



Online Controlled Substances Summit

The public meeting will begin shortly

Thursday, September 11, 2025

12:30pm - 3:30pm Eastern Time

Funding Disclosure: This activity is one part of a multi-part Foundation project related to substance use disorder. The multi-part project is supported by the Food and Drug Administration (FDA) of the U.S. Department of Health and Human Services (HHS) as part of an overall award of \$1,720,109 of federal funds (100% of the project). The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by FDA, HHS, or the U.S. Government. For more information, please visit [FDA.gov](https://www.fda.gov).





Welcome

Susan C. Winckler, RPh, Esq.

Chief Executive Officer
Reagan-Udall Foundation for the FDA

Housekeeping



Due to the meeting size, your microphone and video will remain off during the meeting.



This public meeting is being recorded. The slides, transcript, and video recording will be available on the Foundation website.



Please share your questions and comments for the speakers using the Zoom Q&A function.

Today's Agenda (Eastern Time)



| | |
|----------------|---|
| 12:30pm | Welcome & Opening Remarks |
| 12:40pm | Evolving Threat |
| 1pm | Session 1: Research Updates and Trends |
| 1:30pm | Session 2: Human Impact of Online Access to Controlled Substances |
| 2pm | Session 3: Strategies for Intervention/Disruption |
| 2:40pm | Session 4: Global Perspective |
| 3:15pm | Closing Remarks |
| 3:30pm | Adjourn |



Introductory Remarks

Grace Graham, MPP

Deputy Commissioner for Policy, Legislation, and
International Affairs
U.S. Food and Drug Administration



Evolving Threat

Sangeeta Chatterjee, PharmD

Acting Director, Office of Drug Security, Integrity,
and Response, CDER Office of Compliance
U.S. Food and Drug Administration

2025 Online Controlled Substances Summit

Reducing the Availability of Controlled Substances Online

Sangeeta Vaswani Chatterjee, PharmD

Acting Director

Office of Drug Security, Integrity, and Response

Office of Compliance

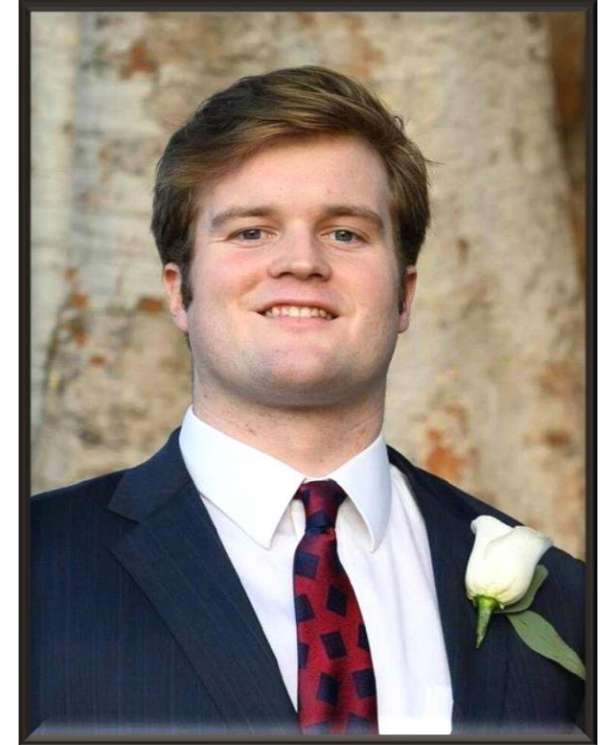
Center for Drug Evaluation and Research

September 11, 2025

Why We Are Here Today: The Human Cost



Ryan Haight died on February 12, 2001, at the age of 18 after buying Vicodin online. This led to the passage of the 2008 Ryan Haight Online Pharmacy Consumer Protection Act, which amended the Controlled Substances Act.



Charlie Ternan died on May 14, 2020, at the age of 22, after ingesting a counterfeit “Percocet” pill that was laced with fentanyl.

CDER Office of Compliance Mission

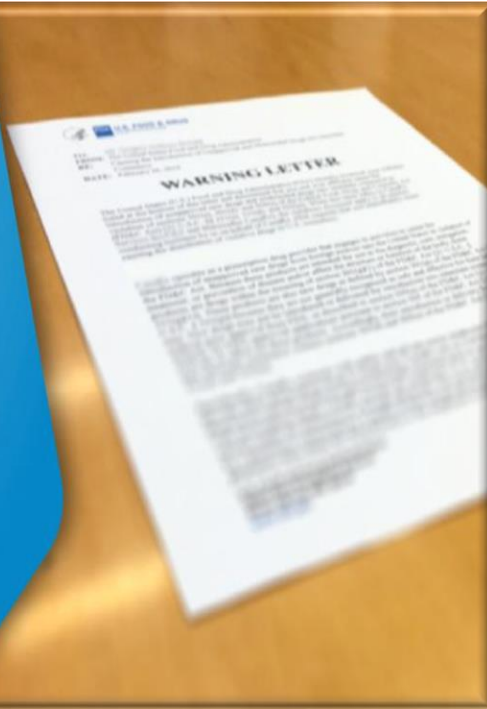
To shield the public from poor-quality, unsafe, and ineffective drugs through proactive compliance strategies and risk-based enforcement actions



Easy Online Access to Controlled Substances Threatens U.S. Consumers

FDA issues
warning letter

FDA



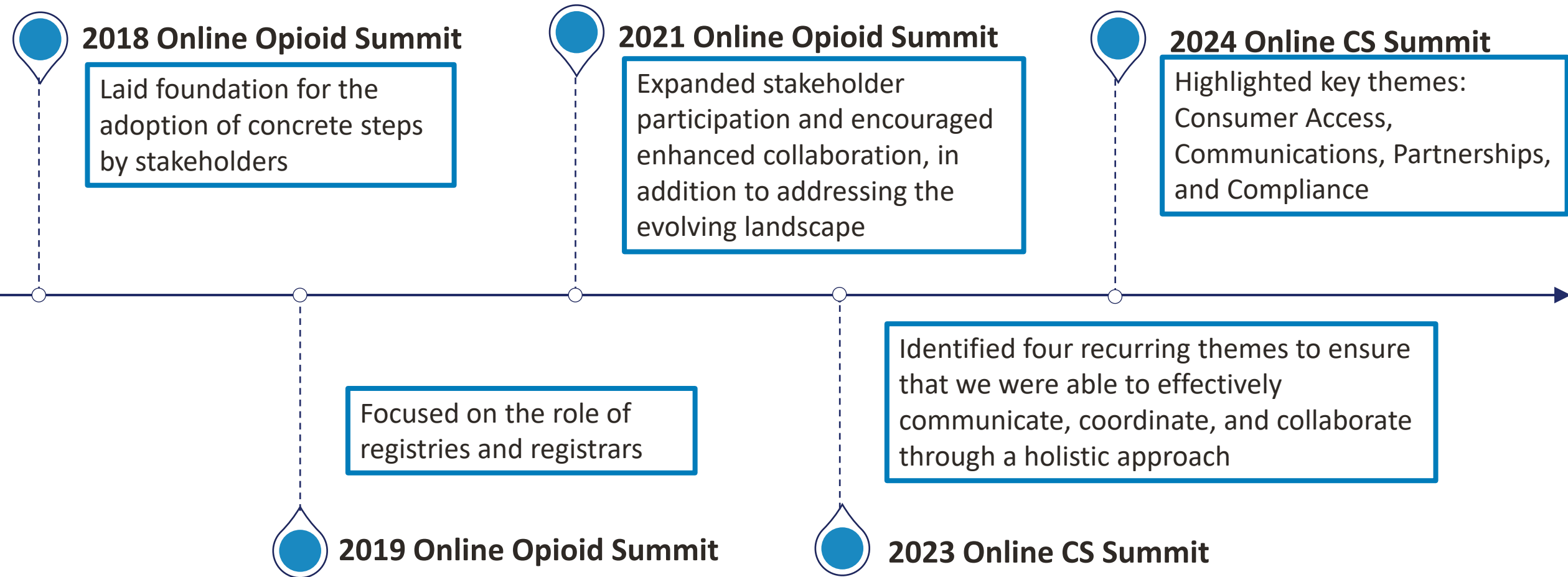
- Since January 2025, FDA has issued 15 Warning Letters for the unlawful sale of controlled substances to U.S. consumers online
- Products cited: Opioids, Benzodiazepines, Schedule II Stimulants
- Often sold without requiring a prescription
- Non-medical and polysubstance use are major concerns

FDA and DEA Warn Online Pharmacies Illegally Selling Adderall to Consumers

Agency Committed to Using All Available Tools to Stop Online Businesses Illegally Selling Potentially Harmful Drug Products to Consumers

April 12, 2022

Evolution of FDA's Online Opioid and Controlled Substances Summits



Online Controlled Substances Summit Participants



- Social media
- Search engines
- Online marketplaces
- Payment processors
- Registries and registrars
- Academia
- International groups
- Federal agencies
- Trade and advocacy

Examples of Successes

Google Now Deindexing Some Web Pages Based on FDA's Administrative Agency Findings

A new Google policy calls for such deindexing based on administrative agency findings—without a court order—in cases where the agency is “charged with protecting consumers’ physical safety from harm by products or services that they consume.”

Instagram will send a pop-up about opioid addiction support if you search certain hashtags

Facebook to redirect users searching for opioids to federal crisis help line

GRIDS convenes 5th international meeting with Public-Private Partners for prevention of dangerous substance trafficking through the Internet



FDA NEWS RELEASE





Federal Government Announces New Pilot Program to Help Stop Illegal Availability of Unapproved Opioids Online

[f Share](#) [t Tweet](#) [in LinkedIn](#) [✉ Email](#) [🖨 Print](#)

For Immediate Release: June 08, 2020

The U.S. Food and Drug Administration and the National Telecommunications and Information Administration (NTIA) are launching a 120-day pilot to help reduce the availability of unapproved opioids illegally offered for sale online.

2024 Online Controlled Substances Summit Critical Insights

| | Key Themes | Current Challenges | Opportunities for Public Health Intervention |
|---|------------------------|---|--|
|  | Consumer Access | Consumers, including patients, are motivated by disparate needs for CS (medical use, self-medication, and non-medical use) | Develop tailored public health interventions that address the issue from a holistic perspective, including patient access to prescribed CS and consumer demand |
|  | Communications | Messaging and messengers are not reaching intended audiences or having the intended impact | Identify and equip trusted messengers to amplify effective, evidence-based messages for intended audiences |
|  | Partnerships | There is a need to establish partnerships to design and implement achievable, realistic solutions | Build partnerships across multiple platforms and organizations to foster trust, support information sharing, disseminate educational opportunities, and create effective public health interventions |
|  | Compliance | Online demand for CS is being met by unapproved and/or counterfeit drugs, which may be unsafe or ineffective, and thus threaten public health | Empower collaborators to engage in proactive, voluntary efforts that complement FDA's mission to protect public health |

Collaboration is Essential

#OnlineCSSummit

#DrugOverdoseCrisis

#SaveLives

#YouthSafety



Evolving Threat

Jake Ellis

Senior Operations Manager
Office of Criminal Investigations
U.S. Food and Drug Administration

U.S. Food and Drug Administration Office of Inspections and Investigations Office of Criminal Investigations

Jake Ellis

Senior Operations Manager

September 2025



Investigative Focus

- The FDA – Office of Criminal Investigations, Cybercrime Investigations Program, conducts criminal investigations across the entire internet landscape
 - Rogue Online Clear Web Pharmacies
 - Darkweb Marketplace Vendors
 - Social Media Applications
 - Encrypted Chat Applications
- Our Investigative Focus
 - Counterfeit drugs which pose significant overdose risk
 - Synthetic opioids, counterfeit Adderall, counterfeit Xanax
 - Misbranded or adulterated FDA regulated products
 - Foreign unapproved medical products



Operation RapTOR

- Joint Criminal Opioid and Darknet Enforcement (JC CODE) Operation
 - International Darknet Operation targeting traffickers of counterfeit pills, opioids, and other illicit goods
 - Operations touch the US, Europe, South America, and Asia



Operation RapTor

The Joint Criminal Opioid and Darknet Enforcement (JCDE) Team and Europol's latest international operation against drug traffickers operating on the Darknet.

OPERATION RESULTS



270

Darknet drug traffickers arrested



\$200 M

in cash and virtual currencies seized



2.3 MT

Metric tons of illicit drugs seized



181

Firearms seized



Operation Double OH-7

- FDA – Office of Criminal Investigations operation to combat the emerging threat of synthetic 7-Hydroxymitragynine (7-OH)
 - **Criminal Exploitation**
 - **Online Markets:** Sold via high-risk internet pharmacies and dark web marketplaces
 - **Labeling Fraud:** Frequently mislabeled as “natural kratom extract”, “all natural”, “herbal blend”, or “mood enhancer”
 - **Online Activity Analysis Snapshot**
 - **Reddit:** Online posts mentioning 7-OH have increased exponentially over the last 12 months. Posting in June 2024 saw an estimated 187 mentions of 7-OH, compared to 19,744 mentions in June 2025. Calendar year 2025 has seen an average of 17,622 monthly post mentioning 7-OH.

Questions?



SOM Jake Ellis
Headquarters
301-844-1386
Jacob.ellis@fda.hhs.gov



Research Updates & Trends



Saleem Alhabash, PhD

Professor & Associate Chair
Michigan State University



John Hertig, PharmD

Founder
Hertig Healthcare Advising, LLC



Angie Hoth, PharmD

Research Consultant
FDA Foundation

WHO BUYS COUNTERFEIT MEDS? AND WHY?



SALEEM ALHABASH

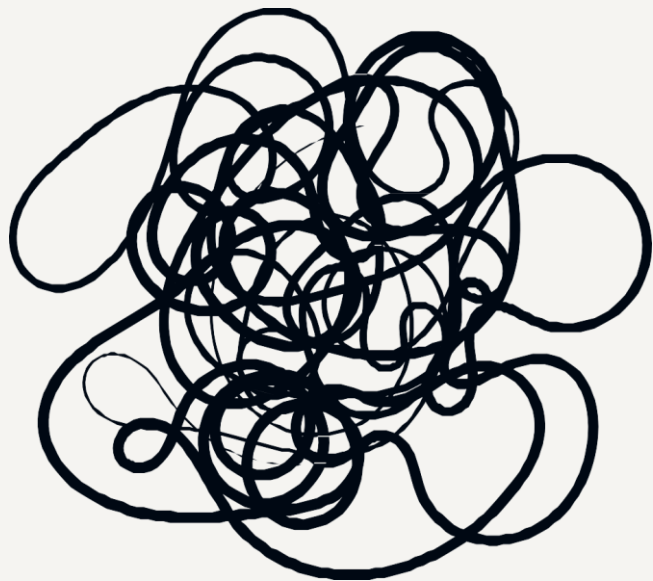
Professor & Associate Chair / Associate Director of Research

Department of Advertising
and Public Relations



Center for Anti-Counterfeiting
and Product Protection

MICHIGAN STATE UNIVERSITY



UNDERSTANDING THE **COUNTERFEIT** ECOSYSTEM



UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

COUNTERFEITING IMPACT



**Global
Economy**



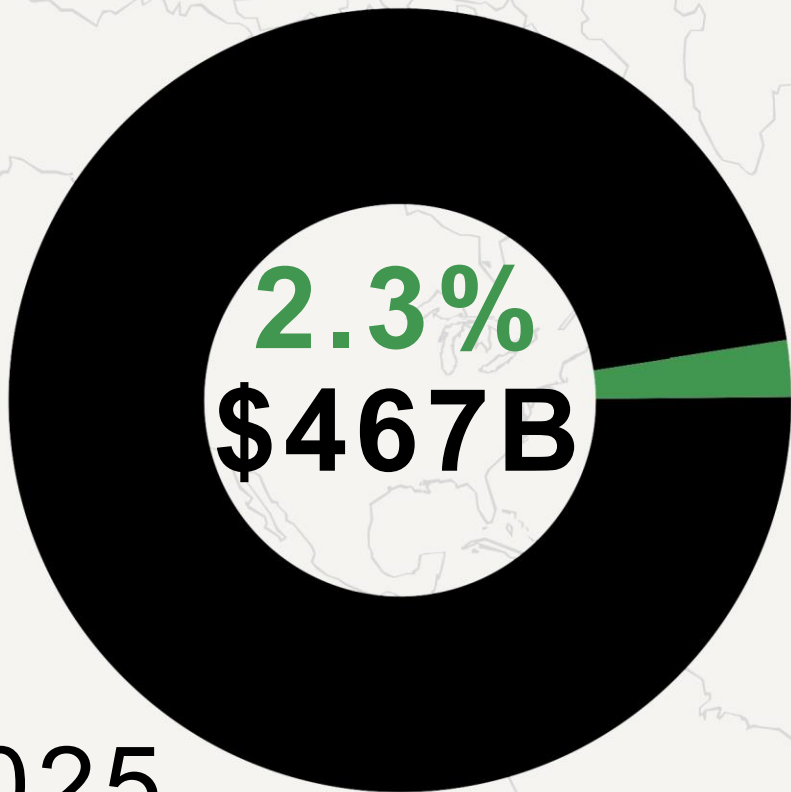
**Communities
Around the
World**



**Health &
Well-Being**



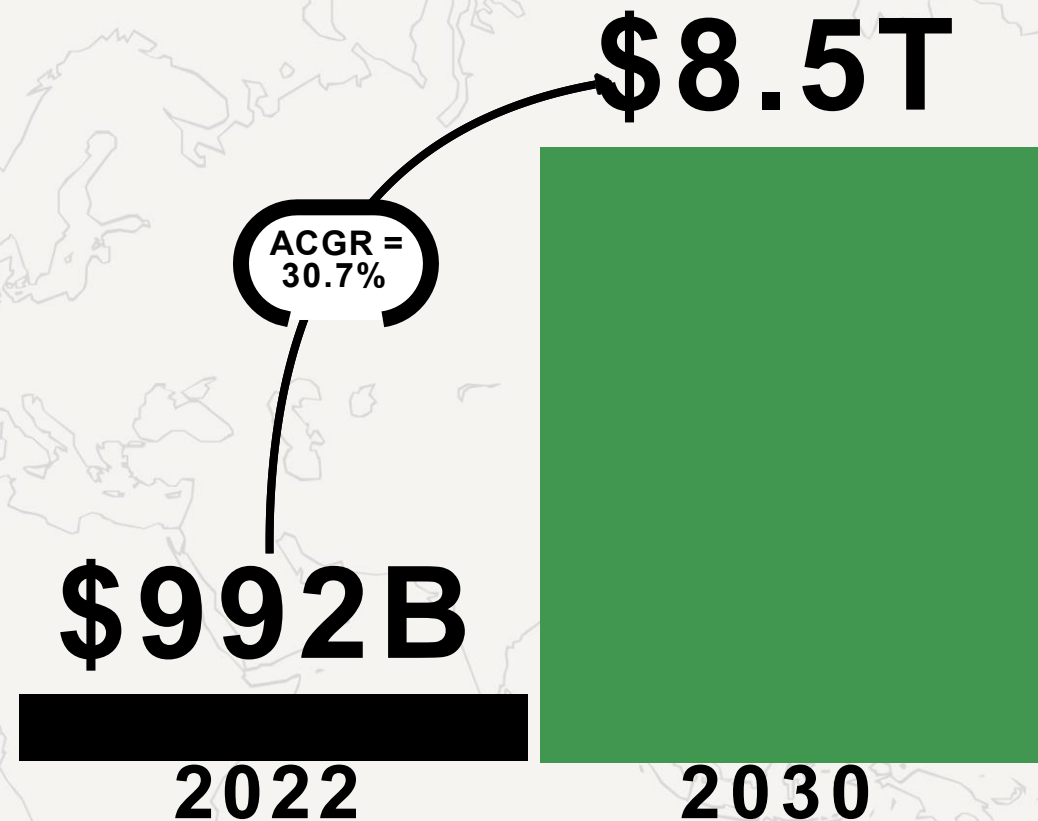
UNDERSTANDING THE COUNTERFEIT ECOSYSTEM



2025

**Counterfeit
Market**

COUNTERFEITING IMPACT



**E-/Social
Commerce Market**



UNDERSTANDING THE COUNTERFEIT ECOSYSTEM



\$200-\$413B
annual sales
of counterfeit
medications



1.5M
counterfeit
medication
units seized
by CBP in
2023



50% of all meds
sold online are
counterfeit &
97% of online
pharmacies
operate illegally



1M deaths annually
attributed to
counterfeit
medications; including
250K children who die
from taking fake
malaria and pneumonia
meds

COUNTERFEITING IMPACT



UNDERSTANDING THE COUNTERFEIT ECOSYSTEM

COUNTERFEITING IMPACT



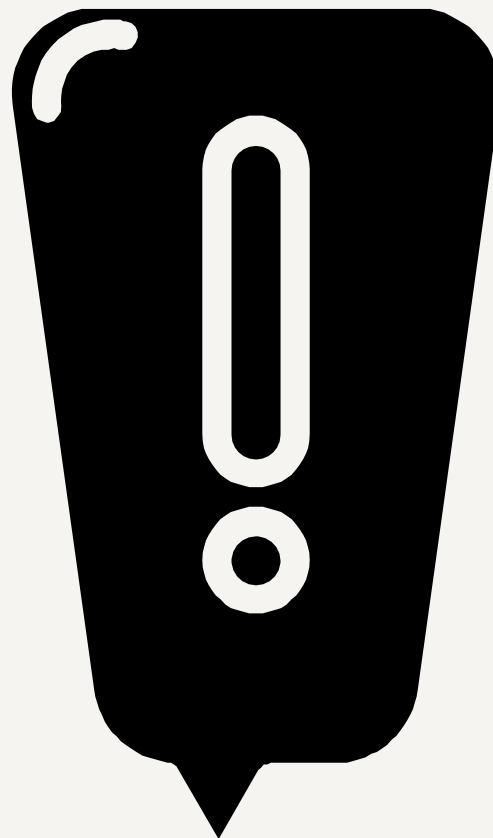
Law Enforcement

Collaborative efforts among brand owners, law enforcement, and platforms (!) for **seizures and take-downs**



Tech Solutions

Identifying counterfeit supply chain and tracking the prevalence of counterfeit products online and offline (e.g., track & trace, smart packaging, blockchain, etc.)



Supply Chain Complexity

Increasing complexity due to explosive **volume** and **velocity** of counterfeit supply.



Mission Impossible

Enhanced competence of counterfeiters renders anti-counterfeiting efforts near **impossible** to contain



UNDERSTANDING THE COUNTERFEIT ECOSYSTEM



KNOWLEDGE GAPS

A deep understanding of consumers is necessary for designing and implementing effective consumer education and awareness-raising anti-counterfeit campaigns and efforts

FOCUS ON CONSUMERS



WHO THE
CONSUMERS
ARE



WHY THEY
BUY
COUNTERFEITS



Never have I ever...



accepted a **friend request** on social media from someone you did not know in real life?

clicked on a **suspicious link** sent to your email and immediately regretted it?

opened a **suspicious attachment** sent to your email from a stranger?

downloaded/used a **'pirated'** piece of content (e.g., movie, song, image)?

bought a product from a **shady website**, e-commerce, or social media platform?

shared **private information online** or with someone you don't know or fully trust?



UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

online risks are
EVERYWHERE



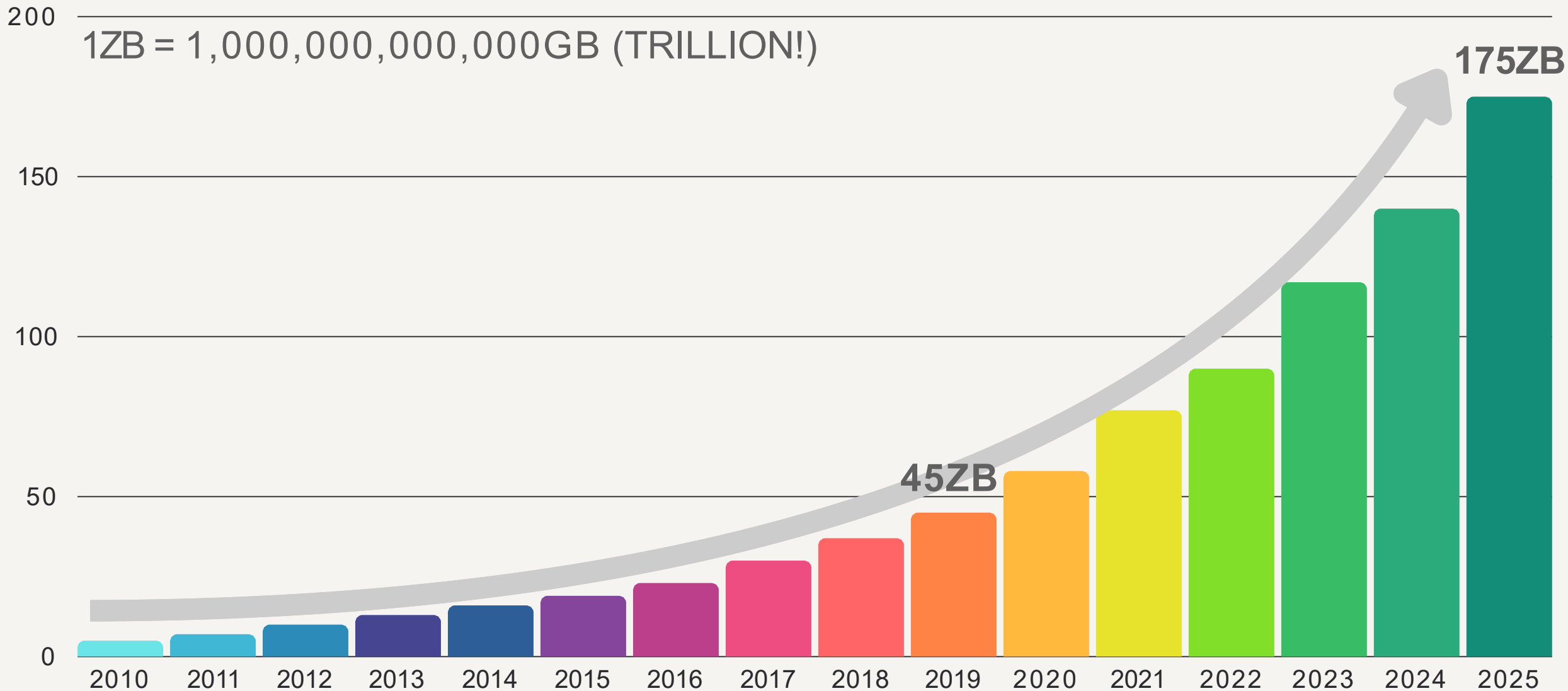
UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

**IS IT A DATA/
INFORMATION
PROBLEM?**

**OR A PEOPLE
PROBLEM?**



DATA AND INFORMATION





UNDERSTANDING THE COUNTERFEIT ECOSYSTEM

175ZB

To **store** the “entire Global Datasphere on DVDs, then you’d have a stack of single layer Blu-ray Discs that could get you...

to the moon

23

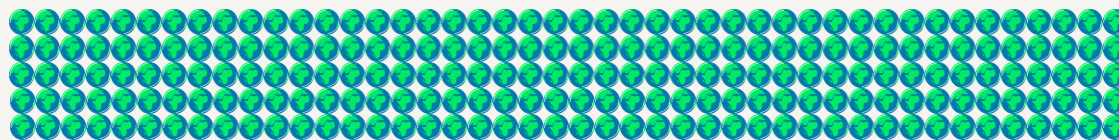
times



circle earth

222

times



To **download** all that data... it would take **one person 1.8 BILLION years** to do it or **81 days** if **everyone on earth** pitched in and worked non-stop!



5000

4000

3000

2000

1000

0

In 2020, IDC estimated that, on average, each person connected to the Internet in the world will have over 4,900 digital touchpoint (engagements) every single day; that's roughly...

“1 digital interaction every 18 seconds”

4909

1426

584

2010

2015

2020

2025



and there are a lot of
BAD ACTORS
out there!






With the **democratization of the Internet** (including social media), platforms are likened to **social organisms** that **evolve beyond their original purpose**, ushering ‘organisms’ that are the sum of **human-algorithm interactions**

|  |  |  |  |
|--|--|---|--|
| Convenience | Entertainment | Entertainment | Entertainment |
| Entertainment | Convenience | Convenience | Convenience |
| Passing Time | Medium Appeal | Photos | Medium Appeal |
| Medium Appeal | Passing Time | Medium Appeal | Passing Time |
| Photos | Self-Expression | Passing Time | Self-Expression |
| Information Sharing | Information Sharing | Self-Expression | Self-Documentation |
| Self-Expression | Social Interaction | Self-Documentation | Photos |
| Social Interaction | Self-Documentation | Social Interaction | Social Interaction |
| Self-Documentation | Photos | Information Sharing | Information Sharing |

Motivations Ranked

[rank-ordering of platform use motivations from most-agree to least-agree]

|  |  |  |  |
|---|---|---|---|
| Passing Time | Entertainment | Entertainment | Entertainment |
| Surveillance | Surveillance | Stay in the Loop | Passing Time |
| Entertainment | Convenience | Passing Time | Convenience |
| Convenience | Self-Documentation | Relaxation | Relaxation |
| Connection/Caring | Medium Appeal | Surveillance | Escapism |
| Social Interaction | Connection/Caring | Medium Appeal | Stay in the Loop |
| Self-Documentation | Stay in the Loop | Escapism | Medium Appeal |
| Information | Social Interaction | Information | Surveillance |
| Escapism | Escapism | Connection/Caring | Creativity |
| Medium Appeal | Relaxation | Social Interaction | Connection/Caring |
| Stay in the Loop | Self-Expression | Self-Expression | Coolness |
| Relaxation | Information | Acceptance | Acceptance |
| Acceptance | Coolness | Information | Self-Expression |
| Self-Expression | | Creativity | Social Interaction |
| Creativity | Attention Seeking | Self-Documentation | Self-Documentation |
| Attention Seeking | Creativity | Brand Promotion | Information |
| Brand Promotion | Brand Promotion | Emotional Disclosure | Emotional Disclosure |
| Emotional Disclosure | Emotional Disclosure | Attention Seeking | Brand Promotion |



UNDERSTANDING THE COUNTERFEIT ECOSYSTEM

CONSUMER BEHAVIOR

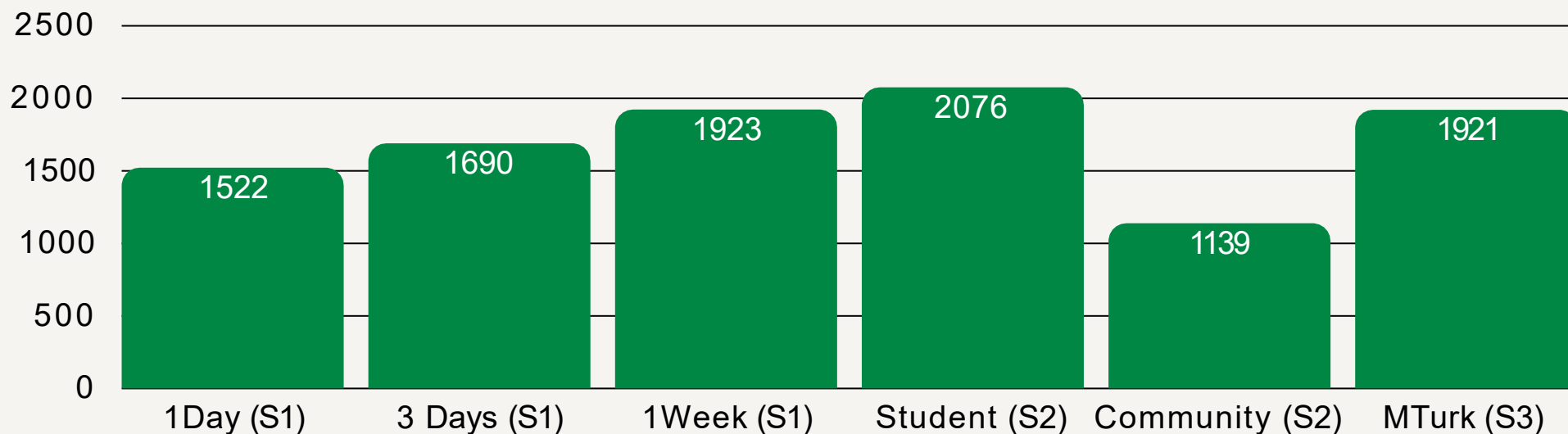
 a few observations

2

Though digital platforms are accessible for free, users place considerable value on their digital presence, thus indicating a deep psychological (and physical) attachment to social and digital media



How much **money** would you need to **give up Facebook?**





UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

CONSUMER BEHAVIOR

 a few observations

3

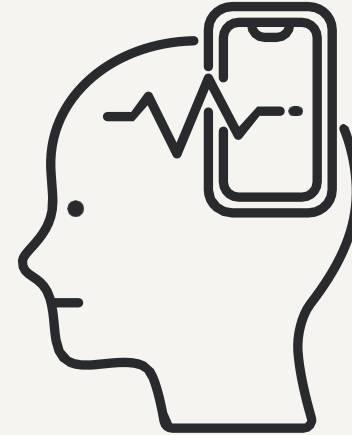
Social and digital media use is...



Automatic



**Habitual/
Ritualistic**



**Passively
Addictive**



Psychophysiology and
eye-tracking study of
organic social media
use!



UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

CONSUMER BEHAVIOR

 a few observations

3



On average, participants switched from one segment to another **every 10 seconds**



THE AVERAGE ATTENTION
SPAN OF A HUMAN IN
2000



THE AVERAGE ATTENTION
SPAN OF A HUMAN
NOW

AND...



THE AVERAGE ATTENTION
SPAN OF A
GOLDFISH

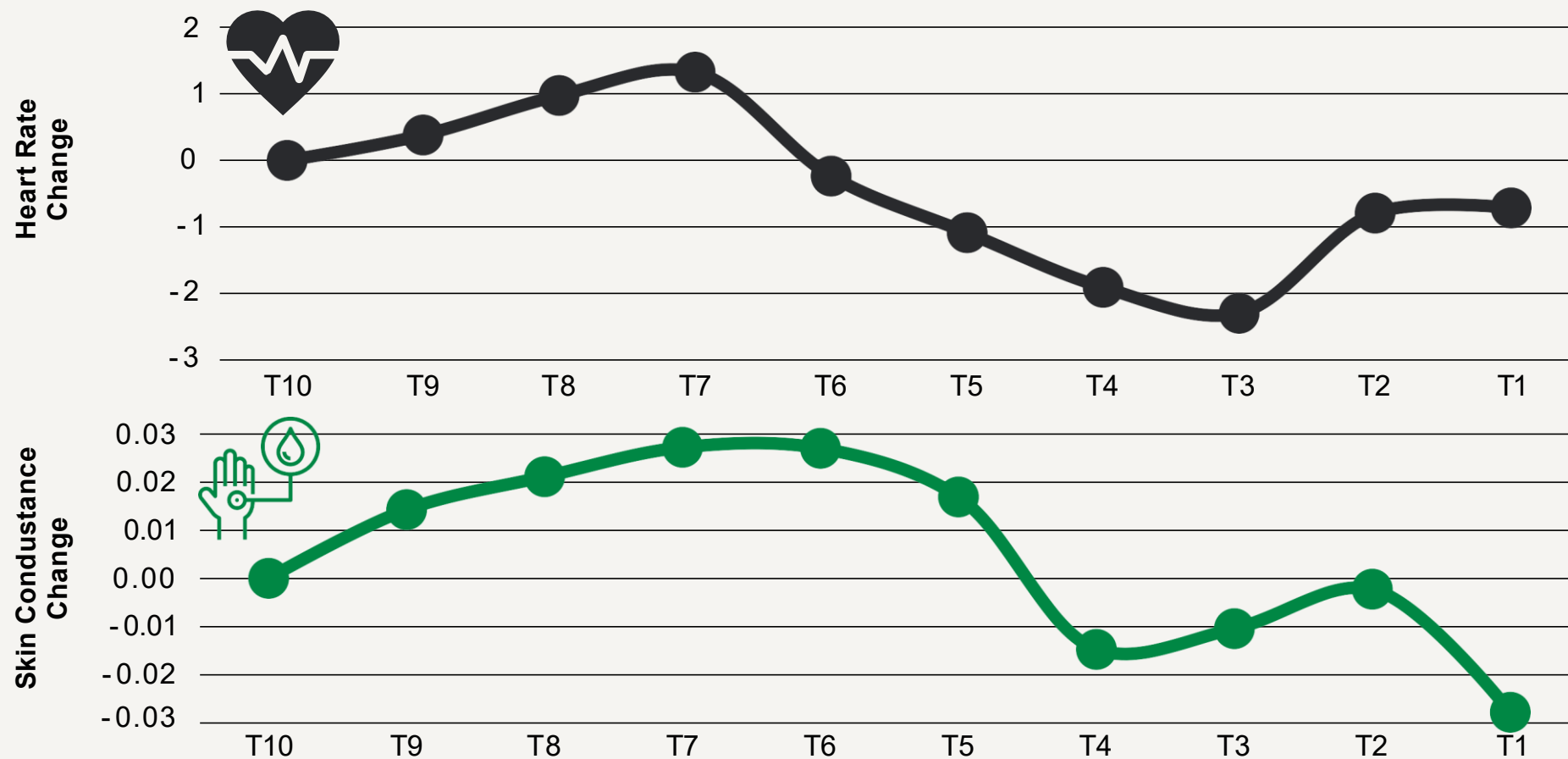


UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

3

CONSUMER BEHAVIOR

 a few observations



10 seconds of heart rate and skin conductance level change prior to pressing the “like” button simulate an “orienting response” or the “What is it?” response, which is automatic, nearly unconscious, and happens over a short period of time (fast).



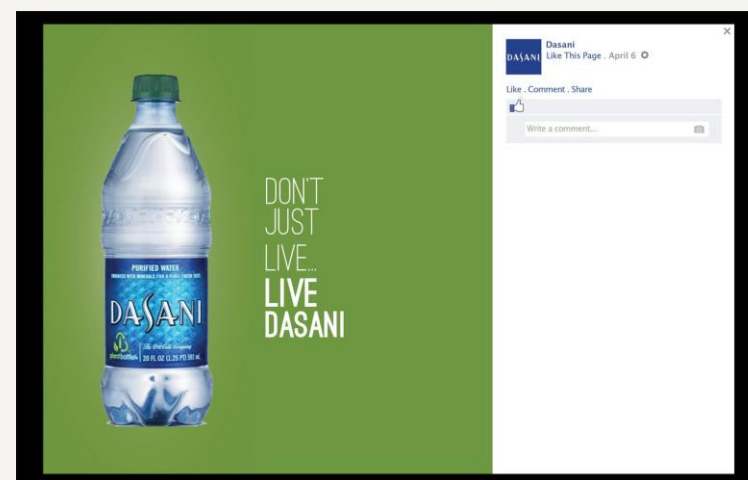
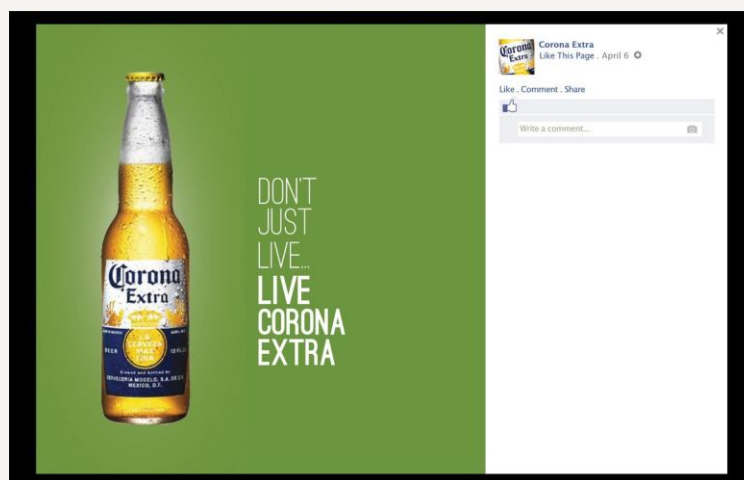
UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

CONSUMER BEHAVIOR

 a few observations

4

What happens online... does not stay online. In a **post-digital** world, online behaviors reflect and influence offline behaviors... and when normative perceptions are aligned with risky behaviors, chances are, humans will engage in such risky behaviors





UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

4

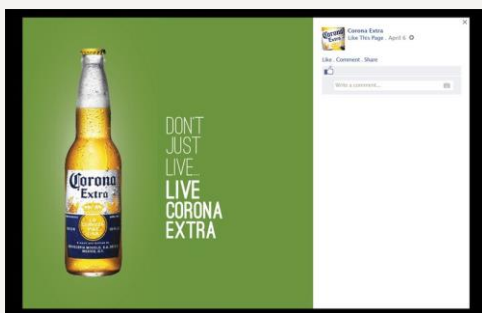
2.02

CONSUMER BEHAVIOR



a few observations

1.23



**INTENTIONS TO
CONSUME ALCOHOL**

$t(139.89) = 5.43, p < .001,$
Cohen's $d = .90$



UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

CONSUMER BEHAVIOR

 a few observations

4





UNDERSTANDING THE COUNTERFEIT ECOSYSTEM

4

55%

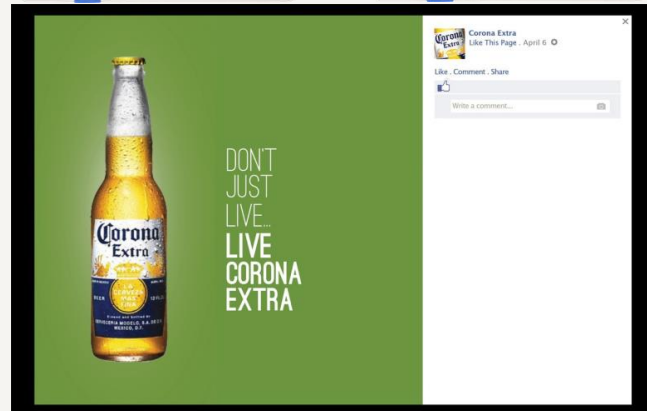
45%

CONSUMER BEHAVIOR

🔍 a few observations

73%

27%



$\chi^2(1) = 4.20, p < .05,$
Cramer's V = .19



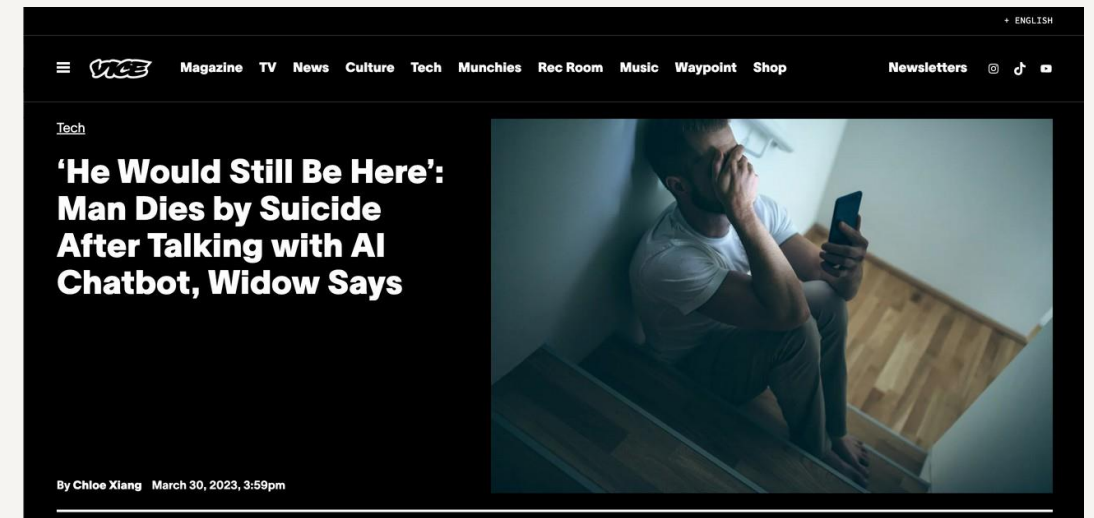
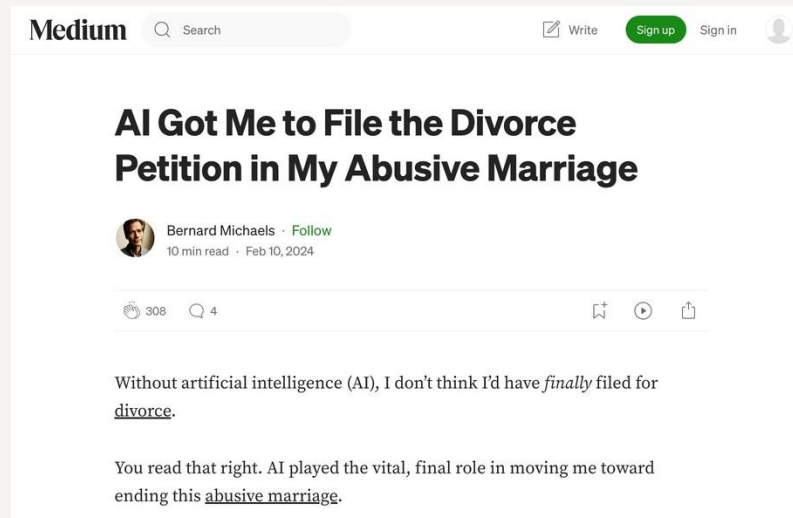
UNDERSTANDING THE
COUNTERFEIT
ECOSYSTEM

CONSUMER BEHAVIOR

a few observations

5

Risks are everywhere and they manifest themselves in new forms and influences as technology use evolves and deepens into the fabric of our lives.



<https://www.vice.com/en/article/man-dies-by-suicide-after-talking-with-ai-chatbot-widow-says/>

<https://medium.com/@BernardMichaels/ai-got-me-to-file-the-divorce-petition-in-my-abusive-marriage-f0d33e9320d9>



2025 GLOBAL
COUNTERFEIT MEDS
CONSUMER SURVEY

RESEARCH APPROACH SURVEY METHODOLOGY



3,982
participants



2025 GLOBAL COUNTERFEIT MEDS CONSUMER SURVEY



BRICK & MORTAR PHARMACY



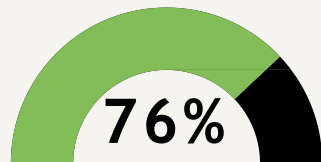
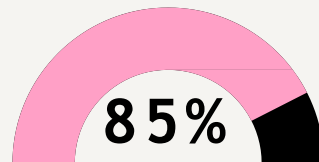
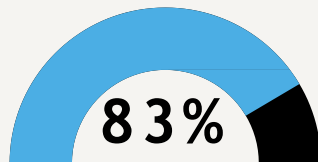
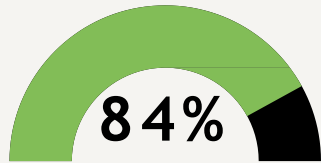
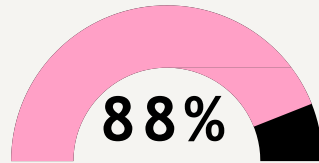
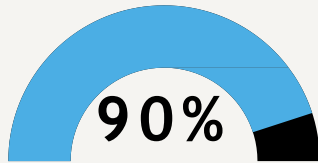
Prescription
Medications



Over-the-Counter
(OTC) Medications



Vitamins &
Supplements



DESCRIPTIVE ANALYTICS PREVALENCE



ONLINE PHARMACY



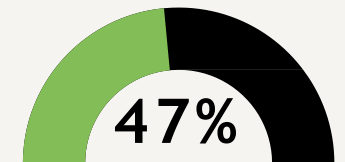
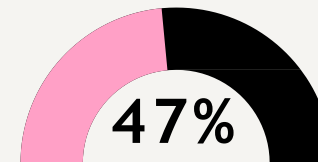
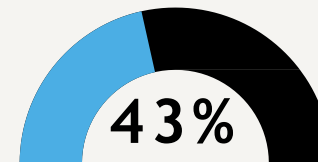
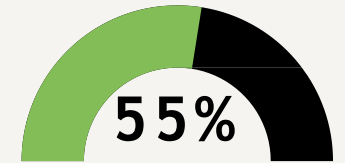
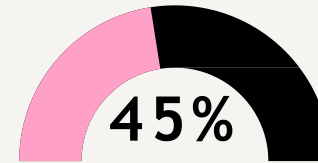
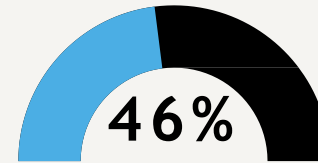
Prescription
Medications



Over-the-Counter
(OTC) Medications



Vitamins &
Supplements





2025 GLOBAL
COUNTERFEIT MEDS
CONSUMER SURVEY



NON-DECEPTIVE SFC MED PURCHASE



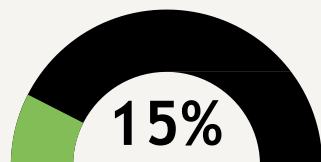
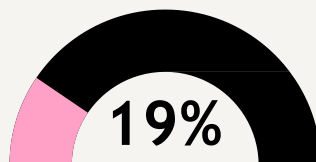
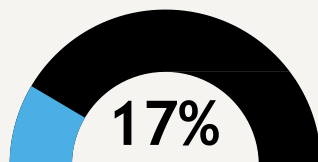
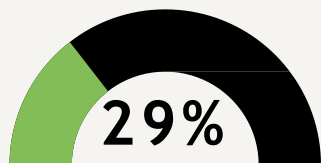
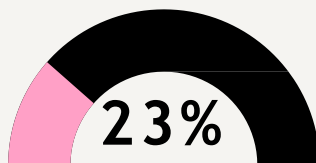
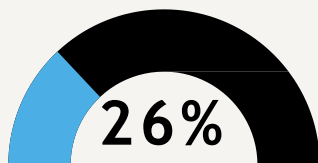
Prescription
Medications



Over-the-Counter
(OTC) Medications



Vitamins &
Supplements



DESCRIPTIVE ANALYTICS PREVALENCE



DECEPTIVE SFC MED PURCHASE



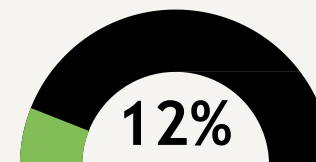
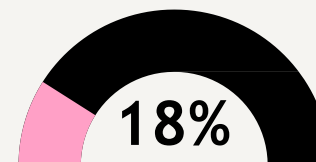
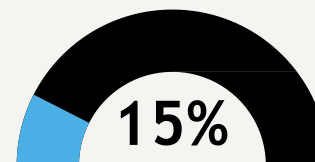
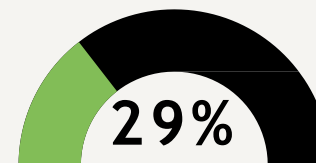
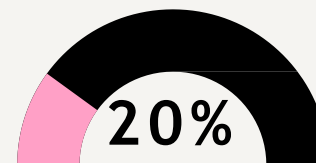
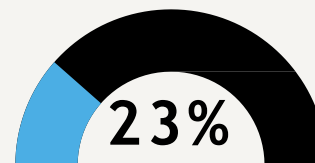
Prescription
Medications



Over-the-Counter
(OTC) Medications



Vitamins &
Supplements





2025 GLOBAL COUNTERFEIT MEDS CONSUMER SURVEY



GENDER



NON-DECEPTIVE SFC MED PURCHASE



Prescription
Medications



Over-the-Counter
(OTC) Medications



Vitmans &
Supplements



DECEPTIVE SFC MED PURCHASE



Prescription
Medications



Over-the-Counter
(OTC) Medications



Vitmans &
Supplements





2025 GLOBAL
COUNTERFEIT MEDS
CONSUMER SURVEY

BOOMER
Y
X
Z

AGE



NON-DECEPTIVE
SFC MED PURCHASE



Prescription
Medications



Over-the-Counter
(OTC) Medications



Vitmans &
Supplements



DECEPTIVE
SFC MED PURCHASE



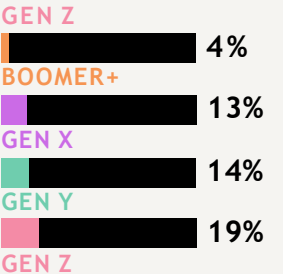
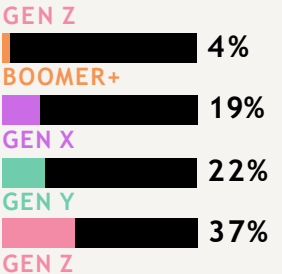
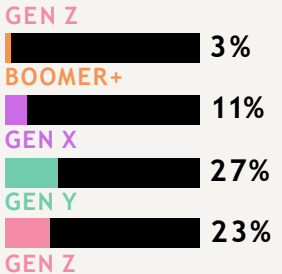
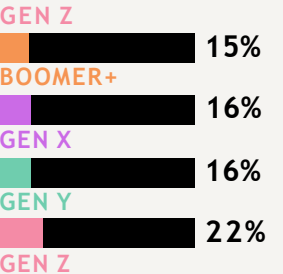
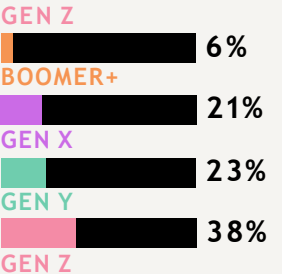
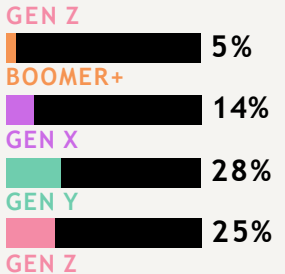
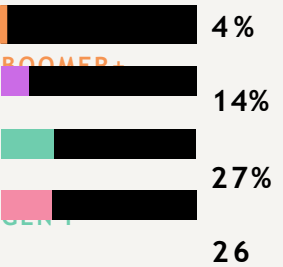
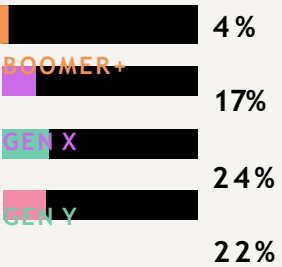
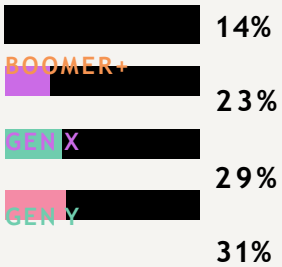
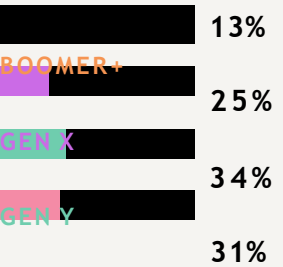
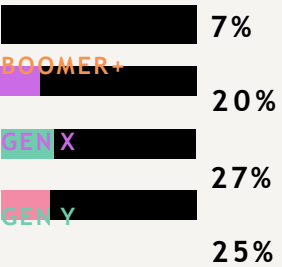
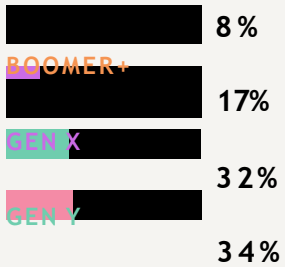
Prescription
Medications



Over-the-Counter
(OTC) Medications



Vitmans &
Supplements





2025 GLOBAL
COUNTERFEIT MEDS
CONSUMER SURVEY



HEALTH
LITERACY



NON-DECEPTIVE
SFC MED PURCHASE



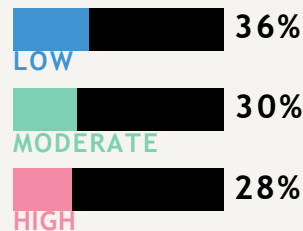
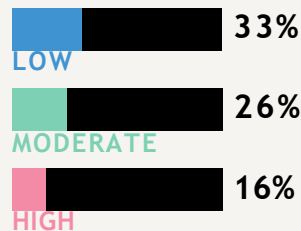
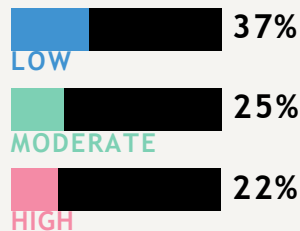
Prescription
Medications



Over-the-Counter
(OTC) Medications



Vitmans &
Supplements



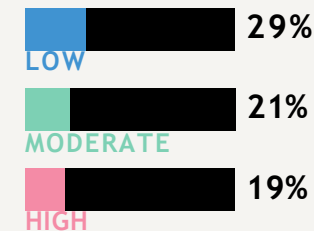
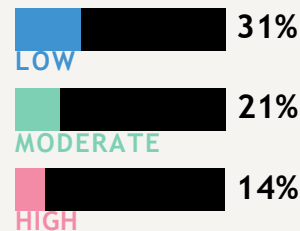
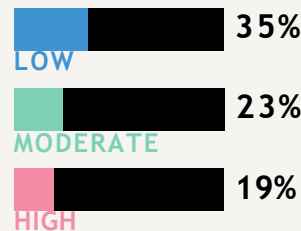
Prescription
Medications



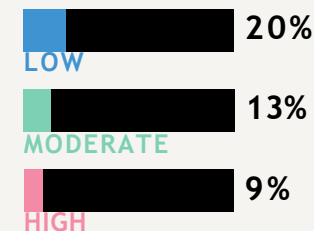
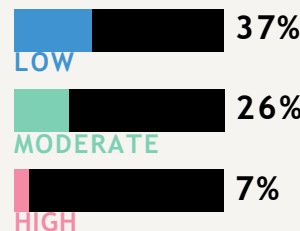
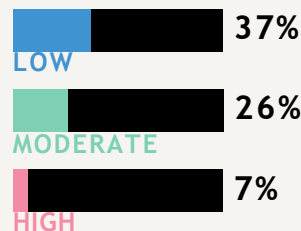
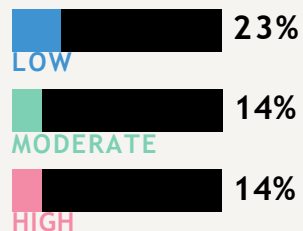
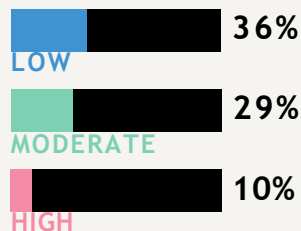
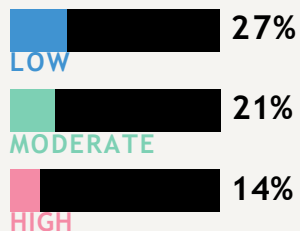
Over-the-Counter
(OTC) Medications



Vitmans &
Supplements



DECEPTIVE
SFC MED PURCHASE





2025 GLOBAL COUNTERFEIT MEDS CONSUMER SURVEY

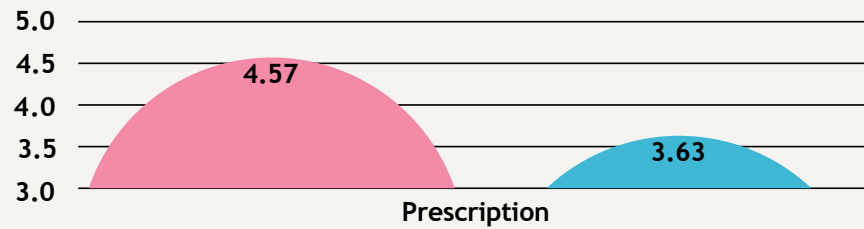
DESCRIPTIVE ANALYTICS MOTIVATIONS



Convenience
& Accessibility



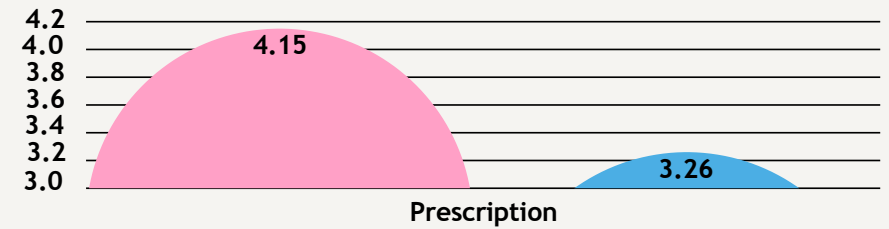
Necessity



Convenience
& Accessibility



Necessity



Non-Deceptive
Purchase



Deceptive
Purchase

Convenience
& Accessibility



24%

-9%

Necessity



52%

67%

$\chi^2(2) = 321.50, p < .001,$
Nagelkerke $R^2 = .11$

$\chi^2(2) = 404.86, p < .001,$
Nagelkerke $R^2 = .14$



Non-Deceptive
Purchase



Deceptive
Purchase

Convenience
& Accessibility



56%

Necessity



108%

$\chi^2(2) = 47.55, p < .001,$
Nagelkerke $R^2 = .14$

$\chi^2(2) = 69.46, p < .001,$
Nagelkerke $R^2 = .21$



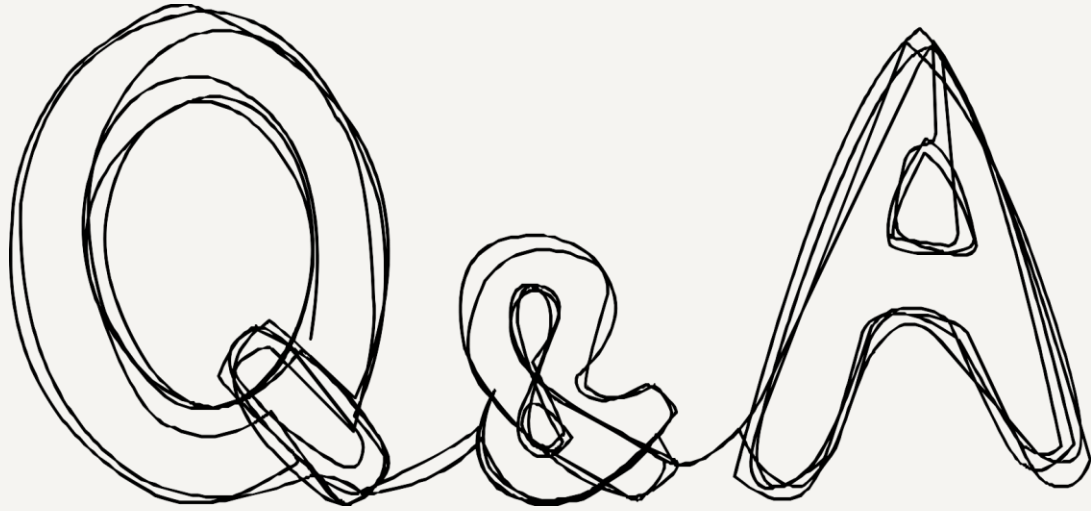
2025 GLOBAL
COUNTERFEIT MEDS
CONSUMER SURVEY

ACTIONABLE INSIGHTS



Consumers – globally and in the US – are gravitating toward online marketplaces to buy different kinds of medications, with demographic and psychographic individual differences that come at play.

Though the convenience of buying medications online is valid, the availability of counterfeit medications increases the risks associated with this behavior, especially that convenience motives are not the chief drivers of this behavior... instead, it's the necessity of getting medications when they're not available or consumers have limited access to them.



**LET'S KEEP THE
CONVERSATION
GOING!**

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Online Controlled Substance Purchases: Consumer and Patient Trends

John B. Hertig, PharmD, MS, CPPS, FASHP, FFIP



HERTIG HEALTHCARE ADVISING

Internet Medicine Sales:

- Why Do Consumers Go Online?



COST



CONVENIENCE



ACCESS

Contributing Trends

- Historic Shift to Buying Medicine Online
 - 52% of U.S. adults have used an online pharmacy
 - A 10% increase compared to 2021, and 17% increase from 2020
- A rise in patient harm
 - 24% of Americans who have purchased medicine online report receiving harmful, counterfeit, or substandard products
- Policy has normalized remote access (for now)
 - U.S. telemedicine flexibilities that allow Schedule II–V prescribing via telehealth without a prior in-person exam remain in effect through Dec 31, 2025, with DEA/HHS pursuing longer-term rules
- Shortages and access gaps push consumers online
 - Persistent stimulant supply disruptions (e.g., mixed amphetamine salts/“Adderall”) have led many patients to look beyond local pharmacies
- Sales channels keep shifting
 - Increasingly use of social media/encrypted messaging and crypto payments

Social Media Threat



Contents lists available at [ScienceDirect](#)

Health policy

journal homepage: www.elsevier.com/locate/healthpol



Purchase of prescription medicines via social media: A survey-based study of prevalence, risk perceptions, and motivations

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^a AbbVie, 1 N. Waukegan Road, North Chicago, IL 60064, United States

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^c Michigan State University, 404 Wilson Road, East Lansing, MI 48824-1212, United States

Controlled Substances and Social Media

- 1,002 participants, with 730 reviewed (met inclusion/exclusion criteria)
 - Mean age 38.0 (SD 11.5)
 - 63.7% male, 35.4% female
 - Insurance coverage: 85.8%.
 - Social media use: 52.0% spend 1–2 hours/day; 29.4% spend 3–4 hours/day
- Purchases online in the past 12 months (% of the full sample)
 - Narcotics (e.g., oxycodone, hydrocodone, fentanyl, etc.): 54.6%
 - Stimulants (e.g., Adderall®, Ritalin®): 52.0%
 - Sedatives (e.g., Xanax®, Valium®, Ativan®): 29.6%

Contemporary Consumer Considerations

- A series of macro-level forces are driving the growth and sophistication of illegal online drug sellers:
 - **Tariffs and Trade Frictions:** Increased costs create incentives for counterfeiters to exploit price disparities.
 - **Insurance Loss & Underinsurance:** Patients unable to afford legitimate medications are pushed toward cheaper, unregulated options.
 - **Artificial Intelligence:** Enables rapid creation of fake websites, SEO manipulation, and automated consumer engagement via chatbots.
 - **Social Commerce & Influencer Ads:** Bypasses traditional pharmacy guardrails to market directly to consumers.
 - **Shortages:** in high-profile drugs create lucrative opportunities for counterfeiters.
 - **Cross-Border Importation:** Leverages foreign jurisdictional shields to evade enforcement.
 - **Modern Payment & Logistics:** Crypto, peer-to-peer transfers, and micro-fulfillment networks facilitate illegal transactions.

Key Takeaways

- Continued increase in e-commerce/online controlled substance purchasing
 - Online pharmacies can be a safe (and potentially cost-effective) alternative to traditional “brick-and-mortar” pharmacies, but must be thoroughly vetted
- Educated consumers take less risks; more education is needed
 - **“Where do you get your medication?”**
- A global issue resulting in serious negative impact on public health and patient safety, especially with controlled substances

The Future...



References

- ASOP Global Foundation (2023). U.S. Consumer Survey: Adoption, attitudes toward controlled-substance tele-prescribing, comfort ordering controlled meds online, and shortage-driven behavior
- DEA/HHS. Third Temporary Extension of COVID-19 Telemedicine Flexibilities (effective through Dec 31, 2025)
- HHS Telehealth Policy explainer. Federal Register telehealth.hhs.gov
- NABP (2024–2025 Annual Report). 40,000+ “Not Recommended” websites and consumer tools (safe.pharmacy)
- NABPFDA. Internet Pharmacy Warning Letters (ongoing enforcement against illegal online pharmacies). U.S. Food and Drug Administration
- DEA. One Pill Can Kill (2025 update). Seizure data on fentanyl-laced counterfeit pills resembling common controlled meds. DEACDC Media Advisory (Oct 2, 2024)
- ASHP Shortage Detail: Mixed Amphetamine Salts (2025). Continuing backorders/allocations affecting access
- Global Initiative Against Transnational Organized Crime (2025). \$1.7B darknet drug sales (context on online drug market dynamics)



Availability of Controlled Substances

Angie Hoth, PharmD, MPH

Reagan-Udall Foundation for the FDA



Online Purchase of Controlled Substances through Social Media



Project Overview

- **To better understand the purchase of controlled substances**, we conducted an observational assessment of social media interactions related to the selling and/or purchasing of controlled substances (opioids, stimulants, and benzodiazepines), including where and how sales are advertised, initiated, and conducted.
- **Methods & Data Collection**
 - Identified Platforms: Chosen based on popularity, purpose of site, and research on sites where purchases may occur
 - Search terms
 - Update of social media scan conducted in 2023

Substances of Interest

Searches included drug name, brand name, and 3+ slang terms identified through preliminary research.

| Type | Name | Brand Name | Slang & Search Terms |
|------------------|-----------------|---------------------------|---|
| Stimulants | Amphetamine | Adderall® | addies, addera11, addieplug, bennies, black beauties, buyaddies, crosses, hearts, la turnaround, speed, truck drivers, uppers |
| | Methylphenidate | Ritalin® | Kiddy coke, poor man's coke, coke junior, jif, study buddies |
| Opioids | Hydromorphone | Dilaudid | d, dillies, footballs, juice, smack |
| | Hydrocodone | Lortab®, Norco®, Vicodin® | bananas, dro, fluff, hydros, tabs, vikes, v-itamin, watson-387, 357s |
| | Fentanyl | Actiq®, Sublimaze® | apache, china girl, china white, dance fever, friend, goodfella, jackpot, murder 8, tango and cash, tnt |
| | Oxycodone | Oxycontin®, Percocet® | 30s, as, berries, blues, blueberries, hillbilly heroin, ms, o.c., oxy, oxycet, oxycotton, ozone, roxy, ercs, greenies, kickers, m-30s, percs, rims, tires, wheels, 512s |
| | Oxymorphone | Opana® | biscuits, blue heaven, mrs. o, o bomb, octagons, stop signs |
| Benzo-diazepines | Alprazolam | Xanax® | bars, benzos, blues, chill pills, downers, nerve pills, planks, tranks, ladders, school bus, xans, xannybars, xanplug, zanies, sellingxans |
| | Clonazepam | Klonopin® | k, k-pin, pin, super valium |
| | Diazepam | Valium® | eggs, jellies, moggies, vallies |

Substances of Interest

Searches included, when possible, popular drug-based emojis.

Common Emoji Codes



Key Takeaways



Safety

Safety of product is not typically discussed in advertisements or during public interactions

Some strategies may increase perceived safety

- Sellers titled “drugstore” or “pharmacy”
- Mixing of legitimate ads with illicit content



Motivations

Common motivations for purchasing online

- Fast, discreet delivery
- No prescription required
- Ease of access
- Urgent need

Some users also cited taking control of their health as a reason for bypassing traditional medical channels



Platform Functions

Policies on all platforms restrict the purchase or sale of controlled substances – policies have changed since 2023

- Consumers & sellers are very savvy to create workarounds to new policies
- “It takes a network to defeat a network”

Search functions may facilitate or block access to sales information



Purchasing

Purchasers typically use social media to identify sellers and then move to a third-party platform for transaction

Payment details are rarely disclosed in posts

Conclusions

- **Despite platform policies prohibiting the sale of controlled substances** via social media platforms, users can still locate sellers through creative search terms, indirect links, and third-party platforms.
- **Common motivations for purchase through social** media include fast, discreet access without prescriptions, while safety information and purchase details are often vague or absent.
- **Massive amounts of information and constantly evolving terminology** make assessment and regulation difficult. Searches are often limited by platform algorithms, location, and more.
- **Missed opportunity for harm reduction messaging to** be pushed to people who search for drug-related terms that helps them understand risks and mitigation strategies. Some platforms offer warning or safety statements, but general harm reduction information is limited.

Human Impact of Online Access to Controlled Substances



Jennifer Frink
Family Representative



Ed Ternan
President & Co-Founder
Song for Charlie

Strategies for Intervention & Disruption



Mike Carson
Senior Director,
Regulatory Policy
eBay



Jim Crotty, JD
Law Enforcement
Outreach Manager
Meta



Stephen Dufresne
Manager, Safety
Operations Outreach
Snap Inc.



Nate Feltner, JD
Principal Corporate
Counsel
Microsoft

Global Perspective



Carrie Harney, JD

Vice President, US Government
& Regulatory
US Pharmacopeia



Vladimir Kostic

Data Analyst, International
Narcotics Control Board
United Nations



Laila Sofia Mouawad

Technical Officer, International
Cooperation Unit, Brazilian Health
Regulatory Agency (Anvisa)

Strengthening the security of the medicines supply chain

Carrie Harney
United States Pharmacopeia



USP's enduring mission



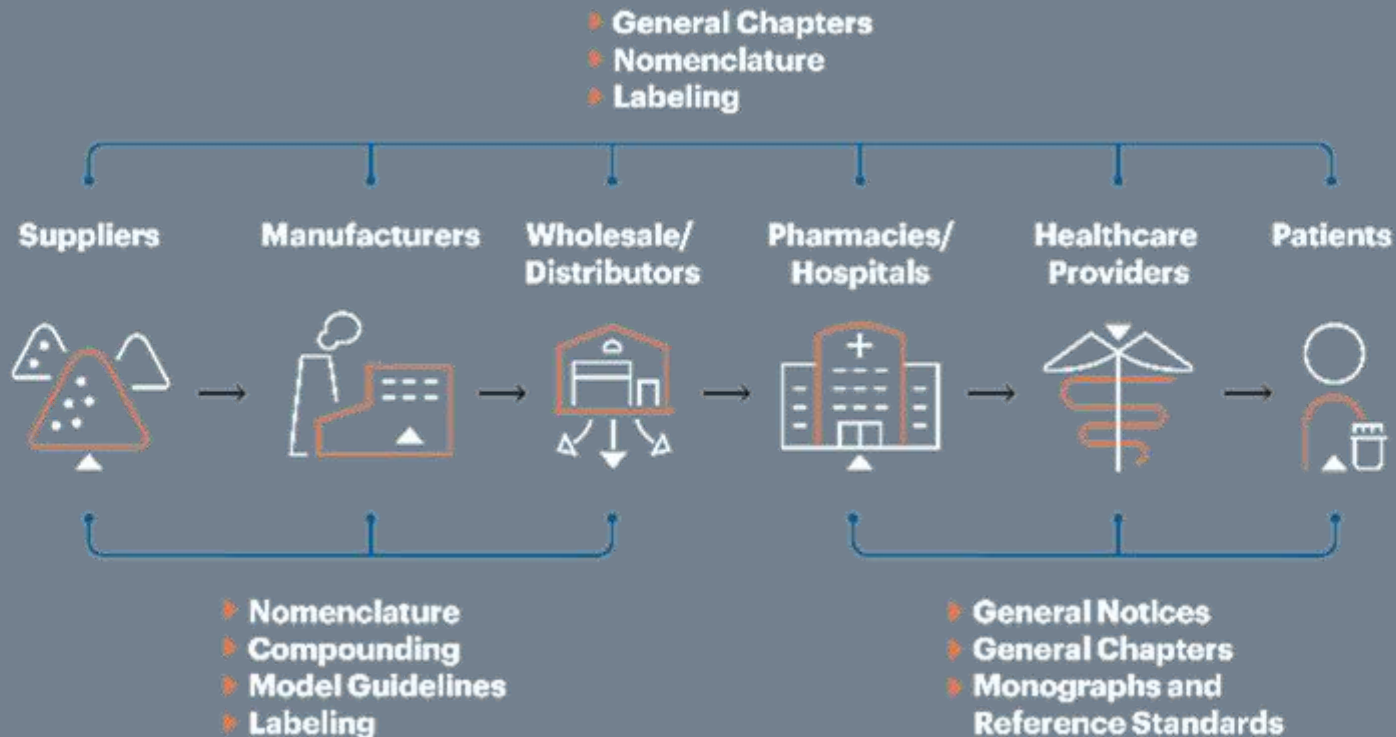
To improve global health through public standards and related programs that help ensure the quality, safety, and benefit of medicines, dietary supplements, and food ingredients.



USP's standards today



More than 9,000 USP standards provide quality benchmarks across the supply chain in over 140 countries



- ▶ Establish and disseminate public Documentary Standards for the quality, purity, identity, strength, and labeling of medicines, dietary supplements and foods
- ▶ Provide physical Reference Standards to support tests and assays in USP compendia
- ▶ Educate producers, practitioners, and others seeking information on quality and USP standards

Illegal online sellers bypass patient protections



At any given time, there are an estimated 30,000-40,000 illegal online pharmacies in operation globally.

- Products sold by illegal online drugs sellers often contain little or no active ingredients; are manufactured in unsafe conditions; contain dangerous ingredients; and/or are controlled substances



The APEC Supply Chain Security Toolkit



HOME



CENTERS OF EXCELLENCE

CONTACT



- ▶ USP APEC Center of Excellence on Supply Chain Security
- ▶ APEC Dialogue on Supply Chain Security
- ▶ APEC Supply Chain Toolkit

Toolkit to combat illegal internet sales of medical products



- ▶ Summarizes the scope of the illegal drug seller problem
- ▶ Provides definitions of key terms
- ▶ Makes recommendations to combat illegal internal medical product sales
- ▶ Provides public education resource materials
- ▶ Ongoing trainings to support implementation of best practices and recommendations



Internet sales toolkit recommendations



1. Develop and deliver **targeted public awareness campaigns** to educate patients and healthcare professionals about the threat of illegal online medical product sellers and how to purchase medicines safely.
2. **Strengthen laws and policies** to protect patients from S&F medical products purchased online. Include education on online pharmacies in educational curriculum for healthcare professionals.
3. **Distinguish safe, legally operating online pharmacies from illegal online medical product sellers.**
4. **Establish Model Voluntary Protocols** for Internet commerce companies.
5. **Participate fully in INTERPOL's Operation Pangea and other cooperative international activities**, including the World Health Organization Member State Mechanism on S&F Medical Products and MEDICRIME Convention.
6. **Establish effective NRA, customs, and law enforcement coordination** to remove illegal online medical product sellers.
7. **Ensure active participation by NRAs, law enforcement, and other government officials** to take a leadership role in preventing the manufacture and distribution of S&F medical products
8. **Involve all stakeholders in creating solutions**, including NRAs, law enforcement, customs officials, NGOs, manufacturers, distribution companies and Internet commerce companies, patients, and healthcare professionals.
9. The activities under the Internet Sales Toolkit should be closely **aligned and coordinated with activities of the APEC Supply Chain Integrity Centers of Excellence** under the direction of the APEC Supply Chain Steering Committee.

Thank You



The standard of trust



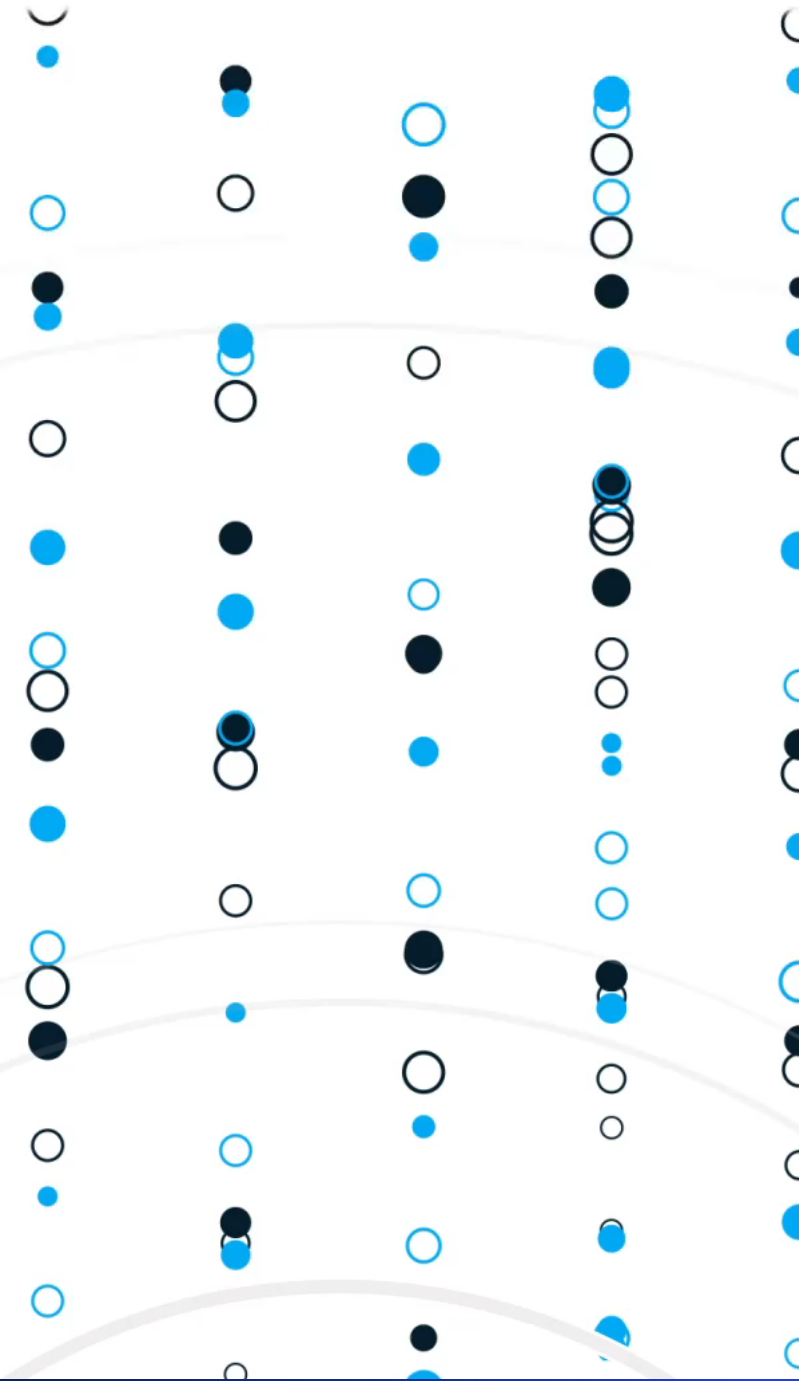
10NICS
Years
100K INCIDENTS COMMUNICATED

Controlled Substances Virtual Summit

Global Rapid Interdiction of Dangerous Substances (GRIDS) Programme

Vladimir Kostic

GRIDS **ION** **PROJECT** **EPISODES**





International Narcotics Control Board

Established under the 1961 Treaty

The International Narcotics Control Board (INCB) is a **UN treaty-mandated body** established in **1961**. Based in **Vienna**.

INCB ensures the availability of **adequate supplies** of narcotic drugs, psychotropic substances, and precursor chemicals for:

- Legitimate medical use
 - Scientific purposes
 - Industrial applications
- INCB works to **prevent the diversion of these substances for illegitimate purposes.**





GRIDS | Information Exchange for Actionable Intelligence

INCB Locations with International Operational Partners CARICOM, Interpol, OCO, UPU & WCO

GRIDS footprint in 9* locations dedicated to increasing tool access, capabilities and trafficking outcomes

GRIDS Cyber Communications Centre (GC3) hosts IONICS suite of state-of-the-art targeting tools (IONICS, GRIDS, SNOOP)

GRIDS provides systems access across all **Govt Law & Regulatory Enforcement Agencies, INTERPOL, OCO, Caricom, UPU, & WCO**



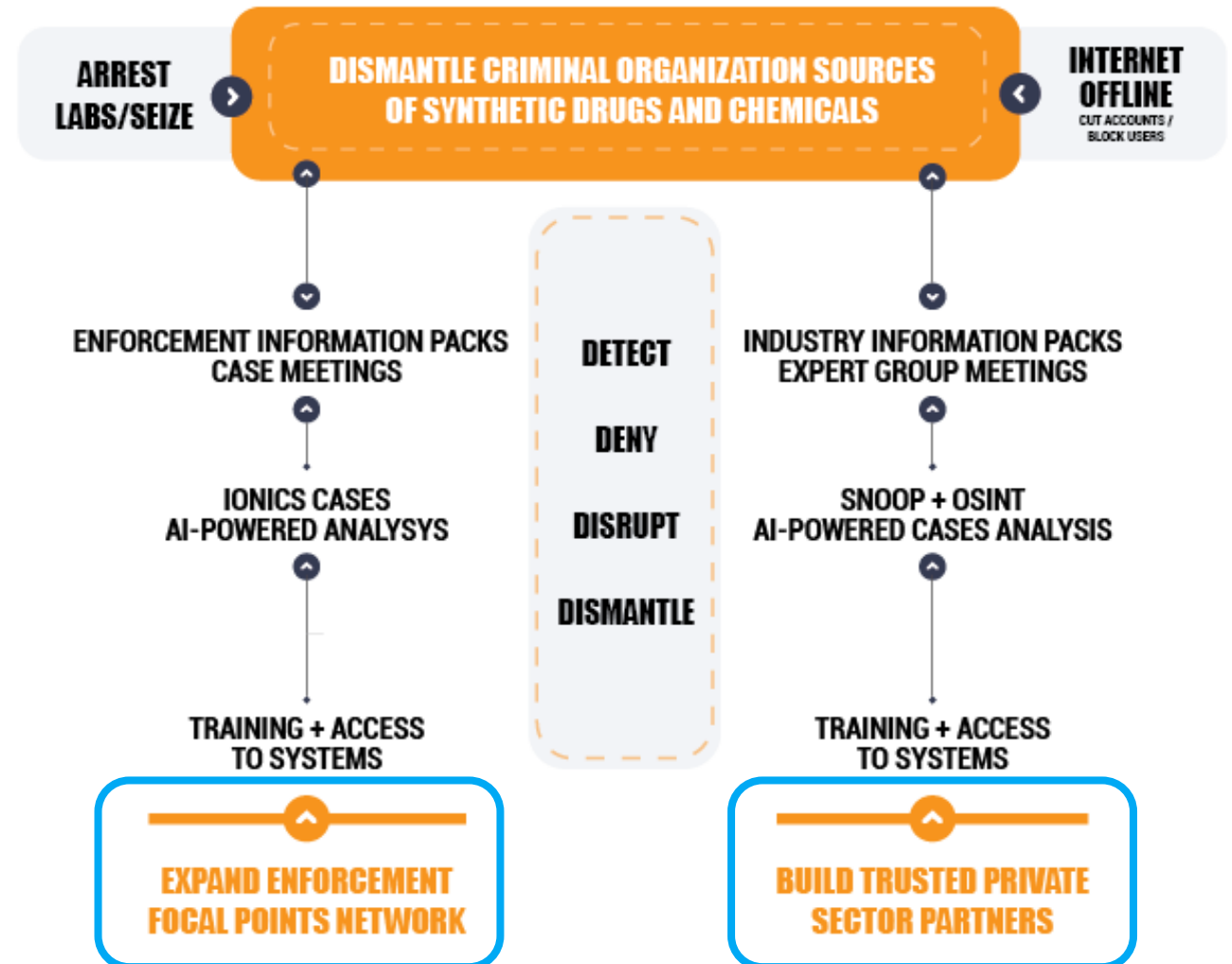


GRIDS | Operational Approach to Dismantle Sources of Drugs

Provide Actionable Intelligence & Advanced Technologies

INCB GRIDS APPROACH

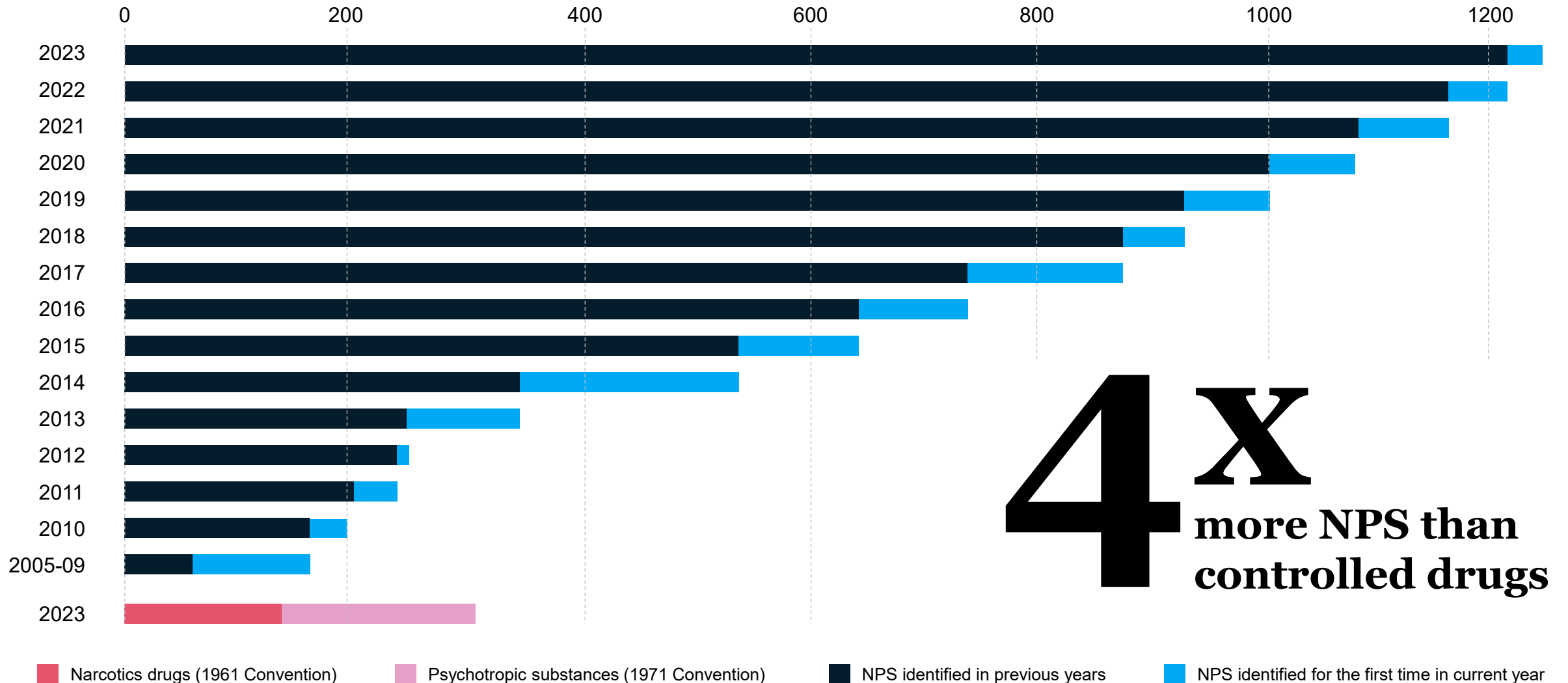
- Exchange information across all national law and regulatory enforcement agencies
- Prioritize transnational organized crime, cyber crime related & border security
- Prioritize detecting/ interdicting deadliest drugs - fentanyl and its precursors- dismantling the source transnational criminal networks
- Develop, operate & train LE on next generation information sharing technologies as the UN hub for national & international partners
- Build effective public-private partnerships that dismantle online transnational criminal networks





Global | Trends on Synthetic Drugs & Chemicals

Number of internationally controlled drugs (2023) and NPS at the global level, 2005–2023





Trends in Synthetic Drugs and Chemicals

2010-2022
Global Seizures of “Pharmaceutical” Opioids

20X

Higher Volume of Seized OPIOIDS

Source: UNODC World Drug Report 2024 <https://www.unodc.org/unodc/en/data-and-analysis/wdr2024-drug-market-trends.html>



Global | IONICS Live Data on Synthetic Drugs & Chemicals

Emerging Synthetics Trafficked as Suspected Pharmaceutical Products



IONICS #121674



Figure 1. Photographs of falsified "oxycodone" tablet containing etonitazepine in New Zealand in 2022 (left, IONICS# 34739) and in Slovenia 2021 (right).



Figure 4. Unconfirmed OSINT report of powder sold as alprazolam noted in the USA in 2021 (left) and of various falsified alprazolam tablets purportedly containing bromazolam in the USA in 2023



Photograph 3: Tablets with isonitazepam identified in Canada in December 2019



Photograph 4: Tablets with isonitazepam identified in Canada in February 2020



Figure 8. Pregabalin consignments from Bangladesh to Qatar (IONICS # 29941), clearly showing production numbers (General Directorate of Drugs Enforcement of the Ministry of Interior of Qatar)



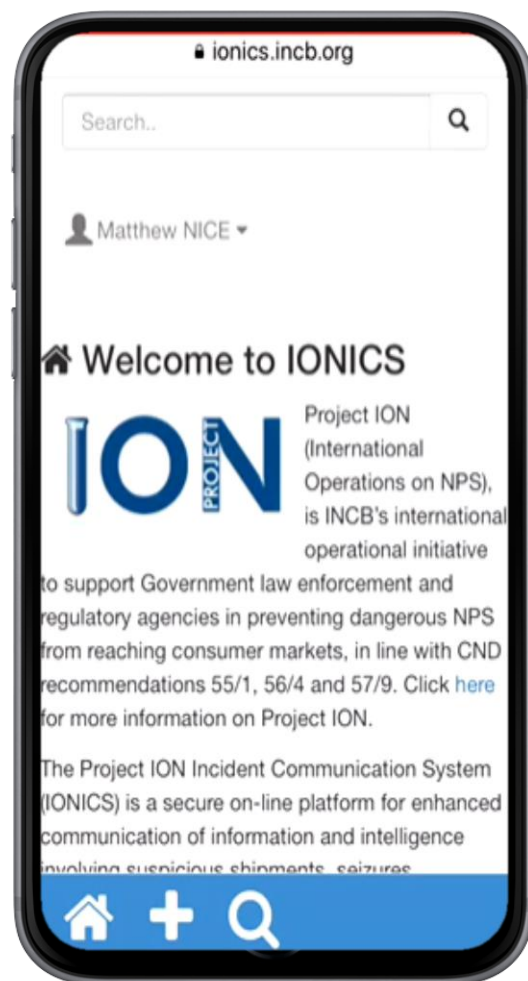
Figure 2. Vape products with etomidate in a seized laboratory in Hong Kong SAR of China (Source: IONICS #104920)



Tools

Information Exchange and Actionable Intelligence

10NICS
100K INCIDENTS COMMUNICATED



IONICS COMMUNICATIONS SUITE

- IONICS for smart mobile devices
- Provides a suite of targeting tools
- Transforming information into actionable intelligence

SNOOP

Scanning of next-generation opioids on online platforms.

- **Monitors the global B2B e-commerce** of synthetic opioids, fentanyl, and related chemicals by wholesale distributors.
- **Focuses** on chemical names, CAS identifiers, and InChiKey.
- **Links suspicious online markets** across multiple platforms and flags high-risk "companies."
- Exports **consolidated account details of "companies"** (seller, emails, phone numbers/WeChat/WhatsApp, sender and financial data).





GRIDS

Providing Officers with State-of-the-Art Tech Tools

Export Company Contact Details, 3rd Party Accounts, Emails, Encrypted Communications
Addressing Cross-Platform Exploitation via Targeting Centres

| Date | Vendor Monikers | Contact Person | Payment | Email | Comms |
|-----------|-----------------|----------------|---------|-------------------------|---|
| 5/13/2023 | | | | | Telephone: +8615613199980; Wickr Id: aronoi; Whatsapp: +8615613199980 |
| 5/14/2023 | | | | sales05@sd-asm.com | Telephone: 008615194121105; Whatsapp: 008615194121105; WeChat Id: 008615 |
| 5/13/2023 | | | | | Telephone: 2922399090 |
| 5/13/2023 | | | | | |
| 5/11/2023 | | | | | Telephone: +1 318 303 6979; Whatsapp: +1 318 303 6979 |
| 5/15/2023 | | | | | |
| 5/13/2023 | | | | | Telephone: +8616632953662; Whatsapp: +8616632953662; Telegram Id: business |
| 4/29/2023 | | | | | Telephone: +8616727288587; Wickr; Whatsapp: +8616727288587; Telegram |
| 5/14/2023 | | | | chrisplugg@gmail.com | Wickr Id: trippyhike |
| 5/14/2023 | | | | researchchem9@gmail.com | Telephone: +1(614)654-6514, +905537859456; Wickr; Whatsapp: +1(614)654-6514 |
| 5/13/2023 | | | | | |
| 5/13/2023 | | | | amy@guangdongkelaiya.cc | Telephone: +8617367838617; Whatsapp: +8617367838617; Telegram; WeChat |
| 5/21/2023 | | | | admin@hbningnan.com | Telephone: + 86 18034019111, +86 18034019111; Wickr Id: ningnanhailey; Whats: |
| 5/15/2023 | | | | | |
| 5/13/2023 | | | | andy@iamcor.org | Telephone: 8615512125745; Skype |
| 5/13/2023 | | | | | Telephone: 20211117101147178 |
| 5/13/2023 | | | | | Whatsapp |
| 5/18/2023 | | | | | |



GRIDS | Building Public-Private Partnerships

Addressing Novel Opioids, Chemicals & Equipment Sales



- 25 UN international events hosted for practical cooperation with “4M” industry since 2018
- Experts from Governments, international organizations and the private sector
- Over 300 technical recommendations since 2018
- Practical and promising practices compiled & disseminated



GRIDS

Access to Real-Time Communications & Targeting



ANNEX I. FENTANYL-RELATED SUBSTANCES* WITH NO CURRENTLY KNOWN LEGITIMATE USES

| No. * | Uses* | Common Substance Name | Other/ Alternative Substance Name(s)† | Abbreviations | CAS No. | CAS No. ‡ | Int. Ch. § |
|-------|---------------|---------------------------|---|---------------|-----------|-----------|------------|
| 1 | Unknown | 2,2-Difluoroethylfentanyl | N-[1-(2-fluorophenyl)propionyl-4-(3-(2-fluorophenyl)propionamido, 2-ortho-difluoroethyl)-1-phenylethyl]-N-propionyl-L-phenylalanine | | 2787-20-8 | 2787-20-8 | |
| 2 | Unknown | 2-Fluorobutyryl fentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-fluorobutyryl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 3 | No Known Uses | 2-Fluoroethylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-fluoroethyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 4 | Unknown | 2-Fluoromethylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-fluoromethyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 5 | Unknown | 2-Propionylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-propionyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 6 | Unknown | 2-Methylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 7 | Unknown | 2-Methylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 8 | Unknown | 2-Ethylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-ethyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 9 | Unknown | 2-Fluoroethylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-ethyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 10 | Unknown | 2-Fluoroethylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-ethyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 11 | Unknown | 2-Fluoroethylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-ethyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 12 | Unknown | 2-Methylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 13 | No Known Uses | 2-Methylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |
| 14 | No Known Uses | 2-Methylfentanyl | N-[1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | 2787-20-8 | 2787-20-8 | |

INCB: Fentanyl-related substances with no currently known legitimate uses



ANNEX I. Non-fentanyl opioids* and related new psychoactive substances* with no known legitimate uses

| No. * | Uses* | Common Substance Name | Other/ Alternative Substance Name(s)† | Abbreviations | CAS No. ‡ | CAS No. § | Int. Ch. ¶ |
|-------|---------------|---|---------------------------------------|---------------|-----------|-----------|------------|
| 1 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 2 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 3 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 4 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 5 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 6 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 7 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 8 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 9 | No Known Uses | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 10 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 11 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |
| 12 | Unknown | 2-(1-(2-fluorophenyl)-1-(1-phenylethyl)-4-(3-(2-fluorophenyl)propionamido, 2-ortho-methyl)-N-propionyl-L-phenylalanine] | | | 2787-20-8 | 2787-20-8 | |

INCB: Non-fentanyl opioids and related new psychoactive substances with no currently known legitimate uses



ANNEX I. Benzodiazepines with no currently known legitimate uses

| No. * | Common Name | Other/ Alternative Substance Name(s)† | CAS No. ‡ | CAS No. § | Int. Ch. ¶ |
|-------|-------------|--|-----------|-----------|------------|
| 1 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |
| 2 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |
| 3 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |
| 4 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |
| 5 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |
| 6 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |
| 7 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |
| 8 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |
| 9 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |
| 10 | Alprazolam | N-[1-methyl-5-pyrimidin-2-yl-1H-tetrazol-3-yl]-1,3-dioxolane-5-carboxamide | 7359-06-8 | 7359-06-8 | |

INCB: Benzodiazepines with no currently known legitimate uses (Status: 23 November 2020)

Does the substance have ANY legitimate use?

153 fentanyl-related substances with **no legitimate uses** in circulation

69 non-fentanyl opioids identified with **no legitimate uses** in circulation

Includes pre-precursors

37 benzodiazepines with **no legitimate uses** in circulation

https://www.incb.org/incb/en/opioids_project/fentanyl-related-substances-with-no-known-legitimate-use.html



GRIDS | Building Public-Private Partnerships

Tech against Trafficking



Online Controlled Substances Virtual Summit 2025

Session 4: Global Perspective

**Use of digital surveillance tools to search for
irregular online sales
The EPINET experience in Brazil**

Laila Sofia Mouawad
Technical Officer
International Cooperation

Challenge

- Massive expansion of e-commerce
- Volume and anonymity of online transactions
- Lack of harmonized global regulations
- Proliferation of counterfeit and substandard products
- Illegal products frequently advertised and sold on social media platforms and online marketplaces. The use of encrypted messaging apps and cryptocurrency for transactions further complicates surveillance and enforcement actions

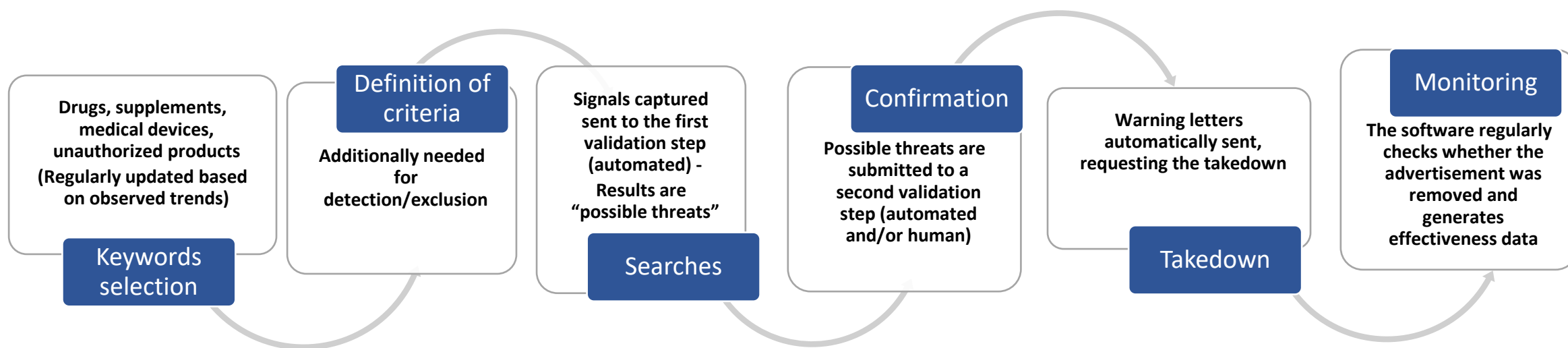
EPINET: Overview

- Technical cooperation project - ANVISA and the United Nations Development Program (UNDP)
- Hiring of a specialized private company to develop the digital surveillance tool (EPINET)
- Monitoring online sales e-commerce in Brazil – through up to 800 keywords

EPINET: Overview

- Searches based on models of Artificial Intelligence (AI), using several factors, URLs and contents to classify signals and threats
- Companies covered: All Brazilian websites and e-commerce platforms
- Contract signed in 2021 - effective from November 2021 to December 2024 (pilot project)
- Ongoing internal process to rehire the tool

EPINET: Overview



EPINET: Numbers of the pilot project

+128.000.000 Signals captured

+920.000 Potential threats detected

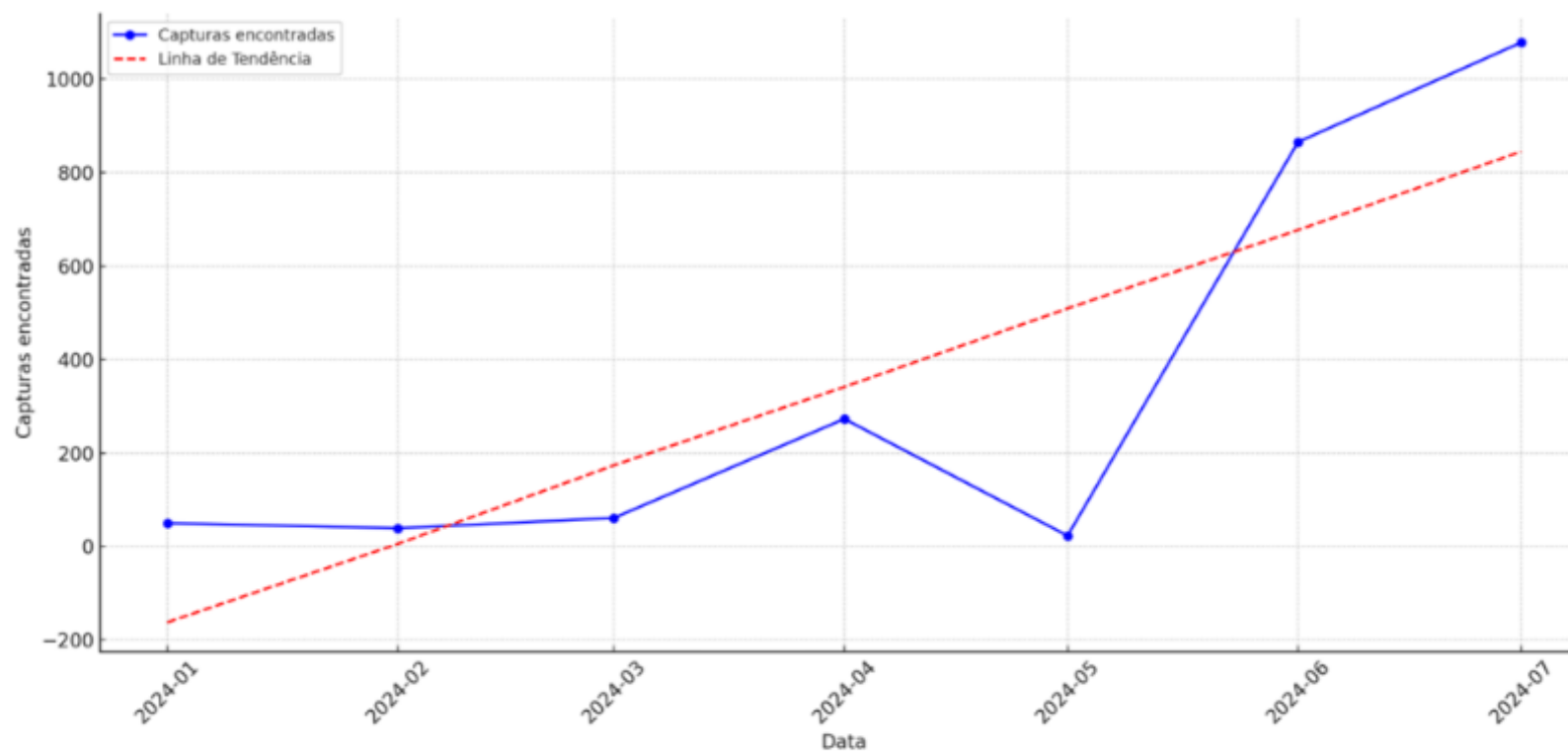
+220.000 Warning letters issued

+98% Takedowns

EPINET: Potential

- Deep/Darkweb investigations are possible, including monitoring malicious forums, onion pages, and malicious Telegram/WhatsApp groups
- Controlled substance example: Vyvanse (Lisdexamfetamine): 6-months investigation detected 54.771 mentions
- Modus Operandi: prescription falsification, direct sales, lotters, including digital marketing strategies

Capturas associadas à “Venvanse”, de janeiro a julho de 2024



EPINET

Advertisement of prescription sale

Mensagem reconstituída 24/08/2024 às 10:42

no Telegram

Mensagens anteriores

24/08/2024

Temos:

- ATESTADO MÉDICO DE TODOS OS ESTADOS
- ATESTADO MÉDICO COM CRM ASSINATURAS E CARIMBO
- ATESTADO MÉDICO DIRETO DO SISTEMA DE MÉDICO

✗ sem assinatura digital, porque esses que a galera vende se pelos grupos nem um tem assinatura digital então não vale de nada

- e temos com assinatura digital também (consultar valor no privado.)

ENSIAMOS O PREENCHIMENTO E AO USAR O CID

- TEMOS RECEITUÁRIO AMARELO
- TEMOS RECEITUÁRIO AZUL
- TEMOS RECEITUÁRIO DE CONTROLE ESPECIAL

VENDEMOS PAINÉIS MÉDICO E DE SAÚDE, FARMACÉUTICA R\$200
**ANJOS E DEMÔNIOS

FARMACOLÓGICO**:

- ATESTADO MÉDICO R\$100,00
- RECEITA MÉDICA R\$100,00
- LAUDO MÉDICO R\$300,00
- SOLICITAÇÃO DE EXAMES (consultar no privado)

FARMÁCIA

...FOCO, ATENÇÃO, CONCENTRAÇÃO e PERFORMANCE...

Venvarse 70mg \$700
Venvarse 50mg \$700
Venvarse 30mg \$590
Stavigile 100 mg/30cps \$270
Stavigile 200 mg/30cps \$390
Ritalina 10 mg/30cps \$160
Ritalina 10 mg/60cps \$260
Ritalina LA 10mg/30cps \$280
Ritalina LA 20mg/30cps \$480
Ritalina LA 30mg/30cps \$480
Ritalina LA 40mg/30cps \$480
Concerta 18mg/30cps \$390
Concerta 36mg/30cps \$480
Concerta 54mg/30cps \$490

EMAGRECEDORES

Sibutramina 15mg \$105(mínimo 2 caixas)

COMPULSÃO ALIMENTAR

Venvarse 70mg \$700
Venvarse 50mg \$700
Venvarse 30mg \$590

Advertisement of drug direct sale

Mensagem reconstituída 28/08/2024 às 22:08

no WhatsApp

Mensagens anteriores

28/08/2024

MEDICAMENTOS CONTROLADOS -(SEM RECEITA)-

...[Opióides, Sedativos, Antidepressivos, Calmantes, Soníferos, Ansiolíticos, Emagrecedores, Smartdrugs, Esteróides, Anabolizantes, Formulas Manipuladas, Controladas, Tarja Preta, etc.]...

- Rivotril Roche 2,5mg (gotas)
- Alprazolam 2mg
- Lorazepam 2mg
- Bromazepam 3mg
- ~Fentanyl~ (Sedativo)
- Diazepam 10mg
- Tramadol 50mg
- Dimorf 10mg
- ~Rohypnol~ 1mg
- ~Boa Noite Cinderela~
- GHB (Sedativo)
- Andractim DHT
- Zolpidem 10mg
- Sertralina 50mg
- Escitalopram 10mg
- Ritalina LA 30mg
- Stavigile 200mg
- Venvarse 70mg
- Adderall 50mg
- ~Sibutramina~ 30mg
- Anfepromona 75mg
- Femproporex 25mg
- Katamina 50ml (Anestésico)
- ~Chumbinho~
- Aphrodisiac (Estimulante Sexual)
- ~Claneto de Potássio~
- Stanozolol (Testosterona)
- GH (Somatotrófico)
- Canabidiol (CBD)
- ~Cytotec~ (Abortivo)
- ~Nembutal~
- Rebite (Corujão)

<https://chat.whatsapp.com/F...>

•TRABALHAMOS COM DIVERSOS MEDICAMENTOS CONTROLADOS SOB ENCOMENDA! -(NÃO EXIGIMOS RECEITUÁRIO)-

✳️ Não sou revenda. Sou fornecedor! ✳️

SE COMPROU, ENVIOU, CHEGOU!

Global Perspectives for regulatory authorities

- Investments on advanced digital surveillance tools
- Strengthening international cooperation
- Enhancement of public awareness about the dangers of purchasing medicines from unverified sources
- Collaboration with internet service providers, payment processors, and tech companies are also essential in dismantling online networks that facilitate the illegal drug trade.

THANK YOU

Laila Sofia Mouawad

Brazilian Health Regulatory Agency (Anvisa)

<https://www.gov.br/anvisa/pt-br/english>



Closing Remarks



Marta Sokolowska, PhD

Deputy Center Director for Substance
Use and Behavioral Health
Center for Drug Evaluation and
Research
U.S. Food and Drug Administration



Sangeeta Chatterjee, PharmD

Acting Director, Office of Drug Security,
Integrity, and Response, CDER Office of
Compliance
U.S. Food and Drug Administration





Online Controlled Substances Summit

Thank you for attending!

The public meeting recording, transcript, and other materials will be available next week at reaganudall.org



REAGAN-UDALL



FOUNDATION
FOR THE FDA