era of significant foreign influence and internal turmoil, characterized by foreign exploitation and territorial relinquishments, which still profoundly influences the CCP's strategic perspectives.<sup>29</sup> The PRC teaches this period as a time of subjugation by Western imperialists, underscoring the present-day emphasis on modernization and self-strengthening.<sup>30</sup> According to an authority on Chinese foreign affairs, the enduring recollection of subjugation by Western powers continues to permeate modern debates within the PRC regarding its regional and global position within the prevailing geopolitical landscape.<sup>31</sup>

The CCP views asymmetric warfare as a critical component in precluding a reoccurrence of national humiliation.<sup>32</sup> In this way, "drug warfare" enables the PRC to overcome powerful adversaries like the United States by avoiding direct military engagement. For example, *Unrestricted Warfare* lists several

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<sup>28</sup> Dockery, "The Domestic Fentanyl Crisis in Strategic Context, Part II: China and the Fentanyl Supply Chain."

<sup>29</sup> Andrew Wilson, "China's Early Encounters with the West: A History in Reverse," *Foreign Policy Research Institute*, April 2008, <https://fpri.org/article/2008/04/chinas-early-encounters-with-the-west-a-history-in-reverse/>.

<sup>30</sup> Neil Munro, "China's Identity through a Historical Lens," *Journal of Advanced Military Studies*, Special Issue (2022), <https://usmcu.edu/Outreach/Marine-Corps-University-Press/MCU-Journal/Journal-of-Advanced-Military-Studies-SI-2022/Chinas-Identity-through-a-Historical-Lens/>; BBC Studios, "The War on Opium—Addicted to Pleasure," YouTube video, 4:02, [https://www.youtube.com/watch?v=QSEhsEfGBL0](https://www.youtube.com/watch?v=QSEhsEfGBL0;); Mitch Anderson, "China's Century of Humiliation," YouTube video, 1:17:33, <https://youtube.com/watch?v=boPkMCJSYSs>.

<sup>31</sup> Alison A. Kaufman, "The 'Century of Humiliation' and China's National Narratives," Testimony before the U.S.-China Economic and Security Review Commission, Washington, DC, March 10, 2011, <https://uscc.gov/sites/default/files/3.10.11Kaufman.pdf>.

<sup>32</sup> Wilson, "China's Early Encounters with the West: A History in Reverse."

means and methods used to fight a non-military war, some of which already exist and some of which may exist in the future. Such means and methods include psychological warfare (spreading rumors to intimidate the enemy and break down his will; smuggling warfare (throwing markets into confusion and attacking economic order); media warfare (manipulating what people see and hear to lead public opinion along); *drug warfare (obtaining sudden and huge illicit profits by spreading disaster in other countries)*. (Emphasis added)<sup>33</sup>

Qiao and Wang argue that, while not strictly military in nature, these tactics can be as devastating as traditional warfare. They refer to variations in tactics as “secondary wars” or “analogous wars” that can inflict damage comparable to traditional military conflicts as part of the more complicated dimensions of warfare. Specifically, they cite extremist groups, rogue financiers, and criminal networks as an exemplification in which military and nonmilitary campaigns together can exploit every available resource.<sup>34</sup> They believed the PRC could gain an edge over the United States and other rivals if the CCP employed indirect and unconventional methods, including drug warfare using criminal networks.

### *Fentanyl Production as an “Unassailable Base”*

One of the fundamental concepts in asymmetric state-sponsored warfare is the concept of the “unassailable base.” This concept was first articulated by T. E. Lawrence in *Seven Pillars of Wisdom*. Lawrence, a key figure in the Arab Revolt against the Ottoman Empire, pioneered innovative asymmetric warfare tactics that continue to resonate in modern conflicts. Lawrence’s approach diverged from the traditional Clausewitzian paradigm, which emphasizes decisive battles as the primary means to victory in a war of attrition, undermining the enemy’s logistical and operational capacity through a sustained unconventional warfare campaign. Lawrence’s “unassailable base” is described as asymmetric attacks protected from physical attacks and fear of them.<sup>35</sup> Under the CCP’s leadership, the PRC has established a base within its regulated pharmaceutical industry,

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<sup>33</sup> Qiao and Wang, *Unrestricted Warfare*, 55.

<sup>34</sup> *Ibid.*, 224.

<sup>35</sup> T. E. Lawrence, *Seven Pillars of Wisdom*, paperback ed. (New York: Anchor Books, 1991).

shielded by advanced surveillance technology, which actively encourages and supports companies by offering incentives while obstructing international efforts to curtail activities legally.<sup>36</sup>

State-endorsed CCP safe havens for illicit drug manufacturers and traffickers function as highly protected environments, where criminal activities are shielded by a complex network of institutionalized corruption and deliberate misinformation.<sup>37</sup> These safe havens are often facilitated by state apparatuses, which not only turn a blind eye to illegal operations but may actively support them, ensuring that traffickers can operate with impunity. Through coordinated efforts to obfuscate facts and suppress transparency, these regimes within the PRC provide an environment in which illicit enterprises can flourish unchecked, undermining the rule of law and posing significant challenges to international security. The CCP's strategic use of misinformation further complicates efforts to disrupt these networks, as it creates a veil of confusion that hinders international cooperation and the effectiveness of counternarcotics operations.

The CCP encourages and actively facilitates fentanyl production within its borders and allows known drug traffickers to operate with impunity, provided they contribute to state-sanctioned economic initiatives such as the Belt and Road Initiative. As discussed in the previous report, CCP authorities further enable operations by alerting manufacturers of impending inspections and investigations.<sup>38</sup> While the PRC tries to give these economic incentives the veneer of supporting social policy goals such as investing in impoverished areas to reduce unemployment, its motives are not entirely altruistic.<sup>39</sup> These policies disrupt global markets and serve as strategic tools to bolster the PRC's economic power. By incentivizing drug trade, they help the nation earn foreign exchange, promote technological development in key industries, and enhance its global competitiveness. Even further, by

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<sup>36</sup> US Congress, House, Select Committee on the Strategic Competition Between the United States and the Chinese Communist Party, "The CCP's Role in the Fentanyl Crisis," 118th Cong., 2nd sess., 2024, <https://www.congress.gov/event/118th-congress/house-event/117142>.

<sup>37</sup> US Congress, "The CCP's Role in the Fentanyl Crisis."

<sup>38</sup> *Ibid.*

<sup>39</sup> The PRC employs a sophisticated system of economic statecraft that intertwines corporate incentives with broader social policy objectives—often characterized as "state capitalism," encourages enterprises to align their activities with national strategic goals, such as poverty alleviation and unemployment reduction in underdeveloped regions. However, this model of economic governance extends beyond benign socioeconomic interventions.



overtaking global pharmaceutical production into its broader economic strategy, the PRC has assured a degree of control over critical supply chains, particularly for essential drugs, while masking the protection it offers for illicit drug protection. This control allows the CCP to use its pharmaceutical industry as a tool for economic coercion and geopolitical leverage, potentially withholding or manipulating the supply of vital medications during times of conflict or political tension. These options not only protect China's domestic interests but also bolster its global influence by creating dependencies in other countries, thereby advancing its national security and economic goals.<sup>40</sup> The PRC's economic policies in this context can be seen as a form of asymmetric tactics, blending economic, criminal, and potentially geopolitical elements to advance national interests while maintaining plausible deniability. In this way, the PRC systematically fuels the global fentanyl crisis, prioritizing economic gain and strategic advantage over human lives.<sup>41</sup>

### Policy Recommendations

By examining the intersection between CCP strategy and the global fentanyl trade, this report highlights the PRC's violations of basic principles of human security. The United States has begun to take action to protect itself from this threat and undermine the PRC's ability to wage drug warfare. In 2019, President Donald Trump, during his first term, declared a national emergency under 10 U.S.C. § 2808 to address border security concerns, including narcotics trafficking along US borders. This declaration allowed for the reallocation of DoD funds to construct a border wall, citing the exploitation of ports of entry by transnational criminal organizations (TCOs) involved in drug smuggling.<sup>42</sup> Following his return to office in 2025, President Trump issued Executive Order 14157, directing the

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<sup>40</sup> Jukka Aukia and Ragnar Ingibergsson, "Hybrid CoE Trend Report 10: Threat Potential in the Economy: From Vulnerabilities to China's Increased Coercion," European Centre of Excellence for Countering Hybrid Threats, Helsinki, Finland, June 2023, <https://hybridcoe.fi/wp-content/uploads/2023/06/20230612-Hybrid-CoE-Trend-Report-10-Threat-potential-in-the-economy-WEB.pdf>.

<sup>41</sup> Select Committee on the Chinese Communist Party, "Select Committee Unveils Findings on the CCP's Role in the American Fentanyl Epidemic," <https://selectcommitteeonthecpp.house.gov/media/press-releases/select-committee-unveils-findings-ccps-role-american-fentanyl-epidemic-report>.

<sup>42</sup> Executive Office of the President, "Declaring a National Emergency Concerning the Southern Border of the United States," Federal Register, February 20, 2019, <https://federalregister.gov/documents/2019/02/20/2019-03011/declaring-a-national-emergency-concerning-the-southern-border-of-the-united-states>.

Department of State to designate eight transnational cartels—including the Sinaloa Cartel and the Jalisco New Generation Cartel—as foreign terrorist organizations and specially designated global terrorists under the Immigration and Nationality Act and Executive Order 13224.<sup>43</sup>

In February 2025, the US Attorney General issued a new policy memo outlining the Department of Justice’s approach to prosecuting cartels and TCOs.<sup>44</sup> The memo calls for the complete elimination of cartels and TCOs, highlighting the need for a change in mindset—moving beyond mitigating the damage these groups cause and toward a more aggressive, proactive strategy. It stresses that halting the flow of deadly substances like fentanyl is no longer sufficient; instead, the United States must marshal the full resources of the Department of Justice and empower federal prosecutors to collaborate urgently with the Department of Homeland Security and other government agencies to eliminate threats to US sovereignty and national security.<sup>45</sup>

To continue to advance a strategy to counter the fentanyl threat, US policymakers and senior leaders need to embrace a higher comfort level with conflict. They must reframe how hostile actions in the gray zone are defined and recognized. The CCP is fully exploiting actions within this space, taking advantage of tactics that stay below the threshold of armed conflict. While this gray zone is well suited for special operations, it is not an effective space for US national policy in the broader context of interstate strategic competition. The solution lies in recalibrating risk calculations to lower the threshold for when the United States and its allies can respond to CCP aggression. This shift would enable quicker, more decisive actions, create a more robust deterrent, alter the cost-benefit calculus that currently favors CCP aggression in gray zone operations, and ultimately reduce the strategic leverage the CCP currently holds in this space.

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<sup>43</sup> Executive Office of the President, “Designating Cartels and Other Organizations as Foreign Terrorist Organizations and Specially Designated Global Terrorists,” January 2025, <https://whitehouse.gov/presidential-actions/2025/01/designating-cartels-and-other-organizations-as-foreign-terrorist-organizations-and-specially-designated-global-terrorists>.

<sup>44</sup> U.S. Department of Justice, Office of the Attorney General, “Memorandum for All Department Employees: Total Elimination of Cartels and Transnational Criminal Organizations,” February 5, 2025.

<sup>45</sup> Nicholas Dockery, “The Largest Near Abroad Threat to the United States: Cartels and Transnational Criminal Organizations,” February 12, 2025. <https://defensenews.com/native/2025/02/12/the-largest-near-abroad-threat-to-the-united-states/>.

While no administration seeks conflict, there is an undeniable obligation to safeguard citizens when they are under attack. The urgency of this situation is clear: the 2024 death toll from domestic opioid overdoses already exceeds the fatalities from both Pearl Harbor and 9/11. While the policy recommendations provided are not exhaustive, they propose targeted solutions that close many of the exploitable gaps currently leveraged by the PRC and other like-minded actors, while also strengthening US domestic and international security. The proposed policy framework is predicated on three critical pillars: military force projection capabilities, global strategic alliance management, and robust domestic legislative measures.

### *Strengthen US Special Operations Command*

President Trump's decision to elevate the US Space Force from a combatant command to a separate service branch in 2019 exemplifies how reshaping military structures can unlock new capabilities in emerging domains. This significant shift in military organization raises a pivotal question: Should a similar approach be taken with the US Special Operations Command (SOCOM)? Special operations forces play a critical and active role in combating drug trafficking and other illicit networks. The growing complexity of transnational crime demands a force capable of executing specialized missions to disrupt and dismantle these networks. SOCOM drives the US military's counter-narcotics efforts, but its current organizational status limits its potential. By examining the command's strategic roles, organizational structures, and missions sets, we can evaluate the potential benefits and challenges of elevating SOCOM to a separate military service, one that could more effectively address the growing complexities of modern warfare and transnational security threats.

Currently, SOCOM operates as a unified combatant command within DoD, drawing resources and personnel from multiple military services.<sup>46</sup> The augmentation of SOCOM

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<sup>46</sup> US Special Operations Forces (USSOF) are organized under SOCOM and oversees the US Army Special Operations Command, US Naval Special Warfare Command, US Air Force Special Operations Command, and US Marine Forces Special Operations Command, and the Joint Special Operations Command. SOCOM is responsible for ensuring the different branches of special operations work together effectively and use compatible equipment. To assist the Geographic Combatant Commands (GCCs), SOCOM also provides specialized commands for each region, called Theater Special Operations Commands (TSOCs). Operationally,

capabilities is imperative given the current geopolitical landscape, necessitated by SOCOM's unique structural challenges and the evolving nature of global threats. The increasing prevalence of irregular warfare and hybrid threats highlights the growing complexity of global strategic competition, demanding a more specialized and agile force to effectively navigate these challenges.<sup>47</sup> SOCOM's distinctive status as the only congressionally mandated combatant command, endowed with both combatant command authority and service-like responsibilities, positions it as a pivotal element in US national security strategy.<sup>48</sup> However, this unique structure also presents significant operational and administrative hurdles.

Unlike traditional military branches led by civilian secretaries reporting directly to the secretary of defense, SOCOM falls under the purview of the assistant secretary of defense for special operations and low-intensity conflict (ASD(SO/LIC)). This position's subordinate status within the DoD hierarchy—reporting to the undersecretary of defense for policy rather than directly to the secretary of defense—has long been criticized for its lack of institutional power and insufficient oversight capabilities.<sup>49</sup> In the post-9/11 global landscape, as SOCOM gained more resources and influence, the ASD(SO/LIC) office struggled to keep up with these changes. Many argued that this mismatch is a result of SOCOM's growing focus on direct-action missions, the emergence of ethical challenges, and bureaucratic obstacles that hindered its ability to prepare for the evolving challenges of great-power competition.<sup>50</sup>

As the United States grapples with the escalating threats posed by Mexican cartels and the PRC's involvement in the fentanyl crisis, elevating SOCOM to an independent armed service presents a transformative opportunity to bolster national security. This structural

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the seven TSOs align with the priorities of their GCCs, ensuring they address current global challenges.; US Special Operations Command Office of Communication, Fact Book 2023 (MacDill Air Force Base, FL: USSOCOM, 2023), 10–11, <https://www.socom.mil/FactBook/2023%20Fact%20Book.pdf>.

<sup>47</sup> The White House, National Defense Strategy (Washington, DC: The White House, 2022), <https://whitehouse.gov/wp-content/uploads/2022/11/8-November-Combined-PDF-for-Upload.pdf>.

<sup>48</sup> Title 10, U.S. Code, Section 164 and Section 167

<sup>49</sup> US Department of Defense, "Office of the Secretary of Defense," accessed January 18, 2025, <https://defense.gov/About/Office-of-the-Secretary-of-Defense/>; Shannon Culbertson and Alice Hunt Friend, "The Unbalanced Spear," Lawfare, September 20, 2020, <https://lawfaremedia.org/article/unbalanced-spear>.

<sup>50</sup> Mark E. Mitchell, Zachary Griffiths, and Cole Livieratos, "America's Special Operators Will be Adrift Without Better Civilian Oversight," War on the Rocks, February 18, 2020.

change could potentially mitigate the gaps that adversaries like the PRC seek to exploit, particularly in the realm of asymmetric warfare. By granting SOCOM greater autonomy and resources, the United States can more effectively counter the complex threats emanating from these nonstate actors. Elevation would give SOCOM the autonomy to prioritize forms of asymmetric warfare campaigns (i.e., state-sponsored drug trafficking in the form of production and distribution of fentanyl) as a core element of national defense. SOCOM's existing capabilities in counterterrorism, intelligence gathering, and unconventional warfare could broaden, allowing for a greater focus on dismantling TCOs and disrupting the use of narcotics as tools of geopolitical influence. The expanded authority would provide SOCOM with greater strategic oversight and operational independence, enabling it to lead specialized operations, increase international collaboration, and integrate advanced technology specifically designed to counter the asymmetric threat posed by drug trafficking. This move parallels the strategic rationale behind the establishment of the US Space Force, which aimed to address emerging vulnerabilities in space-based security. Similarly, an independent SOCOM could optimize its specialized capabilities to confront the evolving challenges posed by cartels and other transnational threats, thereby enhancing the overall resilience of US defense posture.

However, even without the full elevation of SOCOM, there are other immediate reforms that are crucial to enhance SOCOM's operational effectiveness in this complex environment. A key initial reform involves elevating ASD(SO/LIC) to report directly to the secretary of defense. ASD(SO/LIC) is at the center of DoD's counter-drug strategy, programs, and resources by overseeing critical functions such as the detection and monitoring of illicit drug trafficking, the approval of support requests, and the requirement to inform Congress on significant developments. Elevating ASD(SO/LIC) will streamline the budgetary process, ensure stronger oversight and strategic alignment with broader national security priorities, and facilitate a more cohesive integration of SOCOM's efforts with other defense components, particularly in countering cartels, TCOs and the PRC's malign influence in the Americas.<sup>51</sup>

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<sup>51</sup> Statement of the Honorable Christopher P. Maier, Assistant Secretary of Defense for Special Operations and Low-Intensity Conflict, and General Bryan P. Fenton, USA, Commander, USSOCOM, before the Committee on

Secondly, granting SOCOM greater budgetary autonomy is essential to reduce resource competition with other combatant commands, allowing for more efficient allocation to critical missions such as countering TCOs, cartels, and Chinese-backed fentanyl trafficking networks. This financial flexibility enables SOCOM to invest in advanced technologies and training programs tailored to the complexities of hybrid warfare. Additionally, expanding SOCOM's training and education initiatives will better prepare its forces for the evolving threats posed by cartels and state-sponsored actors.

Lastly, strengthening the integration of special operations forces' capabilities with conventional military units and interagency partners is crucial for maximizing operational effectiveness in countering transnational threats. This integration facilitates coordination between SOCOM, the Drug Enforcement Administration, and other law enforcement agencies in disrupting fentanyl supply chains and targeting cartel networks. The success of joint operations, like those conducted by US Southern Command, underscores the potential for collaborative counternarcotics efforts. One example of a relatively effective effort is the Martillo campaign, a US, European, and Western hemisphere effort targeting illicit trafficking routes in coastal waters along the Central American isthmus. Led by Joint Interagency Task Force South, this operation involves US Navy and Coast Guard vessels, aircraft from federal law enforcement agencies, and military and law enforcement units from various nations. A 2016 update showed that Operation Martillo resulted in the seizure of over 693 metric tons of cocaine and \$25 million in bulk cash and the detention of 1,863 suspects and 581 vessels.<sup>52</sup>

### *Strengthen Global Cooperation*

The global fentanyl crisis demands a robust, coordinated international response. International summit commitments must transform into effective, enforceable actions targeting not only fentanyl trafficking but also infrastructural weaknesses facilitating global spread. One solution is to establish an International Pharmaceutical Inspection and

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Armed Services, United States Senate, April 10, 2024, [https://www.armed-services.senate.gov/imo/media/doc/maier\\_statement.pdf](https://www.armed-services.senate.gov/imo/media/doc/maier_statement.pdf).

<sup>52</sup> "Operation Martillo Still Hammering Away at Illicit Trafficking," U.S. Southern Command, accessed March 30, 2016, <https://www.southcom.mil/MEDIA/NEWS-ARTICLES/Article/985770/operation-martillo-still-hammering-away-at-illicit-trafficking/>.

Counter-Proliferation Organization (IPICPO), to assist in efforts combating the production and trafficking of synthetic opioids like fentanyl. Unlike the Pharmaceutical Inspection Co-operation Scheme (PIC/S), which primarily focuses on quality control, IPICPO would specialize in counterproliferation.<sup>53</sup> This targeted mission would complement and enhance ongoing initiatives, creating a more cohesive global strategy. This new entity could model itself after the International Atomic Energy Agency (IAEA), which has proven effective in preventing nuclear proliferation through rigorous inspection, regulation, and enforcement.

Other efforts already exist in the international community: the Global Coalition to Address Synthetic Drug Threats, established in 2023, now includes 159 countries and fifteen international organizations. The coalition focuses on disrupting fentanyl supply chains, detecting emerging drug threats, and implementing effective public health interventions.<sup>54</sup> Recently, eleven core coalition countries announced new initiatives to advance the coalition’s objectives, and the latest data from the Centers for Disease Control and Prevention reveals a 10 percent reduction in overdose deaths over the twelve months ending in April 2024.<sup>55</sup>

Similarly, INTERPOL’s Illicit Goods and Global Health program (IGGH), which operates under the Illicit Markets Sub-directorate, is dedicated to improving global

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<sup>53</sup> The Pharmaceutical Inspection Convention (PIC) of 1970 was extended in 1995 with the creation of the Pharmaceutical Inspection Co-operation Scheme (PIC/S). It was established by “European Free Trade Association” in 1970. The organization aims to promote effective and collaborative efforts in the realm of “Good Manufacturing Practice (GMP)” with several goals. These goals include the implementation, development, and establishment of uniform GMP guidelines and processes for quality auditors in the pharmaceutical market. Furthermore, the program promotes collaboration and interaction among relevant regulatory bodies, as well as local and global groups, in order to establish confidence. All decisions within the scheme are made unanimously. Currently, there are 56 participating authorities.; Prasanna Gayathri B and Kamaraj R, “Pharmaceutical Inspection Co-operation Scheme: An Overview,” *Cureus* 16, no. 9 (September 9, 2024): e69043, <https://doi.org/10.7759/cureus.69043>.

<sup>54</sup> US Department of State, “Global Coalition to Address Synthetic Drug Threats,” <https://state.gov/globalcoalition/>; The White House, “FACT SHEET: Leaders’ Summit of the Global Coalition to Address Synthetic Drug Threats,” September 24, 2024, <https://whitehouse.gov/briefing-room/statements-releases/2024/09/24/fact-sheet-leaders-summit-of-the-global-coalition-to-address-synthetic-drug-threats/>.

<sup>55</sup> The Coalition has formed three primary working groups: one focused on preventing the illicit manufacture and trafficking of synthetic drugs, another on detecting emerging drug threats and use patterns, and a third on promoting public health interventions to prevent and reduce the health impacts of drug use. In addition, representatives can participate in seven sub-working groups, meeting monthly to share expertise, reinforce best practices, and promote joint action. These sub-groups focus on key areas such as drug manufacturing, trafficking, data collection, interagency collaboration, prevention activities, and alternatives to incarceration for individuals with substance use disorders; U.S. Department of State, “Global Coalition to Address Synthetic Drug Threat.”; Centers for Disease Control and Prevention, National Center for Health Statistics, “Provisional Drug Overdose Death Counts,” <https://cdc.gov/nchs/nvss/vsrr/drug-overdose-data.htm>.

cooperation and enforcement capabilities in combating pharmaceutical crime. By collecting data, coordinating international law enforcement operations, supporting multiagency task forces, and raising public awareness, the IGGH works to dismantle criminal networks and reduce the public health risks associated with these crimes. Initiatives like Operation Pangea, launched in 2008, have significantly impacted the fight against illicit online pharmaceutical sales. In its 2021 iteration, Operation Pangea XIV, authorities worldwide seized counterfeit and unapproved medical products valued at over \$23 million and shut down more than 113,000 fraudulent websites.<sup>56</sup>

Despite ongoing efforts, significant gaps remain in addressing the global complexity of pharmaceutical crime, particularly in regulating precursor chemicals, disrupting trafficking networks, and ensuring effective international collaboration. While initiatives like the Global Coalition to Address Synthetic Drug Threats and INTERPOL's IGGH provide comprehensive frameworks, critical areas still require a more targeted approach. A pharmaceutical-focused organization, such as IPICPO, would serve as a global watchdog with the authority to inspect manufacturing facilities worldwide, ensuring compliance with stringent international standards.

Beyond traditional inspections, IPICPO would establish a unified framework for international cooperation in pharmaceutical counterproliferation and could provide the same level of rigor and oversight to the illicit pharmaceutical trade, significantly curbing the production and distribution of synthetic opioids. In doing so, it would not only confront the current crisis but also lay the foundation for a long-term strategy to prevent the misuse of pharmaceuticals, ultimately fortifying both global security and public health.

These inspections would both target the legal production of pharmaceuticals and address illegal manufacturing practices that contribute to the global opioid crisis. IPICPO would bridge existing gaps by establishing a unified, centralized framework for global cooperation. By integrating expertise from international law enforcement, health organizations, and governments, IPICPO would strengthen and complement the efforts of entities like INTERPOL. Its focus on precursor chemicals and source countries would

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<sup>56</sup> Interpol, "Pharmaceutical crime operations," <https://interpol.int/en/Crimes/Illicit-goods/Pharmaceutical-crime-operations>.



enhance ongoing initiatives, improving the coordination of cross-border efforts and enabling more targeted, intelligence-driven operations against illicit pharmaceutical production and trafficking.

Additionally, IPICPO's role in influencing global pharmaceutical manufacturing standards could strengthen the efforts of organizations like PIC/S, IGGH, and the Global Coalition to Address Synthetic Drug Threats. This would help address gaps in existing regulatory frameworks and provide a more comprehensive strategy. Specifically, IPICPO could support inspections of pharmaceutical manufacturing facilities worldwide and offer valuable insight into emerging precursor chemicals, particularly from source countries like the PRC and, more recently, India. These countries are key suppliers of precursor chemicals for fentanyl and methamphetamine, and IPICPO's work could complement and build upon existing regulatory efforts.<sup>57</sup> IPICPO's operations could drive data collection that better informs on the regulation of precursor chemicals, a critical area that aligns with ongoing global efforts. The diversion of precursor and non-controlled or pre-precursor chemicals from legitimate sources remains a significant driver of synthetic drug production.<sup>58</sup>

Critics may argue that IPICPO would duplicate existing efforts. Implementing IPICPO would face several challenges, including securing funding through member state contributions and international grants, fostering international cooperation through diplomatic channels and emphasizing mutual benefits, developing enforcement mechanisms similar to IAEA protocols with graduated sanctions for noncompliance, and addressing sovereignty concerns by establishing protocols for inspections that respect national autonomy while ensuring effectiveness. However, it offers a unique, centralized approach that current fragmented systems lack. The establishment of an IPICPO-like entity represents a critical step in combating the global fentanyl crisis. By integrating inspection, regulation, intelligence sharing, and cross-border cooperation, IPICPO would fill essential gaps in the international response to this pressing public health and security challenge.

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<sup>57</sup> Ricardo Barrios, Susan V. Lawrence, and Liana W. Rosen, "China Primer: Illicit Fentanyl and China's Role," Congressional Research Service, February 20, 2024, <https://crsreports.congress.gov/product/pdf/IF/IF10890>.

<sup>58</sup> Jason Eligh, "Global Synthetic Drug Markets: The Present and Future," Global Initiative Against Transnational Organized Crime, March 22, 2024, <https://globalinitiative.net/analysis/global-synthetic-drug-market-the-present-and-future/>

### *Strengthen Domestic Regulation*

The US government has intensified actions against Chinese companies involved in fentanyl production, highlighting the broader international effort to address the opioid crisis. Indictments against Anhui Ruihan Technology Company, Anhui Moker New Material Technology Company, Shutong Wang, Shifang Ruan, Hefei GSK Trade Company, and others represent substantial legal measures to disrupt the illegal manufacturing and distribution networks of fentanyl and related substances.<sup>59</sup> These efforts aim to mitigate the public health crisis in the United States by targeting the supply chains responsible for the spread of these dangerous drugs.

Unfortunately, historically, both Congress and the executive branch have been slow to respond to drug-related public health emergencies. In 2016, the Centers for Disease Control and Prevention issued guidelines for prescribing opioids for chronic pain that advocated for nonopioid therapies as first-line treatments and set strict limits on prescription dosage and duration.<sup>60</sup> In 2017, the Food and Drug Administration (FDA) implemented measures to improve opioid safety, including required educational programs for healthcare providers on safe prescribing practices and risks of use, with additional mandates requiring detailed labeling on opioid medications to inform patients and providers of the dangers of misuse and addiction.<sup>61</sup> Despite escalating fentanyl-related deaths and economic harm, it was not until October 26, 2017, that acting Health and Human Services Secretary Eric D. Hargan declared the opioid crisis a public health emergency under President Trump's first administration. The FDA took nearly a decade to address the deceptive marketing practices of Purdue Pharma, which contributed significantly to the opioid epidemic. The FDA continues to face criticism for its regulatory oversight and approval processes. Challenges include ensuring drug safety, managing conflicts of interest, and addressing the influence of pharmaceutical companies on drug

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<sup>59</sup> U.S. Internal Revenue Service, "Three Chinese Chemical Manufacturing Companies and Five Employees Charged."

<sup>60</sup> Physician-Patient Alliance for Health & Safety, "3 Things to Remember in the Fight Against Opioid Misuse, Abuse, and Overdose," April 2016, <https://ppahs.org/2016/04/3-things-remember-fight-opioid-misuse-abuse-overdose/>; Liz Lehmann, "The Opioid Crisis: Lawsuits Filed Against Big Pharma and Drug Distributors." *Syracuse Law Review*, February 18, 2018. Accessed July 16, 2024. <https://lawreview.syr.edu/the-opioid-crisis-lawsuits-filed-against-big-pharma-and-drug-distributors/>.

<sup>61</sup> Lehmann, "The Opioid Crisis."

approval and marketing. The FDA's ability to balance public health concerns with demands of the pharmaceutical industry remains a contentious issue, particularly as it seeks to prevent future crises similar to the opioid epidemic.<sup>62</sup>

The year after Hargan declared a public health emergency, Congress passed the Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities Act (SUPPORT Act) in 2018, a comprehensive legislative effort aimed at addressing opioid addiction through expanded Medicaid coverage, treatment programs, and harm reduction measures.<sup>63</sup> While the SUPPORT Act was a step forward, it did not sufficiently address fentanyl's unique challenges. It neglected to focus on synthetic opioids, failed to implement adequate enforcement measures, delayed funding for harm reduction tools, and did not tackle emerging drug trends tied to fentanyl's synthetic nature, potency, and ease of production.

Congress took additional steps and passed a temporary scheduling order to classify fentanyl-related substances as Schedule I drugs under the Controlled Substances Act. These measures were repeatedly extended through continuing resolutions but failed to provide a permanent solution. The Halt All Lethal Trafficking of Fentanyl Act (HALT Fentanyl Act), first introduced in 2023, seeks to classify all fentanyl-related substances as Schedule I permanently, impose the strictest controls and penalties for trafficking these substances, and streamline research into fentanyl analogs to understand effects and medical utilization better.

Fentanyl is a strategically convenient tool for states seeking to exploit the opioid crisis because, unlike heroin, there is no need for vast tracts of land to grow crops.<sup>64</sup> Fentanyl also has fewer production hazards, is easier to produce, and requires smaller amounts of chemicals compared to other synthetic drugs such as methamphetamines. According to a fentanyl working group based in the San Diego area, the economics of fentanyl trafficking are starkly lucrative: a single kilogram of fentanyl, purchased for

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<sup>62</sup> Lehmann, "The Opioid Crisis."

<sup>63</sup> The SUPPORT Act represented a significant legislative achievement by expanding access to treatment for opioid addiction, supports recovery, enhances law enforcement's ability to combat illegal opioids, strengthens synthetic opioid regulation, and encourages research into alternative pain management methods.; Congressional Budget Office, "The Opioid Crisis and Recent Federal Policy Responses,"

<sup>64</sup> Tamman, et al., "We Bought Everything Needed to Make \$3 Million Worth of Fentanyl...Web Browser:"

\$32,000, can be transformed into one million counterfeit pills, with a street value of approximately \$20 million.<sup>65</sup>

However, critics raise concerns about the legislation’s reliance on punitive measures, which could arguably exacerbate problems in the criminal justice system and divert resources from public health solutions. Advocacy groups and some lawmakers call for a more balanced approach prioritizing harm reduction, treatment, and prevention alongside enforcement. Additionally, some scientists warn that permanently scheduling all fentanyl-related substances without evaluating potential benefits could hinder research into life-saving treatments for overdoses.

Despite positive efforts like the HALT Fentanyl Act, which has not yet become law as of this report’s publication, critics argue that Congress’s actions have been reactive rather than proactive, allowing fentanyl trafficking and fentanyl-related deaths to escalate dramatically. Over the past decade, efforts to address opioid distribution have intensified in response to the growing crisis. To close these gaps, Congress, policymakers, and community leaders must remain vigilant and take decisive action to end the exploitation and targeted killing of Americans. This is an absolute responsibility—one that demands addressing every factor contributing to the crisis, from drug trafficking networks to the root causes of opioid addiction, ensuring real and lasting solutions.

One bold but necessary recommendation is that Congress must designate large-scale fentanyl trafficking as a weapon of mass destruction (WMD). Fentanyl’s unparalleled lethality—just two milligrams can prove fatal—and capacity for mass harm make it a clear candidate for WMD classification under federal law.<sup>66</sup> Such a designation would grant federal agencies, including the Department of Defense, the Department of Homeland Security, and the Drug Enforcement Administration, the authority to coordinate resources and strategies at an unprecedented level. Furthermore, this policy shift would underscore the gravity of the fentanyl crisis to international partners and adversaries, signaling a

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<sup>65</sup> U.S. Attorney’s Office, Southern District of California, “County’s Top Law Enforcers Issue Dire Warning about Fentanyl, Carfentanil as Deaths and Border Seizures Spike,” October 6, 2017, <https://www.justice.gov/usao-sdca/pr/county-s-top-law-enforcers-issue-dire-warning-about-fentanyl-carfentanil-deaths>.

<sup>66</sup> Federal Bureau of Investigation, “What We Investigate: Weapons of Mass Destruction,” accessed March 31, 2025, <https://www.fbi.gov/investigate/wmd>.

commitment to safeguarding US citizens and national security while deterring misuse by malicious actors.

Classifying fentanyl as a WMD under US law would fundamentally alter how the United States and its allies address the fentanyl crisis. The Department of Homeland Security defines a WMD as a device—including chemical agents—intended to cause significant harm or death to large numbers of people. Labeling fentanyl as a WMD would allow for the mobilization of resources typically reserved for nuclear, biological, and chemical threats. This reclassification would give the US government access to enhanced military, intelligence, and law enforcement tools for combating fentanyl production and distribution networks, both domestically and internationally.<sup>67</sup>

The designation would create more robust international cooperation frameworks through organizations like NATO and the UN. NATO's existing chemical, biological, radiological, and nuclear defense policies could be expanded to include fentanyl, enabling joint operations between the United States and its NATO allies to target supply chains, disrupt precursor chemical production, and sanction state actors involved in the illicit trade. This would align fentanyl countermeasures with international protocols on chemical warfare, raising the level of urgency and cooperation required to address the crisis.

Additionally, the WMD classification would increase pressure on countries like the PRC, which supplies the precursor chemicals used to manufacture fentanyl. Under international law, the United States could invoke broader sanctions, intelligence-sharing agreements, and coordinated enforcement efforts to hold these governments accountable for failing to prevent the export of fentanyl precursors. This designation would enable more aggressive diplomatic and legal actions, compelling these countries to take greater responsibility for their role in the fentanyl crisis.

By designating fentanyl as a WMD, the United States would not only increase its ability to combat the drug domestically but also strengthen international partnerships in the fight against synthetic opioids. This approach would provide the legal and strategic

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<sup>67</sup> Dockery, "The Largest Near Abroad Threat to the United States: Cartels and Transnational Criminal Organizations."

framework necessary to treat the fentanyl epidemic as a global security threat demanding comprehensive, multinational action.

Lastly, Congress must classify xylazine, a veterinary sedative increasingly discovered in illicit drug supplies, as a Schedule III controlled substance under the Controlled Substances Act. The rising prevalence of xylazine in street drugs, often mixed with fentanyl, results in devastating public health consequences, including overdoses that remain unaffected by naloxone. Federal scheduling would standardize control across states to eliminate critical gaps traffickers exploit, enable more effective testing and interdiction efforts, and empower law enforcement agencies to act decisively.

Cumulatively, these legislative actions represent a comprehensive framework to combat the intertwined threats of xylazine and fentanyl trafficking. By classifying xylazine as a controlled substance and designating large-scale fentanyl trafficking as a WMD, Congress would significantly enhance the United States' ability to protect public health, strengthen national security, and assert the needed leadership in the global fight against cartels and TCOs.

### **Conclusion**

The current fentanyl crisis is deeply rooted in profit-driven practices of corporations that capitalize on insufficient government oversight—particularly from the FDA—and a lack of industry accountability. Shifts in healthcare and insurance policies placed additional pressure on healthcare professionals, setting the conditions for addiction to take hold in communities already struggling with rising mental health issues. Once addiction became widespread, the epidemic took deep root.

Ultimately, decades of systemic failures—combined with persistent demand for drugs in the United States—created the conditions for terrorist organizations like Mexican cartels and transnational criminal networks to thrive. At the same time, nation-states like the PRC, seeking to challenge the US-led global democratic order and strengthen their economic positions, began dominating critical industries, including pharmaceuticals. As PRC's pharmaceutical sector expanded, fentanyl quickly became an increasingly lucrative trade. Whether initially intended as a geopolitical tool or not, it has undeniably evolved into

one—both as leverage in negotiations with the United States and as an instrument of asymmetric warfare, producing consequences far beyond what the CCP may have originally intended.

As the first two volumes showed, aggressive pharmaceutical lobbying, inadequate regulatory and legislative responses, and a struggling public health system all contributed to the current opioid crisis, posing a severe threat to the security and stability of the United States. The transnational origins of fentanyl and fentanyl precursors further complicate regulatory efforts. These conditions created vulnerabilities that external actors can exploit for their benefit and to harm American interests.<sup>68</sup>

The fentanyl crisis is not merely an isolated incident; it is part of a broader, deliberate strategy aimed at undermining US society and infrastructure while advancing the CCP's domestic and international objectives. The PRC has deliberately crafted an “unassailable base” for fentanyl production by offering protection for organized crime figures who employ calculated strategies to dominate the illicit drug trade while helping them evade international accountability. Selective law enforcement and active support for criminal elements illustrate the CCP's deliberate fostering of an environment of illegal operations under the guise of legitimate pharmaceutical activities. The PRC's strategic use of its pharmaceutical industry, transnational criminal organizations, and sophisticated media and propaganda efforts reflects Lawrence's principles of asymmetric warfare from behind a veil of official denials and gestures of cooperation. By establishing unassailable bases and leveraging proxy forces, the PRC has created a formidable network that challenges international efforts to combat the global fentanyl crisis.

Although definitive evidence proving the PRC has an official strategy of asymmetric warfare against the United States remains elusive, the nexus between fentanyl trafficking and geopolitical strategy underscores the importance of understanding asymmetric warfare as a possible explanation for the PRC's involvement in fentanyl production and distribution. Despite the PRC's assertions, its continued role in the US fentanyl crisis points

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<sup>68</sup> Executive Office of the President, “Executive Order on Establishing the United States Council on Transnational Organized Crime,” December 15, 2021, The White House, Briefing Room, Presidential Actions, <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/12/15/executive-order-on-establishing-the-united-states-council-on-transnational-organized-crime>.

### **The Domestic Fentanyl Crisis in Strategic Context: Part III**

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to a significant gap between promises and actions, underscoring the complex challenges posed by this lethal issue. The bilateral cooperation often touted in public forums must move beyond lip service into tangible, strict regulatory enforcement, especially concerning the oversight of precursor chemicals. Moreover, the United States must overhaul domestic strategies, replacing ineffective broad-brush educational programs with targeted, impactful campaigns that accurately convey the dangers of fentanyl and provide pathways to treatment and recovery.



