The Harms of Cocaine Trafficking in the Netherlands and Belgium: Policy Insights from Comparative Assessment

Letizia Paoli and Loes Kersten
University of Leuven Faculty of Law, Belgium

Victoria A. Greenfield
Department of Criminology, Law, and Society
George Mason University, United States

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Outline

- Policy context and questions
  - Approach to analysis
  - Findings
  - Policy insights
  - References
Policy context

• Law enforcement agencies worldwide prioritize cocaine (and other drug) trafficking
  – To reduce supply and, thus, consumption of drugs
  – Because of involvement of organized crime (OC) and related harms of violence, corruption, money laundering

• Literature suggests improbability of supply reduction
  – Policy bodies and scholars increasingly call for supply-oriented applications of harm reduction principles
Research questions

• What harms are associated with trafficking?
  – How severe and frequent are they?
  – What causes them?
  – Can we identify patterns across venues?

• Do harms of trafficking justify prioritization?
Outline

• Policy context and questions

➢ Approach to analysis

• Findings

• Policy insights

• References
## Comparison of two cases

<table>
<thead>
<tr>
<th></th>
<th>Belgium (BE)</th>
<th>The Netherlands (NL)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Market position</strong></td>
<td>Major entry point for EU</td>
<td>Major entry point for EU</td>
</tr>
<tr>
<td><strong>Sources of evidence</strong></td>
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<tr>
<td>Criminal proceedings</td>
<td>52</td>
<td>2003-2009</td>
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</tr>
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<td></td>
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<td>Organized crime database files</td>
<td>81 total; 42 additional</td>
<td>2006-2008</td>
</tr>
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<td>Official reports and statistics</td>
<td>Yes</td>
<td>Various</td>
</tr>
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<td></td>
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</tr>
<tr>
<td></td>
<td></td>
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</tr>
<tr>
<td>Interviews</td>
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<td></td>
</tr>
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<td>Law enforcement experts</td>
<td>15</td>
<td>2010-2011</td>
</tr>
<tr>
<td></td>
<td></td>
<td>28</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2011-2012</td>
</tr>
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<td>Imprisoned traffickers/dealers</td>
<td>12</td>
<td>2010-2011</td>
</tr>
<tr>
<td></td>
<td></td>
<td>13</td>
</tr>
<tr>
<td></td>
<td></td>
<td>2011-2012</td>
</tr>
<tr>
<td>Scientific literature and media reports</td>
<td>Yes</td>
<td>Various</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Various</td>
</tr>
</tbody>
</table>
Harm assessment framework

1. Construct business model

2. Identify possible harms and bearers (taxonomy)

3. Rate severity of harm (scale)

4. Evaluate severity and incidence of harm

5. Prioritize harms (matrix)

6. Rate incidence of criminal activity and of harm in relation to criminal activity (scale)

7. Establish causality of harm
Analysis considers harms within borders

R.O.W. (outside “egg”)

Export

Import

Wholesale distribution

Dealing

Use

Country
i.e., BE or NL (inside “egg”)

Money laundering, threat or use of violence, corruption

Sea, air, land

Chains:

- R.O.W.
- Wholesale distribution
- Dealing (retail)
- Use

Key:
- R.O.W. = Rest of world
- Not studied in NL or BE
Outline

• Policy context and questions
• Approach to analysis

➢ Findings

• Policy insights
• References
Working through harm assessment process

1. Identify possible harms and bearers (taxonomy)
2. Rate severity of harm (scale)
3. Evaluate severity and incidence of harm
4. Prioritize harms (matrix)
5. Rate incidence of criminal activity and of harm in relation to criminal activity (scale)
6. Establish causality of harm
7. Construct business model
Business models in BE and NL similar

- Imports far exceed consumption in both countries
- Cocaine enters mainly via air (Schiphol, Brussels) and sea (Rotterdam, Antwerp), using like tactics
- Trafficking over land occurs between NL and BE and to/from other markets, but open borders impede detection

- Data on wholesale distribution and export are sketchy, but NL plays greater distributional role, with more exchanges
- Little evidence of government corruption in either country, but facilitation occurs in logistics sector
- Revenues largely smuggled or stashed, but some laundering occurs through businesses and investment

- Limited violence in both countries, but violence in NL might be somewhat greater than in BE
NL is “hub” not just entry point

• Large shipments entering BE and NL are cut and repackaged in NL for further distribution throughout Europe

• Several NL-based traffickers orchestrate shipments along entire supply chain
  – Have origin in and/or links to former Dutch colonies in Central America
  – Represent Colombian organizations
  – Maintain high-level intercontinental contacts
Evidence of violence in NL

- Criminal proceedings provide evidence of violence/threats in NL, mostly among traffickers
  - E.g., planned murder, blackmailing, rip-deals, kidnapping
  - Seizures of weapons or armored cars
- Experts confirm picture and add some cases of fatal violence and of fatal accidents (7 in last 10 years) in NL
- Convicted traffickers also indicate use of violence
  - Six of 13 were victims/offenders of serious violence, 2 witnesses
  - One trafficker convicted of murder in cocaine conflict
- WODC monitor indicates average of 10 drug-related (non-specific, incl. users) violent deaths/year in 1992-2009
Working through harm assessment process

- Identify possible harms and bearers (taxonomy)
- Rate severity of harm (scale)
- Evaluate severity and incidence of harm
- Prioritize harms (matrix)
- Rate incidence of criminal activity and of harm in relation to criminal activity (scale)
- Establish causality of harm
Taxonomy delineates types and bearers

<table>
<thead>
<tr>
<th>TYPE OF HARM</th>
<th>Individuals</th>
<th>Private-Sector Entities</th>
<th>Government Entities</th>
<th>Environment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Functional integrity</td>
<td>X*</td>
<td>X**</td>
<td>X**</td>
<td>X***</td>
</tr>
<tr>
<td>Material interests</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>n/a</td>
</tr>
<tr>
<td>Reputation</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>n/a</td>
</tr>
<tr>
<td>Privacy</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>n/a</td>
</tr>
</tbody>
</table>

**SOURCE:** Authors (2013) drawing from von Hirsch and Jareborg (1991) and others.

**NOTES:** X = applicable; n/a = not applicable;

* Functional integrity = Physical and psychological integrity;

** Functional integrity = Operational integrity;

*** Functional integrity = Physical, operational, and aesthetic integrity
Possible harms span individuals, entities, and interests

<table>
<thead>
<tr>
<th></th>
<th>Trafficking</th>
<th>Money laundering</th>
<th>Corruption</th>
<th>Violence</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Functional integrity</strong></td>
<td>Ind (LL) PVT</td>
<td>PVT* GVT (NL only)</td>
<td>PVT GVT</td>
<td>Ind (LL)</td>
</tr>
<tr>
<td><strong>Material interests</strong></td>
<td>Ind PVT GVT</td>
<td>PVT (NL only)</td>
<td>PVT GVT</td>
<td>Ind GVT</td>
</tr>
<tr>
<td><strong>Reputation</strong></td>
<td>Ind PVT GVT</td>
<td>PVT* GVT</td>
<td>PVT GVT</td>
<td>Ind GVT</td>
</tr>
<tr>
<td><strong>“Privacy”</strong></td>
<td>Ind PVT GVT</td>
<td>GVT (NL only)</td>
<td>PVT GVT</td>
<td>n/a</td>
</tr>
</tbody>
</table>

NOTES: Ind = Individual; LL = including loss of life; PVT = private sector; GVT = Government; NL = Netherlands; n/a = not applicable.

*Omitted from our prior (published) analysis of cocaine trafficking in Belgium.
Working through harm assessment process

1. Construct business model
2. Identify possible harms and bearers (taxonomy)
   - Rate severity of harm (scale)
3. Evaluate severity and incidence of harm
4. Prioritize harms (matrix)
5. Rate incidence of criminal activity and of harm in relation to criminal activity (scale)
6. Establish causality of harm
## Common benchmarks gauge severity

<table>
<thead>
<tr>
<th>SEVERITY RATING</th>
<th>Level of <strong>individual’s living standard</strong> at which damage occurs</th>
<th>Level of <strong>entity’s mission capability</strong> at which damage occurs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Catastrophic</td>
<td>1°: Subsistence, consisting of survival, but with maintenance of no more than elementary capacities to function</td>
<td>1°: Viability, consisting of survival, but with maintenance of no more than elementary capacities to function</td>
</tr>
<tr>
<td>Grave</td>
<td>2°: Minimal standard of living</td>
<td>2°: Minimal mission capabilities</td>
</tr>
<tr>
<td>Serious</td>
<td>3°: Adequate standard of living</td>
<td>3°: Adequate mission capabilities</td>
</tr>
<tr>
<td>Moderate</td>
<td>4°: Enhanced standard of living</td>
<td>4°: Enhanced mission capabilities</td>
</tr>
<tr>
<td>Marginal</td>
<td>Negligible or no effect at any level</td>
<td>Negligible or no effect at any level</td>
</tr>
</tbody>
</table>

Incidence provides grounding for prioritizing harms

Matrix of severity, incidence, and priorities

<table>
<thead>
<tr>
<th>SEVERITY</th>
<th>Continuously</th>
<th>Persistently</th>
<th>Occasionally</th>
<th>Seldom</th>
<th>Rarely</th>
</tr>
</thead>
<tbody>
<tr>
<td>Catastrophic</td>
<td>VH</td>
<td>H</td>
<td>H</td>
<td>H/M</td>
<td>M/H</td>
</tr>
<tr>
<td>Grave</td>
<td>H</td>
<td>H</td>
<td>H/M</td>
<td>M/H</td>
<td>M</td>
</tr>
<tr>
<td>Serious</td>
<td>H</td>
<td>H/M</td>
<td>M/H</td>
<td>M</td>
<td>L</td>
</tr>
<tr>
<td>Moderate</td>
<td>H/M</td>
<td>M/H</td>
<td>M</td>
<td>L</td>
<td>L</td>
</tr>
<tr>
<td>Marginal</td>
<td>M/H</td>
<td>M</td>
<td>L</td>
<td>L</td>
<td>L</td>
</tr>
</tbody>
</table>

NOTES: VH = very high; H = high; M = medium; L = Low priority.

Cocaine trafficking persistent in BE and NL (daily, weekly)
### Actual harms to individuals similar in NL & BE*

<table>
<thead>
<tr>
<th>Functional integrity</th>
<th>Severity</th>
<th>Incidence**</th>
<th>Priority</th>
<th>Activity</th>
</tr>
</thead>
</table>
| Loss of life         | Catastrophic | Rarely | H/M | - Trafficking (i.e., fatal injuries to body packers)  
- Trafficking (i.e., fatal accidents) *(NL only)*  
- Violence in trafficking (e.g., murder) *(NL only)* |
| Grave               | Rarely | M | " | - Trafficking (i.e., non-fatal injuries to body packers)  
- Violence in trafficking (e.g., assault) |
| Serious             | Rarely | L | " | " |
| Moderate            | Seldom (NL)  
Rarely (BE) | L | " | " |
| Marginal            | Occasionally (NL)  
Rarely to seldom (BE) | L | - Violence in trafficking (e.g., petty assault) |
| Marginal            | Rarely | L | - Trafficking (i.e., non-fatal injuries to body packers) |
| Only psychological  | Marginal | Occasionally | L | - Trafficking (i.e., non-fatal injuries to body packers)  
- Violence in trafficking (e.g., intimidation) |
| Reputation          | Moderate | See above*** | L | - Violence in trafficking (e.g., assault) |
|                     | Marginal | See above*** | L | - Violence in trafficking (e.g., petty assault, intimidation) |

*Estimates exclude harms associated with cocaine dealing and use.

**Overall incidence, accounting for incidence of activities and of harms in relation to activities.

***Maps to incidence of episodes of violence.
## Actual harms to others similar in NL & BE*

<table>
<thead>
<tr>
<th>Category</th>
<th>Severity</th>
<th>Incidence**</th>
<th>Priority</th>
<th>Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>HARMS TO PRIVATE-SECTOR ENTITIES, specifically to their:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Functional integrity</td>
<td>Marginal</td>
<td>Occasionally</td>
<td>L&lt;sub&gt;PS&lt;/sub&gt;</td>
<td>- Corruption in trafficking</td>
</tr>
<tr>
<td></td>
<td>Marginal</td>
<td>Rarely</td>
<td>L&lt;sub&gt;PS&lt;/sub&gt;</td>
<td>- Money laundering (NL only)</td>
</tr>
<tr>
<td>Material interests</td>
<td>Marginal</td>
<td>Rarely</td>
<td>L&lt;sub&gt;PS&lt;/sub&gt;</td>
<td>- Money laundering (NL only)</td>
</tr>
<tr>
<td>Reputation</td>
<td>Marginal</td>
<td>Occasionally</td>
<td>L&lt;sub&gt;PS&lt;/sub&gt;</td>
<td>- Corruption in trafficking</td>
</tr>
<tr>
<td></td>
<td>Marginal</td>
<td>Rarely</td>
<td>L&lt;sub&gt;PS&lt;/sub&gt;</td>
<td>- Money laundering (NL only)</td>
</tr>
<tr>
<td>“Privacy”</td>
<td>Marginal</td>
<td>Occasionally</td>
<td>L&lt;sub&gt;PS&lt;/sub&gt;</td>
<td>- Corruption in trafficking</td>
</tr>
<tr>
<td><strong>HARMS TO GOVERNMENT ENTITIES, specifically to their:</strong></td>
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<td></td>
<td></td>
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<tr>
<td>Functional integrity</td>
<td>Marginal</td>
<td>Rarely</td>
<td>L&lt;sub&gt;G&lt;/sub&gt;</td>
<td>- Corruption in trafficking</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>- Money laundering (NL only)</td>
</tr>
<tr>
<td>Material interests</td>
<td>Moderate</td>
<td>See above***</td>
<td>L&lt;sub&gt;G&lt;/sub&gt;</td>
<td>- Trafficking and violence (i.e., medical treatment of fatal and non-fatal overdoses and assaults)</td>
</tr>
<tr>
<td></td>
<td>Marginal</td>
<td>See above***</td>
<td>L&lt;sub&gt;G&lt;/sub&gt;</td>
<td>- Violence (i.e., medical treatment of petty assaults)</td>
</tr>
<tr>
<td>Reputation</td>
<td>Marginal</td>
<td>Rarely</td>
<td>L&lt;sub&gt;G&lt;/sub&gt;</td>
<td>- Corruption in trafficking</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>- Money laundering (NL only)</td>
</tr>
<tr>
<td></td>
<td>Marginal</td>
<td>Persistently</td>
<td>M&lt;sub&gt;G&lt;/sub&gt;</td>
<td>- All criminal activities (i.e., non-enforcement effect)</td>
</tr>
</tbody>
</table>

*Estimates exclude harms associated with cocaine dealing and use.

**Overall incidence, accounting for incidence of activities and of harms in relation to activities.

***Maps to incidence of episodes of overdose and/or violence.
Working through harm assessment process

1. Rate severity of harm (scale)
2. Identify possible harms and bearers (taxonomy)
3. Evaluate severity and incidence of harm
4. Prioritize harms (matrix)
5. Rate incidence of criminal activity and of harm in relation to criminal activity (scale)
6. Establish causality of harm

Construct business model
Policy plays substantial role in non-use-related harms, other harms TBD

• Most non-use-related, direct harms arise from illegal status and specific enforcement practices
  – Harms associated with trafficking, violence, money laundering, and corruption studied in BE and NL
  – Harms of dealing studied only in BE

• Use-related harms are “remote” and to-be-determined
  – To what extent are they really caused by trafficking?
  – Some harms arise from properties of drug, but policy, modes of enforcement, etc. also play part
Summary of findings

• Harms of trafficking mostly “L,” with few exceptions, despite large flows* and OC involvement
  – Difference in role (hub and exchanges), might, speculatively, explain higher incidence of violence in NL, but
  – Not enough difference to yield higher priority rankings
• Harms appear to accrue largely in relation to risks and opportunities for compensation across venues
• Harms of trafficking mostly due to drug-control policy and law enforcement practices in both venues

*Use-related harms likely much larger, but they are “remote” and not assessed in this analysis
Outline

• Policy context and questions
• Approach to analysis
• Findings
  ➢ **Policy insights**
• References
Insights for policy

- Neither flows nor OC involvement constitute strong indicators of priority.
- Trafficking, *per se*, might not warrant prioritization on basis of non-use harm.
- If policy “works” by inserting compensable risk, then related harms might be unavoidable.

What are alternatives?
Outline

• Policy context and questions
• Approach to analysis
• Findings
• Policy insights

➢ References
References


• U.S. Department of the Army, Marine Corps, Navy, and Air Force, Risk management: Multiservice tactics, techniques, and procedures for risk management (FM3-100.12, MCRP 5-12.1c, NTTP 5-03.5, and AFTTP[I] 3-2.34), Air Land Sea Application Center, 2001.

Back up slides
As in BE, cocaine entering NL far exceeds consumption

• National Crime Squad (2004) estimates 4-5.4 tons of cocaine consumed annually in NL
• Seizures registered by Dutch police between 2000 and 2010 range from 6.4 tons in 2000 to 17.6 tons in 2003
• National Crime Squad (2004) suggests that 40-50 tons of cocaine enter NL each year
As in BE, cocaine enters NL mainly via air and sea routes

- 75% of seizures involve air route (WCO, 2004)
- 79% of quantities seized is transported by sea (WCO, 2012)
- Main entry points are Rotterdam Port and Schiphol airport
  - Antwerp port and Brussels airport are “pendants” in BE
- Much less known about land route and other ports, airports
  - Dutch police have little information on, smaller airports and ports, inland navigation, trafficking over land
  - Belgian data shows that considerable share of cocaine smuggled through Antwerp is meant for NL
Sea route NL: Rotterdam port

• Largest container port of Europe—11 million containers passed through in 2010

• Cocaine arrives on ships, mostly
  – In containers
  – “Hitchhiking” on legitimate ships
  – With cooperation of local port workers/crew of sea vessels

• Seizures range from few kilograms to several tons

• At least 14 cocaine ‘secondary extraction’ laboratories found in NL in 2005-2007
  – Three deaths since 2001 (no lab information for BE)
Air route NL: Schiphol airport

- Cocaine arrives mainly from Latin America and Caribbean
- Smuggling by passengers
  - 3,934 couriers arrested in 2007-2009 under ‘100% control policy’ of flights from Venezuela, Peru, etc. (2003+)
  - Cocaine is hidden in luggage, on/in body
    - At least five body-packers have died since 2008
    - In 2010, police spent work 2,200 hours in the hospital
  - 27 Schiphol employees arrested for complicity in 2007-2011
- Smuggling by cargo
  - Cocaine is sent in mail packages or hidden in containers
  - At least 46 episodes of involvement of Schiphol employees (e.g., baggage handlers) in cargo smuggling each year in 2007-11
As in BE, little corruption in NL government, but facilitation in logistics

- Proceedings, including additional bribery proceedings (2003-2007), expert interviews provide little evidence of drug-related government corruption
- Proceedings describe non-governmental facilitation
  - Crews of sea vessels
  - Employees of Schiphol airport
  - Employees of other transportation and dispatching companies
  - Lawyers and other professionals*
- Most traffickers report no experience with corruption
  - Four mentioned corruption in private sector and two in public sector

*One government employee (bookkeeper) also served as financial facilitator. See related point on financial facilitation and “money laundering.”
As in BE, money in NL often smuggled or stashed, but also laundered directly

- Large amounts of money smuggled to other countries
- Money that stays in NL is
  - Hidden as cash
  - Spent on luxury goods
  - Invested in real estate, (shell) companies, hotel/catering firms
- Employees hide origin of money in fake transactions
- Lawyers, notaries, accountants, and other professionals also serve, at times, as “financial facilitators”*

*One government employee (bookkeeper) also served as financial facilitator.
5-Step Risk Management Process

Step 1: Identify hazards and associated “bad consequences”
- Analyze mission → List hazards → List causes

Step 2: Assess hazards
- Assess severity
- Assess probability
- Determine risk level

Step 3: Develop controls and make risk decisions
- Develop controls, determine residual risk, and make risk decisions

Step 4: Implement controls
- Develop new controls

Step 5: Supervise and review

Source: Based on Greenfield and Camm (2005: 47), citing military doctrine.
### Possible harms, individuals (NL, BE)

<table>
<thead>
<tr>
<th></th>
<th>Traffic</th>
<th>Money laundering</th>
<th>Corruption</th>
<th>Violence</th>
<th>Bearers</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Functional integrity</strong> (Loss of life)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Body-packers and, in NL, other traffickers in cases of fatal injuries, fatal accidents (e.g., explosions of extraction labs), suicides or murders</td>
</tr>
<tr>
<td>X</td>
<td>n/a</td>
<td>n/a</td>
<td>X</td>
<td></td>
<td>Body-packers and other traffickers in cases of nonfatal injuries, other persons misused without consent</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Traffickers, facilitators, and government officials targeted by use or threat of violence</td>
</tr>
<tr>
<td><strong>Material interests</strong></td>
<td>X</td>
<td>n/a</td>
<td>n/a</td>
<td>X</td>
<td>Ancillary to functional harms (health)</td>
</tr>
<tr>
<td><strong>Reputation</strong></td>
<td>X</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>Persons misused without consent</td>
</tr>
<tr>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>X</td>
<td></td>
<td>Traffickers, facilitators and government officials targeted by use or threat of violence</td>
</tr>
<tr>
<td><strong>“Privacy”</strong></td>
<td>X</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
<td>Persons misused without consent</td>
</tr>
</tbody>
</table>
### Possible harms, private-sector entities (NL, BE)

<table>
<thead>
<tr>
<th></th>
<th>Traffic</th>
<th>Money laundering</th>
<th>Corruption</th>
<th>Violence</th>
<th>Bearers</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Functional integrity</strong></td>
<td>X</td>
<td>n/a</td>
<td>X</td>
<td>n/a</td>
<td>Transport/import businesses, e.g. if corrupt officials/employees or traffickers misuse assets</td>
</tr>
<tr>
<td></td>
<td>n/a</td>
<td>X*</td>
<td>n/a</td>
<td>n/a</td>
<td>Companies of lawyers and accountants facilitating money laundering</td>
</tr>
<tr>
<td><strong>Material interests</strong></td>
<td>X</td>
<td>X (NL only)</td>
<td>X</td>
<td>n/a</td>
<td>Ancillary to functional harms (property) and independent (e.g., property, wages associated with neglect of duties)</td>
</tr>
<tr>
<td><strong>Reputation</strong></td>
<td>X</td>
<td>n/a</td>
<td>X</td>
<td>n/a</td>
<td>Transport/import businesses, e.g. if corrupt officials/employees or traffickers misuse assets, even if businesses are unaware of exploitation</td>
</tr>
<tr>
<td></td>
<td>n/a</td>
<td>X*</td>
<td>n/a</td>
<td>n/a</td>
<td>Companies of lawyers and accountants facilitating money laundering</td>
</tr>
<tr>
<td><strong>“Privacy”</strong></td>
<td>X</td>
<td>n/a</td>
<td>X</td>
<td>n/a</td>
<td>Transport/import businesses, e.g. if corrupt officials/employees or traffickers misuse assets</td>
</tr>
</tbody>
</table>

*Omitted from our prior (published) analysis of cocaine trafficking in Belgium.*
## Possible harms, government (NL, BE)

<table>
<thead>
<tr>
<th></th>
<th>Traffic</th>
<th>Money laundering</th>
<th>Corruption</th>
<th>Violence</th>
<th>Bearers</th>
</tr>
</thead>
<tbody>
<tr>
<td>Functional integrity</td>
<td>n/a</td>
<td>X (NL only)</td>
<td>X</td>
<td>n/a</td>
<td>Government agencies, i.e., if officials/representatives engage in corrupt practices, incl. neglect of duties, and money laundering</td>
</tr>
<tr>
<td>Material interests</td>
<td>X</td>
<td>n/a</td>
<td>X</td>
<td>X*</td>
<td>Ancillary to functional harms (health) and independent (e.g., wages associated with neglect of duties)</td>
</tr>
<tr>
<td>Reputation</td>
<td>n/a</td>
<td>X (NL only)</td>
<td>X</td>
<td>n/a</td>
<td>Government agencies, i.e., if officials/representatives engage in corrupt practices, incl. neglect of duties, and money laundering</td>
</tr>
<tr>
<td>“Privacy”</td>
<td>n/a</td>
<td>X (NL only)</td>
<td>X</td>
<td>n/a</td>
<td>Government agencies, i.e., if officials/representatives engage in corrupt practices, incl. neglect of duties, and money laundering</td>
</tr>
</tbody>
</table>

*Omitted from our prior (published) analysis of cocaine trafficking in Belgium.
As in BE, cocaine trafficking in NL is persistent criminal activity

- National Crime Squad (2004) suggests that 40-50 tons of cocaine enters the Netherlands each year
  - 20+ tons of cocaine might enter and/or transit BE through Antwerp each year (U.S. State Department, 2006 and 2010)

- Trafficking is at least “persistent” given
  - Variability of shipment quantities (grams to tons)
  - Frequency of seizures, and
  - Market position of NL relative to BE