MULTILATERAL EVALUATION MECHANISM (MEM)

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

Haiti

Inter-American Drug Abuse Control Commission (CICAD)
Secretariat for Multidimensional Security (SMS) | 2022
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Evaluation Report on Drug Policies:
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EIGHTH EVALUATION ROUND

2022
PREFACE

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

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

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

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

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

Specifically, the GEG’s work for the thematic assessment for the area of “Measures to Control and Counter the Illicit Cultivation, Production, Trafficking, and Distribution of Drugs, and to Address their Causes and Consequences” was conducted during 2022 and covers the 2019 to 2022 period (unless otherwise specified). This work was adapted to the COVID-19 pandemic with...
the use of technology and virtual tools, as well as taking it into consideration in the evaluation assessments.

Finally, it should be noted that one of the main purposes of MEM evaluation reports is to serve as a useful diagnostic tool to identify opportunities for improvement in drug policies and strategies, both at the national and regional levels.
**Priority Action 1.1**: Develop or strengthen intelligence and interdiction capabilities to detect, investigate, and dismantle laboratories or facilities used in the illicit manufacture of drugs.

Haiti did not implement or participate in ongoing training programs to detect, investigate, and dismantle laboratories or facilities used in the illicit manufacture of drugs, for personnel involved in interdiction operations.

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

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

The agencies in charge of drug control in Haiti do not implement policies that promote gender mainstreaming.

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

Haiti has programs and strategies aimed at land and maritime interdiction, through monitoring, inspections, or checkpoints. However, the country does not have programs or strategies aimed at riverine or aerial interdiction of drugs.

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

Haiti has the following 2001 Law on the Control and Suppression of Illicit Drug Trafficking, Articles 91 and 97; Title IX providing for the use of specialized investigation tools and techniques to prevent and reduce drug trafficking.
**Priority Action 1.5:** Review and/or update mechanisms countries use to monitor the evolution of drug trafficking and related crimes, for the purpose of identifying and responding to new trends and threats.

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

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

Haiti implements actions to identify organized crime groups involved in drug trafficking and related crimes. In this sense, there are measures relating to the functioning of the *Bureau des Affaires Financières et Economiques* (BAFE) and the *Bureau de Lutte contre le Trafic de Stupéfiants* (BLTS).

According to the administrative hierarchy, the Haitian National Police (PNH), the BAFE and BLTS report to the Central Directorate of the Judicial Police (DCPJ). Operations of the HNP financial and economic affairs unit and the counter narcotics unit are governed by Haiti’s intelligence services laws. The Haitian National Police Law establishes how these operate and article 31 describes the powers vested in the DCPJ. That article also focuses on identification of organized criminal groups involved in illicit drug trafficking and related crimes.

Haiti carries out inter-institutional collaboration or cooperation mechanisms to coordinate activities aimed at dismantling organized crime groups involved in drug trafficking and related crimes. At the domestic level, there is collaboration and cooperation between the BLTS and the Haitian Coast Guard for maritime operations, which is supported by a Memorandum of Understanding. Internally, there is also collaboration among PNH.

The country has participated in operations and investigations in cooperation with other countries aimed at dismantling organized criminal groups involved in drug trafficking and related crimes. In this sense, there are mechanisms for regional and international inter-agency cooperation (mutual legal assistance and police cooperation).

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

Haiti’s Pharmacy, Drug, and Traditional Medicine Directorate of the Ministry of Health (DP-MMT) is responsible for, and capable of, analyzing chemical substances, precursors, pharmaceutical products, and synthetic drugs, including New Psychoactive Substances (NPS).
Haiti does not have or participates in ongoing training programs for personnel involved in the analysis of chemical substances, precursors, pharmaceutical products, and synthetic drugs, including NPS.

The country does not have mechanisms to facilitate or share information at the national level across relevant governmental counterparts, nor global repositories on chemical substances, precursors, pharmaceutical products, and synthetic drugs, including NPS.

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

Haiti does not have mechanisms to investigate and disrupt drug trafficking through the Internet.

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

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

The country does not use tools or resources of the International Narcotics Control Board (INCB) to strengthen cooperation with the private sector to prevent the diversion of chemicals.

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

Haiti has national authorities with the appropriate budget, human and material resources for the forfeiture, seizure, and management of assets, tools, or products related to illicit drug markets. This is outlined in the Resolution establishing Bureau of Special Funds Administration Office (BAFOS).

Haiti’s competent personnel do not receive ongoing training for the forfeiture, seizure, or management of assets, tools, or products related to illicit drug markets.
**Objective 2**

**Strengthen National Measures to Address the Challenges Posed by NPS and Illicit Synthetic Drugs, and the Threat of Fentanyl-Related Substances, Non-Medical Synthetic Opioids, and Illicit Amphetamine Derivatives.**

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

Haiti does not have an Early Warning System (EWS) to identify or trace new psychoactive substances (NPS), illicit synthetic drugs, or the threat of fentanyl-related substances, non-medical synthetic opioids, illicit amphetamine derivatives, or other substances subject to international control.

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

Haiti does not improve its capabilities to detect or analyze NPS through the use of special investigative techniques, updated equipment, or acquisition of technology.

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

Haiti does not have regulatory frameworks or guidelines to identify and address the challenges posed by the onset of NPS and emerging synthetic drugs.

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

Haiti does not participate in the International Narcotics Control Board (INCB)’s Project ION (International Operations on NPS).

**Priority Action 2.5:** Develop innovative regulatory approaches, such as generic controls, analogue legislation, and temporary or emergency controls, to enhance national controls on synthetic opioids for non-medical use, and NPS, particularly when scheduling fentanyl-related substances by class.
Haiti does not have innovative legislation or regulatory approach to synthetic opioids for non-medical use or NPS.
Priority Action 3.1: Promote inter-agency coordination with industry to prevent diversion of controlled chemical substances.

Haiti has the Pharmaceuticals, Medicines, and Traditional Medicine Directorate (DPM/MT), established by Organic Law of the Ministry of Public Health and Population (MSPP) as its competent national authority responsible for developing guides, codes of conduct, or other instruments to inform the industry and users in general of controlled chemical substances.

The country has the following instruments and mechanisms to inform the industry and users in general of applicable controls and cooperation methods, to prevent the diversion of controlled chemical substances:

- Import permit for narcotics and precursors
- Operating license issued to manufacturing, importation, and distribution establishments
- Marketing Authorization (*Autorisation de Mise sur le Marché*—AMM) for medicinal products including narcotics
- Standards regulating the importation of narcotics and precursors
- Use of The International Narcotics Control Board (INCB) control instruments
- *Commission Nationale de Lutte Contre la Drogue* (CONALD) control mechanisms

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

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

<table>
<thead>
<tr>
<th>Name of the competent national authority</th>
<th>Does it carry out regular inspections and audits?</th>
<th>Is it responsible for controlling domestic trade?</th>
<th>Does it consider the CICAD Model Regulations?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department of Pharmacy, Medicine, and Traditional Medicine of the Ministry of Public Health and Population</td>
<td>This Ministry of Health (MSPP) normative structure conducts regular annual visits of pharmaceutical establishments that import controlled products</td>
<td>No, but the Ministry of Trade and Industry is in charge of this component</td>
<td>No</td>
</tr>
</tbody>
</table>
**Priority Action 3.2:** Conduct analyses, including through existing mechanisms of information exchange, on substances, their analogues, and precursors, which pose a threat to public health in member states, to identify substances for expedited international control.

Haiti does not carry out analyses that include the exchange of information through existing international mechanisms of substances, their analogs and precursors which pose a threat to public health.

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

Haiti has the “Loi Relative au Contrôle et à la Repression du Trafic Illicite de la Drogue, 2001” as the law on the control and suppression of illicit drug trafficking incorporating the control measures in Article 12, Paragraphs 8 and 9 of the 1988 United Nations Convention to prevent diversion of controlled chemical substances towards illicit activities.

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

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

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

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

<table>
<thead>
<tr>
<th>Control measures</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>A system to monitor international trade in controlled chemical substances to facilitate the identification of suspicious transactions</td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>
The monitoring system shall be used by manufacturers, importers, exporters, wholesalers, and retailers to inform the competent authorities of suspicious orders and transactions

Any controlled substance is seized if there is sufficient evidence that it will be used in the illicit manufacture of narcotics or psychotropic substances

The competent authorities are notified, as soon as possible, if there is reason to believe that the import, export, or transit of a substance is destined for the illicit manufacture of narcotic drugs or psychotropic substances, including, in particular, information about the means of payment and any other essential elements which led to that belief

Requirements to ensure that imports and exports are properly labelled and documented. Commercial documents such as invoices, cargo manifests, customs, transport, and other shipping documents must include the names of the substances, the quantity, and the name and address of the exporter, the importer and, when available, the consignee. These documents are kept for a period of no less than two years and may be made available for inspection by competent authorities

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

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

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

The country does not use the INCB’s Precursor Incident Communication System (PICS).

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

Haiti does not receive training for drug control personnel and for the identification and handling of controlled chemical substances.

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

In Haiti there are no budgetary mechanisms to ensure allocation of resources to acquire necessary equipment or supplies for the preliminary identification of substances and the protective equipment required by personnel in charge of these tasks.
**Priority Action 3.8:** Use, as appropriate, CICAD’s Model Regulations for the control of Chemical Substances Used in the Illicit Production of Narcotic Drugs and Psychotropic Substances (2019) in the formulation of national chemical control regulations.

Haiti does not use the OAS/CICAD Model Regulations for the Control of Chemical Substances Used in the Illicit Manufacture of Narcotic Drugs and Psychotropic Substances.
**Priority Action 4.1:** Streamline, in accordance with national legislation and international obligations, the process for issuing authorizations for national production, and to import and export controlled substances for medical and scientific purposes.

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

<table>
<thead>
<tr>
<th>Product type</th>
<th>Average time to issue import permits</th>
<th>Average time to issue export permits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Narcotic or psychotropic raw materials for the manufacture of medicines</td>
<td>10 days</td>
<td>10 days</td>
</tr>
<tr>
<td>Medication containing narcotic or psychotropic drugs</td>
<td>10 days</td>
<td>10 days</td>
</tr>
<tr>
<td>Analytical patterns classified as narcotic or psychotropic</td>
<td>10 days</td>
<td>-</td>
</tr>
<tr>
<td>Medication classified as narcotic or psychotropic for the personal use of travelers entering or leaving the country</td>
<td>3 days</td>
<td>-</td>
</tr>
</tbody>
</table>

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

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

Haiti has training or awareness activities for competent national authorities and health professionals on the proper access to substances subject to international control solely for medical and scientific purposes. In this sense, there are training sessions on the management and use of health products, inter-ministerial exchange meetings, and information sessions on importation, distribution, and storage.

**Priority Action 4.3:** Improve access to controlled substances for medical and scientific purposes by addressing existing barriers, including those related to laws, regulations, and measures to promote access and build capacity for health care systems.
Haiti has the following regulatory framework to govern the acquisition of substances subject to international control for medical and scientific purposes:

- Application of Articles 20 – 29 of the Pharmacy and Medicines Act.
**Objective 5**

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

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

Haiti has an updated register of individuals and corporations handling pharmaceutical products containing precursor substances, narcotics, or psychotropic substances. In this sense, the information recorded in the register includes the company name, name and surname of the owner, pharmacist/chemist in charge, address, and managers’ contact details.

The country issues licenses to manufacturers and distributors authorizing the handling of pharmaceutical products containing precursor substances, narcotics, or psychotropic substances. Haiti carries out regular inspections and audits of the establishments of individuals and corporations authorized to handle pharmaceutical products containing precursor substances, narcotics, or psychotropic substances.

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

Haiti has the “Loi Relative au Contrôle et a la Repression du Trafic Illicite de la Drogue, 2001” which provides for criminal penalties in Articles 45 to 61 for infractions or violations by individuals or corporations that handle pharmaceutical products containing precursor substances, narcotics, or psychotropic substances. However, the country does not have civil or administrative penalties for these infractions or violations.

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

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

The country does not share information with other regional or global systems on the diversion of materials and equipment for illicit production or manufacture of narcotic drugs and psychotropic substances.
substances.

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

Haiti does not use the International Narcotics Control Board’s (INCB) International Import and Export Authorization System (I2ES). However, it has alternative mechanisms that are ready to issue, load, and exchange expeditiously import and export authorizations of narcotic drugs and psychotropic substances for medical use. In this sense, the alternative mechanisms include import permit, import number and PEN Online.

The country has not received training on the INCB’s I2ES.
**Priority Action 6.1:** Train law enforcement personnel involved in drug investigations in specialized investigative techniques and intelligence collection, analysis, and operations, including through the use of existing information systems and intelligence data exchanges.

Haiti participates in U.S. Department of State’s International Narcotics and Law Enforcement Affairs Section (INL) training programs for personnel involved in drug investigations in specialized investigative techniques and intelligence collection, analysis, and operations.

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

Haiti does not implement or participate in periodic training programs or other capacity-building activities to investigate and counter crimes associated with drug trafficking, such as corruption and money laundering.

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

Haiti does not have information gathering mechanisms to exchange intelligence information at a domestic, regional, or international level to detect routes and methods used by drug trafficking criminal organizations.

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

Haiti has the following tools that promote and strengthen cooperation and the exchange of information and intelligence among domestic law enforcement agencies responsible for drug interdiction and effective border control:

- Haiti National Police (HNP) Act, 2001 law on drugs, Department of Judicial Police (DCPJ)/Control of Narcotics Crime Brigade (BLTS) guidelines
- Memorandum of Understanding between BLTS and the Haitian Coast Guard
Priority Action 6.5: Improve the information systems on drug trafficking and related crimes, including alerts on changing behavior patterns and modus operandi of criminal drug trafficking organizations.

Haiti has a national information system on drug trafficking and related crimes, but the system does not include alerts on changing behaviors and modus operandi of criminal organizations. The national information system on illicit trafficking in drugs and related crimes is organized by the Haitian Observatory on Drugs (OHD). It brings together all those involved in prevention, the interdiction system, the National Commission for the Fight Against Drug Trafficking (CONALD) and the judicial system in order for them to share and exchange information on everything related to combating drugs in Haiti. The Observatory processes information on seizures of drugs, assets, and money linked to illicit drug trafficking as well as on arrests of traffickers contravening the 2001 law on illicit drug trafficking.

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

Haiti has strengthened the legislative frameworks to counter money laundering derived from drug trafficking. In this sense, the country has the law of February 21, 2001, creating the Central Financial Intelligence Unit (UCREF) and the law amending the law of November 11, 2013, sanctioning money laundering and terrorist financing.

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

Haiti does not have training programs for officials or those in vulnerable sectors on prevention, detection, investigation, and prosecution of money laundering derived from drug trafficking.

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

Haiti does not have protocols that enable the authorities to conduct financial and asset investigations parallel to drug trafficking investigations.

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

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

- Mechanisms for interinstitutional cooperation between: UCREF, *Bureau des Affaires Financières et Economiques* (specialized component of the Haitian National Police—BAFE), *Bureau des Affaires Criminelles* (Criminal Affairs Office—BAC), the Bank of the Republic of Haiti (BRH), and the Anti-Corruption Unit (ULCC)
**Priority Action 7.5:** Strengthen the exchange of financial intelligence as related to money laundering, including through the standardization of information systems.

Haiti has the Central Financial Intelligence Unit (UCREF) as its financial intelligence unit.

Haiti has an information system aimed at the investigation and prosecution of money laundering in analyzing cases deriving from drug trafficking. In this sense, the GoAML System is a software developed by the United Nations Office on Drugs and Crime (UNODC), that is currently being implemented in the UCREF.

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

Haiti does not have mechanisms for analyzing money laundering risks, in accordance with the Financial Action Task Force (FATF) recommendations.

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

Haiti has not established partnerships with the financial industries to identify and investigate illicit transactions and money laundering operations related to the proceeds of drug trafficking activities.
Priority Action 8.1: Establish and/or strengthen, as appropriate, national entities responsible for the administration and disposition of assets seized and/or forfeited in cases of drug trafficking, money laundering, and other related crimes.

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

Haiti has Commission Nationale de Lutte Contre la Drogue (CONALD) and the Office of Administration of Special Funds and Anti-Drug Unit (BAFOS) as the designated competent authorities responsible for the administration and disposition of seized and forfeited assets.

The country does not have regulations to facilitate the accountability and transparency of the management of seized and forfeited assets.

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

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

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

Haiti does not have legislation, regulations, or procedures, as well as other specific measures, in accordance with international conventions and treaties, to facilitate the seizure, forfeiture, and management of assets and instruments derived from drug trafficking and other related crimes.
<table>
<thead>
<tr>
<th>Objective 9</th>
<th>DESIGN, IMPLEMENT, AND STRENGTHEN COMPREHENSIVE AND BALANCED NATIONAL PROGRAMS TO REDUCE THE ILLICIT CULTIVATION, PRODUCTION AND MANUFACTURE OF DRUGS THROUGH THE ADOPTION OF EFFECTIVE MEASURES, SUCH AS COMPREHENSIVE AND SUSTAINABLE ALTERNATIVE DEVELOPMENT, ENHANCED LAW ENFORCEMENT COOPERATION, AND OTHER APPROPRIATE POLICIES AND PROGRAMS, TAKING INTO ACCOUNT THE PARTICULAR NEEDS OF SUB-NATIONAL REGIONS OF EACH COUNTRY, RESPECTING HUMAN RIGHTS.</th>
</tr>
</thead>
</table>

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

Haiti has not designed, implemented, or updated national policies or programs to prevent and decrease illicit cultivation, production, or manufacture of drugs.

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

Haiti does not direct budgetary allocations towards financing counternarcotics programs.

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

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

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

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

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

**Priority Action 9.5:** Support supply reduction programs with crime prevention initiatives, in cooperation with civil society and other stakeholders, as appropriate, to address social and economic risk factors.
Haiti does not support the development of supply reduction programs with drug-related crime prevention initiatives that address social and economic risk factors.
### Objective 10

**Objective 10**: Design, implement or strengthen long-term alternative development programs, including rural and urban alternatives, comprehensive and sustainable alternative development programs, and, as appropriate, preventive alternative development, in accordance with the policies, laws and needs of each country, as appropriate, while respecting human rights.

<table>
<thead>
<tr>
<th>Priority Action</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>10.1</strong></td>
<td>Design and implement comprehensive and sustainable alternative development programs, including preventive alternative development, as appropriate, while respecting human rights.</td>
</tr>
<tr>
<td></td>
<td>Haiti has not designed or implemented comprehensive and sustainable alternative development programs or preventive alternative development, as appropriate, as part of the strategies to control and reduce illicit crops.</td>
</tr>
<tr>
<td><strong>10.2</strong></td>
<td>Exchange experiences and best practices in the design and implementation of comprehensive and sustainable alternative development programs, including preventive alternative development, as appropriate.</td>
</tr>
<tr>
<td></td>
<td>Not applicable.</td>
</tr>
<tr>
<td><strong>10.3</strong></td>
<td>Promote and disseminate the results of comprehensive and sustainable alternative development programs, and the benefits they provide to affected communities.</td>
</tr>
<tr>
<td></td>
<td>Not applicable.</td>
</tr>
<tr>
<td><strong>10.4</strong></td>
<td>Design and/or strengthen monitoring and evaluation systems for comprehensive and sustainable alternative development programs aimed at reducing illicit crop cultivation and improving the well-being of communities, through the use of indicators that measure programs’ effectiveness.</td>
</tr>
<tr>
<td></td>
<td>Not applicable.</td>
</tr>
<tr>
<td><strong>10.5</strong></td>
<td>Strengthen state presence in areas affected by or at risk of illicit drug cultivation, consistent with the circumstances of each member state.</td>
</tr>
<tr>
<td></td>
<td>Not applicable.</td>
</tr>
</tbody>
</table>
**Priority Action 10.6:** Promote, in accordance with national realities, the participation of local communities and relevant organizations in the development of comprehensive and sustainable alternative development programs, taking into account their needs and capabilities.

Not applicable.

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

Not applicable.
**Objective 11**

**Design and Implement Plans and/or Programs to Mitigate and Reduce the Impact of Illicit Crops and Drug Production on the Environment, in Cooperation with Local Communities and National Policies of Member States.**

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

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

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

Not applicable.

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

Not applicable.
**OBJECTIVE 12**

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

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

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

Haiti has developed and implemented approaches for controlling micro-trafficking and related crimes, that take into account effects on public health, the economy, social cohesion, and citizen security. In this sense, the Haitian National Police, via the *Bureau de Lutte contre le Trafic des Stupéfiants* (BLTS), identifies the type of trafficker based on the quantity of drugs traded. As such, a street peddler is not judged the same way as a drug dealer who traffics several kilos of a drug. According to the law, sentences differ depending on the quantity of drugs seized.

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

Haiti promotes the interagency exchange of information on the effects of small-scale drug trafficking in the health and security sectors. These exchanges are carried out in accordance with the following table:

<table>
<thead>
<tr>
<th>Entities among which information was exchanged</th>
<th>Means of exchange</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pharmaceuticals, Medicines, and Traditional Medicine Directorate (DPM/MT)</td>
<td>Reports</td>
<td>2022</td>
</tr>
<tr>
<td>Central Directorate of the Judicial Police (DCPJ)</td>
<td>Reports</td>
<td>2022</td>
</tr>
</tbody>
</table>

However, this exchange is not promoted in the social and economic sectors.

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

Haiti does not have programs or strategies that prevent the exploitation of at-risk populations affected by drug trafficking networks, at the national and international level.
Objective 1

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

CICAD notes with concern that Haiti does not implement or participate in ongoing training programs to detect, investigate, and dismantle laboratories or facilities used in the illicit manufacture of drugs, for personnel involved in interdiction operations; nor does it have protocols and operating procedures to detect, investigate, and dismantle clandestine laboratories or facilities for the illicit processing or manufacture of drugs. CICAD also notes that the agencies in charge of drug control in Haiti do not implement policies that promote gender mainstreaming. However, CICAD observes that the country has programs and strategies for land and maritime interdiction of drugs through monitoring, inspections, and checkpoints, but does not have for riverine or aerial interdiction. Moreover, CICAD notes that Haiti has legal instruments providing for the use of specialized investigation tools and techniques to prevent and reduce drug trafficking. However, CICAD notes that the country does not have updated assessments or studies to identify new trends and threats on drug trafficking and related crimes. On the other hand, CICAD observes that Haiti implements actions to identify organized criminal groups involved in drug trafficking and related crimes and carries out inter-institutional collaboration and cooperation mechanisms to coordinate activities aimed at dismantling organized crime groups involved in these crimes. Additionality, the country participated in operations and investigations with other countries aimed at dismantling these organized criminal groups. Moreover, CICAD notes that the country has institutions that are responsible for, and capable of, analyzing chemical substances, precursors, pharmaceutical products, and synthetic drugs, including new psychoactive substances (NPS), but does not have or participates in ongoing training programs for personnel involved in the analysis of these substances, nor has mechanisms to facilitate or share information at the national level across government counterparts, nor global repositories on these substances. CICAD also notes that the country does not have mechanisms to investigate and disrupt drug trafficking through the Internet. CICAD observes further that the country does not have partnerships or information exchange mechanisms with private sector entities to prevent access to materials and services exploited for illicit drug trafficking purposes and does not use tools and resources of the INCB to strengthen cooperation with the private sector to prevent the diversion of chemicals. CICAD notes that Haiti has national authorities with the appropriate budget, human, material resources for the forfeiture, seizure, and management of assets, tools, or products related to illicit drug markets, but its competent personnel do not receive ongoing training in this area.
**Objective 2**  
Strengthen national measures to address the challenges posed by NPS and illicit synthetic drugs, and the threat of fentanyl-related substances, non-medical synthetic opioids, and illicit amphetamine derivatives.

CICAD observes that Haiti does not have an early warning system (EWS) to identify and trace new psychoactive substances (NPS), illicit synthetic drugs, or the threat of fentanyl-related substances, non-medical synthetic opioids, illicit amphetamine derivatives, and other substances subject to international control. CICAD also notes that the country does not improve its capabilities to detect and analyze NPS through the use of special investigative techniques, updated equipment, and acquisition of technology. Additionally, CICAD observes that Haiti does not have regulatory frameworks or guidelines to identify and address the challenges posed by the onset of NPS and emerging synthetic drugs. Moreover, CICAD notes that the country does not participate in the INCB’s Project ION. Furthermore, CICAD observes that Haiti does not have innovative legislation or regulatory approach to synthetic opioids for non-medical use or NPS.

**Objective 3**  
Strengthen or develop legal and institutional frameworks for the effective monitoring and control of essential chemical substances and precursors to prevent diversion of these substances to the manufacturing of illicit drugs and counter its trafficking, including periodically updating national lists of controlled chemical substances.

CICAD notes that Haiti has a competent national authority responsible for developing guides, codes of conduct, and other instruments to inform the industry and users in general of controlled chemical substances and has such instruments and mechanisms. CICAD also observes that the country has an updated register of all individuals and corporations handling controlled chemical substances and that its competent authority carries out regular inspections and audits of the establishments of individuals and corporations authorized to handle these substances. However, CICAD notes that Haiti does not carry out analyses that include the exchange of information through existing international mechanisms of substances, their analogs, and precursors, which pose a threat to public health. On the other hand, CICAD observes that Haiti has legislation incorporating the control measures in Article 12 of the 1988 United Nations Convention to prevent diversion of controlled chemical substances towards illicit activities, which include all of the control measures listed in Paragraph 8, one out of the five control measures listed in Paragraph 9, and incorporate the requests for information set forth in Paragraph 10. Likewise, CICAD notes that the country uses the INCB’s PEN Online system for pre-export notifications of controlled chemical substances, but not the PICS system. However, CICAD observes that Haiti does not receive training for drug control personnel and for the identification and handling of controlled chemical substances. Moreover, CICAD notes that the country does not have budgetary mechanisms to ensure allocation of resources to acquire necessary equipment or supplies for the preliminary identification of substances and the protective equipment required by personnel in charge of these tasks. Likewise, CICAD observes that Haiti does not use the OAS/CICAD Model Regulations for the Control of Chemical Substances Used in the Illicit
Manufacture of Narcotic Drugs and Psychotropic Substances.

**Objective 4**
Ensure adequate availability and accessibility of substances subject to international control for medical and scientific purposes, while also preventing their diversion towards illicit activities, in accordance with international drug control conventions.

CICAD notes that Haiti has special processes for issuing authorizations for the national production, import, and export of substances subject to international control for medical and scientific purposes and that it has an updated register of individuals or companies importing and exporting substances subject to international control for medical and scientific purposes. Additionally, CICAD observes that the country has training activities for competent national authorities and health professionals on proper access to substances subject to international control solely for medical and scientific purposes. Also, CICAD notes that the country has a regulatory framework to govern the acquisition of substances subject to international control for medical and scientific purposes.

**Objective 5**
Adopt or strengthen control measures to prevent diversion of controlled pharmaceutical products containing narcotic drugs and/or psychotropic substances, and those containing precursor substances used in the production of controlled substances.

CICAD notes that Haiti has an updated register of individuals and corporations handling pharmaceutical products containing precursor substances, narcotics, or psychotropic substances, issues licenses to manufacturers and distributors of these substances, and carries out regular inspections and audits of the establishments of individuals and corporations authorized to handle them. CICAD observes that the country has criminal penalties, for infractions or violations by individuals or corporations that handle pharmaceutical products containing precursor substances, narcotics, or psychotropic substances; however, it does not have civil or administrative penalties for infractions or violations by individuals or corporations that handle these products. However, CICAD notes that Haiti does not offer periodic training programs for personnel responsible for preventing trade in and diversion of materials and equipment for the illicit production or manufacture of narcotic drugs and psychotropic substances, nor shares information with other regional or global systems on this matter. Furthermore, CICAD observes that the country does not use the INCB’s I2ES system, but has alternative mechanisms that are ready to issue, load, or exchange expeditiously import and export authorizations of narcotic drugs and psychotropic substances for medical use. CICAD also notes that the country has not received training in the use of the I2ES system.
**Objective 6**

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

CICAD notes that Haiti participates in periodic training programs for personnel involved in drug investigations in specialized investigative techniques and intelligence collection, analysis, and operations. However, CICAD observes that the country does not implement or participate in periodic training programs and other capacity-building activities to investigate and counter crimes associated with drug trafficking, such as corruption and money laundering. Additionally, CICAD notes that Haiti does not have information gathering mechanisms to exchange intelligence information, at a domestic, regional, or international level, to detect routes and methods used by drug trafficking criminal organizations. On the other hand, CICAD observes that the country has tools that promote and strengthen cooperation and the exchange of information and intelligence among domestic law enforcement agencies responsible for drug interdiction and effective border control. Moreover, CICAD notes that Haiti has a national information system on drug trafficking and related crimes, but it does not include alerts on changing behaviors and modus operandi of criminal organizations.

**Objective 7**

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

CICAD notes that Haiti has strengthened its regulatory framework to counter money laundering derived from illicit drug trafficking. However, CICAD observes with concern that the country does not have periodic training programs for officials or those in vulnerable sectors on prevention, detection, investigation, and prosecution of money laundering derived from drug trafficking. CICAD also notes that Haiti does not have protocols that enable authorities to conduct financial and asset investigations parallel to drug trafficking investigations. On the other hand, CICAD observes that the country has mechanisms allowing for interagency coordination and cooperation in the area of preventing and controlling money laundering. However, CICAD notes with satisfaction that Haiti has a financial intelligence unit and has information systems aimed at the investigation and prosecution of money laundering in analyzing cases deriving from illicit drug trafficking. On the other hand, CICAD observes that the country does not have mechanisms for analyzing money laundering risks in accordance with FATF recommendations. Additionally, CICAD notes that Haiti has not established partnerships with financial industries to identify and investigate illicit transactions and money laundering operations related to the proceeds of drug trafficking activities.
Objective 8
Establish and/or strengthen agencies for the administration and disposition of seized and/or forfeited assets in cases of drug trafficking, money laundering, and other related crimes, in line with applicable international law, and in line with relevant standards, such as the FATF recommendations and the recommendations on preventive freezing of assets.

CICAD notes that Haiti has designated competent authorities responsible for the administration and disposition of seized and forfeited assets but does not have regulations to facilitate the accountability and transparency of the management of seized and forfeited assets. Furthermore, CICAD observes that the country does not offer or participate in specialized, periodic training programs for the management and disposition of seized and forfeited assets. Moreover, CICAD notes that Haiti does not have legislation, in accordance with international conventions and treaties, to facilitate the seizure, forfeiture, and management of assets and instruments derived from drug trafficking and other related crimes.

Objective 9
Design, implement, and strengthen comprehensive and balanced national programs to reduce the illicit cultivation, production and manufacture of drugs through the adoption of effective measures, such as comprehensive and sustainable alternative development, enhanced law enforcement cooperation, and other appropriate policies and programs, taking into account the particular needs of sub-national regions of each country, respecting human rights.

CICAD notes that Haiti has not designed, implemented, and updated national policies and programs to prevent and decrease illicit cultivation, production, and manufacture of drugs. Furthermore, CICAD observes that the country does not have direct budgetary allocations towards financing counternarcotics programs. Additionally, CICAD notes that Haiti does not take into account licit traditional uses when designing and implementing policies and programs to reduce the illicit supply of drugs and these policies and programs do not include environmental protection measures. CICAD also observes that the country has not established mechanisms for interinstitutional cooperation between public and private institutions to provide a comprehensive response to the illicit production of drugs. Additionally, CICAD notes that Haiti does not support the development of supply reduction programs with drug-related crime prevention initiatives that address social and economic risk factors, which include the participation of civil society and other social stakeholders.

Objective 10
Design, implement or strengthen long-term alternative development programs, including rural and urban alternatives, comprehensive and sustainable alternative development programs, and, as appropriate, preventive alternative development, in accordance with the policies, laws and needs of each country, as appropriate, while respecting human rights.

CICAD notes that Haiti has not designed nor implemented comprehensive and sustainable
alternative development programs or preventive alternative development therefore, the priority actions of this objective are not applicable.

**Objective 11**

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

CICAD notes that Haiti has not carried out, during the evaluation period (2019-2022), research or studies to determine the characteristics and extent of the environmental impact caused by the illicit cultivation of crops and illicit drug production, therefore, the priority actions of this objective are not applicable.

**Objective 12**

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

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