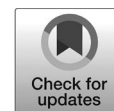# The Importance of an Early Warning System for Drug Policy in Mexico

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Drug markets are dynamic systems that often adapt quickly to demand, competition, or legislation (Krausz et al., 2021). Evidence of this is the adulteration of substances with highly harmful compounds like fentanyl (Palamar et al., 2020), the demand for New Psychoactive Substances (NPS) like 2C-B (Caudevilla-Gálligo et al., 2012), and the emergence of new marketing dynamics like the deep web (Schifano, 2020). While global actions have been implemented to control and regulate the illicit market, these have proven insufficient, leading to the need for transformative drug policies to provide timely and effective responses to this global phenomenon.

The rise of NPS as a means to evade regulation exemplifies how the market operates. NPS are defined as individual substances in pure form or complex preparations not covered by the Single Convention on Narcotic Drugs (1961) or the Convention on Psychotropic Substances (1971). Their ambiguous legal status, ability to evade toxicological tests, rapid adaptation to legal restrictions, global marketing on the internet and limited public knowledge of their adverse effects make them an additional threat to public health (Madras, 2016).

In response, the Global Synthetic Drugs Monitoring Program: Analysis, Reports, and Trends (SMART) was established, aiming to monitor trends in the presence and consumption of NPS and promote control measures (United Nations Office on Drugs and Crime [UNODC], 2008). To further consolidate the program and achievements, the UNODC Early Warning Advisory (EWA) on NPS was launched as a new international policy in 2013. The UNODC EWA is a global drug early warning system fed with information from the UN member countries and international organizations. Through two annual publications, it maintains up-to-date monitoring and gathers best practices in epidemiological surveillance and legislative changes (UNODC, 2014).

An Early Warning System (EWS) is a regional or national program shaped by a multidisciplinary and inter-institutional network of key stakeholders who generate, analyze and exchange information about NPS use, consumption practices, adulterants, or other substances to create public and scientific alerts regarding potential threats and risks to public health. Its primary objective is epidemiological, health, and security surveillance as well as monitoring NPS to provide fast and reliable information that benefits the design of public policies on demand reduction and supply control (Cooperation Program between Latin America, the Caribbean and the European Union on Drug Policies [COPOLAD], n.d.).

The EWS disseminate the emerging drug threats and public health-related risks by Drug Alerts, an evidence-based information bulletin or report, published on official platforms for immediate consultation. The process of creating a Drug Alert involves four stages:

1. Detection: finding an NPS or identifying a drug use related health risk through data from seizures, analysis of street drug samples, toxicological or forensic reports, or emergency services.
2. Characterization: analytical techniques provide data to accurately identify the substance, and toxicological tests validate possible cases of intoxication and harm.
3. Risk assessment: the EWS network analyzes data from the previous stages using scientific evidence and specialized knowledge to generate a clear message about the risks associated with the NPS or identified event.
4. Alert issuance: involves creating a document describing the characteristics of the NPS or identified event, as well as the risks and potential harms associated (COPOLAD, n.d.).

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Stages 3 and 4 are usually carried out through a Drug Information Observatory, a formal network of governmental agencies or international organizations that coordinates linkage, research, training and evidence generation related to substance consumption phenomena in countries or regions (COPOLAD, n.d.).

While international responses to this phenomenon emerged in the late 2000s, Europe had a drug policy for NPS surveillance since 1997. The Early Warning System for NPS of the European Monitoring Centre for Drugs and Drug Addiction (EMCDDA) issued the first drug alert for an NPS, MBDB, in 1998. Subsequently, in 2002 it identified and monitored PMMA, an NPS associated with deaths (EMCDDA, 2022). In 2014, this agency joined the UNODC EWA, notifying the presence of 101 NPS in the region, such as 25I-NBOMe and MDPV.

The variability of actors in this system's network is a key element for NPS and risk practices detection. The Trans-European Drug Information (TEDI) Network is a coalition of 13 civil society organizations in 11 different countries offering substance analysis services in high consumption areas. They use portable detection techniques to identify substance compositions circulating in streets and festivals (EMCDDA, 2021). Between 2009 and 2021, the UNODC EWA issued 26 reports and recorded a total of 381 unique substances (UNODC, 2022a; 2022b).

In 2011, the Inter-American Observatory on Drugs (OID, for its acronym in Spanish) was created in the Americas to monitor NPS through the Early Warning System of the Americas (known by its Spanish acronym, SATA). Since then, the implementation of a national early warning system has been promoted, resulting in four operational EWS: Argentina, Colombia, Chile, and Uruguay (Observatorio Interamericano sobre Drogas [OID] & Comisión Interamericana para el Control del Abuso de Drogas [CICAD], 2020).

Chile and Uruguay's EWS became operational in 2014, with notable achievements. Chile's EWS has filed annual reports highlighting synthetic cannabinoids and synthetic cathinones as the most prevalent NPS in the country (Fiscalía Ministerio Público de Chile 2020). Uruguay's EWS has published five drug alerts for the detection of powders and pills containing a mixture of stimulant substances, the identification of adulterants like levamisole in cocaine, and the presence of NPS in substances sold as LSD (Observatorio Uruguayo de Drogas, 2021).

Argentina and Colombia's EWS were established in 2016. Argentina's EWS has issued seven early alerts to notify the detection of cocaine adulterated with opioids and the identification of NPS like 2C-E, 25I-NBOME and DOI in samples where LSD was expected (Gobierno de Argentina, 2016). Colombia's EWS published 14 early alerts to report the adulteration of stimulant substances

with NPS, the emergence of 25I-NBOME, synthetic cathinones, and high concentrations of MDMA in pills (Ministerio de Justicia Colombia, n.d.).

Although the Americas have only four EWS, the region has 29 National Drug Observatories performing NPS surveillance functions. Furthermore, since 2019 Barbados, Brazil, Costa Rica, Jamaica, Mexico, Paraguay, Peru and El Salvador have initiated the process of establishing a national EWS (COPOLAD, n.d.). In Mexico, the National Observatory on Drugs and Mental Health has been operational since 2001. In 2011, an information system was developed to gather epidemiological data and evidence on drug use prevalence (Secretaría de Salud [SSA] & Comisión Nacional Contra las Adicciones [CONADIC], 2019).

Currently, tens of thousands of people die each year in North America due to the opioid epidemic and the presence of adulterants like fentanyl or other NPS that had been reported in Mexico in recent years (Fleiz et al., 2020). Thus, the immediate establishment of an efficient and reliable EWS in this subregion that allows timely response and permanent surveillance is imperative to prevent adverse events like intoxications or overdoses, as well as the emergence of substance-related mental disorders.

A Mexican EWS will be able to gather data of national drug use prevalence, patterns of NSP use and emerging drug threats. Therefore, the design of specific interventions based on information, in addition to promoting a proper risk perception of drug use and providing regular information will reduce unwanted health and social consequences. To achieve these objectives, the EWS's network of stakeholders should consist of committed governmental agencies, academic and scientific institutions, and civil society organizations capable of articulating and contributing elements in a timely and effective manner.

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