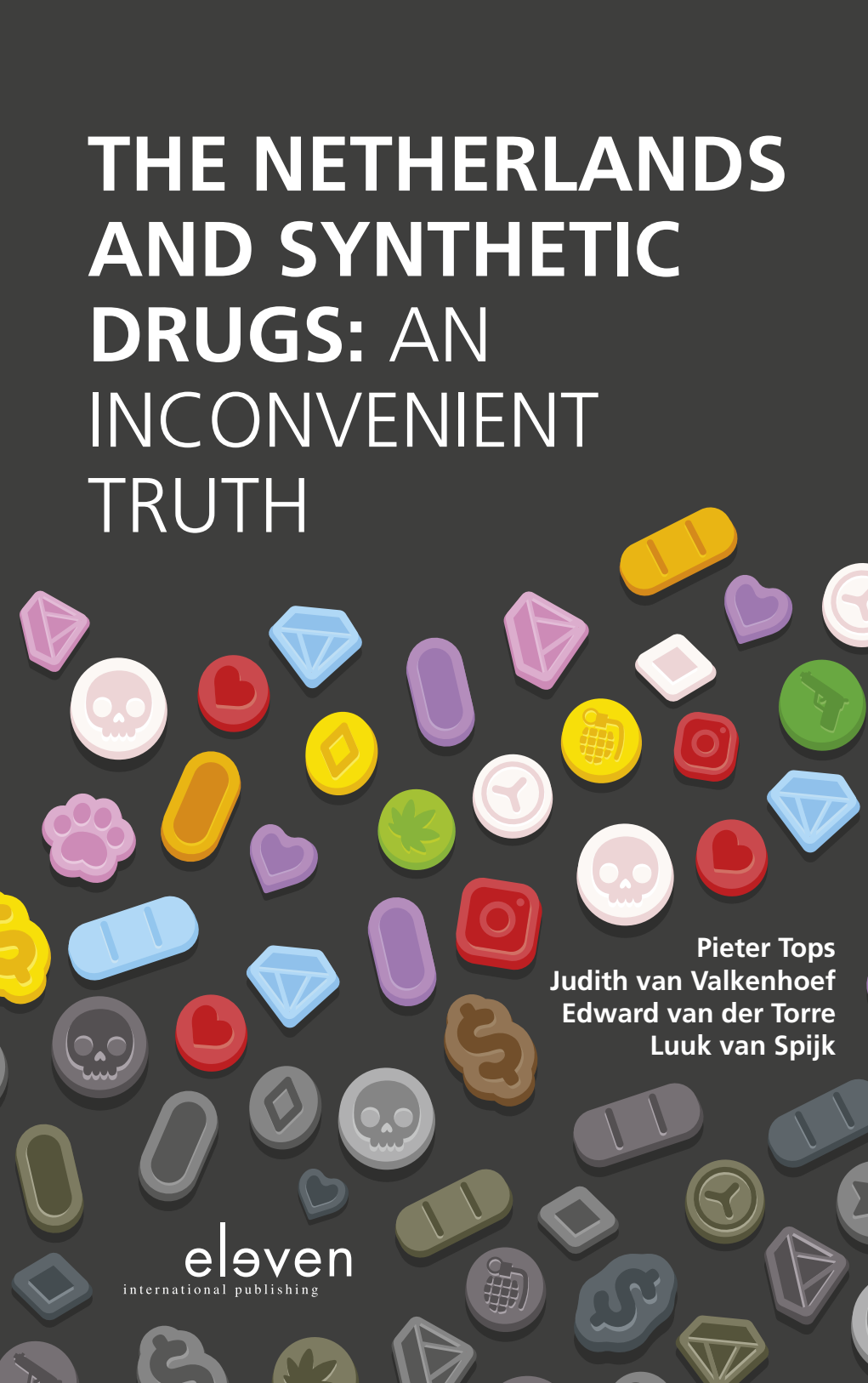


THE NETHERLANDS AND SYNTHETIC DRUGS: AN INCONVENIENT TRUTH



Pieter Tops
Judith van Valkenhoef
Edward van der Torre
Luuk van Spijk

eleven

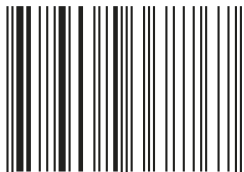
international publishing

The Netherlands is a large producer and trader of synthetic drugs (notably XTC and amphetamines). In fact, Dutch criminals are global leaders in the synthetic drugs industry, with distribution networks and commercial activities across the world. It is a multi-billion business forming a shadow economy that is immensely attractive to many people. This book describes why the Netherlands has become and – barring drastic action by the Dutch government – will remain such a big player in synthetic drugs.

This is an abridged account of another Boom criminologie publication entitled *Waar een klein land groot in kan zijn. Nederland en synthetische drugs in de afgelopen 50 jaar.* (A small country punching above its weight. The Netherlands and synthetic drugs in the past 50 years). The aim of the authors is to make a contribution to the national and international debate about drugs, drugs crime and the anti-drugs efforts.

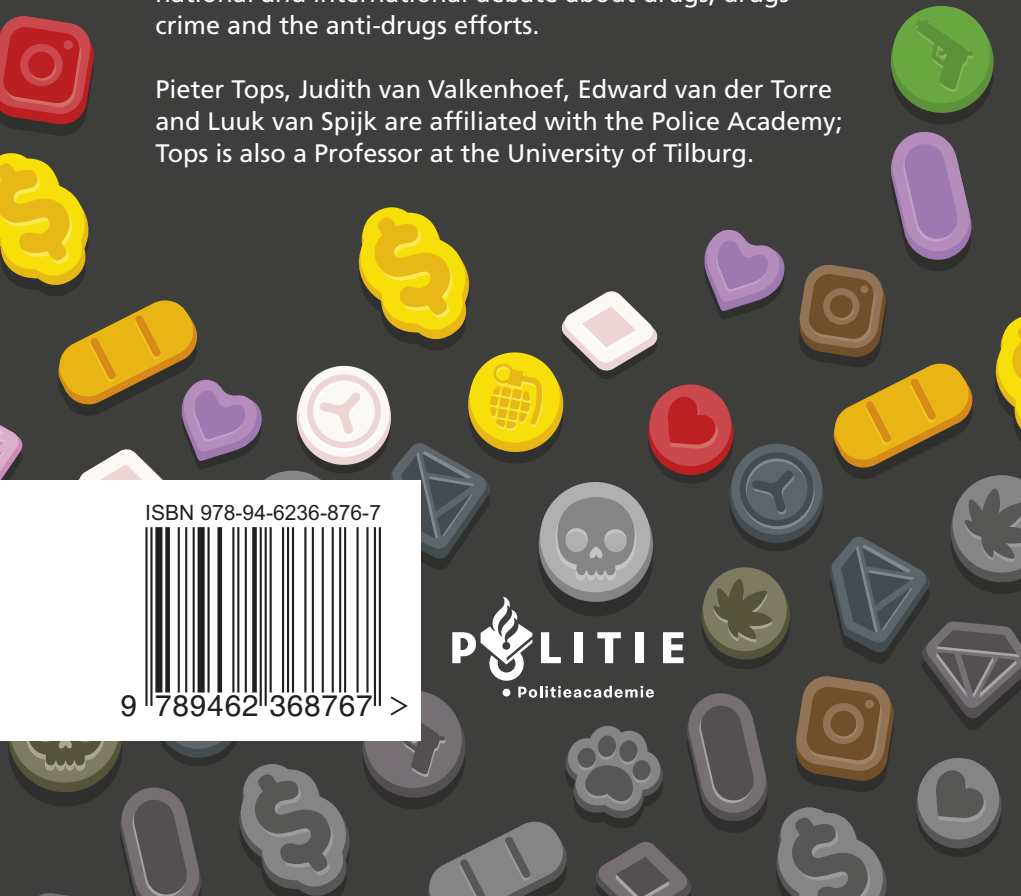
Pieter Tops, Judith van Valkenhoef, Edward van der Torre and Luuk van Spijk are affiliated with the Police Academy; Tops is also a Professor at the University of Tilburg.

ISBN 978-94-6236-876-7



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POLITIE
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Published, sold and distributed by Eleven International Publishing

P.O. Box 85576

2508 CG The Hague

The Netherlands

Tel.: +31 70 33 070 33

Fax: +31 70 33 070 30

e-mail: sales@elevenpub.nl

www.elevenpub.com

Sold and distributed in USA and Canada

International Specialized Book Services

920 NE 58th Avenue, Suite 300

Portland, OR 97213-3786, USA

Tel: 1-800-944-6190 (toll-free)

Fax: +1-503-280-8832

orders@isbs.com

www.isbs.com

Eleven International Publishing is an imprint of Boom uitgevers Den Haag.

ISBN 978-94-6236-876-7

ISBN 978-94-6274-928-3 (E-book)

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Printed in The Netherlands

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INTRODUCTION

The Netherlands, *a seemingly small and innocent country on the North Sea*, has actually long been a major player on the world stage of synthetic drugs. Amphetamines (speed) have been manufactured in the Netherlands on a large scale since about 1970. But its real speciality is MDMA (the active powder in XTC-pills) which has been widely produced in the country since about 1985. Having acquired an excellent reputation over the years, MDMA from the Netherlands is in great demand all over the world. Other synthetic drugs produced and traded in our country, albeit on a smaller scale, include LSD, GHB and methamphetamines. The Netherlands thus boasts a prominent position among the countries with a thriving homegrown drugs industry and market.

The production and trade of these synthetic drugs is a hugely lucrative business. For obvious reasons, no public accounts are available of the revenues from synthetic drugs, so estimates are necessarily approximations based on general assumptions. According to the information we were able to gather for this study, the synthetic drugs revenue in the Netherlands for the year 2017 was *at least* 18.9 billion euros.¹ But this is a conservative estimate and the actual revenue is very probably significantly higher. Moreover, this figure excludes the revenue from amphetamines and XTC produced by Dutch criminals abroad, as well as the revenue they generate from non-synthetic drugs.

That 18.9 billion euros can be seen as the contribution of the Dutch synthetic drugs world to the illegal global economy. Ultimately, traders all over the world pocket a slice of that amount, with a particularly large chunk ending up with the

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1 See chapter 3 and the appendix to the report 'Waar een klein land groot in kan zijn', The Hague, 2018.

middlemen. The amount of money paid for synthetic drugs 'off-lab', i.e. paid directly to the producers in the Netherlands by both native and foreign criminals, is at least 610 million euros. About the phases between off-lab and final street sale, which are so crucial because this is where the top-criminals earn their 'big' money, less is known. We estimate that the revenue for Dutch producers and traders in this phase ranges from a minimum of 3 to 5 billion euros.

The manufacturing costs for synthetic drugs are relatively modest (about 280 million euros in total). One XTC pill costs about 20 cents to produce in the Netherlands. That is only a fraction of the price that the user pays. This 'street value' is 2 to 5 euros in the Netherlands, around 13 euros in Sweden and about 20 euros in Australia, which is an important market for Dutch XTC.² The bulk of the Dutch output is intended for export; the number of XTC users is officially estimated at about 19 million worldwide, but the actual number is probably much higher as many countries (notably in Asia and Africa) have never carried out studies into the scale of synthetic drugs use.³

Central question

How have Dutch criminals been able to maintain a prominent position in the global production of synthetic drugs for decades? It seems puzzling. Particularly as the principal ingredients for synthetic drugs are not made in the Netherlands. Most of the precursors (the substances that determine the type of drugs you are going to make) have to be imported from China. The 'essential' and other chemicals are produced in the Netherlands, but are not always readily available: some are subject to licensing requirements or the

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2 Source: Havocscope.nl, figures for 2017.

3 According to the United Nations Office of Drugs and Crime; see: UNODC (2015) *World Drug Report 2015*. Vienna: United Nations Publications.

obligation to disclose unusual transactions. You cannot order litres of acetone or hydrochloric acid without catching the eye of the law. The system in the Netherlands is generally so effective that criminals prefer to order their chemicals abroad, such as in Poland or, closer to home, Belgium.

Due to the promise of vast profits, synthetic drugs have a magnetic attraction for criminal groups. Which makes it all the more remarkable that Dutch criminals have managed to maintain their international ascendancy for so long. Why have criminals in other countries not muscled into this lucrative business? Admittedly, there have been some initiatives in this direction. In the first decade of this century, Chinese emigrants (with some Dutch assistance) sought to set up an MDMA industry in Canada, but this never came to full fruition.⁴ And several years ago, amphetamine production facilities were started up in Eastern Europe (particularly Poland), often with Dutch advice and support, but the operations in the Netherlands remain bigger and more profitable. More recently, XTC and amphetamine laboratories have emerged in the north of Belgium, again with Dutch players often in a leading role.

So the questions remain: why the Netherlands? Why so big? Why for so long?

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4 *The National Drug Threat Assessment 2017* of the US DEA reports that in 2017 Canadian drugs gangs exported 'tens of millions of tablets' to the United States (p. 14). For comparison: according to our calculations, almost a billion XTC pills at minimum were produced in the Netherlands in 2017 (Tops et al., *Waar een klein land groot in kan zijn*. The Hague, 2018).



A BRIEF HISTORY

'I Love My Country'

Since the early 1990s, Dutch criminal investigation agencies have sought to build a strong intelligence capability. They developed a comparatively new approach focusing on the logistical process of the criminal activities (which makes sense given the complex nature of synthetic drugs logistics). This gave rise to the barrier models. These models, which are still used today, are aimed at throwing up barriers to thwart that logistical process. Over the years, hundreds of investigations were carried out into the collaborative activities between synthetic drugs criminals. The names of the ringleaders were soon common knowledge for most Dutch police officers. As one of them joked: 'These names could almost have been asked as a quiz question in "I Love My Country"'.

Many of these criminals came from a traveller or working class background in the south of the Netherlands, though there were also always relationships with criminal networks in the rest of the country, particularly in the west. Whilst some new names have recently been added, most of the current drugs bosses have been active in the synthetic drugs world for decades. There have been a few changes. Some of the bosses have been succeeded by family members and others have spent time in prison (in the Netherlands or abroad), but with no significant consequences for the effectiveness of their criminal networks. However, more recent signals indicate that new groups, mainly of Turkish, Polish and (sometimes) Moroccan origin, are entering the market (both trade and production) and challenging the position of the traditional Top-X synthetic drugs criminals.

Foreign pressure

Interestingly, the Netherlands usually only gives serious attention to synthetic drugs crime in response to pressure from abroad. This was already the case in the 1970s. At the time, Sweden had to deal with a large stream of amphetamine pills from the Netherlands (initially not punishable here but, from 1969, only available on prescription). It was only after strong diplomatic and political pressure from Sweden that the Dutch authorities acted to stop these exports. Amphetamines were not placed on List 1 under the Opium Act until 1976. By then, the damage had been done: Dutch criminals had learned how lucrative the international amphetamine trade could be. As soon as the ban was in place, they started producing the drugs illegally. A similar pattern occurred in the 1980s when MDMA burst onto the international scene. Again, the Netherlands was relatively late in banning these products (the US did this in 1986, the Netherlands in 1988); criminals astutely exploited this respite to turn the Netherlands into the source country for MDMA.⁵

Strong international pressure to clamp down on synthetic drugs production arose in the mid-1990s. In an interview, the US drugs czar McCaffrey⁶ berated the Netherlands for being a narco-state and a leading French senator, who was conducting a study into the drugs problem in his country, was quick to echo this sentiment. France was extremely irritated by the huge amount of Dutch drugs (both synthetic and cannabis) flowing into the country. The then prime minister Kok was personally taken to task by the French president Chirac and when the conflict even threatened to jeopardize

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5 This phenomenon persists to this day: nps-based drugs are forbidden in neighbouring countries, but many are still legal in the Netherlands; this is discussed later in our analysis.

6 He was the Director of the Office of National Drug Control Policy under President Clinton from 1996 to 2001.

the planned Dutch chairmanship of the European Council of Ministers (first half of 1997), he acted swiftly and decisively. Within a few months, a Unit Synthetic Drugs (USD) was up and running (ironically, a police report had previously urged the creation of such a unit, but to no avail). This USD was a unique collaboration involving multiple parties (the police, the Public Prosecutor, the Fiscal Information and Investigation Service (FIOD), the Economic Crime Unit (ECD), the Customs, the Kmar (Royal Marshals) and the Ministry of Transport & Public Works). To stimulate their mutual cooperation, they were housed in the same office premises which, according to many who were directly involved, was a key factor in the USD's operational success: information could be shared and actions coordinated face to face at the workplace. The USD had a big impact at both national and international level, and the relations with France soon thawed, at least regarding this particular issue.

Despite the USD's good work, prime minister Kok was to receive another international reprimand. During a visit to the White House in September 2000, US president Clinton urged him in a friendly but firm manner to do something to stem the enormous quantities of XTC pills flooding into the US from the Netherlands. And though the USD disputed the accuracy of the US intelligence (arguing that important trade lines of synthetic drugs had in the meantime been taken over by Americans), once he returned to the Netherlands, the prime minister banged his fist on the table and insisted that action be taken. Within half a year, a landmark policy paper entitled 'Joining Forces Against XTC' (*'Samenspannen tegen xtc'*) kick-started a major intensification of the efforts against XTC. A lot of extra money and personnel were made available, with 200 to 250 people (at the police, FIOD, Customs, Public Prosecutor and other agencies) being dedicated to the fight against synthetic drugs crime on a daily basis. About 50 to 100 investigations were started up each year, which was sufficient to satisfy the United States. In 2006 the White House noted that the Dutch government had achieved substantial successes

in its efforts to tackle the production of XTC and withdrew its threat to put the Netherlands on its black list (known as the *Majors List*), a move that would have also impeded the legitimate economic relations between the two countries.

Whether XTC production in the Netherlands had really been curtailed was open to question. Exports to the US did decrease, but mainly because Dutch citizens exporting XTC to the US now faced extradition to that country. This actually happened several times, which acted as an effective deterrent on criminal dealers and producers. The extradition measure elicited vehement protests from the legal community, but it was certainly effective.

Optimism

As the pressure from the US receded, the extra efforts petered out and synthetic drugs once again slipped off the political agenda. This complacency was partly due to the nascent optimism about the effects of the enforcement actions. An initial evaluation of the effects of the Joining Forces Policy Paper in early 2007 was still very cautious in its conclusions (according to the WODC, some indicators pointed to reduction but others to continuing production).⁷ But the national crime analysis CBA 2007, which appeared slightly later, was more positive. It observed brightly that declining international demand for XTC and amphetamines had led to a decrease in production. This optimistic mood received a new impulse in the same period (second half of the noughties) when pressure on countries like Russia and China to curb the production of the precursors PMK and BMK appeared to bear fruit.

When the resources that had previously been made available for the 'Joining Forces against XTC' initiative started to

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⁷ The WODC is the research institute of the Department of Justice and Safety in the Netherlands.

diminish, the Dutch authorities (Public Prosecutor, police, FIOD) adopted a new strategy aimed at tackling the supply of precursors at source, namely in Russia and China. Contacts were established with these countries and Dutch officials became regular visitors to Moscow and Peking.

For whatever reason, the flow of precursors from these countries appeared to dry up at the end of the noughties. BMK plants in Perm and Volgograd (Russia) were closed and the Chinese government took more stringent action against the illegal production of PMK. The extent to which the Netherlands was instrumental in these developments is unknown and influence from the US was probably at least as important. But either way, the reduced availability of precursors appears to have caused problems for the production of synthetic drugs in the Netherlands. From 2007 to 2009 there were strong indications of a significant dip in the production of XTC in the Netherlands.⁸

Synthetic drugs production recovers

But this was only temporary. The criminal world responded to the shortages of PMK and BMK by developing alternatives for XTC, such as MCPP; this replicates the working of MDMA for 80%, but gives users a headache. 'Rubbish came onto the market,' said one investigating officer, 'but it went all over the world'. Ground aspirin powder was added to the substance to suppress headaches, but it didn't really help.

So the search for alternatives continued, now collectively referred to as New Psychoactive Substances (NPS). Popularly known as designer or party drugs, these substances have 'psychoactive' (mind-altering) properties, but do not come

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8 This applied less to amphetamines, partly because bmk – the amphetamine precursor – has far more legal applications than pmk – the xtc precursor; the availability of bmk is therefore harder to constrain.

under the Dutch Opium Act and are therefore not punishable; they imitate the effects of XTC or amphetamines.⁹

Much to the surprise of the criminal investigation agencies, XTC production recovered after a few years. The catalyst of the revival was the development of *pre-precursors*. These were not just as effective as the earlier precursors, but also significantly (up to ten times) cheaper. In 2015/2016, the Dutch XTC pill had made a full comeback thanks to its superior quality. To cater to the changing markets, 'better' XTC is now being produced with a higher MDMA dosage.

The Dutch clampdown on synthetic drugs (notably MDMA) had thus spent its force within a few years. Worryingly, it also had serious adverse side-effects. According to insiders, the advent of *pre-precursors* has made the synthetic drugs world much more complex: 'we have created a many-headed monster'. Previously, the criminal investigators only needed to look out for oleaginous substances; now they also needed to be on the look-out for powdery substances. That's a new problem for the Customs people. Chinese and Lithuanian intermediaries have been eliminated because criminals can now order non-punishable substances direct in China; this boosts their profits. The amount of drugs waste has increased strongly because the use of *pre-precursors* has added an extra step (the 'conversion' step) to the production process; this causes a lot of waste. The production of synthetic drugs has also become more hazardous. The need to use heating blankets, for instance, has led to an increased fire risk. Moreover, some of the traditional 'pill purveyors' have diversified into the cocaine world in order to spread their risks. Some of them also (re)turned to the production of cannabis.

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9 Most nps have chemical names that are incomprehensible to outsiders, such as 4-MEC, 3-MMC and 6-APB. nps are placed on list 1 of the Opium Act with some regularity; 4-FA (xtc light), for instance, was placed on the list in May 2017.

The development of pre-precursors has also given rise to legal complications. The technicalities are a bit challenging, but they are briefly discussed here in order to give an idea of the cat-and-mouse struggle that the judiciary is waging against the drugs criminals. To understand this struggle, it is important to realize that the efforts to tackle synthetic drugs in the Netherlands fall within two legal regimes: the Opium Act and the Chemicals Abuse Prevention Act (Wvmc).¹⁰ The Opium Act centres on the prohibition of the 'end products', i.e. the drugs ('psychoactive substances') themselves, such as XTC and amphetamines. The Wvmc aims to control the substances required to manufacture synthetic drugs, the 'intermediate products'. Many of these substances also have legal applications, making it impossible to simply impose a blanket ban. For this reason, an extensive supervisory and licensing system has been developed under the Wvmc and the European Regulation on drug precursors. A crucial pillar of this system consists of the list of scheduled substances; the manufacture or use of a scheduled substance is subject to possession of a licence. Infringements are treated as an economic offence.

The system, in itself, is reasonably clear. But the crucial problem is which substances must be put on the list and when.

An example.

APAAN is a pre-precursor for amphetamine.¹¹ First found in amphetamine samples in 2009/2010, its application in amphetamines has rapidly taken flight since then. In 2012 the Netherlands Forensic Institute found APAAN in half of all amphetamine samples. As it is not a scheduled substance as defined in the Wvmc and the European Regulation, a Dutch court ruled in 2012 that its application was not subject to the

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10 The Wvmc, in turn, is directly related to Regulation (EC) number 273/2004 of the European Parliament and of the Council on drug precursors.

11 To be precise: apaan is a precursor for bmh and a pre-precursor for amphetamines.

possession of a licence. This opinion was later confirmed in a preliminary ruling of the European Court of Justice. The Netherlands subsequently pressed for APAAN to be placed on the list of scheduled substances, which ultimately happened in late 2013.

However, the criminal world had not been sitting still either. In the meantime, a new pre-precursor had been developed: APAA. Its chemical composition is similar to that of APAAN, but sufficiently different to formally constitute a new substance. The sole purpose of APAA is to manufacture drugs. So the cat-and-mouse game could start all over again. Since then, the drugsproducers have added two more new substances, APA and MAPA, to their repertoire alongside APAA. Commenting on this continuous race between drugs criminals and the law, one perceptive observer noted that ‘the legislator’s efforts to curb the drugs producers are a bit like Tom chasing Jerry in the eponymous cartoons’.

In this grey area, the criminal investigation agencies can invoke Article 10a of the Opium Act under which ‘preparatory actions’ are punishable. This makes it possible to prosecute individuals who are in possession of certain substances with the evident intention of manufacturing drugs or facilitating the manufacture of drugs. The article provides a legal basis for taking action against pre-precursors, but putting it into practice remains a difficult and time-consuming task according to criminal investigators. To confiscate the substances, proof must also be provided that they are intended for the production of synthetic drugs; there must be ‘dual intent’, as it is called in legal jargon.

Where we stand in 2017

Meanwhile, the police and judiciary are convinced that the production and use of XTC and amphetamines have increased again, both in the Netherlands and worldwide, and to a

higher level than ever before.¹² The production method has also changed. They now realize, more acutely than before, that the introduction of pre-precursors was a *game-changer*.

No longer thwarted by a shortage of precursors, the production of synthetic drugs has become more specialized, professional and, in some cases, larger in scale. The authorities regularly uncover modern and well-equipped laboratories that are a far cry from the ramshackle home operations sometimes shown on TV.

Worryingly, the production of synthetic drugs has also come within the reach of more people. Less capital is needed to start up a facility. The elimination of Chinese intermediaries and the rise of the internet have made pre-precursors more accessible. There are strong indications that the number of producers of synthetic drugs has grown, with more smaller-scale production taking place in residential neighbourhoods. Newcomers have entered the market ('kamikaze pilots' as one of the traditional producers calls them). These developments have put the prices of XTC and amphetamines under pressure in the Netherlands. Traditional 'pill purveyors' complain that the business has become less lucrative in the Netherlands. To compensate, they are seeking to tighten their grip on the international markets. Assistance from Outlaw Motorcycle Gangs (OMGs) can help them achieve this.

Despite the intensified efforts against synthetic drugs – via the USD and, later, the Joining Forces Against XTC Policy Paper – Dutch criminal producers held onto their top position on the world league table. The temporary dip was overcome and production rapidly recovered, probably to a higher level than before. This begs the question: how have the Dutch producers managed to retain their leading position for so long? To explain this extraordinary phenomenon, we shall

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12 According to the *Criminaliteits Beeld Analyse (National Crime Analysis) 2016* of the Dutch police.

first look at the criminal world and then at the government's policy over the years.



THE CRIMINAL WORLD OF SYNTHETIC DRUGS

The criminal drugs world is characterized by agility and resilience. It has a remarkable ability to recover from setbacks and losses. How is this world organized? What do we know about it?

The first thing to consider is the *specialization of roles*. Each individual has a specific role. Some purchase precursors and essential or other chemicals, while others buy the hardware (boilers, retorts, etc.). Still others focus on the transportation of the illegal goods, the recruitment of laboratory technicians or the arrangement of production facilities. No specific player takes up an absolute monopoly position. The various players work together in flexible and temporary collaborative structures according to ad hoc needs and opportunities. Some individuals act as controllers or coordinators linking suppliers with customers, and there are always plenty of auxiliaries and service providers on hand to facilitate the process. Many of the key players know each other personally.

The leaders evidently have the knack of building up impressive networks, despite a lack of formal education and linguistic skills. Alongside strong local networks for the systematic production of synthetic drugs, they have managed to create large international networks for undertaking criminal projects across the borders, either on a structural or ad hoc basis. This is effectively a criminal form of 'glocalization', i.e. the performance of economic and cultural (and, in this case, criminal) activities on a global scale, but adapted to local conditions.

In the third place, the criminal world of synthetic drugs is characterized by a remarkable innovative capability. Innovation takes place both at product level – where drugs

and pre-precursors are regularly renewed to circumvent regulatory prohibitions, but without compromising quality (Dutch synthetic drugs continue to enjoy an outstanding international reputation) – and in terms of logistics, with new international contacts being established and new transport routes opened up whenever necessary. There are also strong signals that the internet is being used much more than in the past to order ingredients and hardware as well as for the distribution of end products. The availability of these online services is evidently also helping smaller-scale operators to get a foot on the ground in the synthetic drugs world.

Vast sums of money are earned in the world of synthetic drugs, but efforts to track and trace this capital have so far failed. We simply do not know where the cash goes or flows. In recent years, drastic measures have been taken in the Netherlands to impede the investment of criminal capital. Among other things, banks and other institutions are now obliged to disclose unusual transactions. But these measures appear to have made little impression on the criminals. Part of the money goes abroad (to be invested in all sorts of projects, for instance in real estate), but may also return via all sorts of roundabout routes to the Netherlands using ‘underground banking’ or offshore vehicles (via tax havens). In these ways, criminal money is laundered and made legitimate.

Collective intelligence

All in all, the criminal synthetic drug world appears to be governed by a kind of ‘collective intelligence’. This intelligence is not confined to specific individuals, but a collective characteristic of the entire criminal network. In the Netherlands, XTC is produced through a well-functioning network that can draw on a wide variety of competences and skills. New relationships are easily formed in this network and tend to be long-lasting. This XTC network *in a broad*

sense emerged largely unscathed from the government's clampdown at the start of this century.¹³

When individuals are arrested and taken out of commission, there is always someone waiting to take over their role. And as soon as the police manages to confiscate a large shipment of ingredients, new materials can soon be found and distributed thanks to the extensive and close-knit networks. Moreover, ample financial reserves are available to weather temporary setbacks. Even when the police manage to intercept drug shipments of hundreds of kilos, the criminals remain unperturbed: 'that's the risk' is what the police hear on the tapped lines.

Collective intelligence is obviously not the same thing as individual intelligence. Stupid mistakes are also made in the production chain of synthetic drugs. People regularly get killed in the laboratories due to sloppiness and lack of care; the laboratory work is not that complicated in itself, but things must be done in the correct sequence and with the necessary precautions. Sometimes quarrels and conflicts arise over trivial matters; the criminal world is not always 'rational'. Misunderstandings are never far away. An officer listening to a tapped line amusingly heard one criminal tell the other that the Pie, Mash & Kale was ready, only for the other to reply that he wasn't interested in food, he wanted to know where the PMK was...

Organized anarchy

The criminal world does not operate along linear lines from problem to solution. Processes of acquisition, production and sale are not sequential, but take place in a criss-cross, haphazard fashion. Patterns can be erratic. Even the criminals

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¹³ See T. Spapens, *Interactie tussen criminaliteit en opsporing*, Antwerpen-Oxford 2006.

themselves may not entirely understand them, but they can still operate effectively in this ever-changing landscape by acting on their wits and intuition. Without necessarily seeing the big picture, they recognize a deal when they see one. They have the charm and guile to foster deep loyalties and forge effective networks. Evidently, modern organizational and management theories (networking, improvisation) were intuitively employed in the criminal world long before they came into vogue in the legitimate corporate world.

Structured organizations like the police and other public authorities struggle to get to grips with this system of 'unorganized crime'. One police officer gave the following telling, though perhaps not typical, example:

'We had heard that one well-known group were planning something the next Thursday. It was a big deal, worth more than a million. We wanted to nab them. Two arrest teams and two support teams were drummed up to provide assistance. A helicopter took to the air and a mobile unit was on standby. But at the designated time for the deal, nothing happened. We waited and waited. We had observers all over the place, and made enquiries all round. But we found nothing. No sooner had we called the operation off, than we heard what had happened: the key player had got himself blind drunk the night before and was out for the count until well into the afternoon. We received strong signals that the deal had been moved to the Friday evening, but I couldn't get enough men together at such short notice. We had to let it go.'

This example illustrates how difficult it can be for a well-ordered and planned public organization to get a grip on a world that is unpredictable and largely based on improvisation. The two systems operate at cross purposes.

The barrier model, which approaches crime as a clear and well-structured industry, has the same drawback. The method is not without merit and, upon its initial introduction, was an interesting and innovative way of looking at criminal organizations. Like so many methods, however, it has over time become less effective. Its main weakness is that it approaches criminal networks as if they were rational structures like public organizations. It calls to mind the proverbial drunk who looks for his keys in the light of a lamppost, not because he lost his keys there, but because that is where the light is. In a certain sense, the barrier model acts above all as an *early warning system* for the criminal world: it tells them what to look out for and what precautions to take. Viewed from this perspective, the barriers that are erected to thwart criminal activity unintentionally assist and create opportunities for strategically positioned synthetic drugs criminals.

The world of synthetic drugs comprises hundreds of individuals interacting in a maze of relationships, with controllers directing the transactions between suppliers and clients and high tech operators in China acting as facilitators. Erecting new and ever-higher barriers has so far had a temporary effect at best. Experience shows that the criminal process is best approached not as a linear model that can be blocked with barriers, but as a complex and fairly chaotic flow model – as a reality comprising permanent flows of suppliers and clients who are linked together by criminal entrepreneurs. A ceaseless flow of transactions is thus brought about, making use of legitimate businesses, specialized criminals and petty criminals acting as messenger boys. The processes are hard to fathom for outsiders and are even unpredictable for criminal insiders, and this is a large part of their success. Modern crime research therefore frequently focuses on dynamic network analysis aimed at identifying and understanding vital links in the networks. Big data analysis may be useful in this connection in the future, but is still in its infancy while also being impeded by information sharing obstacles.

Violence

Clearly, violence and counter-strategies to keep competitors and the police at a distance are common practice in the synthetic drugs world. Many criminals are prepared to live under constant threat of violence or to use violence themselves. They seemingly also see several years behind bars as an acceptable trade-off for their gains. Violence is used if necessary, also because criminals cannot take their mutual disputes to the court – though, evidently, plenty of people are prepared to act as executioner: contract killings are a regular occurrence in the world of synthetic drugs.

In recent years, OMGs have acquired a more prominent role in the production and export of synthetic drugs. They provide a secure meeting place for criminals and form a protective shield that safeguards its members from the violent intentions of competing criminals.

The Public Prosecutor's petition of 2017 to the Court of The Hague to ban the Satudarah motorcycle club cites endless instances of the involvement of Satudarah members in drugs cases; these cover the entire spectrum from cannabis to cocaine and synthetic drugs. The ability to supply such a comprehensive range gives the Dutch drugs world an important competitive advantage in the international context. There are not many other places where you can order drug parcels tailored exactly to your own needs.



AND THE GOVERNMENT

Let's take a look at things from the other side of the fence, from the perspective of government policy and enforcement in a broad sense. What do we see then?

The first thing that strikes the eye is that the Netherlands is always later than other countries to come up with an official and legal reaction to new synthetic drugs. This applied to amphetamines in the 1970s and again to MDMA in the 1980s. And the same can be seen today in relation to the developments surrounding NPS. Many of these substances have already been banned in other countries, but are still freely available in the Netherlands. In this way, criminal networks in the Netherlands are basically handed new markets on a plate. One reason for the different reaction in our country is that the Netherlands primarily views synthetic drugs from a public health perspective. We will return to this later.

Also striking is the fact that the Netherlands only tends to act against synthetic drugs when faced with considerable international pressure. This was already extensively sketched above. In this light, it is fair to ask whether the primary objective of Dutch policy is to combat the synthetic drugs world or to placate the international community. Who cares, pragmatists might say, but it is worth noting that the commitment to fighting synthetic drugs tends to slacken as soon as the foreign criticism abates. Whatever the reason may be, it has certainly proved difficult for our country to keep these efforts up on a lasting basis. Evidently, it is hard to instil sufficient intrinsic motivation into our institutions to curb this criminal world. This reluctance is also expressed in the relatively mild sentences that are imposed. Criminals are aware of this leniency and assess their risks accordingly. Mild sentencing undermines the preceding enforcement

efforts and enables the synthetic drugs world to recover from coercive action and come back stronger than ever.

Criminal investigation services in disarray

The rise of the synthetic drugs world in the Netherlands in the 1990s coincided with a high-profile scandal concerning the excessive use of invasive investigation techniques (the notorious IRT scandal), which paralysed the police's criminal investigative powers for a number of years. The use of special criminal investigative techniques other than phone tapping and (later) the recording of confidential information was out of bounds. This applied, in particular, to all forms of human intelligence (use of crown witnesses and civilians as infiltrators). That was a great handicap. Because it is precisely human intelligence that is crucial to build up a strong intelligence capability in the fight against synthetic drugs criminals.

In addition, the police organization has regularly undergone extensive reorganizations in the past decades and these have also left their mark in this connection. The USD, for instance, lost a lot of its effectiveness when it was subsumed within a newly formed national criminal investigation department, the *Dienst Nationale Recherche*, as part of the KLPD (National Police Services Agency) in the period from 2002-2004. And the creation of the National Police Corps at the start of the second decade of this century undermined the police force's intelligence capability in the field of synthetic drugs; for instance, the police currently have much less reliable information on the scale and dynamics of the synthetic drugs world than fifteen years ago. It is also unclear how many members of the criminal investigation services are specifically engaged in tackling synthetic drugs crime. Taking all the various departments together, the number is probably

slightly more than 200, fewer than the 250 FTEs at the height of the 'Joining Forces Against XTC' drive.¹⁴

There have, of course, been successes in the past years: some staggeringly large 'labs' and storage facilities have been uncovered; Operation Explorer (which drew on information from a company in Best where hundreds of synthetic drugs criminals met on a regular basis) initially produced impressive results; visible measures were taken against OMGs; the takeover and dismantling of the Hansa-website (a virtual marketplace where amongst other things large-scale distribution of synthetic drugs took place) was spectacular. Nevertheless, the overall impression is that all these efforts have merely served to underline the extent of the problem: 'our efforts are drops in an ocean, and that ocean is so much greater than we ever thought,' one chief detective sighed after it had become clear that the dismantlement of a gigantic chemicals storage facility (in 2015 in Den Bommel, Zuid-Holland) had had no impact on the price or scale of production.

Complexity

The complexity of the government enforcement system for tackling synthetic drugs is another striking aspect. In fact, complexity has been the one constant factor throughout the many changes in the past thirty years. This problem was already pinpointed in the first Drugs Phenomenon Study from 1996: at that time, fifteen separate units spread across five ministries were involved in some way or other in the efforts against XTC. There has been no essential change in the set-up since then. Fragmentation is a perennial issue, as is the lack of competences. Coordination between the various units is complicated and time-consuming. This makes the

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 14 It is difficult to make a more exact estimate because the majority of the people involved have multiple tasks.

government a cumbersome organization that cannot keep up with the flexibility and agility of ‘unorganized crime’.

The government’s slogan ‘crime is organized, it’s time we were too’, betrays a fundamental lack of understanding of the criminal world. It would be more accurate to say: ‘the criminal world is unorganized, what does that mean for us’? A more improvised approach in fluid networks has been suggested, but what that means in practice is not always clear. And the many obstacles to information sharing between the various organizations, both at national and European level, add to the problem.

The coordination problems within the security and law enforcement world stem mainly from organizational and staffing issues (who is responsible for what, and who supplies what kind of manpower); the problems with organizations in other governmental sectors tend to relate to differences in priorities and ideals: the importance of tackling synthetic drugs must be weighed up against other interests such as public health and foreign policy. Quite often the latter take precedence over synthetic drugs. We will return to this later.

Mild sentencing climate

Other frequently mentioned factors for explaining the dominant presence of Dutch synthetic drugs producers on the global stage are the small chance of getting caught in the Netherlands and the mild sentencing climate for individuals who produce and trade in synthetic and other drugs. That mild sentencing climate is confirmed by international research: a study brought out in 2017 by the EMCDDA, the European drugs monitoring institute, showed that, of the 26 member states, the Netherlands has the lowest score for imposing and implementing penalties for the supply of drugs (cannabis, synthetic drugs and cocaine). The court processing time for drugs cases is also relatively long (some 60 weeks

for complex drugs cases).¹⁵ One investigating officer summed up the connection between our country's sentencing climate and its role in the drugs world as follows:

'Why would a criminal in Australia, which is the biggest customer for pills from the Netherlands, bother to smuggle precursors or pre-precursors, buy chemicals, make hardware, acquire the knowledge, invest vast sums of money and run the risk of severe penalties? Because the punishments for drugs offences are draconian in Australia. Why would anyone do that if a single phone call with a Dutch criminal is enough to order as many pills as you want, in the colour you want, the logo you want, the active ingredients of your choice, and get them delivered where you want, for a price that no one else can make them for, and get superior quality into the bargain. Why would anyone do that?'

There are concrete signals that criminals come to the Netherlands to produce their drugs there because of the smaller risk of getting caught and the lower penalties than in other countries.

The mild sentencing climate has partly to do with the tolerant attitude towards drugs in the Netherlands. Except in the case of extremely addictive substances such as heroin or methamphetamines, virtually nothing is done to restrain the use of drugs. The policy is mainly focused on the prevention of negative health effects (harm reduction), not on curbing drug use in itself. Though users on the one hand and producers/traders on the other can be seen as separate worlds, there is still a certain relationship between the two. If people are

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15 See EMCDDA (2017) *Drug trafficking penalties across the European Union: a survey of expert opinion*, Lissabon, and Zuiderwijk, A.M.G., Cramer, B., Leertouwer, E.C., Temürhan, M. & Busker, A.L.J. (2012) *Doorlooptijden in de strafrechtsketen, ketenlange doorlooptijden en doorlooptijden per ketenpartner voor verschillende typen zaken (Processing times in criminal law cases, end-to-end processing times and processing times per chain partner for different types of cases)*. The Hague: WODC.

allowed to use a certain product, why would it be a problem to produce it? Drugs producers benefit from this laidback stance. For a long time, they have met with little resistance, except when other countries put pressure on the Netherlands. Some question this tolerant attitude. Although the bulk of synthetic drugs produced in the Netherlands are exported, drugs usage also has detrimental effects in the Netherlands itself. Drugs deliveries can easily lead to conflicts, which can escalate into violence. And many people are attracted to the vast amounts of easy money that can be made in this world.

Hitching a ride on the legal economy

The criminal world can 'hitch a ride' on the favourable characteristics of the Dutch economy – this too certainly plays a role in the Netherlands' dominant position in the world market of synthetic drugs. Thanks to these characteristics, the Netherlands is roughly the fifteenth economy in the world, a much higher position than you would expect based on population size. These favourable characteristics include: an international focus, a well-developed financial system, an excellent infrastructure (road, water, rail, air and digital), a strong commercial tradition and a strategic location as a principal gateway to Europe. Besides promoting legal economic activity, all these characteristics also play into the hands of the illegal economy. For instance, due to the high volumes and diversity of the legal freight traffic passing through the country, the risk of illegal goods being intercepted is small. The free movement of persons and goods in the European Union has not just benefited the normal economy, but has also given a strong impulse to criminal activities between, for instance, the Netherlands and Eastern Europe. Measures to counter the illegal production and processing of synthetic drugs therefore have an almost immediate adverse impact on the legal economy and affect the international competitiveness of the Netherlands.

International system

The fight against synthetic drugs is partly pursued through an international system of drugs treaties. A key part of this system concerns lengthy consultations about the placement of substances on black lists. This is a time-consuming process in which many diverse interests must be taken into account. And once a substance is actually placed on the list (and all countries agree to enforce the rules), the criminals can soon develop a substitute. The main body representing the Netherlands in this consultative circuit is the FIOD, a role it must fulfil with relatively little manpower. Moreover, the Netherlands is a small player in the international context and tackling MDMA and amphetamines is not the highest priority worldwide, particularly as they are not among the most addictive classes of drugs.

Nor should we forget that the Netherlands is one of the few countries in the world that has this problem of being home to the large-scale *production* of drugs. Moreover, these are not problem drugs such as methamphetamines and heroin, but drugs with less visible and less serious consequences in the short term ('party drugs'). This puts our country in a fairly unique position. It is a Dutch problem that the Netherlands can only tackle with the assistance of other countries. At the same time, other countries stand to gain little from helping the Dutch to address the situation.

As a result, many actors in Dutch law enforcement see this international system as a necessary and inevitable consultative circuit but, despite playing an active part in this process, ultimately expect little from it in the way of tangible results.

Bias towards other priorities

And it is only fair to admit that, in the final analysis, the Netherlands itself also tends to prioritize other objectives (development aid, human rights, health, the economy, the judiciary) rather than the fight against drugs. One example, which caused a lot of frustration among crime fighters combatting synthetic drugs in the Netherlands, concerns the approach to ketamine.

Ketamine is an anaesthetic (for humans and animals) that is also used as a recreational drug and actually led to a wave of addiction in China. This prompted China to submit a proposal to the international Commission on Narcotic Drugs for the substance to be placed on the list of controlled substances. Looking for allies to back their cause, they sent the Dutch Public Prosecutor a written request to voice support for this proposal. However, from a public health perspective, ketamine is not perceived as a problem in the Netherlands. Accordingly, the Ministries of Health and of Foreign Affairs were not in favour of the proposal. Nor was the Public Prosecutor.

'Ketamine is commonly used as an anaesthetic in Africa. It is easy to use, a midwife is allowed to administer it. You don't need an oxygen mask, you simply sedate the patient and get started. If it was a controlled substance, only an official doctor would be allowed to administer it. This would have huge consequences in Africa. The Netherlands felt that was important and defended their position rather robustly at the meeting in Vienna. Much to the displeasure of the Chinese. The upshot was that we were not welcome in China for a while.'

Public health has always been the overriding priority in the Dutch drugs policy. The CAM Committee, for instance, which decides which drugs are to be placed on forbidden substance lists, has a relatively large public health contingent

and relatively few criminal investigation representatives. The Netherlands is proud of its 'healthy' drugs policy based primarily on harm reduction. There are comparatively few drugs deaths in the Netherlands. Our country is evidently less concerned about the fact that this policy has aided the rise of a large criminal drugs industry which also causes victims in all sorts of other ways.

One consequence of that policy is the Netherlands' tardiness in placing psychoactive substances on the list of forbidden substances. This was the case with amphetamines in the 1970s and with XTC in 1980s. And today, in 2018, we see the same sluggish stance regarding NPS. Many of these substances are already prohibited abroad, but not in the Netherlands. Under our country's system, each substance requires a separate assessment and decision, which helps to perpetuate the cat-and-mouse game between the authorities and the producers. Other countries tend to work with generic lists. Belgium, for instance, passed a Royal Decree in September 2017 banning entire groups of psychoactive substances. The fact that NPS are rapidly placed on forbidden substance lists in other countries and not in the Netherlands is one of the factors that makes the Netherlands attractive for criminals.

The relationship with China provides another instance of bias in the decision-making system. Due to human rights concerns and the regular enforcement of the death penalty in China, the Netherlands is very wary about exchanging police information with that country. The Netherlands wants to avoid China sentencing someone to death on the basis of information from the Netherlands. This standpoint makes it difficult to nurture fruitful relationships with China in the field of drugs prevention. General information can be exchanged, provided it is not traceable to individuals. Many in the world of drugs prevention argue that more intensive cooperation with China is possible without compromising the principle of not sharing information that could lead to the death penalty. Other countries (such as Australia and New Zealand) are

evidently able to do this, but the Netherlands systematically refuses to play ball. Insiders claim that opportunities to make more detailed arrangements with the Chinese are missed due to this rigid stance. Given the importance of the illegal production of Chinese pre-precursors and precursors for the Dutch synthetic drugs industry, that is an important point of concern.

Clearly, in the grand scheme of things, the prevention of synthetic drugs need not always be given priority. Other interests can be just as, if not even more, legitimate. But in the current decision-making system, the prevention of synthetic drugs often receives short shrift. Other interests tend to be preferred because they are more strongly represented in the relevant policy circuits. A *bias* is built into our system, a bias which is only temporarily suppressed under strong foreign pressure from powerful countries such as France and the US. This is one of the reasons why such an extensive criminal drugs industry has been able to take root and thrive in the Netherlands.



WHY THE NETHERLANDS?

This is the question with which we started this analysis: how have Dutch criminals, for decades, been able to play such a prominent role in the global production of synthetic drugs (mainly XTC and amphetamines)? The most important answers are summarized below.

The Dutch synthetic drugs world has achieved its pivotal global position thanks to three related circumstances: the good price-quality ratio of Dutch synthetic drugs, the low risk of the ringleaders getting caught, and the relatively low Dutch penalties, particularly compared to the draconian penalties in, for instance, Australia, China and Indonesia.

The established ringleaders and their criminal networks are able to produce good and cheap synthetic drugs. They have years of experience, a physical infrastructure and a network comprising hundreds of laboratory operatives and pharmacy technicians. In addition, there is a smaller parallel network of innovators: chemists who are well-versed in the latest production methods as well as specialists in tablet manufacturing. In this way, they can cater to the needs of international customers on multiple fronts: Dutch suppliers can handle 'cocktail' orders containing a range of different drugs without any problem.

As a result, national and international top criminals prefer to buy synthetic drugs from Dutch criminals (or exchange them for other drugs) rather than produce these themselves. An additional attraction of the Netherlands for foreign criminals is that the risk of getting caught is greater in their own country, while the penalties are also stiffer.

The low risk of getting caught and the mild penalties also have to do with the broader climate of tolerance in Dutch society.

As we have seen, public health, the economy and international relations are often seen as more important priorities than tackling drugs crime. The emphasis on harm reduction in Dutch health policy also feeds the tolerant attitude towards drugs use and production. Great importance is attached to maintaining the country's typical economic characteristics: an open economy, a congenial business climate, excellent infrastructure, free movement of goods and persons within Schengen countries and a strong commercial tradition. This is understandable, as these are the characteristics that have fuelled our prosperity. But they also make our country attractive to drugs producers and traders. Unfortunately, measures to tackle this problem tend to have negative side-effects for the legal economy. And in the contest between profit and principle, profit usually wins.

The upshot is that, within the broader social climate in the Netherlands, tackling drugs crime is a relatively low priority. Our country typically takes longer to blacklist psychoactive substances than other countries. And, in general, the efforts to tackle drugs crime are only stepped up in response to foreign pressure. The acceptance of drugs production is partly a logical extension of our country's permissive attitude towards drugs: if something is allowed to be used, it must also be possible to produce it. The fact that this attitude also helps to sustain a large criminal drugs world that can have a wider undermining impact on society is often conveniently overlooked.

Looking back at the National Inquiry into Criminal Investigation Methods in the 1990s, the conclusions drawn from the findings were remarkably half-hearted. The report identified two major issues: the (il)legitimacy of the applied investigation methods and the inadequacy of the investigative resources relative to the scale of criminal activity. A lot of attention was devoted to the first problem. The latter problem remained unaddressed.

'Undermining'

In recent years, growing attention has been given to the theme of 'undermining', i.e. the visible and harmful effects of organized crime. First highlighted by mayors in the south of the Netherlands, this issue is now also making its way onto the national agenda. That is noteworthy in itself. Because it is the first time that the Netherlands has put synthetic drugs high on the agenda of its own accord, rather than in response to outside pressure.

The Netherlands is a European hub of drugs production and trade (synthetic drugs, but also cannabis, cocaine and, on a smaller scale, NPS and heroin). International reports are scathing in their assessment (see SOCTA, 2017). The Netherlands is once more widely perceived as a centre of drugs, and even as a narco-state. Interestingly, this time around, these allegations are not from a US drug czar or a French president, but from mayors, councillors and others within the Netherlands – such as high-ranking police officers – who are worried about the undermining influence that the criminal drugs world is having on the Netherlands. We have reached the stage where specific parts of Dutch society revolve around and depend on criminal drugs. The amount of money flowing through this world and the attractions of that money (on disadvantaged groups in our society, but also on others), the undermining effect this has on normal and decent behaviour, and the associated use of violence are sources of mounting concern. The criminal world around synthetic drugs is a major contributor to this deep-seated problem.



THE TWELVE MOST IMPORTANT FINDINGS

1. Synthetic drugs are not just a problem of the South of the Netherlands, but a national problem with adverse consequences for the Netherlands' position and image in the international community. Sufficient financial and human resources, perseverance and dedication alongside a consistent broad-based international approach are imperative to tackle the problem. This has been sorely lacking in recent years.
2. In 2017, criminals in the Netherlands produced at least 18.9 billion euros of XTC and amphetamines. This is an estimate based on fieldwork at the source, using conservative assumptions. This amount of 18.9 billion euros concerns street prices in the Netherlands and abroad. It can be seen as the contribution of the Dutch synthetic drugs world to the illegal global economy.
3. Part of that world revenue is pocketed by Dutch syndru producers and traders. The amount of money paid for synthetic drugs 'off-lab', i.e. paid directly to the producers in the Netherlands is at least 610 million euros. In the next phases of the trade, we estimate that the revenue for Dutch traders ranges from a minimum of 3 to 5 billion euros. About the phases between off-lab and final street sale, which are so crucial because this is where the top-criminals earn their 'big' money, less is known.
4. The Dutch information capability in respect of synthetic drugs is 'woefully inadequate'. Insufficient has been invested in people who are able to interpret international developments and trends and there

is a lack of analytical capacity. Information sharing between governmental and other organizations is a problem. That is a shocking conclusion for a country that plays such a prominent role in the global synthetic drugs world.

5. Dutch criminals are among the top world players in the production of synthetic drugs. International criminals place large drugs orders in the Netherlands. Dutch synthetic drugs have a good price-quality ratio. Drugs ordered in the Netherlands are reliably delivered (at least by criminal standards) to anywhere in the world. Online transactions are on the rise; it is estimated that a quarter of all global online earnings from synthetic drugs go via the Netherlands.
6. The Netherlands has an ideal climate for criminals engaging in synthetic drugs. The location and infrastructure are favourable for international entrepreneurs in both legal and illegal sectors. This makes the Netherlands vulnerable, but the country evidently remains stubbornly unaware of this fact. Due to the lack of manpower for investigating synthetic drugs crime, the chance of criminals getting caught is small, particularly for top criminals who remain at a distance from the hands-on work. The relatively low penalties in the Netherlands (both the penalties and the actual length of the detention) make it even more attractive to produce synthetic drugs in the Netherlands. Despite some recent successes the general impression is that these seizures are only drops in an ever-expanding ocean.
7. The need to tackle synthetic drugs crime is systematically given less priority than other issues such as public health (limiting the damage caused by drugs use: harm reduction), diplomacy (good relations with other countries) and the economy (protection of the chemical

- industry). Anti-drugs efforts only receive priority when friendly heads of state (the US, France) raise the alarm about the drugs industry in the Netherlands. But the effect of this outside pressure is also relatively short-lived.
8. Due to the simplification of the production process, the world of synthetic drugs now consists of two layers. On the one hand, we see increases in scale and professionalization in large 'clean' labs. On the other hand, production is expanding to small laboratories operated by individuals, often based in residential neighbourhoods.
 9. Many raw materials and chemicals come from China, as does the hardware for laboratories (e.g. boilers with control equipment). With their chemical and technical knowhow, Chinese chemical companies are a mega-facilitator of Dutch synthetic drugs crime. Slow and cumbersome international consultative and legislative processes are no match for the expertise and flexibility of criminal Chinese-Dutch coalitions.
 10. The criminal process of synthetic drugs production is not a well-organized linear model that can be easily thwarted by raising barriers at strategic points. Instead, it is a complex and fairly chaotic river landscape in which permanent flows of suppliers and customers are linked together through the coordinating role of smart criminal middlemen. The middlemen operate through multiple legitimate businesses, specialized criminals and petty criminals acting as messenger boys.
 11. For a long time, the synthetic drugs criminals acted fairly discreetly, particularly considering that this is a multi-billion business, and violent incidents remained largely invisible to the public. The traditional synthetic drugs criminals based in Brabant and Limburg typically

worked with people they knew and trusted, made large profit margins and kept violent incidents out of the public eye. They made sure everyone toed the line and prevented escalations. But the criminal world of synthetic drugs has changed. It has become more uncertain, more competitive and more violent.

12. Mayors, magistrates and the police have come to realize that drugs-related crime can have a strong undermining effect on society. This effect can be seen, literally, at street level in the form of extreme violence, in the dangers that illegal laboratories pose for residential areas, and in the pollution of the natural environment caused by waste dumping. At a deeper level, there is an even more alarming truth: the production of synthetic drugs is a relatively easy way for many to amass money, esteem and power. Organized drugs crime is now the cause of increasing violence as well as growing social injustice and inequality in our country. A broad-based approach to this problem should be a top priority for the Dutch government. This is by no means the case. And that is an inconvenient truth.