

Amber ALERT

The use of the clearnet and social media for the advertising and sale of fentanyl analogues

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Reference: 0556 - DICE

This Amber Alert is issued by the United Kingdom's National Crime Agency (NCA). It is based on assessed intelligence and warns of dangers and threats from serious organised criminality. It is devised with the aim of bringing about preventative or remedial action.

We recommend you use this Alert to complement existing knowledge and support ongoing improvements to your business processes and procedures.

The use of the clearnet¹ and social media for the advertising and sale of fentanyl analogues

Overview

Criminal groups and individuals are known to use social media platforms as well as the wider internet for example websites, forums, blogs, business to business portals etc to advertise and sell a wide range of drugs that are designated as illegal and graded for criminal law purposes as Class A, B and C Controlled drugs. This report focuses on the sale of Class A fentanyl analogues and considers the following:

- What are fentanyl analogues and why are they so dangerous?
 - i. Illicit use of fentanyl
 - ii. Why fentanyl analogues?
 - iii. The legal status of fentanyl analogues
 - iv. Impact on the UK by illicit fentanyl analogues
- The supply of fentanyl analogues online
 - i. Who can assist us and how can companies help?
 - ii. Keywords and known issues

What we would like you to do

The information is being shared by the NCA to help develop understanding of the threat posed by the clearnet advertising and sale of fentanyl analogues.

The National Crime Agency (NCA) is a national law enforcement agency which leads the UK's fight to cut serious and organised crime. The NCA Alerts process is the way in which we provide information to non-law enforcement bodies including the private sector to combat and disrupt serious crime. To help us to improve this service, we would welcome any feedback you have on both the Alert itself and the information provided to you. Please email all feedback to alerts@nca.x.gsi.gov.uk and include the reference '0556 – DICE' in the subject line.

¹ Relating to the general Internet accessed by conventional browsers. Does not include Tor or encrypted services.

INFORMATION REPORT

What are fentanyl analogues and why are they so dangerous?

Fentanyl analogues are synthetic opioids that are widely used as pain medication and in anaesthetics across health services all around the world including the UK. They are considered to be particularly effective as pain relief and prescribed generally for chronic pain conditions or palliative care. Medicinal fentanyl can only be prescribed by a suitably qualified and authorised health practitioner. Medicinal fentanyl comes in a range of forms such as patches which are worn on the arm, in lozenge, liquid and tablet forms.

Fentanyl analogues are a family of substances which vary in strength and how quickly they take affect or how long the effects last. Fentanyl is the 'parent' of the family with numerous other analogues in the tree, for example, carfentanil, methoxyacetylfentanyl, furanylfentanyl or remifentanil.

The strengths of fentanyl analogues differ significantly. Fentanyl itself is estimated to be approximately 50-100 times stronger than morphine. Acetylfentanyl is estimated to be approximately 15 times stronger, furanylfentanyl is estimated 20 times stronger than morphine. Carfentanil is estimated to be up to approximately 10,000 times stronger than morphine. For fentanyl analogues such as carfentanil there are no known human safe dosages as the substances are too potent for testing. It has been estimated that an amount of carfentanil about the size of a grain of salt is potentially a lethal dose for humans.

Illicit use of fentanyl

Whilst fentanyl analogues are legitimately used in medical fields the analogues have also been appropriated for use in illicit drugs across the world with extremely harmful effects. In the US in 2017 there were estimated to be approximately $30,000^2$ deaths attributed to fentanyl analogues whilst in the UK from December

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² www.dea.gov/press-releases/2018/11/02/dea-release-2018-national-drug-threat-assessment-0

2016 to July 2019 there are over 160^3 deaths known where illicit fentanyl has contributed to the deaths.

On-line sales of fentanyl analogues are often illicit preparations in which the fentanyl analogues are mixed with a 'bulking agent'. They then may be pressed in to tablets, sold as a powder or even as liquids or sprays. Fentanyl analogues are also commonly found as an additive to heroin to boost the overall potency. It is known that fentanyl patches, lozenges and tablet forms can be diverted from legitimate medical routes to be used illicitly.

Why fentanyl analogues?

In medical uses fentanyl analogues act as extremely effective painkillers for those with chronic pain problems. In this context, dosages are strictly controlled and carefully monitored so the patient will generally not receive the sudden euphoric 'high' that comes from the illicit use of opioids. However, as illicit preparations involving fentanyl analogues exceed safe medicinal levels they constitute a much higher risk of overdose for users.

The use of fentanyl powders in illicit drugs presents drug dealers with an opportunity to increase their profits. A drug dealer can replace a significant amount of the heroin in their street deals with a much smaller amount of fentanyl analogue, maintaining the overall potency of the deals and making up the difference in mass with bulking agent.

The problem with fentanyl tainted drugs is that dealers are not able to blend these relatively small amounts of potent fentanyl uniformly through their drug products so there is a high risk of drug users encountering randomly high concentrations of fentanyl or 'hot spots' in the mixtures that are liable to deliver fatal overdoses of opioids.

The legal status of fentanyl analogues

Within the United Kingdom fentanyl analogues are classified as Class A Controlled Drugs under the Misuse of Drugs Act 1971, which is the category reserved for illicit drugs that present the greatest threat to the life and wellbeing of users. Control is

³ Figures compiled by the NCA

either by individual chemical formula or by virtue of a generic control which was added in 1986 to the UK's Misuse of Drugs Act. This generic control has proved to be extremely effective in ensuring that the new 'designer' versions of fentanyl being encountered are already controlled as Class A drugs. The are some exceptions such as some precursors and some analogues that are of significantly lower potency.

In April 2019 the UK government considered the sale of 'illegal goods such as drugs...on the open internet' as one of their 'clearly defined' harms in the Online Harms White Paper.

Due to the extreme potencies of fentanyl analogues further guidelines have been drawn up for prosecutors by the Criminal Prosecution Service which outline the aggravating features of fentanyl supply and how they should be brought to the attention of the court to consider imposing higher sentencing tariffs.

Internationally, fentanyl analogues are scheduled under the 1971 UN Convention and the United States controls them under the Controlled Substances Act which also has a generic clause similar to the UK's.

Impact on the UK of illicit fentanyl analogues

As noted since December 2016 there have been over 160 deaths in the UK where fentanyl analogues are shown as present in toxicological reports. For a variety of reasons, not least the small levels in which fentanyl analogues may be present to have fatal consequences, it is judged as highly likely that the true numbers of deaths where fentanyl may be implicated is more than those recorded in official numbers.

It is assessed as highly likely that there have also been many non-fatal overdoses linked to fentanyl analogues across the UK which are impossible to quantify. It is also known that there have also been a number of suicides where the deceased has specifically chosen to seek out and use illicit fentanyl analogues for the purposes of self-harm.

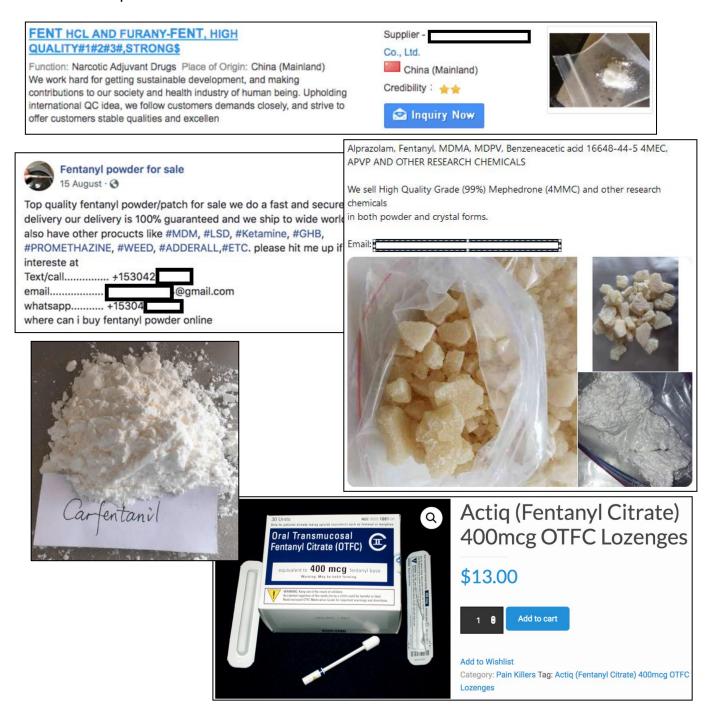
The presence of fentanyl analogues in drug supply chains poses particular challenges for law enforcement and others working in the frontline emergency services including paramedics, prison officers and also outside of emergency

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services, e.g. drug outreach teams. It is known that in the US, where the use of fentanyl analogues is far more widespread, officers have come to serious harm as a result of dealing with suspects who are in possession of fentanyl analogues.

The supply of fentanyl analogues online

Fentanyl powders as well as patches, pills and liquids are advertised across the clearnet on websites, business to business portals, social media platforms, forums and blogs. It is considered that many of those on the clearnet are fraudulent sites designed to entice purchasers in however it is likely that some of them are genuine sellers of fentanyl analogues. Websites can be based anywhere in the world and are often hosted and registered in different geographical areas. Sites and accounts will often also advertise a range of other chemicals and drugs alongside fentanyl. Some example adverts are shown below:



Who can assist us?

The following companies can assist us in our work:

- Those that provide online services that allow users to share or discover usergenerated content or interact with other users online. This includes social media organisations as well as owners/hosters of blogs and forum services
- companies that provide hosting or registration services for websites
- Companies that provide online portals for business to business sales (commonly known as B2B sites)

How can companies help us?

Companies can ensure that any content that they host, or enable hosting of, does not include advertisements for the sale of fentanyl analogues. Due to the variety and diversity of companies and platforms involved it is not possible for NCA to specify how companies should search and remove content however companies could potentially consider:

- Searching for content manually
- Setting up automated search processes to identify content
- Enable triggers or alerts on servers when keywords are input by a user
- The use of commercially available tools to identify sites using key terms

Consideration for your users

Organisations offering a commercial service require users to accept their terms and conditions of use. Those terms and conditions should make it a clear condition of use of the service is that their use will be subject to random or targeted screening to detect the advertising of fentanyl analogues.

The NCA has considered human rights under ECHR: interference with some of these rights, e.g. right to privacy, can be justified where that interference is in accordance with the law and is necessary in a democratic society, in this case for the prevention of disorder or crime and the protection of health. Where users have

consented to terms and conditions stating their use is subject to screening as stated above, they should not have a reasonable expectation of privacy.

Identified keywords and terms.

The NCA has identified the following words and phrases used in advertisements for fentanyl analogues. Companies are invited to use these or generate their own lists to search for content.

Table 1 contains known deliberate mis-spellings and shortened terms used to describe fentanyl analogues on the clearnet. Other synthetic opioids that are not fentanyl analogues but which have similar effects to fentanyl are also listed, e.g. U-47700. Please note the list is not exhaustive but an overview of commonly seen terms.

Table 2 contains UK brands of fentanyl products that are currently available.

Different brands may be available overseas. Table 3 shows generic terms or pseudonyms that are used to describe not only fentanyl but other drugs in general.

1. Name, slang terms and abbreviations (quotes indicate phrases)					
Fentanyl	Fent	fentanil	China white		
Fen-tanyl	Fentany	Fentalyn	Fentalin		
Fentanly	MAF	FUF	FU-F		
3FUF	4-FBF	"fent patches"	"fentanyl patches"		
		"fent patch"	"fentanyl patch"		
Carfentanil	carfent	carfen	Wildnil		
U-47700	U47700	U47	4ANPP		
U-48800	U48800	U48	4-ANPP		
U-49900	U49900	U49			

2. Current fentanyl brand names prescribed in the UK					
Actiq	Abstral	Duragesic	Fencino		
Fentalis	Instanyl	Matrifen	Mezolar		
Mylefent	Opiodur	Pecfent	Sublimaze		
Victanyl	Yemex				

3. Further generic terms that are often found in fentanyl listings (quotes indicate phrases)						
"research chemicals" "research chemical"	"research chems"	"plant food"	"pain pills"			
"pain patches"	"researchchemicals" "researchchemical"					

A list of fentanyl analogues is also shown at appendix 1 which companies may find useful.

Issues to consider

Companies are recommended to ensure that their chosen method of searching should cover all areas within web content, including meta data such as name and title fields, banners and free-text areas. Advertisers may hide the key terms in areas outside the generally searched name or title field in order to hide their posts. Keywords may also be included in comments below an article. For example, it has been noted that adverts can be posted in response to news articles on depression, pain management or self-harm related news stories.

Advertisers also may not have keywords at all in the webpages or hosted content but it may be included in images on the page. An example of this is shown on page. 7 where the term 'carfentanil' is shown within the image of the powder. To counter this, companies may wish to manually inspect images that are posted or hosted to their servers.

Advertisers will often use pseudonyms such as 'research chemicals' in their text and these terms will often be an indicator for drug related postings in general. The term 'research chemicals' is a particularly widely used pseudonym which companies are recommended to search for to cross-match with searches for the names shown in table 1. Searching for terms such as 'research chemicals' can help to counter some of the methods to hide content, such as hiding text in images discussed in the previous paragraph.

Appendix 1 – list of fentanyl analogues*

2,2'-difluorofentanyl	acetyl carfentanil	despropionyl 3-Methylfentanyl	norsufentanil
2-fluoro butyrfentanyl	acetylfentanyl	despropionyl ortho- Methylfentanyl	N-propyl carfentanil
2-fluorofentanyl	acetylnorfentanyl	fentanyl 4-N-propyl analogue	ocfentanil
2-furanylethyl fentanyl	acetyl-alpha-methylfentanyl	fentanyl isothiocyanate	ortho-methyl acetylfentanyl
2-isopropylfuranyl fentanyl	acrylfentanyl	meta-methyl acetylfentanyl	ortho-methyl acryl fentanyl
2-methoxy furanyl fentanyl	alpha-methylbutyryl fentanyl	meta-methylfentanyl	ortho-methyl methoxyacetyl fentanyl
2-methyl furanyl fentanyl	alpha-methylfentanyl	fentanyl N-oxide	para-chloroisobutyrfentanyl
3-allyl fentanyl	alpha-methylthiofentanyl	ortho-methyl acetylfentanyl	para-fluorofentanyl
3-fluoro butyrfentanyl	benzodioxole fentanyl	fentanyl propyl acetyl analogue	tetrahydrofuranylfentanyl
3-fluorofentanyl	benzoyl fentanyl	fentanyl propyl analogue	tetramethylcyclopropanefentanyl
3-furanyl fentanyl	benzoylbenzyl fentanyl	furanylfentanyl	thienyl fentanyl
3-methylbutyr fentanyl	benzylfentanyl	furanyl norfentanyl	2-thiofuranyl fentanyl
3-methylfentanyl	benzylfuranyl fentanyl	hydrocinnamoyl fentanyl	thiofentanyl
3-methylthiofentanyl	beta-hydroxy-3-methylfentanyl	isobutyrylfentanyl	trefentanil
3-phenylpropanoylfentanyl	beta-hydroxyfentanyl	isobutyryl-F-fentanyl N-benzyl analogue	valerylfentanyl
4'-methyl acetylfentanyl	beta-methyl fentanyl	lofentanil	beta-Hydroxythiofentanyl
4-chloro furanyl fentanyl	brifentanil	methoxyacetylfentanyl	omega-hydroxyfentanyl
4-fluorobutyrfentanyl	butyrfentanyl	mirfentanil	2-methylfentanyl
4-fluoroisobutyrfentanyl	butyryl norfentanyl	N-ethyl carfentanil	(2,3 or 4-Fl) (Butyryl or isobutyryl) fentanyl
4'-methoxy fentanyl	butyryl-F-fentanyl N-benzyl analogue	hexanoyl fentanyl	Carfentanil
4''-methoxy fentanyl	crotonyl fentanyl	N-isopropyl carfentanil	Benzodioxazole fentanyl
4-methoxybutyrfentanyl	cyclohexyl fentanyl	N-methyl carfentanil	Thiophenefentanyl
4-methoxyfuranyl fentanyl	cyclopentyl fentanyl	N-methyl norfentanyl	Alfentanyl
4-methoxymethyl fentanyl	cyclopropyl fentanyl	norcarfentanil	Remifentanyl
4-phenylfentanyl	despropionyl-2-fluorofentanyl	norfentanyl	Sufentanil

^{*}Not exhaustive. Spellings may differ on some sites and depending on location.

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- 1. Processed lawfully, fairly and in a transparent manner;
- 2. Collected for a specified, explicit and legitimate purpose and not further processed in a manner that's incompatible with these purposes;
- 3. Adequate, relevant and limited to what's necessary in relation to the purpose for which they are processed;
- 4. Accurate and where necessary kept up to date;
- 5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purpose for which the personal data are processed;
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NCA Alerts Team

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- a) the prevention or detection of crime,
- b) the apprehension or prosecution of offenders, or
- c) the assessment or collection of a tax or duty or an imposition of a similar nature,

to the extent that the application of those provisions of the GDPR would be likely to prejudice any of the matters mentioned in paragraphs (a) to (c).

(DPA 2018, Schedule 2, Part 1).

Any Section 7(1) information should be submitted to alerts@nca.x.gsi.gov.uk.

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