ICAIE
INTERNATIONAL COALITION
AGAINST ILLICIT ECONOMIES

WHITE PAPER

Operationalizing ITP's Article 24 Working Group to Optimally Fight Illicit Trade and Strengthen International Cooperation Across Borders

ASSISTANCE AND COOPERATION



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ABOUT ICAIE

The **International Coalition Against Illicit Economies (ICAIE)** is a national security-centric NGO based in Washington, DC, that brings together committed champions across sectors and communities, including former members of the public sector, companies, and prominent organizations from the private sector and civil society to mobilize collective action to combat cross-border illicit threats. ICAIE advances innovative energies through public-private partnerships, policy dialogues, and transformative threat intelligence and risk management solutions to counter illicit economies. With an eye toward full-spectrum investigations, our ICAIE team bridges the gap between private industry and the public sector.

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Executive Summary

The Protocol to Eliminate Illicit Trade in Tobacco Products (ITP) should use its Article 24 Working Group to convert broad commitments on assistance and cooperation into a practical, intelligence-led enforcement agenda ahead of MOP5 in Yerevan in 2027.

However, Article 24 should not be viewed in isolation. Effective international cooperation is amplified when combined with licensing (Article 6), due diligence (Article 7), track and trace (Article 8), record keeping (Article 9), security and preventive measures (Article 10), and free zone controls (Article 12). Together these provisions create a framework that enables Parties to prevent, detect and disrupt illicit trade in tobacco products.

Scale and Nature of the Challenge

The global illegal economy is estimated at approximately $6 trillion annually, while international trade in counterfeit goods was valued at $467 billion in 2021.[1] Illicit cigarettes alone are estimated to cost governments nearly $50 billion in annual tax revenues, including €14.9 billion in potential excise and VAT revenue losses in the European Union in 2024.[2] Roughly one in ten cigarettes consumed globally is estimated to be illicit.[3] These figures underscore the scale of illicit markets and the importance of addressing illicit tobacco as part of a broader ecosystem of organized crime, corruption, illicit finance and cross-border trafficking. Criminal networks continue to exploit shared routes, ports, logistics, corrupt facilitators and financial channels to move tobacco alongside narcotics, weapons, counterfeit goods, illegal minerals and other contraband.

Why Article 24 Matters

Article 24 requires Parties to strengthen cooperation to prevent, detect, investigate, prosecute, and punish illicit tobacco offences, and to improve information exchange among administrative, regulatory, and law-enforcement authorities. Yet implementation remains weak: while 71% of Parties report national coordination and information-exchange mechanisms, only 33% report cooperation with other Parties on criminal investigations.[4]

The Working Group therefore offers an opportunity to connect health policy with customs, police, tax authorities, financial intelligence units and international enforcement bodies.

A Framework to Address Hubs of Illicit Trade (HIT)

The Hubs of Illicit Trade (HIT) framework can support Article 24 by helping Parties identify the limited number of jurisdictions, corridors, ports, border crossings, logistics nodes, manufacturing-input flows and financial channels that account for a disproportionate share of illicit cigarette activity.

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[1] OECD & EUIPO. (2025). "Mapping Global Trade in Fakes 2025." October 16, 2026. https://doi.org/10.1787/94d3b29f-en.
[2] KPMG. (2025). "Illicit Cigarette Consumption in Europe: 2024 Results." October 16, 2026. https://www.pmi.com/resources/docs/default-source/itp/illicit-cigarette-consumption-in-europe-2024-results.pdf.
[3] World Health Organization (WHO). "Tobacco and Nicotine". WHO Fact Sheets. June 26, 2026. https://www.who.int/news-room/fact-sheets/detail/tobacco
[4] WHO Framework Convention on Tobacco Control, Convention Secretariat. (2025). "2025 Global Progress Report on Implementation of the Protocol to Eliminate Illicit Trade in Tobacco Products," p. 39.

By combining standardised seizure data, periodic multi-country corridor assessments, maritime and container intelligence, supply-chain indicators and multi-commodity analysis, HIT can provide a common operational picture and support rapid alerts, joint risk assessments and concise disruption packages for priority corridors and risk zones.

This approach would help identify where cooperation is most needed, where intelligence gaps persist, which authorities hold relevant information and where coordinated intervention could have the greatest disruptive effect.

This approach should remain evidence-based: documented illicit activity, geographic risk and infrastructure vulnerability can guide enforcement priorities, but geographic overlap alone should not be treated as evidence against infrastructure operators.

Principal Barriers

Six interrelated barriers constrain implementation: insufficient political ownership and operational participation; fragmented national and international coordination; legal and procedural obstacles to cross-border cooperation; intelligence, data and interoperability gaps; resource, expertise and enforcement-capacity constraints; and limited access to specialised non-government expertise and information. Wider drivers—including price and tax differentials, supply-chain and border vulnerabilities, illicit finance, corruption, technology, e-commerce and political instability—reinforce the need for a coordinated enforcement response.

Key Recommendations

- Strengthen national and international coordination by designating appropriate focal points, connecting health, customs, police, tax authorities, regulators, financial intelligence units and prosecutors, and linking them to established regional and international cooperation channels.

- Make cross-border information exchange operational through secure channels, escalation procedures, standardised minimum data fields, rapid corridor alerts and regular multi-country risk assessments linked to defined enforcement triggers.

- Pilot cooperation along a small number of well-evidenced “Article 24 illicit corridors,” using HIT-style mapping and disruption packages to identify source, transit, enabling and destination jurisdictions, priority routes and nodes, responsible agencies, intelligence gaps and recommended enforcement actions.

- Follow illegal goods and money by ensuring major illicit-tobacco seizures trigger consideration of parallel financial investigations, beneficial-ownership checks, trade-based money-laundering analysis, asset tracking and asset-recovery action, supported where appropriate by FATF and the Egmont Group.

- Use existing mechanisms for joint and coordinated investigations, mutual legal and administrative assistance, evidence exchange, prosecution support and cross-border asset recovery, working with WCO, INTERPOL, EUROPOL, UNODC, FATF, the Egmont Group, OECD and other expert bodies.

- Strengthen controls over supply chains, free-trade zones (FTZs), information sharing and key manufacturing inputs, including leaf, acetate tow, paper, filters, packaging materials and machinery, ensuring they remain proportionate, risk-based and enforcement-led.

- Use multi-commodity indicators as intelligence triggers when the same route, transporter, warehouse, company, facilitator or border point appears in tobacco and other contraband cases, treating such overlaps as investigative leads rather than proof of common control.

- Prioritize maritime and container intelligence exchange on high-risk port corridors, including pre-arrival information, manifests, consignee and shipper details, container routing, transshipment history, declaration anomalies and previous enforcement indicators.

- Connect Article 24, Article 8 and the Global Information-Sharing Focal Point by promoting fully digital, interoperable and standards-based track-and-trace systems, supported by globally recognised identifiers, common data exchange standards, minimum datasets, clear operational use cases and performance reporting. Parties should therefore support interoperable, standards-based T&T systems for tobacco products, drawing on the principles set out in the WHO Policy Paper on Traceability of Medical Products and proven models such as UNICEF's Traceability and Verification System (TRVST), where appropriate.

- Structure authority-led engagement with relevant non-government actors where specialised technology, logistics, standards, financial, supply-chain or market intelligence can support enforcement. ITP Article 4.2 should provide the basis for such engagement, which should be transparent, purpose-limited, documented and subject to conflict-of-interest safeguards, data protection and government decision-making authority.

- Measure outcomes beyond seizure volumes, including intelligence exchanges, coordinated investigations, financial investigations opened, prosecutions supported, illicit assets restrained or confiscated, illegal factories disrupted, priority inputs intercepted and trafficking routes dismantled.

I. Introduction

A. Expanding Global Illegal Tobacco Markets: Impacts to Global Security

Criminal entrepreneurs and other threat networks increasingly exploit the technological, financial, and communications advances of globalization, contributing to a global illegal economy estimated at $6 trillion annually.[5] These illicit activities threaten international trade, legitimate markets, and the transportation and financial systems that move goods, services, and people.[6]

Illicit economies and hubs of illicit trade operate across regions, enabling criminal networks to diversify their activities, expand transnational operations, and generate revenues that fuel corruption, organized crime, violence, terrorist financing, and instability. According to a 2025 OECD–EUIPO report, global trade in counterfeit goods was estimated at $467 billion in 2021, illustrating the substantial economic impact of illicit markets.[7]

Illicit threats are inter-linked threat multipliers, as sophisticated criminal networks diversify and scale their illicit portfolios. The same illicit networks trafficking in narcotics and illegal tobacco products also move people, arms, endangered wildlife, illegally-mined gold and critical minerals alongside fake medicines, electronics, apparel, and illegal alcohol products.[8]

[5] International Coalition Against Illicit Economies (ICAIE). "New ICAIE Estimate on the Size of the Global Illegal Economy: At Least $6 Trillion Annually". ICAIE Executive Brief, July 2026. https://icaie.com/2026/07/new-icaie-estimate-on-the-size-of-the-global-illegal-economy-at-least-6-trillion-annually-icaie-executive-brief-july-2026/.
[6] Organization for Economic Cooperation and Development (OECD). "Illicit Trade. Criminal Converging Networks". OECD Reviews of Risk Management Policies, OECD Publishing, Paris. 2016. http://dx.doi.org/10.1787/9789264251847-en.
[7] OECD. "Mapping Global Trade in Fakes". May 7, 2025. Paris: OECD Publications. https://www.oecd.org/en/about/news/press-releases/2025/05/global-trade-in-fake-goods-reached-USD-467-billion-posing-risks-to-consumer-safety-and-compromising-intellectual-property.html.
[8] ICAIE. Op.cit.



This is also the reality in the trade in illicit cigarettes, which remains a persistent, complex challenge across borders, as criminals and other threat networks profit handsomely through significant market penetration that results in governments losing close to $50 billion in tax revenue annually, including €14.9 billion in lost excise and VAT receipts within the European Union (EU).[9] It is estimated that 1 in every 10 cigarettes is illicit.[10]

The illegal tobacco trade results in significant economic losses, floods legitimate commerce with cheaper alternatives that are often counterfeits or contain substandard or toxic materials and undermines tobacco control policies. Among the drivers of the thriving illegal tobacco trade is the fact that higher excise taxes have created excessive price differentials between licit and illicit tobacco products which has expanded criminal market penetration in many countries as consumers seek cheaper alternatives. The trade in such illicit and illegal products further hinders global tobacco control efforts as these cigarettes become more accessible to minors and those who are trying to quit.

[9] Oxford Economics. "An economic assessment of the drivers of the illicit cigarettes trade in the EU". February 13, 2026. https://www.oxfordeconomics.com/resource/an-economic-assessment-of-the-drivers-of-the-illicit-cigarette-trade-in-the-eu/.
[10] WHO. "Tobacco and Nicotine". WHO Fact Sheets, op. cit.



In advance of the next Meeting of the Parties (MOP5) to the Protocol to Eliminate Trade in Tobacco Products (ITP) to be held in Yerevan, Armenia, in 2027, this ICAIE White Paper examines the urgent need for effective policy implementation related to the work of the ITP's Article 24 Working Group in leveraging the international insights from recent academic research, best practices within law enforcement, and critical insights, case studies, and lessons learned from the global anti-illicit trade community.

Another strategic objective of this White Paper is to encourage a greater understanding of the growing harm of the illegal tobacco trade as it converges with other forms of criminality in markets and across e-commerce and the digital world.

As highlighted below, ICAIE has put a spotlight on how illicit trade funds criminal networks that penetrate governance structures through their corruptive influence and infiltrate other industries as they diversify. These groups use the illicit economy to finance terrorism, money laundering, and global security threats, thereby harming companies that play by the rules while making investments and creating jobs in markets. This illicit trade also reduces tax revenue that can fund public services and exposes communities to products without regulation and quality control.

ICAIE advocates stronger cross-border cooperation, responsible public-private partnerships, specialized anti-illicit trade expertise, and innovative technologies, including digital track-and-trace systems, to combat illicit tobacco and organized crime. Effective Article 24 implementation requires coordinated engagement among customs, law enforcement, financial intelligence units, regulators, and relevant private-sector stakeholders, subject to appropriate safeguards.

The Hubs of Illicit Trade (HIT) methodology, which ICAIE has supported through research in South Asia, offers a practical framework for strengthening Article 24 cooperation to help secure tobacco supply chains. By mapping illicit trade hubs, source, transit, and destination jurisdictions, trafficking corridors, logistics infrastructure, financial channels, and criminal facilitators, HIT can help identify priority enforcement targets and opportunities for coordinated investigations.[11] Integrating strategic intelligence and geographic risk analysis can enable the Article 24 Working Group to translate international cooperation commitments into targeted, intelligence-led actions against illicit tobacco networks.

II. Why Article 24 Matters: Assistance and Cooperation as an Operational Enforcement Agenda.

The World Health Organization's Framework Convention on Tobacco Control (FCTC), which came into force in 2005, is the first international health treaty to outline numerous standards and measures to control tobacco use through demand-and-supply reduction strategies.[12]

FCTC Article 15 calls on the Parties to eliminate all forms of illicit trade in tobacco products, including smuggling, illicit manufacturing and counterfeiting, and states that the "development and implementation of related national law, in addition to subregional, regional and global agreements, are essential components of tobacco control."[13]

FCTC Article 15 also enumerates various actions for Parties to take such as monitoring and collecting data on cross-border trade in tobacco products including illicit trade and to "exchange information among customs, tax and other authorities". It also encourages Parties to adopt measures to enable the confiscation of criminally-derived proceeds related to the illicit trade in tobacco products.[14] It strongly recommends further cooperation between national agencies and with regional and international intergovernmental organizations "as it relates to investigations, prosecutions and proceedings, with a view to eliminating illicit trade in tobacco products".[15]

In 2007, negotiations commenced on a supplementary anti-illicit trade protocol to the FCTC, which was finalized in the Protocol to Eliminate Illicit Trade in Tobacco Products (ITP).[16] It was adopted at the FCTC's 5th Conference of Parties (COP5) in November 2012 in

[11] Ibid.
[12] World Health Organization (WHO). "Framework Convention on Tobacco Control". WHO FCTC. May 25, 2003. https://fctc.who.int/resources/publications/i/item/9241591013.
[13] WHO. "Measures relating to the reduction of the supply of tobacco: Article 15 – Illicit Trade in tobacco products". WHO FCTC. https://www.who.int/teams/health-promotion/tobacco-control/implementing/measures,
[14] Ibid.
[15] Ibid.
[16] WHO. "Protocol to Eliminate Illicit Trade in Tobacco Products". Framework Convention on Tobacco Control (FCTC). May 3, 2013. https://fctc.who.int/resources/publications/i/item/9789241505246

South Korea, and entered into force September 24, 2018.[17] The first ITP Meeting of the Parties took place October 8-10, 2018.[18]

At MOP1 Parties called for a working group which focused on information sharing, in accordance with Art 21., assistance and cooperation (Art 23), mutual admin assistance (Art 28), investigation and prosecution (Art 24) and mutual legal assistance (Art 29).[19] The ITP is the first international legal instrument that provides countries with general guidance on the political, technical, and international collaboration needed to eliminate illicit trade in tobacco products.

In particular, Article 24 states that the Parties:

> "shall, in accordance with their domestic law, take all necessary measures, where appropriate, to strengthen cooperation by multilateral, regional or bilateral arrangements for the prevention, detection, investigation, prosecution and punishment of natural or legal persons engaged in illicit trade in tobacco, tobacco products or manufacturing equipment."

Article 24 further encourages each Party to "ensure that administrative, regulatory, law enforcement and other authorities dedicated to combating illicit trade in tobacco, tobacco products or manufacturing equipment (including, where permitted under domestic law, judicial authorities) cooperate and exchange relevant information at national and international levels within the conditions prescribed by its domestic law."

At its fourth session, the Meeting of the Parties (MOP) to the ITP held in Geneva, November 24-26, 2025, established two Working Groups—on Article 6.5 and Article 24—through decisions FCTC/MOP4(6) and FCTC/MOP4(7).[20] These Working Groups were created to support the Protocol's effective implementation by developing technical recommendations, identifying best practices, and strengthening cooperation among Parties.

Moreover, under FCTC/MOP/2/7 (June 16, 2021)[21], under consideration for assistance and cooperation (Article 24), and specific to law enforcement cooperation, MOP stated the following:

"The Working Group emphasizes the importance of developing or strengthening networks of law enforcement agencies, including police, customs and others, to curb tobacco product smuggling through intelligence sharing and joint-investigation efforts.

In addition, in order to expand the network internationally and to amplify the scope of investigations beyond regional borders, the Working Group also emphasizes the importance of developing or strengthening regional cooperation, establishing, when

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[17] WHO. "Fifth Session of the Conference of the Parties to the WHO FCTC". https://fctc.who.int/convention/conference-of-the-parties/sessions/fifth-session-of-the-conference-of-the-parties-to-the-who-fctc.
[18] WHO. "First Session of the MOP to the Protocol to Eliminate Illicit Trade in Tobacco Products". FCTC. https://fctc.who.int/protocol/governance/meeting-of-the-parties-of-the-parties/first-session-of-the-meeting-of-the-parties.
[19] Ibid.
[20] WHO. "Global meeting on eliminating illicit trade in tobacco products opens in Geneva". FCTC. November 24, 2025. https://fctc.who.int/newsroom/news/item/24-11-2025-global-meeting-on-eliminating-illicit-trade-in-tobacco-products-opens-in-geneva.
[21] WHO. "FCTC/MOP/2/7 Assistance and Cooperation". FCTC. November 18, 2021. https://fctc.who.int/resources/publications/i/item/fctc-mop-2-7-assistance-and-cooperation.

necessary, arrangements with other international organizations. In some countries, cooperation strategies – such as fusion centers and international police cooperation pathways – have proven effective in investigating transnational crimes and could also be explored to combat illicit trade in tobacco products. A list with the description of such mechanisms is provided in Annex 3."[22]

The FCTC/MOP/2/7 report also highlighted the potential benefits of closer cooperation with INTERPOL and the World Customs Organization (WCO) to strengthen cross-border investigations, while emphasizing the need to protect enforcement strategies from tobacco-industry commercial and other vested interests. [23]

The Working Group on Article 24 is mandated to identify best practices for and barriers to the implementation of the article, and to prepare a report on effective mechanisms for strengthening assistance and cooperation in the investigation and prosecution of offences under the Protocol. It will also present its conclusions and recommendations at MOP5, to be held in Yerevan, Armenia, in 2027.[24]

The Working Group on Article 24 held its first meeting virtually on June 24, 2026.[25] Participants engaged in discussions on the progress toward implementation of Article 24 of the Protocol and the work that has been undertaken by the MOP in relation to Article 24, taking into account the report of the Working Group on Assistance and Cooperation that was established in decision FCTC/MOP1(10).

The second meeting of the working group will take place in Brazil between October 20 and 22nd, 2026. Parties are expected to complete their work in the working group in the first half of 2027 and publish their recommendations in a report at least 75 days before the MOP5 meeting for consideration, deliberation, and adoption.

The Working Group's terms of reference create new opportunities to implement practical cross-border enforcement cooperation, enabling meaningful investigations, prosecutions, capacity building, information sharing, and technical assistance to effectively tackle the illegal tobacco trade.

[22] Ibid.
[23] Ibid.
[24] WHO. "First Meetings of the Working Groups on Articles 6.5 and 24 of the Protocol to Eliminate Illicit Trade in Tobacco Products". FCTC. July 12, 2026. https://fctc.who.int/newsroom/news/item/12-07-2026-first-meetings-of-the-working-groups-on-articles-6.5-and-24-of-the-protocol-to-eliminate-illicit-trade-in-tobacco-products.
[25] Ibid.

III. How the Hubs of Illicit Trade (HIT) Framework Can Support Article 24 Cooperation

The central challenge for Article 24 is translating international cooperation commitments into operational priorities: where should enforcement efforts be concentrated, which jurisdictions and agencies should cooperate, and which trafficking corridors and illicit supply-chain nodes offer the greatest opportunities for disruption? The HIT framework can support these decisions by identifying geographic risk zones, risk points, trafficking corridors, logistics infrastructure, financial mechanisms, and connections across illicit markets. This capability is particularly relevant given the current implementation gap. The WHO FCTC's 2025 global progress report found that while 71 percent of Parties reported national mechanisms for coordination and information exchange, only 33 percent reported engaging with other Parties to investigate criminal offenses involving illicit tobacco trade.[26]

A. The Illegal Tobacco Trade Nexus with the World of Crime Convergence (HIT Project)

The Hubs of Illicit Trade (HIT) project is a data-driven framework designed to identify and analyze geographic risk zones, risk points, trafficking corridors, commodities, transportation methods, financial mechanisms, and other enablers associated with illicit trade.[27] By connecting individual incidents and locations into broader regional and transnational networks, HIT helps identify where different illicit markets converge and where targeted enforcement and international cooperation may have the greatest impact.[28]

One of the central insights emerging from HIT is that illicit tobacco should not be viewed as an isolated commodity market. The same geographic environments that facilitate cigarette smuggling may also support trafficking in narcotics, gold, counterfeit goods, pharmaceuticals, wildlife products, weapons, fuel, and other contraband. The convergence does not necessarily mean that the same criminal organization controls every commodity. Rather, different illicit markets can exploit common routes, border vulnerabilities, ports, transportation infrastructure, concealment methods, corrupt facilitators, financial channels, and logistics services.

International evidence supports this broader analytical approach. The World Customs Organization (WCO) describes cigarette and tobacco smuggling as a global phenomenon linked to transnational organized crime and notes the continued diversification of smuggling routes.[29] The Financial Action Task Force (FATF) has similarly identified illicit tobacco as a money-laundering vulnerability because of its profitability,

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[26] FCTC. "2025 Global Progress Report on Implementation of the Protocol to Eliminate Illicit Trade in Tobacco Products". August 27, 2026. https://fctc.who.int/resources/publications/m/item/2025-global-progress-report-on-implementation-of-the-protocol-to-eliminate-illicit-trade-in-tobacco-products.

[27] Hubs of Illicit Trade Project in Partnership with ICAIE. September 2026. https://hitproject.org/.

[28] Ibid.

[29] WCO. Revenue Program. August 27, 2026. https://www.wcoomd.org/en/topics/enforcement-and-compliance/activities-and-programmes/revenue-programme.aspx?utm.

cash intensity, and transnational character and has emphasized the need for international cooperation against the financial proceeds generated by the trade.[30]

HIT 3 illustrates convergence at the corridor level.

South Asia provides a useful example. The HIT 3 South Asia project identifies risk zones and points across India, Pakistan, Bangladesh, and Sri Lanka, and groups geographically-connected nodes into larger illicit trade corridors.[31] These include formal land crossings, informal border areas, container ports, coastal routes, airports, inland distribution hubs, manufacturing areas, and transportation nodes.

India's Northeast Corridor provides one example. Directorate of Revenue Intelligence (DRI) reports show foreign-origin cigarettes moving through India's northeastern border region and then toward major inland markets. During FY2024–25, DRI reported increased seizures along the Northeast–Delhi route, including interceptions in Bihar and Uttar Pradesh totaling approximately 7.56 million cigarettes.[32] DRI has also documented cigarette seizures in Assam, Meghalaya, and Mizoram, demonstrating the importance of the northeastern border and inland distribution system.[33]

HIT 3 also identifies the Northeast Corridor as relevant to other illicit commodities and trafficking flows. This raises an important question for Article 24: could intelligence from narcotics, gold, wildlife, counterfeit goods, or organized-crime investigations help identify tobacco trafficking networks, facilitators, routes, and financial flows operating within the same geographic environment?

India's maritime system provides another illustration. DRI documented 7.14 million counterfeit cigarettes imported from Vietnam and mis-declared as baby diapers at Kolkata Port in November 2024, while another 5.5 million counterfeit cigarettes from Thailand were seized at Chennai Port after being mis-declared as veneer sheets.[34] In 2025, DRI reported additional large cigarette seizures at Chennai Port involving shipments originating from Thailand, Singapore, and the UAE.[35] These cases demonstrate how container ports can connect overseas source or transit locations with Indian maritime risk zones and onward inland distribution networks.

The HIT approach can therefore help distinguish among three analytically distinct phenomena: documented illicit activity, where seizures or investigations provide direct evidence; risk-zone convergence, where several illicit commodities repeatedly use the same geographic environment; and strategic vulnerability, where infrastructure and connectivity create opportunities for exploitation, but available evidence does not establish illicit activity at a particular facility. Maintaining these distinctions is essential to avoiding unsupported conclusions.

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[30] FATF. “Illicit Tobacco Trade”. August 29, 2026. https://www.fatf-gafi.org/en/publications/Methodsandtrends/Illicittobaccotrade.html?

[31] Hubs of Illicit Trade Project in Partnership with ICAIE. “South Asia”. ICAIE Policy Brief. September 2026. https://hitproject.org/.

[32] DRI. “Smuggling in India 2024-25”. September 2, 2026. https://dri.nic.in/main/smug2025#:~:text=Smuggling%20in%20India%20Report%202024-25,of%20Finance%2C%20Government%20of%20India

[33] Ibid.

[34] Ibid.

[35] Ibid.

The recent HIT 3 assessment of the Adani port network illustrates this caveat. Ports located within or adjacent to HIT risk zones can be treated as strategically relevant infrastructure nodes, but geographic overlap alone should never be interpreted as evidence that a port operator is involved in illicit trade. The analytical value comes from understanding how high-volume container, road, rail, warehousing, and transshipment infrastructure intersects with documented regional trafficking corridors and therefore where customs and enforcement authorities may benefit from enhanced risk assessment and information sharing.

B. Leveraging the HIT Framework as a Tool for the Article 24 Working Group

The HIT Project can support Article 24 by transforming dispersed seizure and enforcement information into a shared intelligence picture of illicit-trade networks, trafficking corridors, and operational vulnerabilities. It can complement existing international cooperation mechanisms in five practical ways.

First, identify priority jurisdictions for cooperation. The HIT approach can classify jurisdictions according to their role as source, production, transit, transshipment, enabling, distribution, or destination environments. This moves cooperation beyond broad country-to-country engagement and helps identify the specific jurisdictions relevant to a particular trafficking chain.

Second, identify priority risk zones and disruption points. A corridor consists of more than its origin and destination. HIT identifies intermediate nodes such as ports, border crossings, airports, inland container depots, logistics hubs, warehouses, coastal landing points, and distribution centers. These can provide opportunities for intervention at different stages of the illicit supply chain. Article 24 cooperation could therefore become more targeted by asking not simply *which countries are involved?* but *which specific nodes connect those countries and where can coordinated enforcement have the greatest disruptive effect?*

Third, connect tobacco investigations with wider organized-crime intelligence. Where tobacco routes converge with narcotics, gold, counterfeit goods, wildlife, or other illicit markets, authorities should consider whether investigations conducted by customs, police, financial intelligence units, anti-corruption bodies, and specialized organized-crime agencies contain information relevant to tobacco enforcement. This is especially important because Article 24 should not operate in an institutional silo since the criminal networks and enabling environments themselves cross commodity and agency boundaries.

Fourth, integrate financial intelligence into corridor analysis. Mapping the physical movement of illicit tobacco should be complemented by mapping the movement of proceeds. FATF notes that the international character and profitability of illicit tobacco creates money-laundering vulnerabilities and calls for stronger international cooperation.[36] HIT can overlay physical corridors with indicators such as bulk cash

[36] FATF. “Illicit Tobacco Trade”. September 7, 2026. https://www.fatf-gafi.org/en/publications/Methodsandtrends/Illicittobaccotrade.html?utm.

movement, hawala and other informal value-transfer mechanisms, trade-based money laundering, shell companies, mis- and under-invoicing, and other financial enablers where evidence supports their presence. This would help Article 24 cooperation move beyond seizure statistics toward identifying and confiscating the profits sustaining criminal networks.

Fifth, provide a common visual intelligence picture for cross-border cooperation. HIT risk maps and corridor analysis can integrate incidents, commodities, trafficking routes, logistics infrastructure, financial mechanisms, and enabling factors into a shared operational picture. This can help participating authorities identify intelligence gaps, prioritize investigations, and determine which international partners hold relevant information.

From Mapping to Disruption

The strategic value of the HIT approach for Article 24 ultimately lies not in producing more maps, but in supporting targeted disruption. A risk-zone or corridor analysis should trigger a sequence of operational questions:

What is moving? → Where is it moving? → Through which nodes? → Who facilitates the movement? → How are proceeds transferred? → Which jurisdictions and agencies hold relevant intelligence? → Where would coordinated intervention create the greatest disruption?

This approach aligns closely with the Working Group's mandate to strengthen assistance and cooperation in investigations and prosecutions. It also provides a mechanism for prioritization. Article 24 cooperation resources can be concentrated on corridors where there is documented cross-border activity, repeated seizures, multiple participating jurisdictions, convergence with other illicit markets, or identifiable financial and logistical enablers.

For MOP5, the Article 24 Working Group could therefore consider encouraging Parties to develop shared risk-zone and corridor assessments for illicit tobacco, supported by standardized data fields and designated national focal points. Priority corridors could then become the basis for targeted information exchanges, coordinated customs actions, financial investigations, joint investigative support, capacity building, and, where appropriate under domestic law and existing agreements, prosecution coordination.

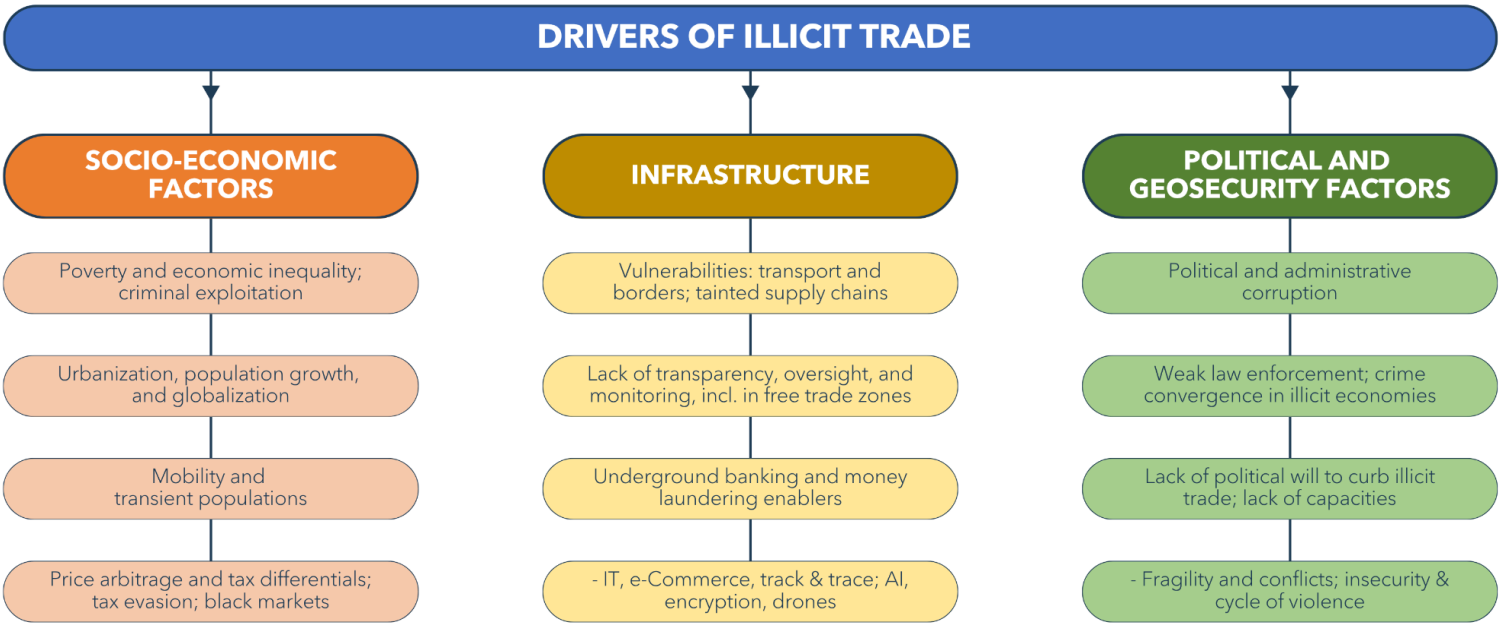
The HIT approach should not replace existing customs, police, financial-intelligence, or judicial cooperation mechanisms. Its value lies in its role as an analytical layer connecting them: identifying where cooperation is most needed and helping to transform fragmented information about individual seizures into a geographically and operationally coherent picture of transnational illicit trade.

IV. Barriers to Effective Article 24 Implementation

The Protocol provides a strong framework for international cooperation against illicit trade. However, effective implementation of Article 24 depends on Parties being able to translate international commitments into practical cooperation between the authorities responsible for prevention, detection, investigation, prosecution and enforcement.

International cooperation takes place within a broader environment in which illicit markets are driven by interconnected socio-economic, infrastructure, political and security factors. As illustrated in Figure 1, these include price and tax differentials, supply-chain and border vulnerabilities, illicit financial mechanisms, corruption, limitations in enforcement capacity, technology and e-commerce, and political instability.

Figure 1: Drivers of illicit trade



Source: Authors. Hubs of Illicit Trade (HIT 1) and HIT 3 Projects

These wider conditions illustrate why illicit tobacco cannot be addressed solely as a product-specific regulatory issue. Article 24 cannot remove all of the underlying drivers of illicit trade, but stronger assistance and cooperation can help Parties respond more effectively to their cross-border consequences. Six barriers are particularly relevant.

1. Political Ownership and Participation

Effective implementation requires sustained political commitment and the appropriate involvement of the authorities responsible for preventing and combating illicit trade. Article 24 cooperation would benefit from stronger operational participation by customs, tax, police, financial intelligence, prosecutorial and other relevant enforcement authorities alongside public-health and regulatory authorities. This would help ensure

that international policy discussions translate into effective information exchange, investigations, prosecutions and enforcement action.

2. Fragmented Institutional Coordination

Illicit tobacco investigations frequently involve multiple authorities, including customs, police, tax administrations, regulators, financial intelligence units and prosecutors. Weak coordination between these institutions can fragment intelligence and make it difficult to develop a common understanding of trafficking routes, facilitators, financial flows and associated criminal activity.

The international dimension remains particularly challenging. While 71% of Parties reported national mechanisms for coordination and information exchange, only 33% reported cooperation with other Parties on criminal investigations involving illicit tobacco trade. Strengthening the links between national coordination arrangements and regional and international enforcement networks should therefore be an important component of Article 24 implementation.

3. Legal and Procedural Barriers to Cross-Border Cooperation

Differences in domestic legislation and procedures can constrain the timely exchange and use of information across jurisdictions. Effective cooperation may also require appropriate mechanisms for mutual legal or administrative assistance, evidence exchange, coordinated investigations, prosecution support, financial enquiries and asset recovery.

Article 24 should therefore encourage Parties to make effective use of existing bilateral, regional and international cooperation mechanisms wherever possible, rather than creating parallel structures.

4. Intelligence, Data and Interoperability Gaps

Cross-border enforcement depends on information that is timely, comparable and operationally useful. Fragmented seizure information, inconsistent data fields and barriers to cross-border data exchange can make it difficult to identify patterns across jurisdictions or connect individual seizures to wider trafficking corridors.

Similar challenges arise in relation to legitimate supply-chain information. Greater interoperability, common data standards and effective exchange of relevant supply-chain information can strengthen the ability of authorities to identify diversion, anomalies and emerging risks. Article 24 cooperation should therefore focus not simply on increasing the volume of information exchanged, but on improving its quality, comparability, timeliness and operational value.

5. Resource, Expertise and Enforcement-Capacity Constraints

Differences in institutional capacity and access to specialized expertise can limit the ability of Parties to conduct customs risk analysis, financial investigations, intelligence analysis, cargo targeting and complex cross-border investigations.

Technical assistance and capacity building should therefore form an integral part of Article 24 cooperation. Existing international and regional mechanisms can provide relevant expertise, training and operational support and should be leveraged wherever appropriate, avoiding unnecessary duplication of established structures.

6. Stakeholder Engagement and Access to Specialised Expertise

Governments remain responsible for implementing and enforcing the Protocol. At the same time, effective enforcement may require access to specialized capabilities and information held outside government, including expertise relating to technology, logistics, standards, financial flows, supply chains and market developments.

Article 4.2 of the Protocol specifically recognizes the need for transparency in interactions with the tobacco industry and requires Parties to act in a manner consistent with Article 5.3 of the WHO FCTC when implementing their obligations under the Protocol. Appropriate safeguards therefore need not preclude access to relevant expertise or information where this supports legitimate enforcement objectives.

Where non-government expertise or data is required, engagement should be authority-led, transparent, purpose-limited and documented, with appropriate conflict-of-interest safeguards, protection of sensitive information and government control over policy and enforcement decisions. This provides a basis for obtaining relevant technical and operational input while protecting the integrity and independence of implementation.

From Barriers to Practical Cooperation

These barriers are interconnected. Fragmented institutional arrangements can impede information sharing; inconsistent or inaccessible data can limit cross-border intelligence; resource constraints can restrict the ability of authorities to investigate identified networks; and insufficient operational participation can prevent international commitments from translating into enforcement action.

The Article 24 Working Group therefore has an opportunity to focus on practical mechanisms that address these barriers collectively, including designated focal points, secure information-sharing arrangements, standardized data, coordinated investigations, financial-intelligence cooperation, technical assistance, capacity building and appropriately safeguarded stakeholder engagement.

Experience from established international cooperation frameworks provides useful examples of how these challenges can be addressed in practice. The following section considers the good practices and mechanisms that may be most relevant to strengthening Article 24 implementation.

V. Leveraging Good Practices from International Fora's Cooperation Models to Strengthen ITP and Article 24 Working Group, Including customs, Financial Crime, Organized Crime and Cross-border Enforcement

Figure 2: Policies to counteract illicit activities in hubs of illicit trade.



Source: Authors. Hubs of Illicit Trade (HIT 1) and HIT 3 Projects.

A. Inter-Governmental Good Practices

The Article 24 Working Group can draw on established cooperation mechanisms and good practices developed by international organizations, including UNODC, OECD, WCO, FATF, the Egmont Group, IMF, INTERPOL, and EUROPOL.

Their experience in intelligence sharing, cross-border investigations, financial-crime enforcement, technical assistance, capacity building, and appropriate cross-sector cooperation offers practical lessons for strengthening Article 24 implementation.

Through public-private partnerships and a commitment to working with industry and civil society groups, these international organizations have developed a better understanding of how illicit trade harms markets and communities worldwide.

Through evidence-based research, they help shape holistic policy frameworks to guide effective law enforcement approaches to counter illicit trade to inform the Article 24 Working Group to develop better policies, actions, and partnerships to strengthen the implementation and enforcement of the FCTC and ITP.

Table 1. Good Practices and Measures to Benchmark Article 24 Working Group

International Instruments / Initiatives	UN Convention Against Transnational Organized Crime (UNTOC)	UN Convention Against Corruption (UNCAC)	FATF Standards on Combating Money Laundering and the Financing of Terrorism	OECD Working Party on Countering Illicit Trade (WP-CIT) / OECD Bribery Convention/WG	World Customs Organization (WCO) Revised Kyoto Convention (RKC)
Effective AIT Measures and Good Practices	✓	✓	✓	✓	✓
International Cooperation and Exchange of Information	✓	✓	✓	✓	✓
Mutual Legal Assistance	✓	✓	✓	✓	✓ (Mutual Administrative Assistance)
Criminalization Provisions	✓	✓ (Corruption/Bribery)	✓ (Predicates)	✓ (Bribery)	✓ (Customs Offenses)
Preventive Measures	✓	✓	✓	✓	✓
Corruption/ Bribery	✓	✓	✓	✓	✓ Customs Integrity (Revised Arusha Declaration)
AML Measures Confiscation of Dirty Funds Asset Recovery	✓	✓	✓	✓	✓ (WCO AML/CTF Programme; FATF Cooperation)
Joint Investigations	✓	✓	✓	✓ (OECD WGB 2021 Recommendation)	✓ Nairobi Convention Customs Mutual Assistance Agreements (CMAAs)
Training, Technical Assistance, Capacity-Building	✓ (UNODC)	✓ (UNODC)	✓ (FSRBs)	✓ (OECD)	✓ (WCO)
Public-Private Partnerships	✓ (UNODC)	✓ (UNODC)	✓ (Egmont Group)	✓ (BIAC)	✓ (WCO)
Conferences, Dialogues, Projects	✓ (UNODC)	✓ (UNODC)	✓ (FATF/FSRBs /Egmont)	✓ (OECD)	✓ (WCO)

The FCTC ITP has strong language, provisions, and measures to counter illicit trade and illegal tobacco products. However, as outlined in Section IV of this White Paper, it has lacked the expertise, energies, and resources to truly make the protocol a tool for international cooperation to seriously combat illicit tobacco and related criminalities.

Addressing this gap may require access to relevant non-government expertise or data. Where such input is needed, engagement should be authority-led, transparent, purpose-limited, documented and subject to applicable conflict-of-interest safeguards and government oversight, as laid out in Article 4.2 of the ITP.

This need for transparent, expertise-led engagement is particularly evident in the implementation of tracking and tracing. While the FCTC ITP clearly defines the information required for tracking and tracing purposes, it has not endorsed for tobacco traceability the same interoperable, standards-based principles that WHO promotes in the pharmaceutical sector, including approaches linked to GS1 standards and verification models such as TRVST. This gap has created confusion among Parties, encouraged fragmented national solutions and vendor-led models that are not fit for purpose, and weakened the prospects for interoperability and effective use of the Global Information-Sharing Focal Point.

Other international organisations, including INTERPOL, OECD, WCO and UNODC, have developed dynamic public-private partnership models that strengthen anti-illicit trade, anti-crime and anti-corruption frameworks while preserving appropriate safeguards against conflicts of interest.



Established international cooperation models demonstrate that effective cross-border enforcement requires standing operational mechanisms rather than ad hoc exchanges following individual seizures.

These mechanisms include designated national focal points, secure information-sharing channels, standardized data, joint risk assessments, coordinated investigations, technical assistance, and procedures for tracing criminal proceeds across jurisdictions.

Article 24 can build on these existing practices without creating duplicative institutional structures.

As illustrated in Table 1, relevant models include WCO customs information exchange, FATF risk assessment, UNTOC and UNCAC mechanisms for mutual legal assistance and joint investigations, and OECD approaches to implementation guidance, peer learning, and capacity building. Adapting these practices to illicit-tobacco enforcement would help Parties exchange actionable intelligence, coordinate investigations, and obtain specialized assistance more effectively.

Building on these international models, Article 24 cooperation should connect information exchange with measurable enforcement outcomes, including coordinated customs operations, joint investigations, mutual legal assistance, financial investigations, beneficial-ownership inquiries, asset recovery, and prosecution support.

Applying these measures and practices would help transform Article 24 from a broad cooperation commitment into a practical mechanism for illicit tobacco enforcement and for disrupting illicit-tobacco supply chains, facilitators, financial flows, and transnational criminal networks.

There is much that the Article 24 Working Group can learn from other international organizations through technical assistance, drawing out the practical lessons from each model, that can strengthen its enforcement and compliance mechanism by adopting successful strategies, for example, as illustrated in the ensuing next chart:

INTERNATIONAL COOPERATION FRAMEWORKS	PRACTICAL MEASURES AND TECHNICAL ASSISTANCE
OECD Working Party on Countering Illicit Trade (WP-CIT)	• Work on Cross-Border Illicit Markets • Conduct Anti-Illicit Trade Country Reports • Develop Recommendation on Countering Illicit Trade and Promoting Transparency in Free Trade Zones • Examine Tax Evasion and Tax Leakage in High-Risk Sectors including Tobacco • Undertake Non-Counterfeit Illicit Products (NCIPs) dialogues • Promote Public-Private Partnerships
OECD Anti-Bribery Working Group	• Monitor and Evaluation of Criminalization of Bribery and OECD Anti-Bribery Convention • Peer Review and Implementation • Promote Standards and Guidelines on Corporate Compliance • Recommendations on Effective Legislative Reforms and Accountability • Global Engagement and Partnerships
World Customs Organization (WCO)	• Support Intelligence-sharing • Customs Mutual Assistance • Standardized Seizure Reporting • Share best practices on customs and trade fraud including smuggling and trafficking
FATF	• Implementation of Effective 40 Recommendations to combat money laundering and terrorist financing • Promote Information-sharing, cross-border investigations and Mutual Assessments • Peer Review; Compliance Processes; Enforcement
Egmont Group of Financial Intelligence Units (FIUs)	• Conduct FIU-to-FIU Financial Investigations • Secure Information-sharing between FIUs • Promote Joint Tactical Analysis and Case Studies • Capacity Building and Training
INTERPOL	• Operational coordination across jurisdictions • Points of Contact: National Central Bureaus • 24/7 Secure Networks • International Alerts / Notices • Cooperation Agreements with other Organizations
UNTOC/UNCAC	• Active measures to criminalize transnational organized crime, corruption, money laundering and other crimes • Mutual Legal Assistance; exchange of information • Cross-border Joint Investigations; Asset Recovery • Training and Technical Assistance

Through stronger net-centric, whole-of-community partnerships and smart global supply-chain solutions, the WHO can harness the ITP to disrupt and dismantle the webs of corruption and criminality in source, transit and demand markets related to the global illegal trade in tobacco products. This concern is reinforced by the European Court of Auditors' Special Report 23/2026 on combating illicit tobacco in the EU[37], which found that responses remain fragmented, coordination and intelligence sharing are weak, and initiatives lack sufficient operational direction.

In practice, when MOP and related platforms are dominated by public-health officials without sufficient participation from customs, tax, police, financial-intelligence and other enforcement specialists, they are less able to make progress on the practical initiatives needed to disrupt illicit markets, strengthen cross-border investigations and make Article 24 cooperation operational.

If one is to truly fight illicit trade successfully, law enforcement and other critical implementing agencies must be at the table in frank, deliberative discussions to better inform ITP Article 24 Working Group's future policies and actions.

The MOP5 in Armenia in 2027 presents an important opportunity to effectively combat the illegal tobacco trade globally, and to strengthen international cooperation to help all countries – across source, transit, and destination markets.

B. Interoperable Digital Traceability as an Enabling Enforcement Tool

Article 8 of the ITP mandates that Parties establish a comprehensive tracking and tracing (T&T) system to secure tobacco supply chains as an integral part of their national anti-illicit trade and investigative efforts of illegal tobacco products.[38] Specifically, the Article requires that each Party must ensure unique identification markings (such as codes or stamps) on all cigarette unit packets, packages and outer packaging, and use these markings for record-keeping and data accessibility and sharing.[39]

The Protocol's T&T provisions also call for "a global information-sharing focal point (GSP) located at the Convention Secretariat" of the FCTC and accessible to all Parties, enabling them to make enquiries and receive relevant information.[40]

Track and trace (T&T) systems are a valuable tool for enhancing supply chain visibility, but they are not a standalone solution to illicit trade. While they can identify diversion from legitimate manufacturing and distribution channels, they are inherently less effective against counterfeit production and wholly clandestine supply chains operating outside the legal system. To establish an effective Global Information-Sharing Focal Point (GISFP) and maximise the benefits of Article 8, Parties should prioritize fully digital, standards-based T&T systems that are interoperable across jurisdictions and capable of generating actionable supply-chain data for information exchange and enforcement.

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[37] Special report 23/2026: Combating the illicit trade in tobacco in the EU | European Court of Auditors. https://www.eca.europa.eu/en/publications/SR-2026-23
[38] WHO, ITP Protocol, Article 8. Framework Convention on Tobacco Control (FCTC). May 3, 2013. https://fctc.who.int/resources/publications/i/item/9789241505246.
[39] Ibid.
[40] Ibid.

Such systems must be supported by robust regulatory oversight, effective law enforcement and proper manufacturing controls.

Although the Protocol's objectives are clear, implementing Article 8 has faced practical challenges. Debates over industry influence have contributed to perceptions that implementation has been hindered despite the technology operating on principles comparable to those adopted in WHO-endorsed pharmaceutical traceability models. [41]

Interoperability remains a major limitation of Article 8 implementation, despite it being a central objective of the Protocol. Currently, few national T&T systems can exchange and use data seamlessly across borders, while many Parties continue to rely on paper-based tax stamps. Although these stamps support product authentication and revenue assurance, they do not provide the event capture, movement records, data exchange, or end-to-end supply-chain visibility required for effective tracking and tracing.

The European Union's T&T system, launched in 2019, demonstrates both the strengths and limitations of Article 8 implementation. It provides one of the world's most sophisticated systems for monitoring legal tobacco supply chains and offers significantly greater visibility than conventional tax stamps. However, the EU experience also confirms that T&T alone cannot address illicit manufacturing, counterfeiting or other criminal supply chains operating outside the regulated market. Even the most advanced T&T frameworks must therefore be complemented by strong enforcement, market surveillance, intelligence sharing, cross-border cooperation and controls over key manufacturing inputs.

The GISFP, launched by the WHO FCTC Secretariat in September 2023 as the interim information-sharing mechanism envisaged under Article 8, has the potential to become a cornerstone of international enforcement cooperation. However, 2025 progress reports indicate little evidence of meaningful operational use, with no reported utilisation statistics, qualitative outcomes or user feedback.[42] Progress appears to have been constrained by delays in the appointment of national administrators, contact points and related governance arrangements. As one of the Protocol's most underutilised cooperation mechanisms, the GISFP could become a key focus of future Article 24 discussions on practical measures to strengthen cross-border collaboration.

In this context, the Article 24 Working Group could examine proven interoperability models from other regulated sectors, including UNICEF's Traceability and Verification System (TRVST). [43]

Built on internationally recognized standards, including GS1, TRVST supports the verification and monitoring of medicines and vaccines and helps detect counterfeit, falsified and diverted products. Through the broader Verification and Traceability Initiative, WHO, UNICEF, the World Bank, the Gates Foundation and other partners have

[41] Allen William, Andrew Gallagher, Anna B Gilmore, Michael Eads. "Tracking and tracing the tobacco industry: potential tobacco industry influence over the EU's system for tobacco traceability and security features." September 22, 2019. Tobacco Control. e56–e62. doi:10.1136/tobaccocontrol-2019-055094. Epub 2019 Sep 22. PMID: 31543502; PMCID: PMC7799412.
[42] FCTC/MOP/4/6 Global information-sharing focal point (Article 8 of the Protocol) https://fctc.who.int/resources/publications/i/item/fctc-mop-4-6-global-information-sharing-focal-point-(article-8-of-the-protocol)
[43] UNICEF. "Traceability and Verification System (TRVST)". https://www.unicef.org/supply/traceability-and-verification-system-trvst.

promoted interoperable traceability approaches based on common standards and secure information exchange. [44]

TRVST provides a practical example of how standards-based digital infrastructure can facilitate verification, cross-border information sharing and supply chain transparency. Similar principles could be adapted for tobacco products to support serial number verification, product movement monitoring and enhanced international cooperation against illicit trade. The model offers a potential pathway for improving interoperability under the Protocol and could inform future recommendations to Parties and discussions at MOP5.

Ultimately, T&T systems should be viewed as an enabling enforcement tool rather than a complete solution to illicit trade.

Their effectiveness depends on interoperability, timely information sharing and integration with broader regulatory and enforcement frameworks.

As Parties consider the future evolution of Article 8 and Article 24 cooperation, greater attention should be given to fully digital, standards-based solutions and interoperability models such as TRVST that can strengthen international collaboration and improve the practical effectiveness of the Protocol.

VI. A Practical Article 24 Operating Framework: Considerations for Parties at MOP5

Article 24 should be treated as a transnational crime cooperation platform that connects health authorities with customs, police, tax administrations, financial intelligence units, prosecutors and relevant international organisations. Its purpose should be to convert fragmented information into coordinated prevention, investigation, prosecution and disruption.

1. Make information exchange operational.

Establish designated national focal points, secure channels, agreed minimum data fields, rapid corridor alerts, escalation procedures and regular multi-country risk assessments. Information exchange should be linked to defined operational triggers, including significant seizures, route changes, suspicious operators, diverted manufacturing inputs and emerging concealment methods.

2. Create an Article 24 assistance and capacity-building package.

Develop modular support covering customs risk analysis, financial investigation, beneficial-ownership checks, asset recovery, free-zone controls, intelligence analysis, evidence handling, prosecution support and the use of digital supply-chain data. Assistance should respond to assessed national needs and include measurable implementation outcomes.

[44] Carly Nel. "Verification and Traceability Initiative". December 7, 2021. Technet. https://www.technet-21.org/en/topics/programme-management/the-verification-and-traceability-initiative.

3. Follow the supply chain upstream.

Strengthen proportionate, risk-based cooperation on processed tobacco leaf, acetate tow, filters, cigarette paper, packaging materials and manufacturing machinery. Measures may include licensing or equivalent controls, supplier due diligence, legitimate-demand assessment, record keeping, targeted customs analysis and rapid cross-border alerts where diversion is suspected.

4. Connect Article 24, Article 8 and the GISFP.

Recommend interoperable, standards-based track-and-trace principles, including globally recognised identifiers and common data exchange standards. The Global Information-Sharing Focal Point should be supported by minimum datasets, clear user procedures, operational use cases and performance reporting. Pharmaceutical traceability models, including TRVST, should be presented as comparators whose principles may inform tobacco traceability rather than as systems to be copied without adaptation.

5. Structure responsible public-private cooperation.

Enable authority-led engagement with relevant non-government actors where it provides necessary technology, logistics, financial, standards or market intelligence. Safeguards should include transparency, documented purpose, conflict-of-interest controls, data protection, government decision-making authority and consistency with applicable Protocol and WHO FCTC provisions.

6. Measure disruption, not activity alone.

Track outcomes such as intelligence exchanges, coordinated and financial investigations, prosecutions supported, assets restrained or confiscated, illicit factories disrupted, diverted inputs intercepted and trafficking routes dismantled. Seizure volumes should remain an indicator, but not the sole measure of effectiveness.

The detailed HIT corridor recommendations below should serve as the operational application of this framework and should not repeat the general policy case already established in earlier sections.

Annex I

TOP 10 RECOMMENDATIONS FOR MOP5

Making Article 24 Operational:
Strengthening Assistance and Cooperation Against Illicit Tobacco Trade

#	Recommendation	Practical Action
1	**Strengthen national and international coordination**	Designate appropriate national focal points and strengthen links between customs, police, tax, financial intelligence, prosecutors, regulators and other relevant authorities, connecting them to regional and international cooperation channels.
2	**Make cross-border information exchange operational**	Establish secure channels, escalation procedures and a standardized corridor-alert mechanism so significant seizures, new concealment methods, suspicious importers or exporters, diverted manufacturing inputs and route changes generate timely alerts to relevant partners. Agree minimum seizure-data fields covering origin, destination and transit country; brand or product; quantity; transport mode; concealment method; importer and exporter; port or crossing; manufacturing inputs; associated commodities; and suspected financial methods.
3	**Pilot cooperation along priority illicit-trade corridors**	Select a small number of well-evidenced transnational illicit-tobacco corridors. For each, identify source, transit, enabling and destination jurisdictions; principal ports, border crossings, transportation modes, logistics nodes and relevant enforcement agencies. Conduct quarterly or semi-annual multi-country assessments using HIT-style mapping to track changes in routes, commodities, concealment techniques, logistics nodes and criminal facilitators. Prepare concise disruption packages setting out risk points, known routes, commodities, recent incidents, financial indicators, responsible agencies, intelligence gaps and recommended enforcement actions.
4	**Strengthen investigation and prosecution cooperation**	Make greater use of existing mechanisms for joint and coordinated investigations, mutual legal and administrative assistance, evidence exchange, prosecution support and cross-border asset recovery, drawing on established international models where appropriate.
5	**Follow the money as well as the product**	Establish a trigger requiring significant illicit-tobacco cases to prompt consideration of a parallel financial investigation, including financial-intelligence exchange, beneficial-ownership enquiries, suspicious payments, bulk cash, trade-based money laundering, informal value transfer, shell companies, asset tracing and recovery where legally appropriate.

6	**Strengthen risk-based controls over supply chains and manufacturing inputs**	Improve proportionate, risk-based cooperation on processed tobacco leaf, acetate tow and filters, cigarette paper, packaging materials and tobacco-product manufacturing machinery. Use licensing or equivalent controls, supplier due diligence, record keeping, legitimate-demand assessment, targeted customs analysis and rapid cross-border alerts to identify suspected diversion, while adapting measures to national circumstances.
7	**Connect tobacco enforcement with wider organised-crime intelligence**	Use multi-commodity information as an intelligence trigger where the same route, transporter, warehouse, company, facilitator, border point or financial channel appears in tobacco and other contraband cases. Flag such overlaps for cross-agency review while treating them as investigative leads rather than evidence of common criminal control.
8	**Strengthen maritime, container and enforcement capacity through existing networks**	Prioritize maritime and container intelligence exchange along high-risk port corridors, including pre-arrival information, manifests, consignee and shipper details, container routing, transshipment history, declaration anomalies and previous enforcement indicators. Work through established international and regional mechanisms to strengthen customs risk analysis, cargo controls, intelligence capabilities, technical assistance and training, treating ports as components of wider corridors and avoiding unnecessary duplication.
9	**Improve interoperability and use of digital supply-chain information**	Encourage interoperable, standards-based approaches to track and trace and cross-border data exchange, supported by globally recognised identifiers and common data standards. Lessons from other regulated sectors may be considered where appropriate and adapted to tobacco-specific requirements.
10	**Measure cooperation by enforcement outcomes**	Complement seizure statistics with indicators covering actionable intelligence exchanges, coordinated investigations, financial investigations initiated, prosecutions supported across borders, illicit manufacturing sites disrupted, diverted inputs intercepted, assets restrained or confiscated and trafficking routes disrupted or dismantled.

Cross-cutting implementation principle

Implementation should be authority-led, evidence-based, proportionate and consistent with applicable domestic law and Protocol obligations. ITP Article 4.2 should serve as the basis for structuring any engagement with relevant non-government actors. Where such expertise, technology, standards, logistics or market intelligence can support enforcement objectives, engagement should be transparent, purpose-limited, documented and subject to appropriate safeguards, conflict-of-interest controls, data protection and government decision-making authority.

Annex II

How the Hubs of Illicit Trade Project Can Assist the Work of ITP's Article 24 Working Group

The Hubs of Illicit Trade (HIT) Project

The following examples illustrate how the HIT framework can support implementation of Article 24 to effectively counter the illegal tobacco trade by identifying geographic risk zones, trafficking corridors, logistics nodes, source and transit jurisdictions, commodity convergence, and potential points for coordinated intervention.

These examples are intended as illustrative risk and cooperation assessments, not as allegations against particular commercial operators or infrastructure owners.

Case Study 1. India Northeast Corridor:
From Border Entry to Inland Distribution

HIT 3 Geographic Relationship

HIT 3 identifies India's northeastern border environment as a key illicit-trade system connecting the India–Myanmar Border Risk Zone, the Assam/Northeast Risk Zone, and inland transportation and distribution networks.

Illicit tobacco is an important component of this corridor. Foreign-origin cigarettes enter Northeast India through cross-border routes and are subsequently transported by road through Assam and other northeastern states. From these entry and consolidation points, shipments can move farther into India through major highway and commercial transportation networks.

The corridor therefore extends beyond the immediate border region. Northeast India serves as both an entry and a transit region, connecting the India–Myanmar border to inland markets via routes extending toward Bihar, Uttar Pradesh, Delhi, and other major population and distribution centers.

Illustrative HIT pathway:

India–Myanmar border → Northeast India → Assam transportation nodes → Bihar/Uttar Pradesh → Delhi and other domestic markets

Article 24 Relevance

This example demonstrates why international cooperation should span the entire trafficking corridor rather than focus on individual seizures. Intelligence obtained at the border may need to be combined with information from customs, police, transportation enforcement, financial investigators, and authorities in destination markets.

For the Article 24 Working Group, the HIT Project could help identify:

- source and transit jurisdictions;
- recurring border entry areas;
- inland transportation routes;
- logistics and storage nodes;
- destination markets;
- common concealment methods; and
- points where coordinated investigations could disrupt the network rather than merely seize individual consignments.

It also demonstrates the potential value of India–Myanmar and broader information exchange on regional customs and law enforcement regarding cigarette origins, brands, consignments, transporters, importers, financial flows, and recurring trafficking patterns.

Case Study 2. Major Commercial Port Infrastructure:
Distinguishing Documented Activity, Geographic Risk and Strategic Vulnerability.

This example should be presented with an explicit evidentiary caveat.

HIT 3's value includes assessing how major legitimate infrastructure intersects geographically with established illicit-trade risk zones. This does not imply that the infrastructure operator participates in or facilitates illicit trade.

The Adani port network provides a useful methodological example because its facilities intersect several HIT 3 Indian maritime risk environments. These include:

Facility	**HIT 3 Geographic Relationship**
Mundra	Gulf of Kutch Risk Zone / North-West Maritime Corridor
Mormugao	Goa Risk Zone / Western Maritime Corridor
Vizhinjam	Kerala–Lakshadweep Belt / Western Maritime Corridor
Kattupalli / Ennore	Chennai Hub / Eastern Maritime Corridor
Krishnapatnam / Gangavaram	Andhra Coast / Eastern Maritime Corridor
Dhamra / Gopalpur	Odisha Coast / Eastern Maritime Corridor
Haldia	West Bengal Risk Zone
Colombo CWIT	Sri Lanka maritime system / International connection to Indian HIT corridors

Mundra provides a documented example of the criminal exploitation of legitimate container infrastructure for a commodity other than tobacco. In September 2021, DRI detained two containers that had arrived at Mundra from Afghanistan via Bandar Abbas, Iran. The containers were declared as semi-processed talc stones; an examination led to the seizure of approximately 2,988 kg of heroin. Follow-up investigations extended to multiple Indian cities.

The illustrative corridor was:

Afghanistan → Bandar Abbas/Iran → Arabian Sea → Mundra/Gulf of Kutch → Indian inland distribution

This should not be presented as evidence implicating Adani or Mundra's operator. Rather, it demonstrates the broader HIT principle that criminal organizations may seek to exploit high-volume legitimate trade infrastructure.

The same caution applies to Colombo. The Colombo West International Terminal began operations in April 2025 and is designed for approximately 3.2 million TEUs, strengthening Colombo's role as a South Asian transshipment hub. Its relevance to HIT is therefore primarily strategic and geographic, unless specific enforcement evidence establishes illicit activity involving the terminal.

Article 24 Relevance

This example demonstrates an important analytical distinction for the Working Group:

Documented illicit activity ≠ geographic risk ≠ infrastructure vulnerability.

HIT can code and display these categories separately. Doing so allows governments to identify infrastructure that merits monitoring or enhanced customs cooperation without making unsupported claims about operators or facilities.

Case Study 3. Crime Convergence: Tobacco as One Commodity Within Larger Illicit Corridors

HIT 3's most important strategic contribution may be its ability to identify multi-commodity corridors.

For example, DRI's September 2024 enforcement reporting illustrates commodity convergence across India's northeastern illicit-trade environment. DRI documented foreign-origin cigarette seizures in Assam and Bihar alongside heroin near Shillong, methamphetamine tablets on the Assam–Agartala road, pangolin scales in Assam, and wildlife trafficking in Bihar. During the same month, DRI also reported multiple foreign-origin gold seizures across India's wider transportation system.[45]

Similarly, Pakistan Customs reported two enforcement operations in December 2025 in Quetta, highlighting the variety of illicit commodities moving through the same regional enforcement environment. In one operation, three containers traveling from Quetta to Punjab and Khyber Pakhtunkhwa were found carrying smuggled cigarettes, betel nuts, Indian medicines, Chinese salt, and auto parts. In a separate operation at the same location, authorities recovered 22.14 kg of suspected heroin concealed in a vehicle.[46]

These examples do not establish that the same criminal organization controls all of these commodities. They do, however, demonstrate why enforcement agencies should examine whether commodities share transportation infrastructure, concealment methods, facilitators, warehouses, financial mechanisms or border vulnerabilities.

Article 24 Relevance

This is where Article 24 can benefit significantly from cooperation with agencies whose principal mandate is not tobacco.

A customs narcotics investigation may identify a transporter relevant to cigarette smuggling. A financial intelligence unit may identify payments associated with several contraband commodities. An organized-crime investigation may reveal warehouses, freight forwarders, shell companies or corrupt facilitators that service multiple illicit markets.

HIT provides the analytical architecture for identifying these overlaps and generating leads for further investigation.

[45] Directorate of Revenue Intelligence (DRI). September 27, 2026. https://dri.nic.in/main/prelease?utm.
[46] Federal Board Revenue. "Customs Enforcement Quetta Seizes Narcotics, Smuggled Goods and Vehicles Worth Rs. 1.38 Billion." September 29, 2026. https://www.fbr.gov.pk/customs-enforcement-quetta-seizes-narcotics-smuggled-goods-and-vehicles-worth-rs-138-billion/174457?utm.

Case Study 4. From HIT Data to Article 24 Action: Proposed Operational Model

The preceding cases suggest a practical workflow through which HIT-type data could support Article 24.

HIT Function	Questions for Article 24	Potential Cooperation Response
Identify risk zone	Where is illicit tobacco activity concentrated?	Prioritize geographic areas
Identify risk points	Which ports, crossings, airports, warehouses or logistics nodes recur?	Target intelligence collection
Build corridor	How are individual risk points connected?	Coordinate authorities along the route
Identify source/transit/destination roles	Which jurisdictions participate in different stages?	Establish bilateral/multilateral information exchange
Overlay commodities	What other illicit goods use the same corridor?	Share intelligence across specialized agencies
Identify manufacturing inputs	Where do tobacco, acetate tow, paper, filters and equipment originate?	Supply-chain and customs cooperation
Overlay financial mechanisms	How are goods and proceeds financed?	FIU/FATF/Egmont-supported financial investigation
Identify logistics methods	Containers, trucks, drones, vessels, baggage or parcels?	Mode-specific enforcement
Map incidents/seizures	Are patterns recurring across jurisdictions?	Joint risk assessment/investigation
Identify intelligence gaps	What information is missing and who may possess it?	Targeted Article 24 information request
Prioritize disruption points	Where could intervention have the greatest network effect?	Coordinated enforcement operations
Track changes over time	Are routes adapting after enforcement?	Dynamic risk reassessment

Case Study 5. Financial Investigations, Criminal Asset Tracing, and International Cooperation: Operation Destabilise (United Kingdom and International Partners, 2024–2025)

Professional money laundering networks provide financial services to transnational organized crime groups by converting illicit proceeds into assets or payment mechanisms that can be transferred across jurisdictions. These networks may support narcotics trafficking, firearms smuggling, cybercrime, sanctions evasion, and other criminal activities. Their operations frequently involve cash couriers, cryptocurrency, financial intermediaries, commercial companies, and cross-border transactions.[47]

Operation Destabilise, led by the United Kingdom's National Crime Agency (NCA), provides a documented example of how financial investigations can expose and disrupt criminal organizations operating across several countries.

Operational case. In December 2024, the NCA publicly identified two Russian-speaking money laundering networks, known as Smart and TGR, that provided financial services to organized crime groups. Investigators found that the networks collected cash generated by criminal activities, including narcotics and firearms trafficking, and arranged corresponding cryptocurrency payments. This enabled criminal organizations to move value internationally without physically transporting the proceeds across borders.[48]

The investigation identified individuals coordinating criminal cash collections, cryptocurrency exchanges, and international financial transfers. The Smart network was associated with Ekaterina Zhdanova, Khadzi-Murat Magomedov, and Nikita Krasnov, while the TGR network was associated with George Rossi, Elena Chirkinyan, and Andrejs Bradens. The NCA also identified financial connections involving sanctioned entities and overseas commercial structures.[49]

Financial investigations and beneficial ownership. The investigation went beyond individual cash seizures to identify the coordinators, intermediaries, financial channels, and corporate entities supporting the laundering infrastructure.

In subsequent investigations, the NCA identified a connection between the TGR network and the acquisition of a controlling interest in Kyrgyzstan's Keremet Bank. The NCA reported that Altair Holding SA, a company linked to George Rossi, acquired a 75 percent stake in the bank in December 2024. Investigators connected the arrangement to suspected sanctions evasion and payments supporting Russian military-related activities.[50]

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[47] United Kingdom National Crime Agency. "Operation Destabilise: NCA Disrupts Multi-Billion Russian Money Laundering Networks with Links to Drugs, Ransomware and Espionage, Resulting in 84 Arrests." December 4, 2024. https://www.nationalcrimeagency.gov.uk/news/operation-destabilise-nca-disrupts-multi-billion-russian-money-laundering-networks-with-links-to-drugs-ransomware-and-espionage-resulting-in-84-arrests

[48] Ibid.

[49] United Kingdom National Crime Agency. "Operation Destabilise: NCA Exposes Billion-Dollar Money Laundering Network That Purchased Bank to Fund Russian War Effort." November 21, 2025. https://www.nationalcrimeagency.gov.uk/news/operation-destabilise-nca-exposes-billion-dollar-money-laundering-network-that-purchased-bank-to-fund-russian-war-effort.

[50] Ibid.

This aspect of the case demonstrates the importance of examining corporate ownership and control rather than focusing exclusively on the individuals physically handling criminal proceeds. Ownership information, transaction records, financial intermediaries, and cryptocurrency transfers can help investigators identify the higher-level beneficiaries and coordinators of illicit financial systems.

The case provides documented evidence of corporate ownership analysis. However, public reporting does not establish that every entity's ultimate beneficial owner was conclusively identified through a completed beneficial ownership investigation.

International cooperation and financial disruption. Operation Destabilise involved cooperation among the NCA, UK police forces, financial-sector partners, and international authorities, including agencies in the United States, Ireland, France, and the United Arab Emirates. U.S. sanctions against individuals and businesses associated with the networks complemented the criminal investigations and enforcement measures.[51]

The investigation also demonstrated how seizures can generate intelligence supporting broader financial investigations. Authorities used evidence concerning cash couriers and cryptocurrency transfers to identify financial coordinators, map laundering relationships, and disrupt the networks' access to legitimate financial systems.

By November 2025, the NCA reported 128 arrests and more than £25 million seized in cash and cryptocurrency in the United Kingdom. Intelligence generated through the operation also supported international partners in seizing approximately $24 million and more than €2.6 million.[52]

These figures concern reported seizures, not necessarily assets finally confiscated or returned following completed judicial recovery proceedings.

Relevance to Article 24. Operation Destabilize demonstrates how financial investigations can expose the broader infrastructure supporting transnational organized crime. By examining suspicious cash movements, cryptocurrency transactions, corporate ownership structures, and international financial intermediaries, investigators identified networks facilitating the movement and concealment of criminal proceeds. The case illustrates the value of coordinated financial intelligence and international law enforcement cooperation in disrupting criminal financial networks beyond the immediate seizure of illicit commodities.

Policy Implication. Parties could strengthen implementation of Article 24 by establishing procedures that automatically trigger parallel financial investigations after significant illicit tobacco seizures. These investigations should prioritize identifying the ultimate beneficiaries of criminal proceeds, tracing assets across jurisdictions, and pursuing appropriate freezing, confiscation, and recovery measures. Greater cooperation

[51] United Kingdom National Crime Agency. “Operation Destabilise: NCA Disrupts Multi-Billion Russian Money Laundering Networks with Links to Drugs, Ransomware and Espionage, Resulting in 84 Arrests.” December 4, 2024. https://www.nationalcrimeagency.gov.uk/news/operation-destabilise-nca-disrupts-multi-billion-russian-money-laundering-networks-with-links-to-drugs-ransomware-and-espionage-resulting-in-84-arrests

[52] United Kingdom National Crime Agency. “Operation Destabilise: NCA Exposes Billion-Dollar Money Laundering Network That Purchased Bank to Fund Russian War Effort.” November 21, 2025. https://www.nationalcrimeagency.gov.uk/news/operation-destabilise-nca-exposes-billion-dollar-money-laundering-network-that-purchased-bank-to-fund-russian-war-effort.

among financial intelligence units, customs authorities, prosecutors, and asset-recovery agencies could help ensure that enforcement actions target not only illicit shipments but also the financial structures sustaining transnational criminal organizations. Parties should also distinguish assets temporarily seized or frozen from those ultimately confiscated or recovered through legal proceedings.

Case Study 6. Portugal: MAOC-N and Transatlantic Maritime Cooperation

Operational context. The Maritime Analysis and Operations Centre – Narcotics (MAOC-N), headquartered in Lisbon, provides a multinational platform for coordinating intelligence and law-enforcement responses to maritime and aerial drug trafficking into Europe. Its nine participating countries are Portugal, Belgium, France, Germany, Ireland, Italy, the Netherlands, Spain, and the United Kingdom.

Documented operation. In November 2025, Portuguese authorities conducted Operation Renascer following intelligence supplied by MAOC-N concerning suspected maritime cocaine trafficking from South America toward Europe. The Portuguese Judicial Police coordinated an operation involving the Portuguese Navy, National Maritime Authority (AMN), and Air Force.[53]
The operation intercepted two fishing vessels approximately 1,000 nautical miles from Lisbon, seizing more than seven metric tons of cocaine and identifying ten foreign nationals aboard the vessels. Authorities reported that the vessels had departed South America and that the cocaine was believed to have been loaded offshore near Brazil.[54]
International cooperation included Brazil's Federal Police, the U.S. Drug Enforcement Administration, Joint Interagency Task Force West, and the United Kingdom's National Crime Agency. Intelligence received through MAOC-N supported a coordinated response involving multiple national authorities and maritime capabilities.[55]

Relevance to Article 24. Although the operation concerned narcotics rather than tobacco, it demonstrates an established model for cross-border intelligence exchange, coordinated maritime surveillance, and operational intervention along international trafficking corridors. The involvement of authorities from South America and Europe illustrates how source, transit, and destination jurisdictions, including maritime routes involving Free Zones, can cooperate to identify and intercept illicit shipments before they reach their intended markets.

For the Article 24 Working Group, the MAOC-N model offers lessons for coordinating customs, maritime, police, and intelligence authorities. Similar mechanisms could support tobacco-related maritime risk assessments, targeted cargo inspections, information exchange on suspicious vessels and shipments, and joint investigations where authorized.

Policy implication. Parties could explore using existing maritime cooperation platforms to develop intelligence-led enforcement arrangements for high-risk illicit-tobacco corridors. Rather than creating new structures, Article 24 cooperation could build on established national contact points, secure information-sharing procedures, and operational coordination mechanisms.

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[53]Portuguese Navy. Operação “Renascer”: Intercetadas duas embarcações de pesca com mais de sete mil quilos de droga. November 21,
2025. https://www.marinha.pt/pt/media-center/Noticias/Paginas/Operacao-Renascer-Intercetadas-duas-embarcacoes-de-pesca-com-mais-de-sete-mil-quilos-de-droga.aspx.
[54]Maritime Analysis and Operations Centre – Narcotics (MAOC-N). (2025, November 24). MAOC-N supports Portuguese maritime operation – 7 tonnes of cocaine seized. October 16,
2026. https://maoc.eu/maoc-n-supports-portuguese-maritime-operation-7-tonnes-of-cocaine-seized/.
[55] Ibid.

Case Study 7. Colombia: Strengthening Enforcement Capacity Through International Cooperation and Technical Assistance

Operational Context. Colombia's experience in combating transnational organized crime demonstrates the importance of sustained international cooperation, specialized law-enforcement capabilities, and coordinated enforcement across maritime ports and international logistics networks. Criminal organizations exploit legitimate commercial infrastructure to transport illicit commodities, making effective cargo inspections, intelligence sharing, and interagency coordination essential components of enforcement strategies.

Documented Case. Colombia has strengthened its maritime cargo-control capabilities through cooperation with the United Nations Office on Drugs and Crime (UNODC) and the World Customs Organization (WCO). In July 2019, the Colombian government signed a memorandum of understanding with UNODC to implement the Container Control Program (CCP). The initiative aimed to reduce transnational criminal organizations' exploitation of maritime containers through specialized training, improved cargo-risk analysis, and coordination among national enforcement agencies.[56]

The program was designed to strengthen existing port-control infrastructure while promoting regular training, operational planning, and information exchange. In 2021, the Colombian Ministry of Foreign Affairs reported that more than 700 Colombian officials had received port-control training during the program's initial implementation period. Authorities also highlighted the establishment of interagency coordination mechanisms supporting enforcement against narcotics trafficking and related criminal activities.[57]

Colombia's cooperation with UNODC and WCO continued to expand. According to the 2024 Passenger and Cargo Control Program (PCCP) Annual Report, four additional national cargo-control units were established at Colombian seaports, supplementing seven existing units. With eleven PCCP-supported national units, Colombia had the most such units worldwide at the time. This expansion reflected a sustained commitment to building institutional capacity and coordinating cargo enforcement.[58]

The PCCP, which integrated the Container Control Program and Airport Communication Project in 2024, provides specialized training and mentoring in cargo-risk profiling, intelligence-led targeting, and the identification of high-risk shipments. It also supports secure information exchange among participating enforcement units, enabling

[56] Ministry of Foreign Affairs of Colombia. "Colombia firma Memorando de Entendimiento con Naciones Unidas para la implementación del Programa Global de Control de Contenedores." July 8, 2019. https://cancilleria.gov.co/en/sala-de-prensa/noticias/colombia-firma-memorando-de-entendimiento-con-naciones-unidas-para-la-implementacion-del-programa-global-de-control-de-contenedores.

[57] Ministry of Foreign Affairs of Colombia. (2021). "Colombia renueva su compromiso con el Programa Global de Control de Contenedores." October 14, 2026. https://cancilleria.gov.co/sala-de-prensa/noticias/colombia-renueva-su-compromiso-con-el-programa-global-de-control-de-contenedores.

[58] United Nations Office on Drugs and Crime and World Customs Organization. (2025). "Passenger and Cargo Control Programme: Annual Report 2024," p. 25. October 13, 2026. https://www.unodc.org/documents/Container-control-programme/25-04-07_-_PCCP_Annual_Report_2024_EN_web.pdf.

authorities to identify suspicious cargo movements and coordinate operational responses.[59]

A further example of international technical assistance occurred in May 2025, when Colombian Navy, customs, and police personnel participated in specialized training at the Cartagena Container Terminal. Conducted under the Organization of American States' regional project Strengthening Cargo Security in the Americas – Phase II, the training involved instructors from Canada and Mexico and focused on practical inspection techniques for vessels and intermodal containers. The program was funded by Canada and supported cooperation among Colombian enforcement institutions and international partners.[60]

Relevance to Article 24. These initiatives primarily address narcotics trafficking and broader transnational organized crime. However, their institutional and operational approaches are directly relevant to international cooperation against illicit tobacco.

The Colombian experience illustrates how sustained technical assistance can strengthen national enforcement capacity through specialized training, permanent interagency units, intelligence-led cargo inspections, and international information exchange. It also demonstrates the value of combining international support with existing national institutions rather than relying exclusively on temporary operations.

For the Article 24 Working Group, these practices offer a model for assisting Parties that face resource constraints, limited inspection capabilities, or insufficient coordination among customs, police, tax authorities, and other enforcement agencies.

Similar arrangements could help identify suspicious tobacco shipments, diverted manufacturing inputs, and illicit supply-chain activities moving through maritime ports and international logistics corridors.

Policy Implication. Parties could develop Article 24 capacity-building programs that combine specialized customs training, risk-based cargo profiling, interagency coordination, secure intelligence exchange, and practical inspection exercises.

International assistance should prioritize sustainable national capabilities, including the establishment or strengthening of specialized cargo-control units, regular training, access to appropriate inspection technologies, and participation in regional enforcement networks.

The Colombian experience also suggests that capacity building should be evaluated through measurable institutional and operational indicators, including trained personnel, functioning interagency units, improved risk assessments, actionable intelligence exchanges, and coordinated investigations.

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[59] World Customs Organization. (n.d.). “UNODC–WCO Passenger and Cargo Control Programme (PCCP).” October 16, 2026. https://www.wcoomd.org/en/topics/enforcement-and-compliance/activities-and-programmes/unodc_wco_container_control_programme.aspx.

[60] Ministry of Foreign Affairs of Colombia. “OEA capacita a funcionarios colombianos en inspección intermodal de buques y contenedores.” October 16, 2026. . https://www.cancilleria.gov.co/en/node/30530.

Rather than creating separate mechanisms exclusively for illicit tobacco, Parties could adapt existing international customs and law-enforcement cooperation programs to address tobacco trafficking and related financial and logistical networks.



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