UKRAINE: Organized Crime Dynamics in the Context of War

Suggested Citation: UNODC, Ukraine: Organized Crime Dynamics in the Context of War, July 2025

Comments on the report are welcome and can be sent to: unodc-research@un.org

Table of contents

Introduction

Since the full-scale invasion of Ukraine by the Russian Federation in February 2022, the political economy of Ukraine has been profoundly transformed.[1] The aggression affected both licit and illicit trade routes, disrupted criminal organizations, and spawned new forms of informal and illicit exchange at the frontline and in the rear of the country. It has also led to the emergence of new challenges, such as the development of new skills and technologies that could be exploited by transnational organized crime.

This report aims to address the following overarching questions: how has the ongoing war against Ukraine affected organized crime and illicit markets in Ukraine, and what are the possible implications for the country, the region and the international community?

These questions are addressed through research into the following six areas:

- Organized crime structures and their evolution
- Drug supply and demand, including production and trafficking
- Online scams, and cyber and telephone fraud
- Arms trafficking
- Economic crime, including smuggling of cigarettes and custom fraud
- Trafficking in persons
- The facilitation of illegal exit and draft evasion

To address the overarching research question about the effects of the war on organized crime and illicit markets, the chapters compare data for the pre-war and post-invasion periods. The report covers the period of January 2021 to June 2024, with background data for 2019-2020 and preceding periods where available and relevant, used for contextualization. It is based on desk research and in-country fieldwork, with analysis of publicly available official statistics and secondary literature, court decisions and key informant interviews. Field data collection and analysis were conducted from December 2023 to June 2024 (see Annex A for more details).

The overall purpose of this research is to provide an evidence base to the government of Ukraine and national agencies involved in responding to organized crime, the United Nations (UN) and other international organizations, and other UN Member States, for countering crime-related challenges emerging out of the war against Ukraine. This research focuses on government-controlled parts of Ukraine. Consideration of alleged war crimes is outside the scope of this research.

---

[1] Resolution ES 11/7, UN General Assembly, adopted 24 February 2025, available at: https://docs.un.org/en/A/RES/ES-11/7.

Map 1   **Topographic map of Ukraine**

Map 1   Topographic map of Ukraine

The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.
Sources: UN Geospatial, Natural Earth

1

Organized crime in war time: adapting and seizing new opportunities

Key findings on the analysis of organized crime structures and their evolution

The full-scale invasion of Ukraine by the Russian Federation[2] resulted in a certain dispersion of traditional criminal organizations to outside the country and reduced illegal trade in 2022. Illicit activities increased in 2023, although not to the levels observed before the war.

The current picture of the criminal landscape in Ukraine is complex, with a variety of actors operating in different illegal markets. No single criminal organization dominates the scene.

Structured criminal organizations are primarily engaged in drug trafficking, particularly of synthetic drugs, and in the management of call centres to commit online and cyberfraud.

National institutions have remained active in combating organized crime with both legislative and criminal justice actions, leading to prosecutions and convictions. Traditional organized crime, such as the "thieves-in-law", has been particularly hit by the national response.

The Ukrainian organized criminal[3] "ecosystem" has been characterized as constituted by a number of different groups:[4]

1. professionally and traditionally organized criminal groups (including the so-called community of "thieves-in-law") and functional racketeering groups

2. businesspeople who accumulated their initial capital through the shadow economy

3. groups constructed from former official, vertically powerful ruling circles, and networks of people linked by personal or professional connections with the former Soviet Union special services

4. oligarchic clans organized in pyramidal structures, and

5. amorphous delocalized cyber criminals (individuals as well as groups).

The criminal scene seems to lack a single authority, or a common operative logic – in the words of one key informant, it is "anarchic".[5]

---

[2] Ibid.

[3] Ukrainian criminal law defines organized criminal groups similarly to the definition of "organized criminal group" in the UN Convention against Transnational Organized Crime, Art.2a. Organized groups are defined as consisting of three or more persons who have previously organized themselves for the purpose of committing one or more crimes and have a division of functions among the group members. A criminal organization, in contrast, is defined as a hierarchical group consisting of five or more people with division of criminal labour in the group and committing grave and especially grave crimes.

[4] Tetiana Melnychuk, "Organized Crime in Ukraine and Its Models in Transition", *Organized Crime as Institutional Cluster: Transition from Traditional to Informational Model in Ukraine*, Tetiana Melnychuk ed. (Cham: Springer Nature Switzerland, 2023), p. 41–96. Available at: https://doi.org/10.1007/978-3-031-39532-1_4.

[5] Interview with Key Informant (KI17) – see Annex A, March 2024.

The conflict in eastern Ukraine before 2022, and the full-scale invasion since 2022, have had a significant impact on the transformation of organized crime and transnational criminal networks and illicit activities in the country. However, this transformation has not been linear, affecting various groups, networks and illicit markets and flows in different ways.

According to the Ministry of Internal Affairs, about 45 per cent of crimes committed by organized crime groups involve trafficking in narcotics and psychoactive substances (see section 2).[6] This study documents the engagement of structured criminal organizations like *Khimprom* and *Dvadtsiativski* in the production and trafficking of synthetic drugs. This type of trafficking largely operates over the dark web (see section 2.5).

Criminal actors have seized new opportunities created by conflict, such as running call centres for the commission of online and telephone fraud[7] that also target forcibly displaced populations (see section 3). Structured criminal organizations, such as *Khimprom* and *Dniprovski*, are actively engaging in this type of criminal activity with large revenues.

Across the board, the war has threatened the interests of organized criminal actors and their capacity to profit from illicit economies. This has led some to emigrate and relocate their operations abroad. Since the outbreak of the war, cooperation between Russian and Ukrainian organized crime has reportedly reduced due to the political situation and the practical hurdle of smuggling across the frontline, which is characterized by active manoeuvre warfare.[8]

Additionally, the routes used by organized crime to move goods have been affected by the active frontline of some 1,200 kilometres.[9] According to an expert interviewed for this study, this has led to a shift in the location of the activities of criminal groups away from the frontlines, towards the western border.[10]

Groups involved in arms trafficking have reportedly moved to cities closer to the combat zones of Dnipro, Zaporizhzhia and Kryvyi Rih.[11] The activities of groups involved in drug trafficking or facilitating the illegal movement of people across the border have been concentrated in the western regions of the country due to the proximity to the border, the absence of checkpoints, which facilitates movement and transportation, and the "calm environment".[12]

---

[6] Ministry of Internal Affairs Letter to UNODC Regional Programme Office in Ukraine, 5 December 2023.

[7] Interview with Key Informant (KI21) – see Annex A, April 2024.

[8] GI-TOC, "New Front Lines: Organized Criminal Economies in Ukraine in 2022" Global Initiative Against Transnational Organized Crime (Geneva, Switzerland, February 2023), p. 16.

[9] The figure is according to Ukraine's Minister of Defence, for February 2024. Iryna Lysohor, "Umierov: liniia frontu v Ukraini narazi skladaie 3200 km, aktyvni boiovi dii – na 1200 km", LB.UA, 25 February 2024. Available at: https://lb.ua/society/2024/02/25/600245_umierov_liniya_frontu_ukraini_narazi.html

[10] Interview with Key Informant (KI8) – see Annex A, February 2024.

[11] Ibid.

[12] Ibid.

1.1. Overview of crime statistics

In the two years preceding the war, 2019–2021, a total of 30 verdicts were handed down in cases related to organized crime groups.[13] In 2022–2023, the number of sentences for the creation of criminal organizations decreased by 40 per cent compared to the previous period (2019–2021); but the number of sentences for participation in criminal organization[14] doubled to 42 over the two-year period.[15]

Chart 1. Number of convicted organized criminal groups (OCGs) and OCG participants in Ukraine, 2019–2023.
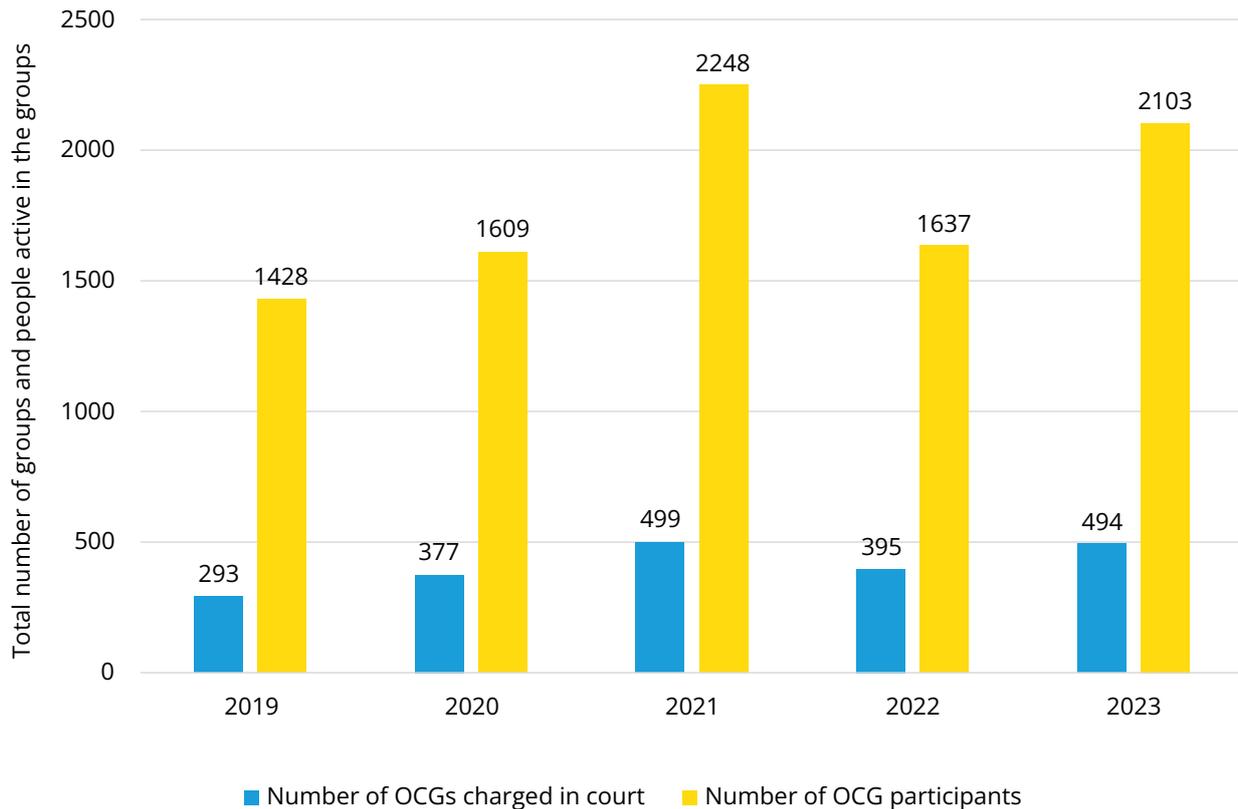
Source: Office of the Prosecutor General[16]

According to statistics provided by the Office of the Prosecutor General to UNODC,[17] the number of organized criminal groups charged in Ukrainian courts dipped in the first year of the full-scale invasion before returning to its 2021 level.

---

[13] All under Article 255, article 1. In 10 cases, defendants were released from punishment. Ukraine, Law 2341-III "Criminal Code of Ukraine", with amendments. Available at: https://zakon.rada.gov.ua/laws/show/2341-14#Text.

[14] Ukraine, Law 2341-III "Criminal Code of Ukraine", with amendments, Art. 28. Available at: https://zakon.rada.gov.ua/laws/show/2341-14#Text.

[15] Office of Prosecutor General of Ukraine, "Annual reports on registered criminal proceedings", 2013-2023. Available at: https://gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2.

[16] Letter of the Office of Prosecutor General of Ukraine to UNODC research team, 5 April 2024.

[17] Ibid.

From 2020 to 2023, the average size of charged groups remained relatively stable (between 4 and 5 people) and, until 2023, an average group had been charged with 8-9 offences. In 2023 the rate of offences per group doubled to over 16.[18]

1.2. Response to organized crime activity

Ukraine's public administration and institutions have remained functional throughout the war and the state remains an important actor in enforcing laws and addressing its obligations in combating transnational organized crime. The war has strengthened the incentive for central authorities to combat the forms of organized crime that undermine government revenues and affect the country's relations with its partners, including illicit economic flows, smuggling and illicit trade in goods.[19] The government has increasingly turned to executive sanctions[20] to undermine the influence of organized crime and to hit key actors.[21]

At the same time, the dependence of the central state on donor aid, grants and loans may have led to the prioritization of the fight against certain forms of organized crime, for instance illicit call centres targeting EU residents and Ukrainians abroad.[22]

The war has provided further powerful incentive for the security and intelligence sector to combat organized crime. National Police and the Security Service of Ukraine (SBU) have disrupted dozens of criminal organizations producing and trafficking drugs, including cross border trafficking attempts. Their pattern of arrests and seizures of arms suggests a certain level of capacity to conduct surveillance and disrupt criminal activities of various types.

Box 1. Targeting "thieves-in-law"

Since the Soviet era, thieves-in-law (*vory v zakoni*) have widely been considered the elite of the underworld,[23] playing the role of arbitrators in underworld conflicts and wielding considerable influence in the former Soviet Union space.[24] In Ukraine, they were established in Donetsk and in other regions, including Kyiv and Odesa.[25]

---

[18] Ibid.

[19] Volodymyr Artiukh and Taras Fedirko, "War and dependent state formation in Ukraine", article under review, prepared for *Focaal*.

[20] Ukraine, Presidential Decree, nr.203, 2021. Available at: https://www.president.gov.ua/documents/2032021-38949.

[21] Ukraine, Presidential Decree, nr.140, 2021. Available at: https://www.president.gov.ua/documents/1402021-38381.

[22] The parliament has launched a Temporary Investigative Commission to investigate the involvement of organized criminal groups in scam call centres. See: https://ips.ligazakon.net/document/DI09198A.

[23] Mark Galeotti, *The Vory: Russia's Super Mafia* (New Haven: Yale University Press, 2018).

[24] Gigi Tevzadze, "Thieves in Law: New Facts for the History of social Control", in *Die Idee der Freiheit in Philosophie und Sozialwissenschaften* (Benjamin Verlag, Amsterdam 2009). Available at: https://www.researchgate.net/publication/280068320_Thieves_in_Law_New_Facts_for_the_History_of_Social_Control.

[25] Interview with Key Informant (KI17) – see Annex A, March 2024.

The Ukrainian Parliament passed a special law against thieves-in-law in June 2020.[26] It introduced several new articles to the Criminal Code (255-1, 255-2, 255-3) to penalize the "establishment or expansion" of criminal influence or support to criminal influence.

In 2020, nine people were charged. In the following years, the number increased: 117 in 2021, 64 in 2022 and 106 in 2023.[27] According to the Ministry of Internal Affairs, the offences covered by the new articles of the Criminal Code accounted for the majority of these arrests.[28]

On the other hand, charging and convicting suspects under the new articles has been difficult.[29] From 2020 to 2023, there were few successful prosecutions (one court verdict in February 2022).[30]

To accelerate the process of fighting thieves-in-law and "criminal authorities", the National Security and Defence Council (NSDC) turned to the mechanism of executive sanctions. On 21 May 2021,[31] sanctions were imposed against 557 known thieves-in-law worldwide. Most of them, according to the Ministry of Internal Affairs, were not in Ukraine at that time. The same package of sanctions was also applied to a further 111 foreign individuals allegedly involved in organized criminal groups.[32]

After the start of the full-scale invasion, Ukrainian law enforcement has increased pressure on thieves-in-law and criminal authorities, following a pattern established over the previous three years. In 2022, after the introduction of martial law, the Strategic Investigations Department of the National Police was authorized to expel all persons who pose a threat to national security from Ukraine.[33] Some thieves and criminal authorities went abroad before or at the beginning of the invasion, but according to an interview subject, three high-ranking members of the criminal underworld returned to Ukraine in early 2023.[34]

---

[26] Ukraine, State Legislature, Law nr. 42, art. 343 of 2020. Available at: https://zakon.rada.gov.ua/laws/show/671-20#Text.

[27] Ministry of Internal Affairs Letter to UNODC Regional Programme Office in Ukraine, 5 December2023.

[28] Ibid.

[29] Interview with Key Informants (KI17) – see Annex A, March 2024.

[30] Office of Prosecutor General of Ukraine, "Annual reports on registered criminal proceedings", 2013-2023. Available at: https://gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2.

[31] Ukraine, Presidential Decree, nr.203, 2021. Available at: https://www.president.gov.ua/documents/2032021-38949.

[32] Ministry of Interior Affairs, "Zaiava MVS shchodo rishennia RNBO pro sanktsii vidnosno lideriv orhanizovanykh zlochynnykh uhrupovan", 14 May 2021. Available at: https://mvs.gov.ua/uk/press-center/news/zayava-mvs-shhodo-risennya-rnbo-pro-sankciyi-vidnosno-lideriv-organizovanix-zlocinnix-ugrupovan.

[33] Interview with Key Informant, (KI17) - see Annex A, March 2024.

[34] Interview with Key Informant (K18) – see Annex A, February 2024.

2

Drug trafficking: the rise of synthetic drugs and fall of heroin markets

Key findings on drug trafficking

The full-scale invasion was followed by an immediate drop in drug seizures in 2022, suggesting a reduction of drug trafficking due to closed borders and ports, a trend which can also be observed througout trafficking routes in the region. In 2023 the seizure numbers increased again, although not to the same levels as before the 2022.

The full-scale invasion also impacted the main geographical patterns of international drug trafficking into and through Ukraine. The activity decreased overall, moving from sea borders to the Western land borders.

Seizures of cocaine and heroin in Ukraine drastically decreased after the full-scale invasion when the ongoing transformation of the national drug market from opiates to synthetic drugs continued in line with the regional patterns recorded in other Eastern European countries. After the full-scale invasion, there was an increase in seizures of synthetic drugs in 2022 and 2023, in particular cathinones. The illicit production of synthetic methadone has been increasingly detected as well. The synthetic drugs market is dominated by large and structured criminal organizations expanding into other criminal activities.

The UNODC World Drug Report 2024 highlights the recent changing patterns in the whole Eastern European and Central Asian drugs market. The Report records the gradual shift from Afghan opiates towards synthetic drugs, and notably different types of cathinones.[35]

Ukraine is not an exception in this regional pattern, with sharp increases in seizures reported for various cathinones in 2022 and 2023, which are now the most seized amphetamine-type stimulants (ATS) in Ukraine.

At the same time, there was a large decline in heroin and cocaine seizures in 2022 and 2023 as compared to 2020 and 2021.

Data based on criminal proceedings showed largely similar patterns. In 2021, the volume of seized drugs and psychoactive substances in Ukraine associated with completed criminal proceedings amounted to 3,255 kg.[36]

---

[35] UNODC Research, "World Drugs Report 2024", UNODC, June 2024, page 36. Available at: https://www.unodc.org/documents/data-and-analysis/WDR_2024/WDR24_Key_findings_and_conclusions.pdf.

[36] Based on data for completed criminal proceedings which likely leads to exclusion from the annual figures of larger seizures in more complex cases that take longer to investigate. Office of Prosecutor General of Ukraine, "Annual reports on registered criminal proceedings", 2021-2023. Available at: https://gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2.

Seizures above 100g in Ukraine and neighboring countries, before the war (Nov 2019 – Feb 2022)
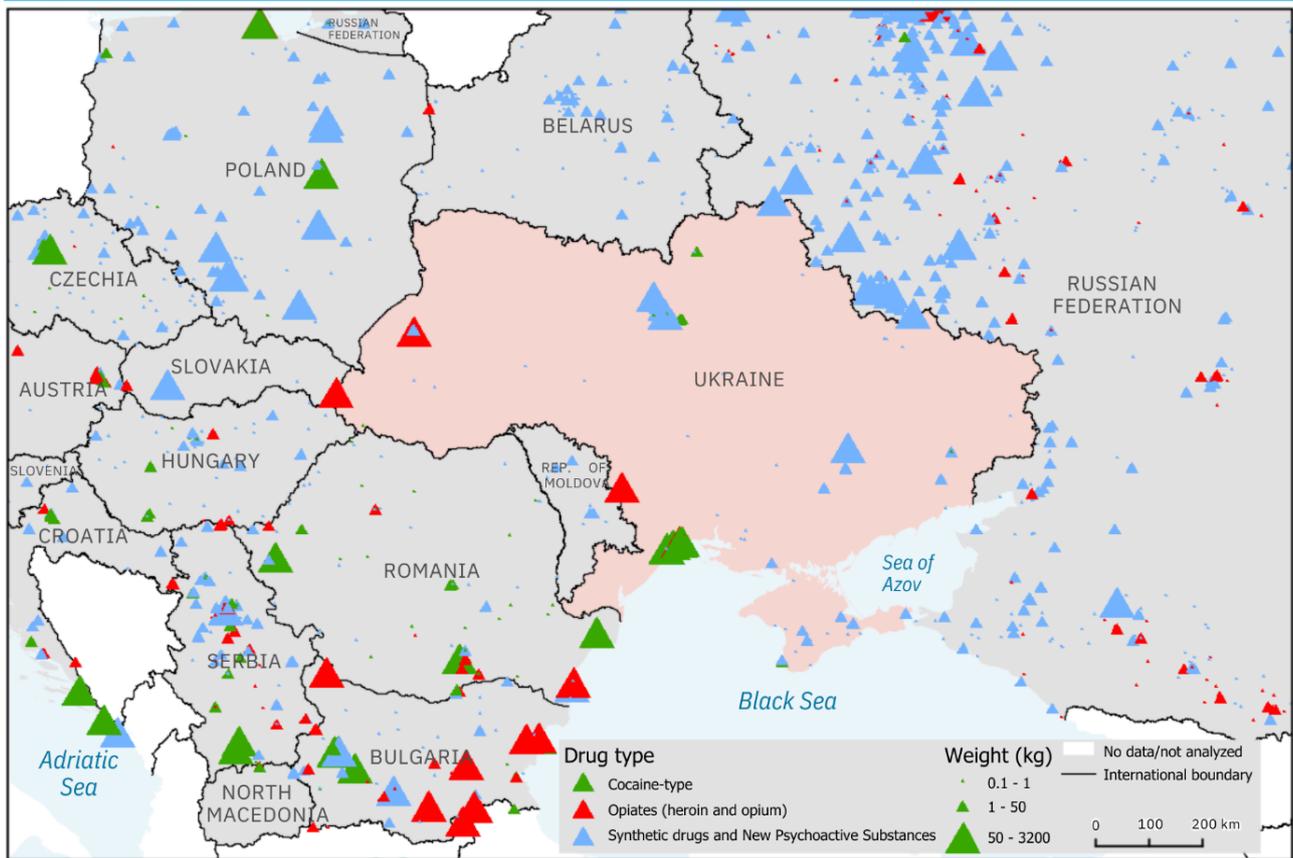
The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.
Source: UNODC Drug Monitoring Platform

Seizures above 100g in Ukraine and neighboring countries, after the start of the war March 2022 – May 2024)
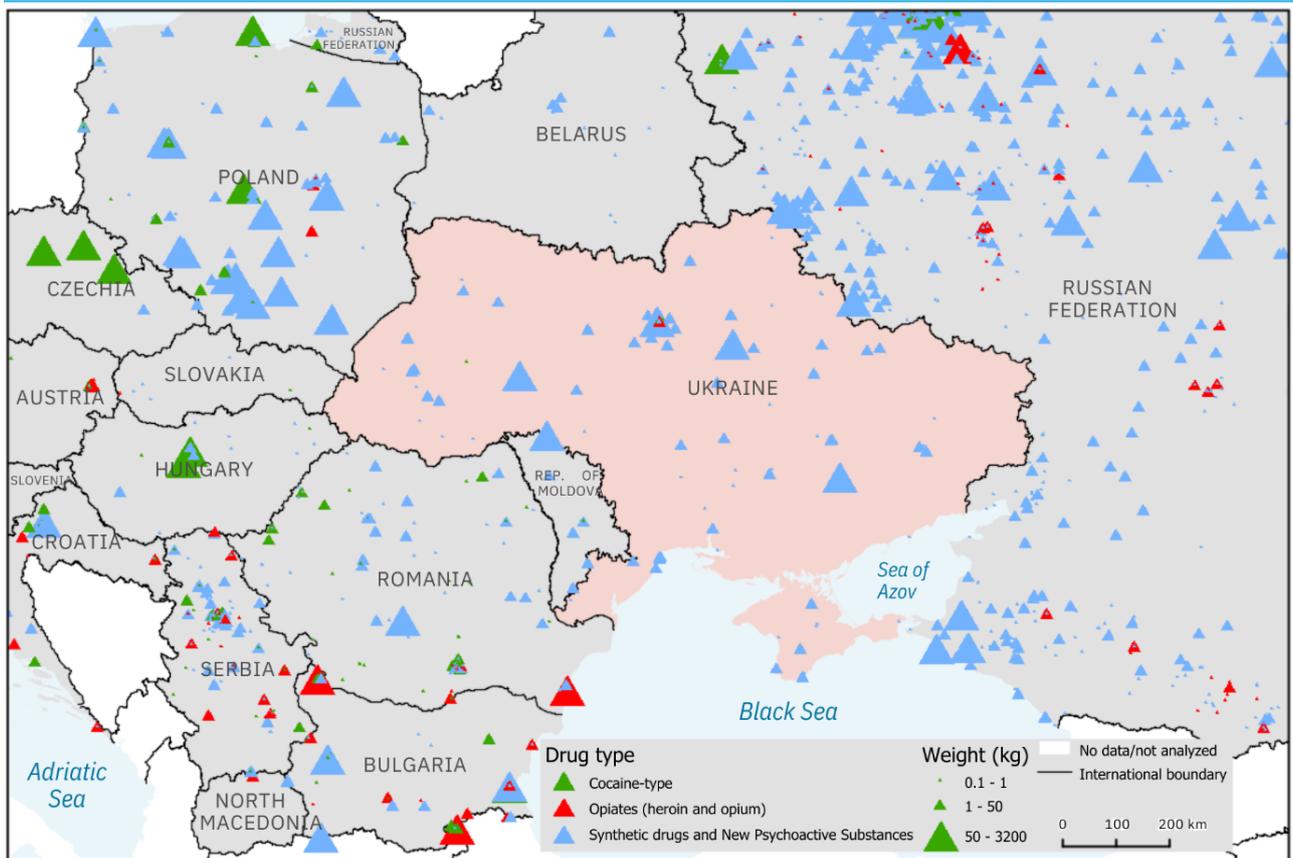
The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.
Source: UNODC Drug Monitoring Platform

16

In 2021 seizures were dominated by cannabis (64 per cent of all drug seizures), heroin (21.5 per cent) and cocaine (5.1 per cent). The total volume of seizures decreased by 16.3 per cent in 2022 compared to the previous year. Heroin has virtually disappeared from the list of seized drugs – law enforcement officers report that only 72 grams of the substance was seized in 2022. The amount of cocaine seized fell by 97.7 per cent.

In 2023, total seizures returned almost to pre-full-scale invasion (although by far not pre-pandemic) levels. Seizures of amphetamines increased by 36 per cent, which may be due to the increased dismantling of drug-producing laboratories and law enforcement renewed focus on the issue, increased checkpoints and security measures.[37]

2.1. Routes: relocation of trafficking

According to the Ukrainian authorities, before 2022, Ukraine was a major transit hub for drug trafficking, with several transnational routes passing through the country.[38] Ukraine has an attractive geographical location for drug trafficking with its common border with the EU, access to the Black and Azov Seas, and developed infrastructure of sea and airports. Ukraine served as a transit route for heroin of Afghan origin and cocaine from Latin America to be smuggled into the EU; for captagon to transit to and from the Middle East, and for cannabis resin from North Africa to pass from Western to Eastern Europe.[39] In 2021 the main points of entry for drugs into Ukraine were the Odesa port and Boryspil airport.[40]

The war has changed the situation, disrupting cross-border shipments through air and seaports, complicating land border logistics in the west and south, and severely disrupting cross-border flows to the east. In areas where territorial control has changed hands, Ukrainian state prevention efforts of the circulation of narcotics, psychotropic substances and precursors has ceased.[41]

Border seizure statistics provided by the Ukrainian authorities suggest that, to some extent, in war-time year 2022 compared to pandemic year 2021, cross-border flows might have increased particularly on the western borders with Poland, and with Moldova and the Transnistria region. Across the board, detections tended to grow faster in the last three months of 2022, suggesting a possible rebound of trafficking after the initial disruption.[42]

---

[37] Ibid.

[38] Ukraine, Report on Drug and Alcohol Situation in Ukraine for 2022 (based on data 2021), Ministry of Health, Institute of Psychiatry, Forensic Psychiatric Examination and Drug Monitoring (Kyiv, Ukraine, 2022), p. 49. Available at: https://cmhmda.org.ua/report/zvit-za-2022-rik/.

[39] Ukraine, Institute of Forensic Medicine, *National Report on the Drug Situation in Ukraine 2022*, Ministry of Health of Ukraine (Kyiv, Ukraine, 2022) p. 49. Available at: https://cmhmda.org.ua/report/zvit-za-2022-rik/.

[40] Ukraine, Report on Drug and Alcohol Situation in Ukraine for 2022 (based on 2021 data), Ministry of Health, Institute of Psychiatry, Forensic Psychiatric Examination and Drug Monitoring (Kyiv, Ukraine, 2022). Available at: https://cmhmda.org.ua/report/zvit-za-2022-rik/.

[41] Ibid.

[42] Ibid.

Chart 2. Share of drugs detected by the State Border Service of Ukraine, by border of detection, 2021, 2022, Jan-Sept 2023, in kilograms.

2021: Total seizures 698.17 Kg

Border with Poland 1%
Non-Government Controlled Areas 1%
Crimea, administrative border 3%
Air 1%
Border with Romania 2%
Border with the Republic of Moldova 2%
Border with the Russian Federation 9%
Border with Belarus 1%
Sea 80%

2022: Total seizures 127, 67 Kg

Non-Government Controlled Areas 1%
Border with the Russian Federation 5%
Sea 80%
Border with the Republic of Moldova 32%
Border with Poland 47%
Border with Romania 6%
Border with Slovakia 4%
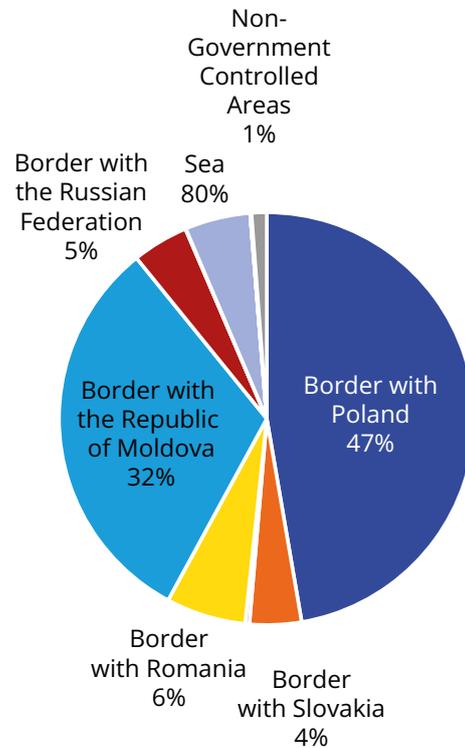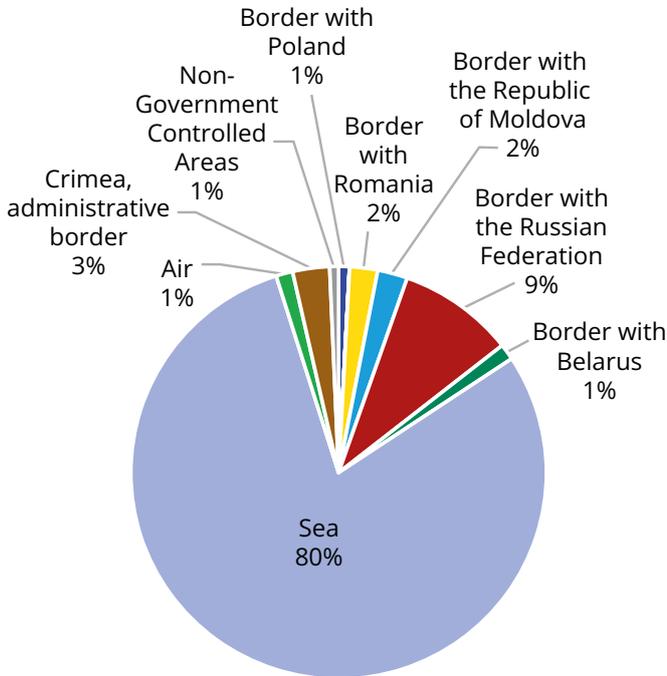
Jan-Sept 2023: Total seizures 295.67 Kg

Border with Poland 8%
Border with Romania 4%
Other: Russian Federation, Belarus, contact line with occupied territories, air, sea, and river ports 56%
Border with the Republic of Moldova 32%
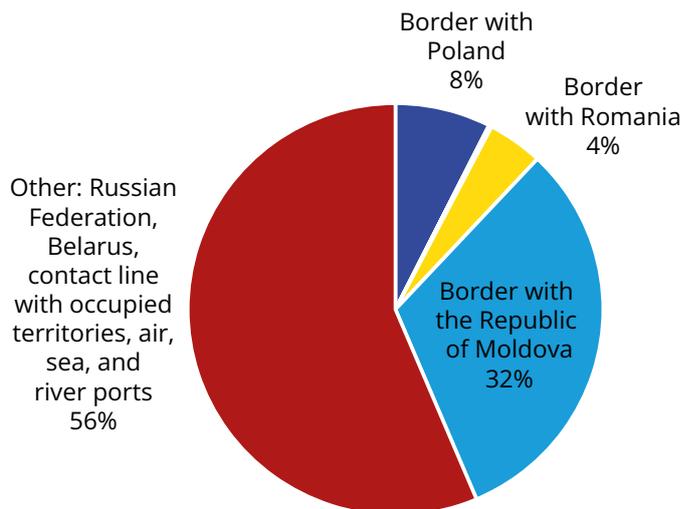
* The available data covers the first 9 months of 2023. The increase in the "other" category is likely accounted for by resumption of trade via river and seaports in Odesa region, and not by any cross-border trade with Russia or Belarus.

Source: Ministry of the Interior of Ukraine

2.2. Cocaine: traffickers have adapted by changing supply routes

In Ukraine, cocaine is considered an elite drug by users. Since at least mid-2010, there have been direct and indirect shipments of cocaine from Latin America.[43] It was delivered by air and by ship, mainly to the ports of Odesa region. Quantities seized from air passengers arriving in Ukraine remained small[44] compared to law enforcement seizures in the ports of Odesa region.

After 24 February 2022, Ukraine closed all airports and all seaports, until a partial reopening of Odesa region's ports in August 2022 as part of the Black Sea Grain Initiative. Overall, cocaine seizures in 2022 significantly fell, by 7.8 kg in total, or 0.5 per cent of all drugs seized by weight, according to health authorities.[45]

As far as the most recent trends are concerned, an active retail drug dealer from Kyiv interviewed observed that "cocaine became more available" in 2023 and early 2024, with prices staying at the pre-2022 level.[46] Evidence suggests a geographical shift of cocaine routes, which now enter Ukraine via the western land border with the EU.[47]

2.3. Heroin: trafficking routes disrupted, domestic market in crisis

Heroin and opium from Afghanistan have traditionally reached markets in Ukraine through two main trafficking routes: the so-called 'northern route' through Central Asia and onwards to Eastern Europe, or else through West Asia and the Western Balkans.[48]

---

[43] Ruggero Scaturro, "An Altered State: Evolving Drug Trends in Wartime Ukraine", *Global Initiative Against Transnational Organized Crime* (Geneva, Switzerland, February 2024), p.13. Available at: https://globalinitiative.net/analysis/evolving-drug-trends-in-wartime-ukraine/.

[44] State Customs Service of Ukraine, "Kyivski mytnyky vyiavyly dvokh narkokurieriv z Brazylii z kokainom u shlunku i kartyni", press release in a Telegram group, 21 July 2021. Available at: https://t.me/UkraineCustoms/939.

State Border Guard Service of Ukraine, "Zamist' tsukerok-kokain", press release (video), 8 October 2021. Available at: https://t.me/DPSUkr/963.

[45] Ukraine, Institute for Forensic Medicine, National Report on the Drug Situation in Ukraine 2023, Ministry of Health of Ukraine (Kyiv, 2023), p.54. Available at: https://cmhmda.org.ua/report/zvit-za-2023-rik/. This data concerns seizures in cases for which criminal proceedings have been opened (some may be ongoing).

[46] Interview with Key Informant (KI13) – see Annex A, March 2024.

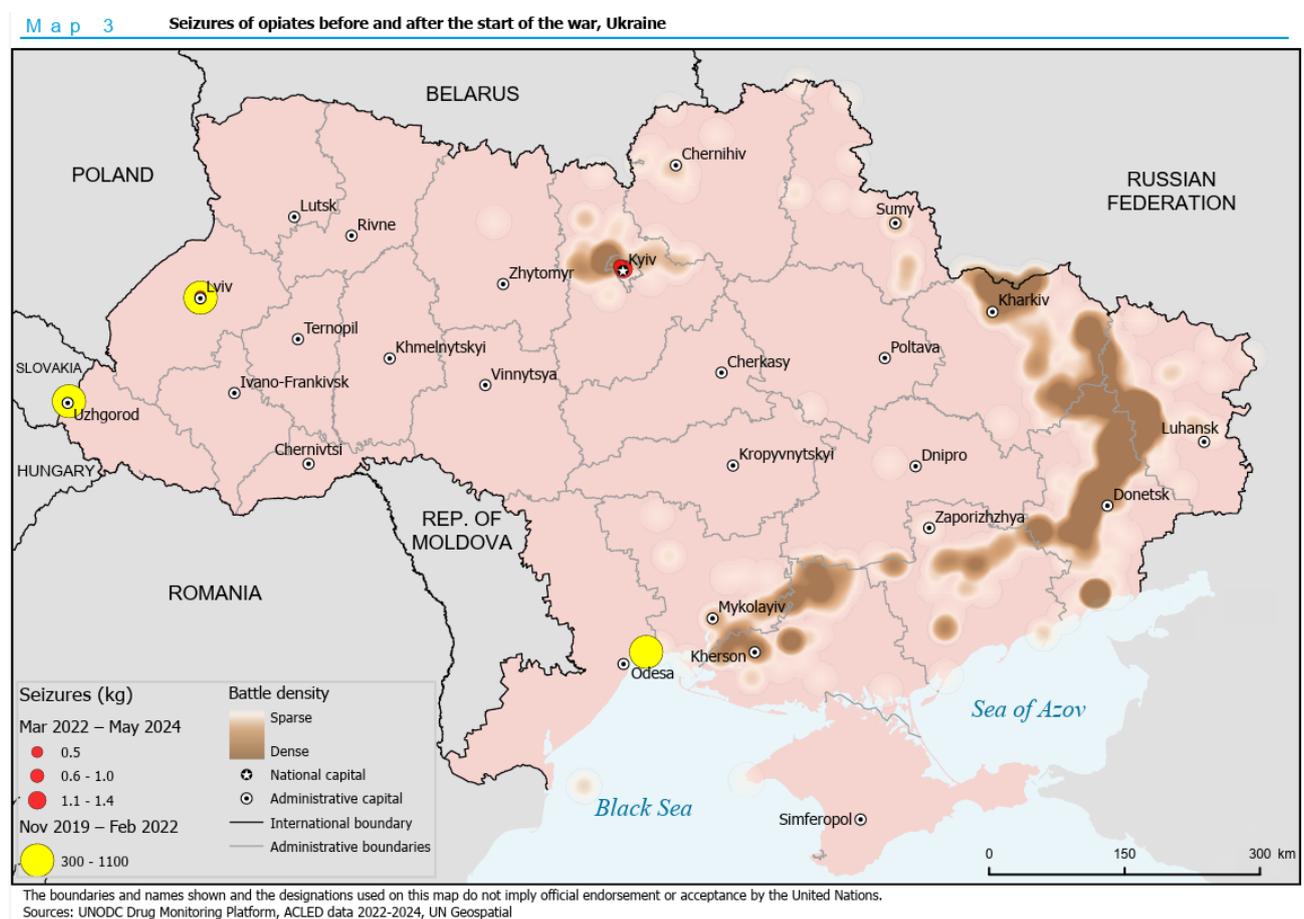[47] Ruggero Scaturro, "An Altered State: Evolving Drug Trends in Wartime Ukraine", Global Initiative Against Transnational Organized Crime (Geneva, Switzerland, February 2024), p. 13-15.

[48] Ibid., p.11. See also: UNODC Research, "Afghan opiate trafficking along the northern route", UNODC, June 2018, pp. 52, 97. Available at: https://www.unodc.org/documents/publications/NR_Report_21.06.18_low.pdf.

According to the Ukrainian authorities,[49] since 2021 the majority of heroin has entered the country via its southern border.[50] A former high-level heroin dealer from Kyiv, active until mid-2022, described how prior to the beginning of the full-scale invasion in 2022 Central Asian heroin arriving in Ukraine was primarily distributed through the darknet, where wholesale suppliers worked with highly vetted buyers on specialized, hidden forums.

The heroin market in Ukraine started to decline before 2022, in parallel to other Eastern European countries, and a gradual decline in seizures was recorded for some years. In addition, as with cocaine, the war has complicated heroin trafficking to and through Ukraine, further affecting illicit opiate markets.

Meanwhile, a rise in synthetic methadone production and significantly increased seizures of opium poppy straw, to 788 kg in 2023 from 48 kg in 2022,[51] suggest an expanded market of heroin alternatives.

Map 3   Seizures of opiates before and after the start of the war, Ukraine

The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.
Sources: UNODC Drug Monitoring Platform, ACLED data 2022-2024, UN Geospatial

---

[49] Ministry of Internal Affairs Letter to UNODC Regional Programme Office in Ukraine, 5 December 2023; Ukraine, Report on Drug and Alcohol Situation in Ukraine for 2022 (based on data 2021), Ministry of Health, Institute of Psychiatry, Forensic Psychiatric Examination and Drug Monitoring (Kyiv, Ukraine, 2022) Available at: https://cmhmda.org.ua/report/zvit-za-2022-rik/; https://cmhmda.org.ua/report/zvit-za-2023-rik/.

[50] Ukraine, Report on Drug and Alcohol Situation in Ukraine for 2022 (based on data 2021), Ministry of Health, Institute of Psychiatry, Forensic Psychiatric Examination and Drug Monitoring (Kyiv, Ukraine, 2022), p.49. Available at: https://cmhmda.org.ua/report/zvit-za-2022-rik/.

[51] Based on data for completed criminal proceedings. Office of Prosecutor General of Ukraine, "Annual reports on registered criminal proceedings", 2022-2023. Available at: https://gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2/

2.4. Synthetic drugs

In line with regional trends, Ukraine's synthetic drug production and market have expanded over the last few years and continued to evolve in 2022 and 2023.[52] There is a trend towards increased consumption of synthetic amphetamines, synthetic opioids (mainly methadone) and new psychoactive substances (NPS). As in other parts of Eastern Europe, cathinones, are now commonly used in the country.

Gray data suggests that since 2015, NPS cathinones are more in demand with people who inject drugs. This shift could be attributed to limited availability and access to opiates and "homemade" methamphetamine, as well as a wider availability of synthetic stimulants in the market.[53]

The synthetic opioid methadone, also used in opioid maintenance treatment in Ukraine, had become more available in the country's illicit drugs market before 2022.[54] The near quadrupling of heroin retail prices in Ukraine in 2022 put it out of the reach of many users, who shifted to cheaper and more accessible methadone, continuing a trend away from heroin already registered before 2022.[55]

Ukraine's illicit methadone market has shifted to mostly domestic production.[56] The activities of clandestine laboratories illicitly manufacturing this synthetic opioid are regularly recorded in Ukraine (see Box 2).

Part of the methadone produced in Ukraine is smuggled by organized criminal groups to neighbouring countries for further sale.[57] However, it appears that post-2022, its outbound cross-border trafficking has been limited. This is likely because of the rising domestic demand for methadone, closure of borders, and active hostilities in border areas in north-east and east Ukraine.

---

[52] The Observatory of Illicite Markets and the Conflict in Ukraine, "Drugs on the front line", Global Initiative against Transnational Organized Crime, 22 January 2024. Available at: https://globalinitiative.net/analysis/ukraine-synthetic-drugs-ocindex/.

[53] UNODC Research, "Conflict in Ukraine: key evidence on drug demand and supply", UNODC, April 2022. Available at: https://www.unodc.org/documents/data-and-analysis/Ukraine/Ukraine_drug_demand_supply.pdf.

[54] Ukraine, Report on Drug and Alcohol Situation in Ukraine for 2023 (based on data 2022), Ministry of Health, Institute of Psychiatry, Forensic Psychiatric Examination and Drug Monitoring (Kyiv, Ukraine, 2023), p.105. Available at: https://cmhmda.org.ua/report/zvit-za-2023-rik/.

[55] Ibid.; European Monitoring Centre for Drugs and Drug Addiction. 'European Web Survey on Drugs 2021: Emerging Findings in Ukraine', *European Union Drugs Agency*. Available at: https://www.emcdda.europa.eu/publications/data-fact-sheets/european-web-survey-drugs-2021-emerging-findings-ukraine_en.

[56] Interviews with Key Informant (KI3) – see Annex A, February 2024.

[57] Ukraine, Report on Drug and Alcohol Situation in Ukraine for 2022 (based on data 2021), Ministry of Health, Institute of Psychiatry, Forensic Psychiatric Examination and Drug Monitoring (Kyiv, Ukraine, 2022), p.49. Available at: https://cmhmda.org.ua/report/zvit-za-2022-rik/.
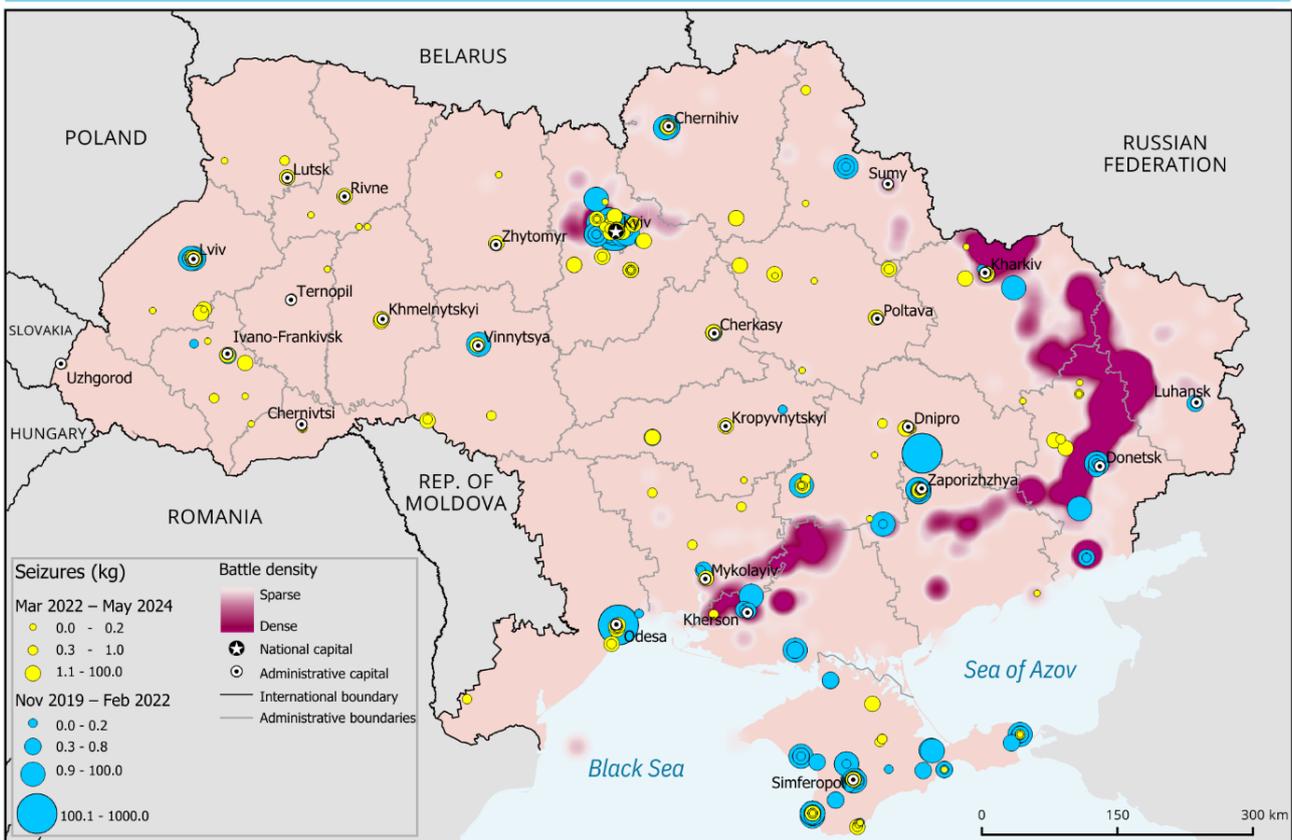
The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.
Sources: UNODC Drug Monitoring Platform, ACLED data 2022-2024, UN Geospatial

2.5. The organized crime behind the rise of synthetic drugs

According to the UNODC World Drug Report 2024,[58] the expansion of cathinones in the last few years has been facilitated by the darknet market Hydra which, before its dismantling in April 2022, accounted for 80–90 per cent of all drug sales on the dark web. In contrast to almost all other darknet markets, over the period 2018–2022, drug sales on *Hydra* were dominated by stimulants, notably cathinones, and only then followed by cannabis and other drugs.

After February 2022, the import of cathinones and precursors into Ukraine was organized through Ukraine's western borders with the EU and Moldova, using postal delivery services and road transport.[59]

In recent years, there has been a steady trend towards the division of the production and sale of synthetic drugs. Thus, laboratories, warehouses and consumers were located in

---

[58] UNODC Research, "World Drugs Report 2024", UNODC, June 2024, page 36. Available at: https://www.unodc.org/documents/data-and-analysis/WDR_2024/WDR24_Key_findings_and_conclusions.pdf.

[59] Ukraine, Report on Drug and Alcohol Situation in Ukraine for 2023 (based on data 2022), Ministry of Health, Institute of Psychiatry, Forensic Psychiatric Examination and Drug Monitoring (Kyiv, Ukraine, 2023), p.15. Available at: https://cmhmda.org.ua/en/report/national-report-2023/.

one country or territory, while call centres that accepted orders and organized delivery were located in another.[60]

According to Ukrainian authorities, there has been a significant rise in the number of dismantled clandestine drug laboratories: from 17 in 2019; 79 in 2020; 94 in 2021; 61 in 2022; to 102 in 2023.[61]

Map 5   **Change in the number of dismantled drug labs before (2020-2022) and after the start of the war (2022-2023), by oblast, Ukraine**

The boundaries and names shown and the designations used on this map do not imply official endorsement or acceptance by the United Nations.
Source: Ministry of Internal Affairs Letter to UNODC Regional Programme Office in Ukraine, 05.12.2023, UN Geospatial
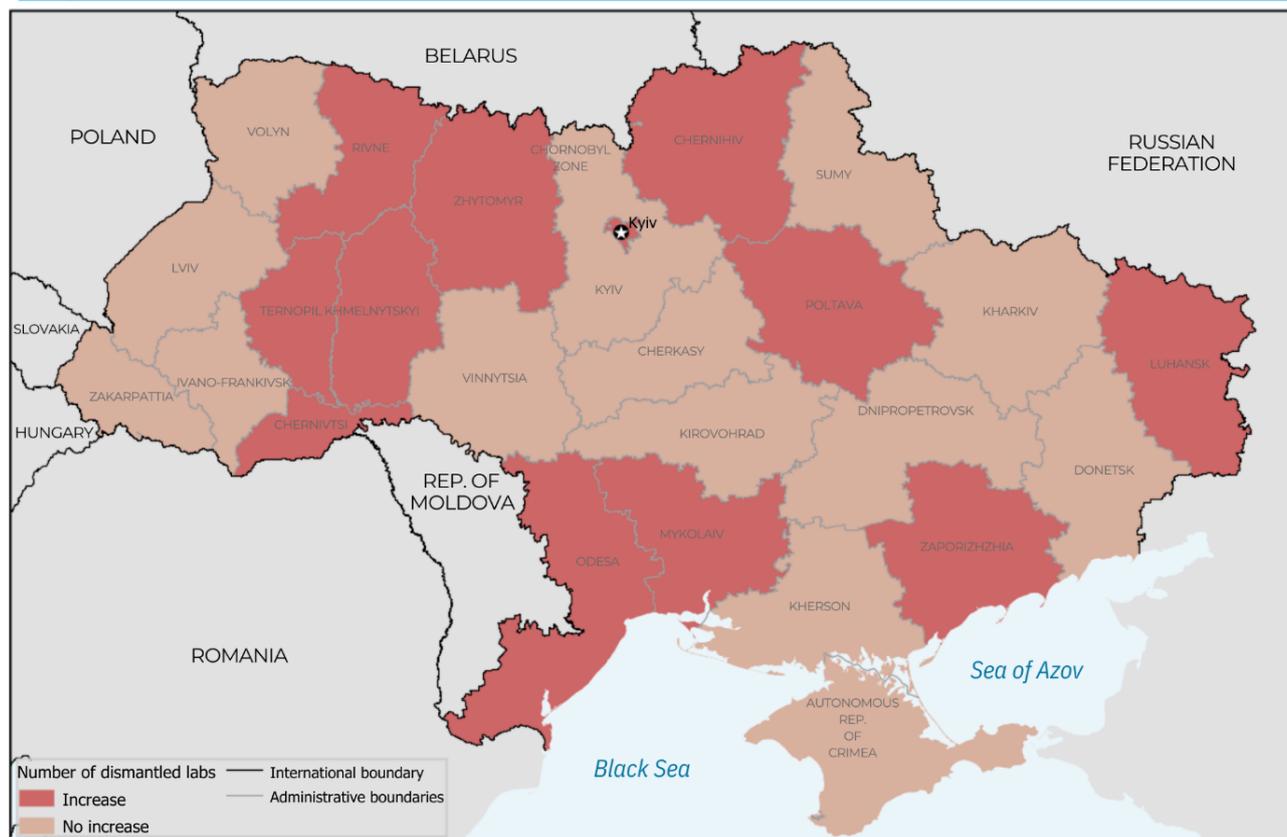
Amphetamine ranks first in terms of production among dismantled laboratories, with a (declining) share of 82.1 per cent, 75.2 per cent and 71.4 per cent in the years from 2020 to 2022, respectively. In 2023, the largest number of laboratories was found in Kyiv and Kyiv region, as well as in Rivne region. In Rivne region in particular, the number of dismantled laboratories increased from one in 2020 to 12 in 2023;[62] their reported specialization was mainly in amphetamine and methamphetamine.[63]

---

[60] Ukraine, Report on Drug and Alcohol Situation in Ukraine for 2023 (based on data 2022), Ministry of Health, Institute of Psychiatry, Forensic Psychiatric Examination and Drug Monitoring (Kyiv, Ukraine, 2023), p.106. Available at: https://cmhmda.org.ua/en/report/national-report-2023/.

[61] Ministry of Internal Affairs Letter to UNODC Regional Programme Office in Ukraine, 05.12.2023. See also National Report on the Drug Situation in Ukraine 2022.

[62] Ministry of Internal Affairs Letter to UNODC Regional Programme Office in Ukraine, 05.12.2023.

[63] Ibid.

There is a link between an increase in substance abuse and stress and trauma,[64] and the trauma experienced by combats and civilians during the war could increase drug use in the future. Drug usage for stress relief has been identified as the second largest driver for drug consumption in a study conducted by Ministry of Health of Ukraine, wherein nearly half of all respondents indicated stress as the main driver, while mental health was the fourth largest driver.[65] Research published by the Global Initiative against Transnational Organized Crime suggests that synthetic drug use has been detected among soldiers at the frontlines of the war.[66]

Expert observers note that the growth, increasing sophistication and relatively non-violent character of Ukraine's market in synthetic drugs would have been impossible without a "stable and structured network behind it".[67] Such a structure is reportedly provided by Khimprom, a transnational criminal organization that operates in a number of countries in Eastern Europe and Central Asia. This group has been active in Ukraine since 2014, transforming into a transnational syndicate specialized in synthetic drugs, with some reports claiming it has achieved a near-monopoly on synthetic drugs.[68] The Security Service of Ukraine (SSU) has claimed that the group hierarchy includes some 1,000 members and generates $2 million in monthly profits.[69]

Despite arrests of a large number of dealers in 2017, and of middle-level "managers" in 2019, the group reportedly showed resilience and also expanded beyond illicit drug markets to become a large player in cyberfraud (see section 3.1).[70]

---

[64] UNODC Research, "World Drugs Report 2023", UNODC, June 2023, Chapter 5. Available at: WDR23_B3_CH5_substance_use.pdf.

[65] Institute of Psychiatry, Forensic Psychiatric Examination and Drug Monitoring of the Ministry of Health of Ukraine, "Onlain-opytuvannia shchodo poshyrenosti ta chastoty vzhyvannia okremykh narkotychnykh i psykhotropnykh rechovyn v Ukraini – 2023", August 2023. Available at: vzhyvannya-narkotykiv-v-ukrayini-rezultaty-opytuvannya-2023.pdf.

[66] Global Initiative against Transnational Organized Crime, "Drugs in the Frontline", 22 January 2024. Available at: https://globalinitiative.net/analysis/ukraine-synthetic-drugs-ocindex/.

[67] Rugerro Scaturro, "An Altered State: Evolving Drug Trends in Wartime Ukraine", *Global Initiative Against Transnational Organized Crime* (Geneva, Switzerland, 2024), p.24. Available at: https://globalinitiative.net/wp-content/uploads/2024/02/Ruggero-Scaturro-An-altered-state-Evolving-drug-trends-in-wartime-Ukraine-GI-TOC-February-2024.pdf.

[68] State Security Service of Ukraine, "Z pochatku povnomasshtabnoi viiny SBU zneshkodyla ponad 60 zlochynnykh uhrupovan, yaki planuvaly peretvoryty Ukrainu na tranzytera narkotykiv do YeS (video)", 28 December 2023. Available at: https://ssu.gov.ua/novyny/z-pochatku-povnomasshtabnoi-viiny-sbu-zneshkodyla-ponad-60-zlochynnykh-uhrupovan-yaki-planuvaly-peretvoryty-ukrainu-na-tranzytera-narkotykiv-do-yes-video. Rugerro Scaturro, "An Altered State: Evolving Drug Trends in Wartime Ukraine", Global Initiative Against Transnational Organized Crime (Geneva, Switzerland, 2024), p.24-26. Available at: https://globalinitiative.net/wp-content/uploads/2024/02/Ruggero-Scaturro-An-altered-state-Evolving-drug-trends-in-wartime-Ukraine-GI-TOC-February-2024.pdf.

[69] State Security Service of Ukraine, "Z pochatku povnomasshtabnoi viiny SBU zneshkodyla ponad 60 zlochynnykh uhrupovan, yaki planuvaly peretvoryty Ukrainu na tranzytera narkotykiv do YeS (video)'", 28 December 2023. Available at: https://ssu.gov.ua/novyny/z-pochatku-povnomasshtabnoi-viiny-sbu-zneshkodyla-ponad-60-zlochynnykh-uhrupovan-yaki-planuvaly-peretvoryty-ukrainu-na-tranzytera-narkotykiv-do-yes-video.

[70] Interview with Key Informant (KI16) – see Annex A, March 2024. This information has not been corroborated by Ukrainian authorities. Due to the nature of the source, this information has been supplemented in the corresponding section with further citations.

According to interviews with syndicate representatives, at the start of the conflict Khimprom had up to 20 drug laboratories across Ukraine.[71] After February 2022, most of the organization's laboratories in Ukraine were located close to the frontline; trafficking to the East eventually stopped, while trafficking to the EU via Volyn continued.[72]

In August 2023, the SSU dismantled the group's "branches" in Kyiv and Sumy regions. The criminals had set up two drug laboratories respectively in each area, which ensured the industrial illegal production of substances for sale in Ukraine and the EU.[73]

On 30 December 2023, Ukraine's National Security and Defence Council imposed sanctions against the alleged organizers of the syndicate.[74]

Box 2. Case study: a synthetic drug lab adapts to war[75]

As part of the research undertaken for this report, an interview was conducted in February of 2024 with the leader of a synthetic drugs lab in the west of Ukraine (to whom we interchangeably refer here as the lab organizer and producer). The account could not be verified independently, but it is illustrative of the adaptation and innovation of traffickers during the war.

The clandestine laboratory has been functioning for over six years. The organizers used a basement in a private house to host a full-cycle production line. They produced tens of kilograms of different drugs monthly for the domestic market, primarily amphetamine and methamphetamine.

The organizer of the laboratory confirmed the growing demand for methadone, with the peak of orders for this narcotic drug occurring in the spring of 2023.[76] The producer noted that methadone is often consumed by people with a history of heroin abuse, as well as those with amputations to relieve chronic pain.

The average wholesale price of methadone in the illicit market, according to the producer, was $100 for ten tablets of 10 mg, and $300 for ten 25 mg tablets at the time of interview.[77]

Before February 2022, the lab sourced raw materials primarily from Europe. Imports were routed via the Odesa container seaport. Both sources and routes have changed

---

[71] Ibid.

[72] Ibid.

[73] State Security Service of Ukraine, "Z pochatku povnomasshtabnoi viiny SBU zneshkodyla ponad 60 zlochynnykh uhrupovan, yaki planuvaly peretvoryty Ukrainu na tranzytera narkotykiv do YeS (video)'", 28 December 2023. Available at: https://ssu.gov.ua/novyny/z-pochatku-povnomasshtabnoi-viiny-sbu-zneshkodyla-ponad-60-zlochynnykh-uhrupovan-yaki-planuvaly-peretvoryty-ukrainu-na-tranzytera-narkotykiv-do-yes-video.

[74] OCCRP, "Ukraina Vvela Sanktsii protyv Predpolahaemykh Uchastnikov Narkokartelia «Khymprom»", 8 January 2024. Available at: https://www.occrp.org/ru/daily/18342-2024-01-08-13-39-35.

[75] This information has not been corroborated by Ukrainian authorities.

[76] Interviews with Key Informant (KI3) – see Annex A, February 2024.

[77] Ibid.

slightly. The interviewee reported that supplies from the EU were crossing into Ukraine in Chernivtsi region in small batches transported by trucks together with payloads of legally traded pharmaceutical drugs. Alongside supplies from the EU, the laboratory also sourced chemicals from Asia because they are cheaper and logistics are less complicated.

The organization of the laboratory was reportedly relatively small, consisting of six people. It was managed by two people who were also responsible for supply and sales, two drivers and two chemists. The scale of this laboratory was clearly smaller than those of other larger organizations, such as the ones managed by the Dvadtsiativski organized criminal group in Kryvy Rih, 37 members of which were arrested in February 2023. The group, reportedly specialized in methamphetamine, had a hierarchical structure and distinct sub-groups of chemists, keepers, distributors and enforcers, as well as people responsible for liaising with representatives of law enforcement agencies.[78]

---

[78] National Police of Ukraine, "Masshtabna spetsoperatsiia Natspolitsii: zneshkodzheno diialnist kryvorizkoho narkokarteliu, uchasnyky yakoho «zabezpechuvaly» narkotykamy maizhe vsi rehiony Ukrainy", press release, Kyiv. February 2023. Available at: https://www.npu.gov.ua/news/masshtabna-spetsoperatsiia-natspolitsii-zneshkodzheno-diialnist-kryvorizkoho-narkokarteliu-uchasnyky-iakoho-zabezpechuvaly-narkotykamy-maizhe-vsi-rehiony-ukrainy.

3

Scams and online fraud: the call centres of crime

> **Key findings in scams and online fraud**
>
> In 2023, a drastic increase in the number of fraud cases was recorded in Ukraine. Cases in this area of crime more than tripled compared to 2022 and 2021, with estimated illegal revenues in the range of billions of US dollars.
>
> Fraud is carried out by an estimated 1,500 call centres located throughout Ukraine, with large structured criminal organizations engaging in this type of criminal activity.
>
> Their victims are mainly Ukrainians, especially those who were forcibly displaced. However, people in Western Europe, the Russian Federation and occasionally other countries are also targeted.

3.1. The rise in cyberfraud

Ukraine's Office of the Prosecutor General (OPG) registered 14,760 fraud crimes in 2021[79] and 16,430 in 2022 (in 6,043 of these cases it was possible to identify and reach suspects). In 2023, the number more than tripled, to 53,547. The temporary parliamentary commission on cyberfraud has estimated that in 2024 there were some 1,500 illicit call centres operating across Ukraine.[80]

According to a member of the Parliamentary Commission on Special Inquiry into Call Centres, the scale of call centre fraud is "simply colossal" with estimated annual illicit revenues of call centres believed to be "in the billions of US dollars".[81] In December 2023, OPG reported the closure of a network of call centres operating across 16 regions of Ukraine, with some 2,500 call operators employed in the centres. At the time, the network's annual turnover was reported to be UAH 3 billion, or around $74 million.[82]

Call centres in Ukraine are organized to operate internationally and target citizens in many countries.[83] Still, many centres target Ukrainians, who, although less profitable,[84] are easier to reach since fluency in foreign languages is not needed.

The war, moreover, has created conducive conditions for telephone and online fraud targeting internally displaced people (IDPs) as recipients of state subsidies. According to a member of a parliamentary investigative commission on call centres, these centres:

---

[79] The offence is not limited to cyberfraud. Ukraine, Law 2341-III "Criminal Code of Ukraine", with amendments, Article 190, parts 3-4. Available at: https://zakon.rada.gov.ua/laws/show/2341-14#Text.

[80] The Temporary Parliamentary Commission on Cyber Fraud, "Koll-tsentry. Biznes i nichoho osobystoho", 19 December 2024. Available at: https://com1.org.ua/koll-tsentry-biznes-i-nichoho-osobystoho/.

[81] Interview with Key Informant (KI21) – see Annex A, April 2024.

[82] Office of the Prosecutor General of Ukraine, "Vykryto masshtabnu merezhu shakhraiskykh kol-tsentriv z richnym obihom u 3 mlrd hrn", press release on Facebook, 29 December 2023. Available at: https://www.facebook.com/share/p/9vsZCtAFYEAxKJ8A/.

[83] Jack Meegan-Vickers, "Scam call centers in Ukraine", Global Initiative against Transnational Organized Crime, 21 October 2023. Available at: https://globalinitiative.net/analysis/scam-call-centres-in-ukraine/.

[84] Interview with Key Informant (KI21) – Annex A, April 2024.

work very seriously with refugees […] they obtain lists of internally displaced people from social centres using some of their connections. Then they extort money from the IDPs, for example, saying that a certain fee needs to be paid in order to receive compensation for housing or for finding new housing for them. People who are in a state of stress due to what happened in their lives sometimes react to these manipulations, especially the elderly.[85]

3.2. Involvement of organized crime

The call centres "industry" is dominated by five criminal groups, each operating at least 10 call centres.[86] Khimprom and Dniprovski have been named as the two largest groups in this illicit market.

In March 2023, the National Police of Ukraine (NPU), together with the Latvian authorities and with the support of Europol and Eurojust, detained three organizers and seven members of a criminal organization in Kamianske in the Dnipro region, who had set up an extensive network of fraud call centres.[87] According to law enforcement, the organization had more than 60 employees, and at least 14 victims were identified, namely Latvian citizens who were defrauded of almost UAH 2 million (approx. $54,000). During the arrest, UAH 12 million (approx. $324,960) in cash was seized from the fraudsters, suggesting the group also laundered and cashed out the proceeds of crime.[88]

In September of the same year, the National Police reported that it had closed down a call centre run by a "criminal authority" with connections to the thieves-in-law network (a so-called smotriashchy) in the city of Dnipro.[89] In November 2023, NPU detained the organizer – alleged to have strong ties to a thief-in-law – and 15 members of a fraudulent call centre[90] that extorted up to $200,000 per month from their victims.[91]

---

[85] Ibid.

[86] Interview with Key Informant (KI29) – see Annex A, July 2024.

[87] Ukraine, National Police "Natspolitsiia spilno z latviiskymy kolehamy vykryla orhanizatoriv mizhnarodnoi shakhraiskoi skhemy z misiachnym oborotom 5 mln hrn" (16 March 2023). Available at: https://www.npu.gov.ua/news/natspolitsiia-spilno-z-latviiskymy-kolehamy-vykryla-orhanizatoriv-mizhnarodnoi-shakhraiskoi-skhemy-z-misiachnym-oborotom-5-mln-hrn.

[88] National Police of Ukraine, "Orhanizuvaly diialnist «koll-tsentriv»: Natspolitsiia spilno z latviiskymy kolehamy provela spetsoperatsiiu iz zatrymannia uchasnykiv zlochynnoi orhanizatsii", press release in a Telegram group, 8 August 2023. Available at: https://t.me/UA_National_Police/13631.

[89] Ukraine, National Police, "Shchomisiatsia vyduriuvaly cherez «call-tsentr» do dvokh mln hrn: u Dnipri zatrymaly 13 uchasnykiv zlochynnoi orhanizatsii na choli z tak zvanym «smotriashchym»", (14 September 2023). Available at: https://www.npu.gov.ua/news/shchomisiatsia-vyduriuvaly-cherez-call-tsentr-do-dvokh-mln-hrn-u-dnipri-zatrymaly-13-uchasnykiv-zlochynnoi-orhanizatsii-na-choli-z-tak-zvanym-smo-triashchym.

[90] National Police of Ukraine, "Na Odeshchyni zatrymano orhanizatora ta 15 uchasnykiv shakhraiskoho kol-tsentru, yaki vymaniuvaly u liudei do 200 tysiach dolariv na misiats", press release in a Telegram group, 24 November 2023. Available at: https://t.me/UA_National_Police/16196.

[91] Police of Odesa, "Na Odeshchyni zatrymano orhanizatora ta 15 uchasnykiv shakhraiskoho kol-tsentru", video, 24 November 2023. Available at: https://www.youtube.com/watch?v=WwO1Ene71e4.

Some call centres are organized by prisoners within detention facilities. For example, in November 2023, the National Police exposed a group of inmates of the Vinnytsia Correctional Colony who organized a fraudulent call centre.[92] Among the participants in the scheme were both prisoners and people who had already served their sentences. In February 2024, the SBU charged a prisoner of the Zhytomyr Correctional Institution who was targeting relatives of Ukrainian military personnel.[93]

According to an interviewed expert, some fraudsters rely on "lists of Ukrainians missing in the war. They then call and tell relatives that they know the whereabouts of their missing relative, often providing the name, surname, and patronymic of the relative [and extorting large sums of money]".[94]

3.3. The organizational structure of call centres

Call centres of crime tend to operate in large cities, such as Kyiv, Dnipro, Odesa, Lviv and Kharkiv, where they are easier to disguise as regular offices. Large cities also have suitable labour market conditions, which in the context of the war means young people (under 25 years old, which is the draft age for men) with language and communication skills suitable for this crime. The Parliamentary Inquiry on Call Centres[95] encountered cases of "mass recruitment of underage persons [into call centres] because they can freely move around the city not risking that they would be stopped by a draft patrol".[96]

Personal data is a core asset in the operation of call centres. According to a key informant, organized criminal groups behind cyberfraud operations use the darknet[97] to procure bank details and postal courier service and mobile operator customer data. These breaches often include phone numbers, emails and even passport details, which are used in phishing and other fraudulent activities.[98]

---

[92] Ukraine, National Police, "Natspolitsiia vykryla hrupu v'iazniv Vinnytskoi vypravnoi kolonii, yaki orhanizuvaly shakhraiskyi kol-tsentr", press release in a Telegram group, 27 November 2023. Available at: https://t.me/UA_National_Police/16276.

[93] Security Service of Ukraine, "SBU vykryla viaznia Zhytomyrskoi vypravnoi ustanovy, yakyi vyduriuvav hroshi u rodychiv ukrainskykh viiskovykh", press release in a Telegram group, 26 February 2024. Available at: https://t.me/SBUkr/11286.

[94] Interview with Key Informant (KI21) – see Annex A, April 2024.

[95] Ukraine, Parliament of Ukraine, *Proekt Postanovy pro utvorennia Tymchasovoi slidchoi komisii Verkhovnoi Rady Ukrainy z pytan rozsliduvannia mozhlyvykh faktiv shakhraistva ta inshoi nezakonnoi diialnosti u sferi finansovykh posluh ta rynkiv finansovykh posluh, yaki zdiisniuiutsia z vykorystanniam informatsiinykh, elektronnykh komunikatsiinykh, informatsiino-komunikatsiinykh system ta elektronnykh komunikatsiinykh merezh*, (Kyiv, 2023).

[96] Ibid.

[97] Ukraine, National Police "Natspolitsiia spilno z latviiskymy kolehamy vykryla orhanizatoriv mizhnarodnoi shakhraiskoi skhemy z misiachnym oborotom 5 mln hrn", 16 May 2023. Available at: https://www.npu.gov.ua/news/natspolitsiia-spilno-z-latviiskymy-kolehamy-vykryla-orhanizatoriv-mizhnarodnoi-shakhraiskoi-skhemy-z-misiachnym-oborotom-5-mln-hrn.

[98] Interview with Key Informant (KI21) – see Annex A, April 2024.

Box 3. The organization of a fraud call centre

Law enforcement reports, court decision materials, interviews and the Special Parliamentary Inquiry's interim report all indicate a similar basic structure for Ukrainian call centres. In 2023, a court case of the Prymorskyi District Court of Odesa described the operations of a call centre that in 2020-21 had defrauded citizens of Ukraine and neighbouring countries.[99][100]

The call centre operated under the guise of an official computer services firm that rented office space, changing locations from time to time. The firm had a director and an accountant both reporting to the head of the operation.

The organization was managed and coordinated through two groups on Telegram: one accessible via computer, the other from personal phones.

The first group received a list of prospective victims' personal data, mobile phone numbers and places of residence through Telegram Messenger from the co-organizers of the criminal organization, together with the bank account number of an unidentified member of the criminal organization to which the victims were led to transfer their money. Using the second group in the Telegram Messenger, the organizers of the group, as well as the «head of security», controlled and coordinated the call centre operations and other issues related to the overall activities of the group.

The administration of the call centre comprised a chief administrator and subordinate managers of three departments: "cold callers" (kholodnyky), "closers" (klouzery) and "loans" (kredyty). Each of the organization's departments had its own functions, staff, manager, instructions for misleading victims and training material.

A victim of such a fraud would be persuaded to apply via Internet banking for a «quick» loan, receive funds to his or her bank account, and transfer them to a bank account belonging to an unidentified member of the criminal organization.

If the victim refused the quick loan, the task of the closer was to obtain the cvv (cvc) code of the victim's bank card and other personal information, making it possible to transfer money via Internet banking, while explaining to the victim that funds would be debited for banking services, mobile operators, Internet charges or other fees.[101]

---

[99] Ukraine, Prymorskyi District Court, Case Nr. 522/17810/22, 24 August 2023. Available at: https://reyestr.court.gov.ua/Review/113012323.

[100] National Police of Ukraine, "Na Odeshchyni zatrymano orhanizatora ta 15 uchasnykiv shakhraiskoho kol-tsentru, yaki vymaniuvaly u liudei do 200 tysiach dolariv na misiats", press release in a Telegram group, 24 November 2023. Available at: https://t.me/UA_National_Police/16196. According to a lawmaker (Interview KI21, April 2024), large call centres can have up to 200-300 operatives, requiring suitable office space.

[101] Ukraine, Parliament of Ukraine, "Proekt Postanovy pro zvit Tymchasovoi slidchoi komisii Verkhovnoi Rady Ukrainy z pytan rozsliduvannia mozhlyvykh faktiv nezakonnoi diialnosti u sferi finansovykh posluh ta rynkiv finansovykh posluh, yaki zdiisniuiutsia z vykorystanniam informatsiinykh, elektronnykh komunikatsiinykh, informatsiino-komunikatsiinykh system ta elektronnykh komunikatsiinykh merezh pro vykonanu robotu" (29 November 2023). Available at: https://itd.rada.gov.ua/billInfo/Bills/Card/43313.

4
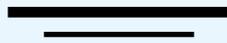
Arms trafficking: increased availability and attention

Key findings in arms trafficking

The vast increase in availability of weapons since February 2022 has resulted in a higher number of armed seizures and arms-related violence among civilians, particularly regarding domestic and intimate partner violence.

The evidence collected indicates that arms trafficking domestically is mainly limited to small scale actors and opportunistic traders of arms collected from the battlefield or stockpiles.

At the time of writing there is little evidence of illicit trade of captured weapons and ammunition from the area of active hostilities to the rear of the battlefield.

The information available for this study does not suggest the existence of any relevant transnational arms trafficking out of Ukraine following February 2022.

However, given the number of arms available and the historic presence of criminal actors specialized in this illicit trade, this situation needs continuous monitoring.

The war that began on 24 February 2022 dramatically increased the presence and use of weapons of war in Ukraine, potentially increasing the availability of arms to non-combatants, and affecting the sources, profile and patterns of arms proliferation and trafficking. A review of available data and fieldwork suggests that, as of July 2024, such risks primarily concern domestic proliferation of illicitly sourced small arms and light weapons (SALW), explosives and ammunition in Ukraine,[102] with increased diversity and sophistication of such weapons.

In the period of February 2022 to June 2024 there have been relatively few reported cases of illicit arms sales domestically, and even fewer internationally. Known arms trafficking seems to be low-level, small in scale and involving primarily individuals rather than organized criminal groups.

Border seizures remain low despite evidence that border controls have increased. This is in keeping with a pattern that has emerged since 2014. Nevertheless, the conflict has dramatically increased the long-term risks of both domestic and cross-border trafficking.

---

[102] Discussing illicit weapons proliferation and trafficking, this report refers predominantly to small arms and light weapons, which include firearms, and ammunition, which in this research mainly refer to hand, rifle, and rocket-propelled grenades. The International Instrument to Enable States to Identify and Trace, in a Timely and Reliable Manner, Illicit Small Arms and Light Weapons Small Arms (Small Arms Review Conference 2006, A/CONF.192/15, United Nations publication DPI/2428K, 2006, part II.4), defines "small arms" as weapons designed for individual use, including, inter alia, "revolvers and self-loading pistols, rifles and carbines, sub-machine guns, assault rifles and light machine guns". In contrast, "light weapons" are "designed for use by two or three persons serving as a crew, although some may be carried and used by a single person. They include, inter alia, heavy machine guns, hand-held under-barrel and mounted grenade launchers, portable anti-aircraft guns, portable anti-tank guns, recoilless rifles, portable launchers of anti-tank missile and rocket systems, portable launchers of anti-aircraft missile systems, and mortars of a calibre of less than 100 millimetres."

4.1. Availability of arms and violent crime: a conflict-related pattern

The changes in proliferation and trafficking of arms in Ukraine after February 2022 must be understood in the context of increased insecurity in the country after the outbreak of hostilities in Donbas in 2014.[103]

The conflict in Donbas dramatically increased the proliferation and use of military-grade small arms, light weapons and ammunition, increasing the availability of hand grenades, as well as rocket-propelled grenades and landmines.[104]

Weapons seizure data[105] (Chart 3) suggests a surge in illicit stocks of weapons, particularly in weapons of war compared to the pre-2014 period: significant increases in seizures have been observed in rifled firearms, grenades, ammunition and sophisticated light weapons such as grenade launchers and man-portable air defence systems. The upsurge in seizures correlates with the start of combat in Donbas.[106]

Despite the relative stabilization of hostilities in 2015-2021,[107] continued seizures point to circulation of weapons originating in the conflict, and indeed flows from the conflict area to the rest of the country. While daily seizures might have made a dent in the quantities of weapons in circulation, the "sheer volume of loose weapons continue[d] to dwarf enforcement efforts, with deadly consequences for Ukrainian citizens".[108]

At the same time, the political instability and conflict in the eastern Donetsk and Luhansk regions (the conflict in Donbas)[109] led to a prolonged increase in insecurity for civilians, both in government-controlled and non-government-controlled areas (NGCA).[110]

---

[103] United Nations, "Two Years after Russian Federation's Invasion, UN Remains Committed to Ukraine's Sovereignty, Independence, Assistant Secretary-General Tells Security Council", press release, 12 February 2024. Available at: https://press.un.org/en/2024/sc15588.doc.htm.

[104] Interview with Key Informant (KI9) – see Annex A, 16 February 2024.

[105] Complied based on OPG annual statistics for seizure of weapons used in registered crimes for which the proceedings have been concluded. This data excludes voluntary surrender of SALWs, seizures in offences with on-going procedures, and seizures that did not trigger criminal proceedings.

[106] Seizure data does not *directly* represent amounts of proliferating illicit weapons, as it is also connected to intensity and effectiveness of law enforcement.

[107] Dominique Arel and and Jesse Driscoll, Ukraine's Unnamed War: Before the Russian Invasion of 2022, Cambridge University Press (2023). New edition. Cambridge; New York, NY: Cambridge University Press, 2023.

[108] Matt Schroeder and Olena Shumska, "Making the Rounds: Illicit Ammunition in Ukraine", *Small Arms Survey* (2021), p. 10. Available at: https://www.jstor.org/stable/resrep28487.1.

[109] United Nations, "Secretary-General Says Russian Federation's Recognition of 'Independent' Donetsk, Luhansk Violate Ukraine's Sovereignty, Territorial Integrity", press release, 23 February 2022. Available at: https://press.un.org/en/2022/sgsm21153.doc.htm.

[110] The regular reports on the human rights situation in Ukraine by the Office of the United Nations High Commissioner for Human Rights (e.g. of 15 June and 17 August 2014) portrays a rising tally of civilian deaths on both sides of the contact line in Donbas through the second half of 2014 and early 2015 (see part II.A of the reports). See also: Emmanuel Tronc and Anaïde Nahikian," Ukraine-Conflict in the Donbas: Civilians Hostage to Adversarial Geopolitics", *Harvard Humanitarian Initiative* (21 July 2020). Available at: http://dx.doi.org/10.2139/ssrn.3657394.

According to the OPG, crimes committed with firearms more than trebled in a year (from 761 in 2013 to 2523 in 2014), before decreasing to just under 500 in 2016, and 300 in 2021.[111]

There was a concomitant rise in different types of violent crime, and a lasting surge of violent deaths in the several years following 2014, only some of them related to the combat. Small Arms Survey's Global Violent Deaths data reveal that "homicides [in Ukraine] rose from 2,100 in 2015 to more than 5,500 in 2019".[112]

Similar to the surge in 2014, the full-scale invasion and the subsequent intensification of armed conflict seems to have increased the availability and diversity of abandoned and diverted weapons of war and ammunition. The increasing trend in the seizures recorded, however, remains somewhat of the same scale recorded in 2019, before the reductions seen during the pandemic period.

In 2023, increasing seizures compared to 2019 and before were particularly recorded for grenades. Between 2021 and 2023, seizures of rifled firearms increased almost 1.5 times; hand grenades, almost five-fold; and grenade launchers and rocket-propelled light weapons, 6.5 times (see Chart 3).

Although violent crime in Ukraine has somewhat increased, the extent of this increase is lower than that of growing proliferation of weapons.[113]

As of June 2024, the amplitude of change in weapons and ammunition seizures so far does not appear to be commensurate with the change in the intensity and spread of warfare on the Ukrainian territory. It is plausible that the observable rise in seizures might lag behind an increase in illicit arms stock in Ukraine.

---

[111] According to OPG's annual data on registered criminal acts. The figures are for government-controlled territories, but a note of caution is due, as this statistic likely includes some registered crimes committed during active hostilities by separatists or Russian forces in Donbas in an early period of hostilities in 2014. It therefore does not unproblematically reflect changes in the crime situation in government-controlled territories of Ukraine. See Office of Prosecutor General of Ukraine. n.d. Annual reports on registered criminal proceedings, 2013-2023. https://gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2.

[112] Gergely Hideg and Gianluca Boo, "The Calm before the Storm: Global Violent Deaths Update 2019–2020", Small Arms Survey, 29 August 2022. Available at: https://smallarmssurvey.medium.com/the-calm-before-the-storm-global-violent-deaths-update-2019-2020-5b56c53b6834.

[113] Violent crime has risen in Ukraine, but not uniformly across different categories of crime. Interview with Key Informant (KI24) – see Annex A, 1 April 2024. Also: Interview with Key Informant (KI18) – see Annex A, 2 March 2024. Note of caution: comparison between 2022 and 2014 is problematic, as in 2022 Ukraine lost control of a higher proportion of its previously government-controlled territory than in 2014.

Chart 3. Weapons, ammunition, and explosives seized as part of concluded criminal proceedings

Legend:
- Explosives (in kilograms)
- Pneumatic weapons and gas pistols
- Cold weapons
- Improvised explosive devices*
- Landmines
- Grenades
- Cartridges (in thousands)
- Grenade launchers and rocket-propelled systems
- Other firearms
- Rifled firearms
- Smooth-bore firearms

Number of seizures

Years: 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023

Y-axis: 0, 2000, 4000, 6000, 8000, 10000, 12000, 14000, 16000

Source: Office of Prosecutor General of Ukraine, Annual reports on registered criminal proceedings, 2013-2023. https://gp.gov.ua/ua/posts/pro-zareyestrovani-kriminalni-pravoporushennya-ta-rezultati-yih-dosudovogo-rozsliduvannya-2.

Note: Prior to 2015, blocks of explosives were classified as improvised ("self-made") explosive devices. From 2015, blocks of explosives were counted as explosives, by weight.

4.2. Diversity of sources of illicit weapons

Recently the main source of illicit arms trade seems to be weapons opportunistically salvaged from the battlefield by civilians;[114] some reports and interviews with key informants suggest that some individuals or groups making regular trips between the frontline and the rear are becoming involved in trafficking small arms and ammunition.[115] People interviewed for this study, however, insisted that inspections at road checkpoints, train stations and post service offices near the frontline limit such activity.[116]

The conflict in Donbas has been identified as a major source of illicitly sourced small arms and light weapons in the country before 2022,[117] with the authorities regularly reporting thwarted attempts to illicitly traffic weapons from the combat area into government-controlled territories.[118] Weapons and ammunition stemming from the conflict quickly reached distant regions of the country, in many cases brought accidentally or as souvenirs by combatants returning home.[119]

One of the distinct characteristics of the pre-2022 illicitly sourced weapons profile in Ukraine was its relative uniformity: military-grade weapons and ammunition seized were predominantly of Soviet origin, consistent with the geographically circumscribed character of the conflict in Donbas.[120]

After February 2022, the war has significantly complicated the illicit weapons trade in Ukraine.

The intensification of warfare has resulted in weapons and ammunition, including heavy weapons and artillery munition, being abandoned on the battlefield, left in depots and captured as trophies. Interviews with Ukrainian combatants[121] indicate routine battlefield capture or seizure of weapons and ammunition from the opposing forces and suggest that there are frontline exchanges[122] of captured and officially unaccounted for "loot" among Ukrainian military units.[123] This continues the pattern set during the

---

[114] Security Service of Ukraine, "SBU zavtrimala che troich 'chornich zbpojapiv', jaki hotili prodati kriminalitetu chaipersku zbroju ta granatameti RF", daily press release in a Telegram group, 30 October 2023. Available at: https://t.me/SBUkr/10150.

[115] Security Service of Ukraine, "SBU vikrila mershu dilkiv, jaki pradovali trofejnu zbroju kriminalitetu", daily press release in a Facebook group, 26 June 2024. Available at: https://www.facebook.com/SecurSerUkraine/posts/pfbid02HfnDCtHFNxCJB378LZmAQ3nKTiZkKr3WfETHDdCFn9p95uem9QDAXYCQhsG5Ezp9l.

[116] Interviews with Key Informant (KI10, KI11, KI12, KI28) – see Annex A, 15 January to10 February and 20 June 2024; Interview with Key Informant (KI24) – see Annex A, 1 April 2024.

[117] Matt Schroeder and Olena Shumska, "Making the Rounds: Illicit Ammunition in Ukraine", *Small Arms Survey* (2021), p. 30. Available at: https://www.jstor.org/stable/resrep28487.1.

[118] Ukraine Center for Security Studies, "Rezultaty Doslidzhennia "Nezakonnyi Obih i Vykorystannia Zbroi v Ukraiini u 2020"", 3 February 2021. Available at: https://censs.org/illcit-arms-2020/.

[119] Ibid., p.10.; Interview with Key Informant (KI9) – see Annex A, 16 February 2024.

[120] Interview with Key Informant (KI9) – see Annex A, 16 February 2024.

[121] Interviews with Key Informants (KI10, KI11, KI12, KI28) – see Annex A, 15 January to 10 February and 20 June 2024.

[122] Interviews with Key Informant (KI10, KI11, KI12) – see Annex A, 15 January to 10 February 2024.

[123] Ibid.

early phases of the Donbas conflict, when according to memoirs, public interviews,[124] and field research[125] with ex-combatants, pro-government militias operated with trophy weapons and ammunition.[126]

As of mid-2024, stockpiles of trophy weapons are managed in different ways by different parts of the Ukrainian defence forces, and are not always subject to the same strict controls applicable to weapons officially issued by the Ukrainian defence forces to servicepeople.[127] The use and exchange of trophy weapons among combatants does not amount to trafficking so long as these remain in the area of active conflict.

Manoeuvre warfare over a larger territory has also drastically increased access for civilians to obtain abandoned weapons and ammunition in frontline territories.[128] Hand grenades pose a particular threat for proliferation, as already extensively documented in the pre-2022 period.[129] Court records suggest that, in keeping with the pre-2022 patterns,[130] hand grenades continue to be used by civilians in acts of interpersonal violence.[131]

At the time of writing, the Ukrainian government has introduced draft legislation to parliament that would oblige civilians holding trophy weapons to register them with National Police, and has plans to introduce criminal liability for trafficking of parts of firearms.[132]

Another source for illicit arms trade is the diversion from government stockpiles in the area of conflict, constituting a further potential point of illicit supply of arms. At the beginning of the war, military authorities reportedly handed out some 25,000 rifles to civilians alongside ammunition and rocket-propelled grenade launchers.[133]

---

[124] For an overview, see Yurii Stasiuk, «Ozbroiennia ukrainskykh dobrovolchykh batalioniv na skhodi Ukrainy u 2014 rotsi», Hileia: naukovyi visnyk, 130, 2018. Available at: http://www.irbis-nbuv.gov.ua/cgi-bin/irbis_nbuv/cgiirbis_64.exe?C21COM=2&I21DBN=UJRN&P21DBN=UJRN&IMAGE_FILE_DOWNLOAD=1&Image_file_name=PDF/gileya_2018_130_25.pdf.

[125] Taras Fedirko. N.d. "Militarised civil society and the informal economy of war in Ukraine since 2014" Unpublished article manuscript.

[126] Ibid.

[127] Interviews with Key Informant (KI10, KI11, KI12) – see Annex A, 15 January to 10 February 2024.

[128] Interview with Key Informant (KI18) – see Annex A, 2 March 2024.

[129] Matt Schroeder and Olena Shumska, "Making the Rounds: Illicit Ammunition in Ukraine", *Small Arms Survey* (2021), p. 25. Available at: https://www.jstor.org/stable/resrep28487.1.

[130] Matt Schroeder and Olena Shumska, "Making the Rounds: Illicit Ammunition in Ukraine", *Small Arms Survey* (2021), p. 25. Available at: https://www.jstor.org/stable/resrep28487.1.

[131] See Online Annex – List of published court cases used for this study: #110558314, 112453653, 112924129, 113286082, 115842279.

[132] Ukraine, Parliament of Ukraine, *Analitychna zapyska z pytan porivnialnoho zakonodavstva shchodo rehuliuvannia obliku ta lehalizatsii trofeinoi zbroi ta boiovykh prypasiv,* policy brief, 2024. Available at: https://research.rada.gov.ua/uploads/documents/32446.pdf; Interview with Key Informant (KI24) – see Annex A, 1 April 2024.

[133] Mark Galeotti and Anna Arutunyan, "Peace and Proliferation: The Russo-Ukrainian War and the Illegal Arms Trade", Global Initiative against Transnational Organized Crime (March 2023), p. 8. Available at: https://globalinitiative.net/wp-content/uploads/2023/03/Mark-Galeotti-and-Anna-Arutunyan-Peace-and-proliferation-The-Russo-Ukrainian-war-and-the-illegal-arms-trade-GI-TOC-March-2023.pdf;

Ukrainian authorities regularly report seizures of weapon and ammunition stockpiles in frontline territories, sometimes abandoned or purposefully hidden by retreating forces.[134] According to a representative of the National Police, the most arms are seized by authorities in Donetsk, Kharkiv and Zaporizhzhia regions, and seizures decrease as the distance from the area of active hostilities increases.[135]

The great majority of official and media reports about illicitly sourced weapons concerns Russian or Soviet-made and -designed models. However, sporadic evidence that Western-made hand grenades – more easily diverted and more difficult to track and control – have been seized or used away from frontlines in Ukraine has emerged.

Before February 2022, weapons were illicitly imported to Ukraine in relatively small quantities and converted within the country from rubber bullet and acoustic expansion weapons.[136] Compared to other countries, official seizures in Ukraine registered "significant proportions of assembled and converted arms",[137] indirectly corroborating reports of domestic arms conversion workshops catering to criminals.[138]

According to data reported by the Ukrainian authorities to UNODC through the UN Illicit Arms Flows Questionnaire, 5,158 firearms were seized in 2023, of which about 20 per cent (1,041 weapons) were converted.[139] According to the Criminal Investigation Department of the National Police of Ukraine, as of the first three months of 2024, converted firearms still constitute a significant proportion of seized firearms.[140] A senior official in the National Police estimated that up to 50 per cent of firearms trafficked in Ukraine might be transported by post, disassembled in separate packages, as this helps avoid detection and responsibility.[141]

The Law of Ukraine 2114-IX On civilian participation in defence of Ukraine, passed at the beginning of the war, currently obligates civilians to surrender weapons and ammunition obtained during the war no later than 10 days after the end of martial law.

[134] Security Service of Ukraine, "SBU vyiavyla 3 skhrony z rosiiskoiu zbroieiu ta vybukhivkoiu: sered vyluchenoho – hranatomety vorozhykh DRH poblyzu Kyieva", daily press release in a Telegram group, 8 February 2024. Available at: https://t.me/SBUkr/11126.

[135] Interview with Key Informant (KI24) – see Annex A, 1 April 2024.

[136] Martyniuk, Anton. 'Measuring Illict Arms Flows: Ukraine'. Geneva: Small Arms Survey, April 2017. https://www.smallarmssurvey.org/sites/default/files/resources/SAS-BP3-Ukraine.pdf; Schroeder and Shumska, 'Making the Rounds: Illicit Ammunition in Ukraine', 10; Schroeder, Matt, Florquin, Nicolas, Hideg, Gergely, and Olena Shumska. 2019. *Small Arms Trafficking: Perceptions of Security and Radicalization in Ukraine.* Unpublished background paper. Geneva: Small Arms Survey. August 2019. See also: Galeotti, Mark, and Anna Arutunyan. 'Peace and Proliferation: The Russo-Ukrainian War and the Illegal Arms Trade'. Geneva: The Global Initiative Against Transnational Organized Crime, March 2023, 6-8.

[137] UNODC, Global Study on Firearms Trafficking (United Nations Office on Drugs and Crime publication, 2020).

[138] Francesco Buscemi, Nils Duquet, Ekaterina Golovko and Eric Woods, "Illicit firearms proliferation in the EU periphery: The case of Ukraine" in *Triggering terror: Illicit gun markets and firearms acquisition of terrorist networks in Europe,* Nils Duque and Kevin Goris eds., (Brussels; Flemish Peace Institute, 2018). Available at: https://flemishpeaceinstitute.eu/safte/files/project_safte_eu_neighbourhood_ukraine.pdf.

[139] UNODC, Global Study on Firearms Trafficking (United Nations Office on Drugs and Crime publication, 2020).

[140] Interview with Key Informant (KI24) – see Annex A, 1 April 2024; Anton Martyniuk, "Measuring Illicit Arms Flows", *Small Arms Survey* (2017), p.4. Available at: https://www.smallarmssurvey.org/sites/default/files/resources/SAS-BP3-Ukraine.pdf.

[141] Interview with Key Informant (KI24) – see Annex A, 1 April 2024.

4.3. Actors possessing and trafficking weapons and ammunition

There is limited evidence of organized crime engagement in the domestic and cross border illegal possession and trafficking of arms. According to one expert interviewed, "trafficking [before 2022] was predominantly opportunistic, low-level, small-scale, and domestic rather than international".[142] In mid-2024, it appears that the war has so far not radically transformed patterns of trafficking.

For the purpose of this study, a random sample of 46 closed court cases selected from a total of 625 cases closed in 2023 and concerning illegal possession or sale of RGD-5 hand grenades were reviewed. Thirty-eight of these cases concerned civilian defendants, most of them in possession of small quantities of grenades,[143] in locations far from frontlines. In most of these cases, defendants did not attempt to sell the weapons.

According to Ukrainian court statistics, of 3,073 people convicted for illicit handling of weapons and ammunition[144] between 2022 and 2023, 98 per cent were accused of acts committed individually, while only the remaining 2 per cent of acts committed in groups. The proportion of military personnel among those convicted, however, has increased, from 4.3 per cent in 2019 to 13.3 per cent in 2023.

In February 2024, the SSU apprehended a former convict who was using previously hidden stockpiles to sell grenades, explosives and ammunition while in prison.[145] In early 2024, law enforcement registered several cases of people previously convicted of illegal handling of weapons (grenades) selling stashed weapons from within penitentiaries."[146]

One of the largest cases of post-February 2022 trafficking documented in SBU press releases concerns a man in the central Ukrainian region of Vinnytsia who had prepared an arsenal of weapons and ammunition worth a reported UAH 3 million (approximately $75-80,000). The person in question used "specialized Internet platforms" to purchase damaged weapons and repaired them for sale. The SSU documented his attempt to sell "a Russian AK-12 [automatic rifle] and Dragunov sniper rifle for almost 300,000 UAH [approx. $7,000]".[147] This and other cases[148] suggest that while some weapons have made their way into illicit markets in Ukraine, the role of organized crime in this activity remains unclear.

---

[142] Interview with Key Informant (KI9) – see Annex A, 16 February 2024.

[143] List of published court cases used for this study: In 30 cases, only 1 grenade was seized; 81 grenades were seized in these 48 cases in total.

[144] Ukraine, Law 2341-III "Criminal Code of Ukraine", with amendments, Article 263. Available at: https://zakon.rada.gov.ua/laws/show/2341-14#Text.

[145] Security Service of Ukraine, "SBU vyiavyla 3 skhrony z rosiiskoiu zbroieiu ta vybukhivkoiu: sered vyluchenoho – hranatomety vorozhykh DRH poblyzu Kyieva", daily press release in a Telegram group, 8 February 2024. Available at: https://t.me/SBUkr/11126.

[146] Interview with Key Informant (KI7) – see Annex A, 5 February 2024.

[147] Security Service of Ukraine, "SBU zatrymala shche trokh 'chornykh zbroiariv', yaki khotily prodaty kryminalitetu snaipersku zbroiu ta hranatomety rf", daily press release in a Telegram group, 30 October 2023. Available at: https://t.me/SBUkr/10150.

[148] Interview with Key Informant (KI7) – see Annex A, 5 February 2024; Security Service of Ukraine, "SBU blokuvala dva kanaly pidpilnoho prodazhu zbroi, cherez yaki rosiiski avtomaty ta vybukhivka potraplialy do ruk kryminalitetu", daily press release in a Telegram group, 7 September 2023. Available at: https://t.me/SBUkr/9571.

There are indications that prices in the illicit market for assault rifles in Ukraine might be as much as 4-5 times higher than in the Western Balkans,[149] suggesting that the supply of small arms to Ukraine's illicit market remains small compared to other regions.[150]

A 2021 analysis of trafficking patterns after the 2014 conflict noted "an apparent disconnect between the large quantity of illicit ammunition circulating in Ukraine and the frequency and size of interdicted cross-border shipments", with shipments far smaller than those seized in other countries with active armed conflicts or high levels of criminal violence.[151]

Possible factors that have contained the illicit arms market to date could include effective law enforcement efforts to detect and disrupt weapons and ammunition trafficking, making weapons trafficking in Ukraine very risky; constraints on wholesale logistics; and a preference for alternative sources of illicit enrichment.

Research undertaken for this report and other assessments[152] has so far found little evidence that this pattern has been reversed or changed since February 2022, although it is early days and the sensitivity of the issue may affect official reporting. Seizures of ammunition by the State Border Service of Ukraine appear to be of small quantities in standalone shipments rather than attempts at shipping large volumes for illicit sale internationally.[153]

Officials interviewed in the regions of Chernivtsi[154] and Zakarpattia[155] reported an absence of any notable cases of outward trafficking of weapons and ammunition, and one case of inward trafficking from the EU. The World Customs Organization notes that Ukraine's customs authorities reported 31 and 29 cases of weapons seizures in 2022 and 2023 respectively.[156]

---

[149] GI-TOC Arms Monitoring Project, "Smoke on the Horizon: Trends in Arms Trafficking from the Conflict in Ukraine", *Global Initiative Against Transnational Organized Crime* (Geneva, Switzerland, June 2024), p. 17.

[150] The alternative interpretation – that a high internal demand keeps prices high – is unlikely. A high-demand, high-price scenario would in principle entail a higher than present level of domestic and border (import) seizures and detected attempted sales and would be reflected in more elaborate organization of criminal actors. As of mid-2024, the evidence reviewed in this section does not suggest this is the case in Ukraine.

[151] Matt Schroeder and Olena Shumska, "Making the Rounds: Illicit Ammunition in Ukraine", *Small Arms Survey* (2021), p. 50. Available at: https://www.jstor.org/stable/resrep28487.1.

[152] GI-TOC Arms Monitoring Project, "Smoke on the Horizon: Trends in Arms Trafficking from the Conflict in Ukraine", *Global Initiative Against Transnational Organized Crime* (Geneva, Switzerland, June 2024).; Interview with Key Informant (KI9) – see Annex A, 16 February 2024.

[153] Seizures of arms are not compared as the data for 2022 and 2023 is not disaggregated, and the recent statistics do not separate cold arms from firearms. State Border Service of Ukraine, "Annual statistics for 2023". Available at: https://web.archive.org/web/20240621231443/https://dpsu.gov.ua/ua/potochniy-rik/.

[154] Interview with Key Informant (KI1) – see Annex A, January 2024.

[155] Interview with Key Informant (KI7) – see Annex A, 5 February 2024.

[156] World Customs Organization, "Illicit trade report 2023", WCO (2023). Available at: https://www.wcoomd.org/-/media/wco/public/global/pdf/topics/enforcement-and-compliance/activities-and-programmes/illicit-trade-report/itr_2023_en.pdf?db=web.

Box 4. Production and modification of small armed drones: risks for a new criminal market

The shift to a large-scale war in the two years following February 2022, with mass military mobilization and the participation of civilians in funding the war effort, has created new challenges for countering proliferation of weapons and related technology. One such challenge stems from the widespread use of modified civilian off-the-shelf drones, as well as purposefully assembled First-Person View (FPV) racing drones for bombardment and construction of low-cost guided munitions at the frontline.[157]

From 2014 to 2015, civilian crowdfunding – raising money from a larger number of people typically contributing smaller sums, usually via online platforms – provided support to pro-government militias in eastern Ukraine, aiding them with both military and non-military resources for combat.

There are growing open online communities on drone technology generally, as well as specifically for the purposes of modifying drones for combat, and the skills needed to design and assemble drones are becoming more widespread. Delivered to the frontline, FPV drones are combined with improvised or converted explosives (typically, truncated rocket-propelled grenade rounds with an improvised detonator)[158] into guided missiles.

Another significant development is the adaptation of 3D-printing technology to create weapon systems for these drones[159] or tail stabilizers to turn grenades into aerial bombs, and printing of plastic casings for improvised explosive devices that can be dropped like bombs.

Similarly to FPV drones, these components can be freely and legally purchased for as little as $20.[160]

FPV drones and associated technology and components are not weapons in themselves. However, they represent the blurring of lines between civilian and military technology that could be used for illicit purposes away from the frontlines.

As of writing, there have been no known cases of the use of drones as weapons in non-military scenarios in Ukraine. However, it is important to highlight this specific phenomenon as vulnerable to exploitation by organized crime groups in the future.

---

[157] Taras Fedirko, Maryna Yakovenko, Daria Chernousova, Stephanie Diepeveen, Matti Pohjonen, Adam Quinn, Theo Tindall and Florian Weigand, "Deciphering drones: the organisation of innovation in Ukraine's war economy", Research report. *ODI and LSE Ideas* (London, United Kingdom, 2024). Typical models are 7 to 10 inches across.

[158] Interviews with Key Informant (KI12) – see Annex A, 10 February 2024.

[159] Willy Rock, "3D Printers + Drones, a Lethal Combination in the War in Ukraine", Royals Blue, 19 May 2022. Available at: https://www.royalsblue.com/3d-printers-drones-a-lethal-combination-in-the-war-in-ukraine/.

[160] Ali Express. "Behorse Airdrop System for DJI Mavic 3 Pro Drone", n.d. Available at: https://archive.ph/4XQxe.

5

Smuggling of goods: damaging the economy

> **Key findings in the smuggling of goods**
>
> Customs fraud and the smuggling of tobacco are causing economic damage to Ukraine's finances.
>
> Smugglers are adopting a number of methods – some very basic, some highly sophisticated – to avoid or falsify customs declarations.
>
> As of February 2022, due to border restrictions, the number of detected smuggled cigarettes in Ukraine dropped, with a strong reduction of inbound smuggling by sea. At the same time, some increase in detections was recorded of exports at the western borders with Hungary.
>
> It appears cigarette smugglers are reorientating their business into other criminal avenues.

5.1 Smuggling and customs fraud in Ukraine

According to experts, economic losses from smuggling and customs fraud reach UAH 300 billion, approximately $11 billion, or 5.5 per cent of the country's GDP in 2021.[161]

Smuggling[162] before the war could be divided into two broad approaches: avoidance of customs control, and goods concealment to deceive customs control.[163]

According to border guards working on the Ukraine-Slovakia border, one of the most common methods used by Ukrainian smugglers at land customs is hiding goods in large containers or trucks. Smugglers can conceal smuggled goods among legal trade or use special hidden compartments to transport goods across the border. Another method is the use of falsified customs documents and routes.[164] Smugglers have been known

---

[161] According to World Bank data, https://data.worldbank.org/indicator/NY.GDP.MKTP.CD?locations=UA.

[162] Art. 201 of the Criminal Code of Ukraine defines smuggling as the movement of large quantities of goods, cultural and historical valuables, poisonous and potent substances, radioactive materials, explosives, as well as weapons and ammunition, special technical means of covertly obtaining information across the customs border of Ukraine outside customs control or concealed from customs control. See: Ukraine, Law 2341-III "Criminal Code of Ukraine", with amendments, Art. 201. Available at: https://zakon.rada.gov.ua/laws/show/2341-14#n1354.

[163] Methods of moving contraband outside of customs control involve moving goods across the border outside of customs control areas – both at the border crossing point where the customs office is located and outside of it, as well as at times when customs control and clearance are not carried out, or avoiding clearance by using illegally obtained or forged documents. In the place where the customs point is located, smugglers take other measures, such as using hides, disguising some items as others, submitting fake documents or declaring them as diplomatic cargo, as well as understating the value of goods when declaring them. O. O. Kukshynova and D. S. Nosenko, "Perspektyvy borotby ta zapobihannia konrabandnoi zlochynnosti v mezhakh ukrainskoho zakonodavstva", *Naukovyj visnyk Uzhhorodskoho Universytetu* (Uzhhorod, Ukraine, 2021). Available at: https://visnyk-juris-uzhnu.com/wp-content/uploads/2022/01/48.pdf.

[164] Interview with a representative of the State Border Guard Service in Zakarpattia region (K15), January 2024.

also to use aerial drones to transport goods across the border,[165] and to make use of the specificities of terrain to avoid detection.[166]

Box 5. Smuggling schemes according to the Ukrainian authorities

Various methods of smuggling are commonly referred to as "schemes".[167] Examples of these schemes include:

The **"inaccurate declaration"** is the underreporting of the quantity, dimensions and value of goods; fraudulent classification in customs reports; or concealment of the true name, manufacturers or quality of the goods.[168] This form of customs fraud is a common way to reduce customs duties and taxes for imported goods.[169]

"Zelenka" ("Wooded areas") is the movement of goods outside of official border crossing points, particularly when using the specificities of local terrain for concealing the border crossing. The Zakarpattia region, where the EU-Ukraine border runs through forested mountain areas and along rivers, is often used for smuggling cigarettes out of the country.[170]

"Empty transport" is a smuggling and customs fraud scheme involving goods that are concealed in a transport that presents itself as empty.[171] In recent years Ukrainian authorities have introduced vehicle scanners and begun to subject empty vehicles to stricter controls to combat this scheme. For example, according to the Security

---

[165] Ukrainian State Border Guard Service, "'Viina droniv' na zakhidnomu kordoni: udar u spynu vid kontrabandystiv" video, 14 December 2023. Available at: https://www.facebook.com/DPSUkraine/videos/1398638674341413.

[166] Regional Directorate of the State Border Guard Service of the Western Border of Ukraine, press release on Facebook, 22 September 2023. Available at: https://www.facebook.com/zahidnuy.kordon/posts/pfbid0269oc7B6nuz2uxiwQf51dYVGZjNSEt3bz87gHvfd3jh1B9uypAe3bsH6Quc88CKm3l.

[167] Transcript of a meeting between the President of Ukraine and Zakarpattia region customs officers on 6 July 2019 provided to the research team.

[168] Such actions are subject to a fine of 300 per cent of the unpaid amount of customs duties. Depending on circumstances, smuggling of goods attract fines between UAH 170,000 and UAH 1,275,000 (US$4,126 to US$30,951 at the 10 October 2024 National Bank of Ukraine exchange rate) and imprisonment of up to eight years, with disqualification to hold certain positions or engage in certain activities for up to three years and confiscation of property. See Ukraine, Law 3513-IX "On Amendments to the Criminal Code and the Code of Criminal Procedure of Ukraine regarding the criminalization of smuggling of goods", 9 December 2023. Available at: https://zakon.rada.gov.ua/laws/show/3513-20#Text.

[169] Ukraine, Cabinet of Ministers, Declaration nr. 1375 on the customs value of goods transported across Ukrainian borders (2003). Available at: https://www.kmu.gov.ua/npas/2617408.

[170] Security Service of Ukraine, "SBU zatrymala na Kyivshchyni narkotorhovtsiv, u yakykh vylucheno rekordni za ostanni roky ponad 20 tonn 'tovaru'", 17 August 2023. Available at: https://ssu.gov.ua/novyny/sbu-zatrymala-na-kyivshchyni-narkotorhovtsiv-u-yakykh-vylucheno-rekordni-za-ostanni-roky-ponad-20-tonn-tovaru.

[171] For example, a seemingly empty petrol tanker truck arrives for inspection, but may in fact be filled with cigarettes.

Service of Ukraine, in 2023 customs officers detected a seemingly empty truck loaded with Apple branded equipment worth an estimated at $1.5 million.[172]

The "preferential scheme" involves the dispersal of a shipment of goods among a coordinated group of people who transport consignments in quantities/values permitted for personal use, elsewhere known as "ants trafficking".

Tax-free goods can have a total value of up to EUR 500 (up to EUR 1,000 at airports). Sometimes, the goods are broken down into smaller consignments and transported by specially created teams (the so-called "ants"), which move goods without taxation within the official thresholds of 500 EUR, or 50 kg".

In April 2021, a sanctions list was signed against the top 10 Ukrainian smugglers.[173] The sanctions included the freezing of assets, restrictions on trade operations and other restrictions on mobility and of economic nature.[174]

At the end of 2023, amendments to the Criminal Code were adopted to criminalize the smuggling of certain goods,[175] making the Bureau of Economic Security, responsible for pre-trial investigations.[176]

---

[172] Censor.net, "Lvivski mytnyky oformyly yak porozhnii mikroavtobus, nabytyi tekhnikoiu, v tomu chysli Apple, na $1,5 mln. FOTOreportazh", 23 April 2023. Available at: https://censor.net/ua/photo_news/3413952/lvivski_mytnyky_oformyly_yak_porojniyi_mikroavtobus_nabytyyi_tehnikoyu_v_tomu_chysli_apple_na_15_mln.

[173] Ukraine, Presidential decree no. 140/2021, 3 April 2021. Available at: https://www.president.gov.ua/documents/1402021-38381.

[174] At the end of 2021, the Security Service of Ukraine reported that 22 people and 148 companies were included in the sanctions list of smugglers in 2021. These entities were involved in suspicious financial transactions related to money laundering worth UAH 938 million (US$34.47 million at the National Bank of Ukraine exchange rate for 1 December 2021). Financial transactions in 23 banks were also suspended, the right to perform notarial acts in relation to 104 real estate objects was restricted, and the issuance of permits and licences for the import and export of currency values was suspended. See: Iryna Lysohor, "Pid sanktsii proty kontrabandystiv zahalom potrapyly 22 fizychnykh osoby i 146 yurydychnykh, – Bakanov", LB.UA, 10 November 2021. Available at: https://lb.ua/economics/2021/11/10/498325_pid_sanktsii_proti_kontrabandistiv.html.

[175] They concerned Articles 201 («Smuggling of cultural property and weapons») and 201(1) («Smuggling of timber and valuable tree species»). At the same time, the CCU was supplemented with new Articles 201(3) (Smuggling of goods) and 201(4) (Smuggling of excisable goods). See Ukraine, Law 3513-IX "On Amendments to the Criminal Code and the Code of Criminal Procedure of Ukraine regarding the criminalization of smuggling of goods", 9 December 2023. Available at: https://zakon.rada.gov.ua/laws/show/3513-IX - Text.

[176] The Law amends Article 216 of the Criminal Procedure Code to deprive investigators of the security agencies of the right to conduct pre-trial investigations in criminal proceedings under Article 201(1) of the CCU, and to empower detectives of the Bureau of Economic Security to conduct pre-trial investigations in criminal proceedings under Articles 201(1), 201(3), 201(4) of the CCU.

5.2. Illegal cigarette trade

According to the statistics of the State Customs Service, in the immediate pre-2022 period, some of the most common types of smuggled goods detected at the border were tobacco products,[177] mobile phones and tablets, and drugs.[178]

In 2021, the damage to the state budget in terms of tax loss from illicit cigarettes alone was estimated to be more than UAH 15 billion (roughly $500 million), while according to Ukraine's government, state revenue losses from illicit trade of excisable goods were estimated at UAH 30 billion ($1.1 billion).[179]

According to a Ukrainian market research company, in 2023 Ukraine may have lost UAH 23.5 billion (or approx. $636.2 million) through unpaid taxes on illicit tobacco sales, a more than four-fold increase since 2020 (in current value UAH).[180] The bulk of the loss is accounted for by cigarettes produced illegally in Ukraine and cigarettes produced legally for sale in duty free shops but diverted for the domestic market.

After the beginning of the full-scale invasion in 2022, when domestic fuel production facilities were destroyed and the government temporarily suspended VAT and excise duty on fuel, tobacco became the most important source of excise revenues.[181]

At the same time, inbound and outbound detected smuggled cigarettes in Ukraine decreased by more than a factor of nine, from 13.56 million packs in 2021 to 1.45 million packs in 2022.[182] From a net recipient of smuggled cigarettes in 2021 (when detected illicit imports exceeded exports by a factor of four), in 2022 Ukraine became a net exporter (the volume of detected illicit exports was 2.8 times the size of imports).

The reduction of inbound flows is accounted for by the drastic fall of cigarette trafficking by sea, and to a much lesser extent, the decline of trafficking across Ukraine's northern and eastern borders. The war cut off the main inward cigarette smuggling routes. The

---

[177] Ukraine has not been able to accede to the Protocol to Eliminate Illicit Trade in Tobacco Products for eight years. In April 2016, the Parliament of Ukraine approved the «Statement of the Verkhovna Rada of Ukraine on the occasion of the 10th anniversary of Ukraine's ratification of the WHO Framework Convention on Tobacco Control» (Resolution No. 1087-VIII), which instructed the Government to start the process of ratifying the Protocol. However, the Protocol has not yet been ratified.

[178] Ukraine, State Customs Service, "Za I pivrichchia 2020 r. pratsivnyky Derzhmytsluzhby vyiavyly porushen mytnykh pravyl na ponad 1 mlrd hrn", 10 July 2020. Available at: https://customs.gov.ua/en/news/novini-20/post/za-i-pivrichchia-2020-r-pratsivniki-derzhmitsluzhbi-viiavili-porushen-mitnikh-pravil-na-ponad-1-mlrd-grn-124; A report by a Special Investigative Commission of the Parliament provided a "conservative" estimate of losses from the illegal production and circulation of excisable tobacco products, alcoholic beverages and fuel is about UAH 40 billion per year (fuel – UAH 10 billion [US$270.37 million]], tobacco – UAH 21 billion [US$567.7 million], and alcohol – UAH 9 billion [US$243.3 million]).

[179] Ibid.

[180] Kantar Ukraine. Report on illicit trade markets in Ukraine: results for October 2023. Report #10353 (Kyiv, December 2023). Available at: https://www.nicontrabandi.org.ua/sites/default/files/2024-01/%D0%96%D0%BE%D0%B2%D1%82%D0%B5%D0%BD%D1%8C%202023.pdf.

[181] Ibid.

[182] Ukrainian Institute for the Future, "Nelehalnyi rynok tiutiunovoi produktsii v umovakh povnomasshtabnoi viiny: vyklyky ta zahrozy", report, p. 10, 21 September 2023. Available at: https://uifuture.org/reports/nelegalnyj-rynok-tyutyunovoyi-produkcziyi-v-umovah-povnomasshtabnoyi-vijny-vyklyky-ta-zagrozy/.

Ukraine-Hungary border was the only stretch of the Ukrainian state border to see a net increase in detected illicit cigarette flows (in this case, illicit exports, from 0.18 to 0.3 million packs annually) between 2021 and 2022.[183]

The Border Guard Service attributes this increase to the fact that Ukraine's western borders are heavily guarded, resulting in increasing arrests for smugglers.[184] In addition, border guards have noted a reorientation of smugglers to other areas, such as organizing illegal border crossings for men of conscription age.[185]

---

[183] Ibid., p. 11.

[184] Interview with Key Informant (KI2) – see Annex A, February 2024.

[185] Interview with Key Informant (KI5) – see Annex A, January 2024.

6

Trafficking in persons: exploiting those in need of refuge

> **Key findings in trafficking in persons**
>
> The war resulted in a vast displacement of population within and outside Ukraine's borders. This typically increases the vulnerability of people to fall victim to trafficking in persons.
>
> A documented form of domestic trafficking is the recruitment of displaced populations deceived into shelters or other accommodation disguised as humanitarian assistance, where they are exploited for forced labour.

The war has increased the economic vulnerability of the Ukrainian population and led to internal and cross-border forced displacement of a large proportion of the population as well as social fragmentation, death of family members and breakdown of families. Since 24 February 2022, some 14 million Ukrainians, or 35 per cent of the population, have been forced to flee their homes. UNODC has investigated the risks of trafficking in persons for Ukrainian refugees in Western Europe, highlighting how the mitigation measures put into place by many destination countries seems to have resulted in limited increases in the number of victims of trafficking compared to the mass displacement recorded in 2022 and 2023.[186]

As far as trafficking in persons within the national borders of Ukraine is concerned, according to experts interviewed for this report, this remains predominantly opportunistic. Moreover, there are few cases of child trafficking in Ukraine, particularly with the involvement of organized criminal groups.[187]

According to official law enforcement figures, the number of human trafficking offences[188] officially registered annually in Ukraine decreased following the full-scale invasion and, despite a small rebound in 2023, remains significantly below its pre-2022, and especially pre-Covid-19, levels. Moreover, the majority of registered offences were committed by individuals.[189] This apparent decline and rebound over 2022–2023 is in line with a drop in reports of other criminal activities and trafficking.

---

[186] For further information on this see *UNODC Study on Trafficking in Persons and Smuggling of Migrants in the Context of Displacement caused by the War in Ukraine,* UNODC publication, February 2025.

[187] Interviews KI26 and KI27, May and June 2024.

[188] Offences under Article 149 of the Criminal Code of Ukraine 'Trafficking in Human Beings'. Ukraine, Law 2341-III "Criminal Code of Ukraine", with amendments. Available at: https://zakon.rada.gov.ua/laws/show/2341-14#Text.

[189] Letter of the Office of Prosecutor General of Ukraine to UNODC research team, 5 April 2024.

Chart 4. Trend in detected human trafficking offences and victims in Ukraine, 2019–2023[190]
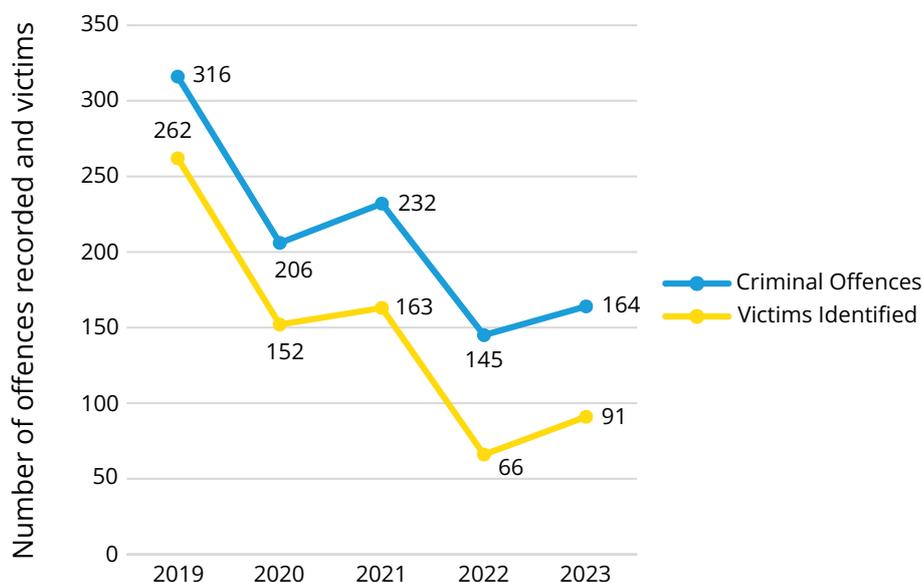
Source: Office of the Prosecutor General.[191]

The National Social Service of Ukraine assigned the status of victim of human trafficking to 47 people in 2022, 118 people in 2023, and 43 in the first quarter of 2024. In 2023, almost half (55 people) of those given the status, suffered from exploitation in armed conflict, with labour exploitation (22), exploitation for forced criminal activities (17) and sexual exploitation (11) constituting other large categories.[192]

Interviews with key informants working in the domain of trafficking in persons confirm that many cases could remain unreported to the authorities.[193]

An IOM survey[194] published in December 2023 showed that the vulnerability to trafficking in persons affects the entire population and not only those with a low socio-economic status who are typically the most vulnerable to trafficking. The survey compared trafficking risks perception among people at risk of trafficking (on the basis of difficult socio-economic background) and a control group (people not at risk). It found that on

---

[190] Ibid. Offences reported concern Art. 149 of the Criminal Code of Ukraine. Ukraine, Law 2341-III "Criminal Code of Ukraine", with amendments. Available at: https://zakon.rada.gov.ua/laws/show/2341-14#Text.

[191] Ibid. Offences reported concern Art. 149 of the Criminal Code of Ukraine. Ukraine, Law 2341-III "Criminal Code of Ukraine", with amendments. Available at: https://zakon.rada.gov.ua/laws/show/2341-14#Text.

[192] Ukraine, Ministry of Social Policy, "Ukraintsi staly chastishe zvertatysia za dopomohoiu u vypadkakh, koly postrazhdaly vid torhivli liudmy", press release, 1 May 2024. Available at: https://www.msp.gov.ua/press-center/news/ukrayintsi-staly-chastishe-zvertatysya-za-dopomohoyu-u-vypadkakh-koly-postrazhdaly-vid-torhivli-lyudmy; Interview with Key Informant (KI27) – see Annex A, 20 June 2024.

[193] Interviews with Key Informants (KI22, KI23, KI25) – see Annex A, April-June 2024.

[194] IOM, "Otsinka ryzykiv ta vrazlyvosti tsilovykh hrup naselennia do torhivli liudmy ta ekspluatatsii pid chas viiny. Hruden 2023", December 2023. Available at: https://ukraine.iom.int/uk/resources/otsinka-ryzykiv-ta-vrazlyvosti-tsilovykh-hrup-naselennya-do-torhivli-lyudmy-ta-ekspluatatsiyi-pid-chas-viyny-hruden-2023.

average, half (52 per cent) of those surveyed in the control group were ready to accept at least one "risky offer" that could lead them to be trafficked.[195]

In a number of cases reviewed for this report reveal that displacement, housing need and unemployment combined enable individual traffickers and criminal groups to exploit vulnerable individuals and lure them into situations of exploitation and forced labour. Welfare subsidies for IDPs and refugees make this group even more vulnerable as they may be exploited to obtain access to these subsidies. According to a key expert informant, "IDPs are the least protected people. As state payments to IDPs are cancelled, people agree to any work conditions, and fall into the trap of forced labour because of their vulnerability".[196]

Box 6.1. The case of exploitation of IDPs in Lviv region[197]

In April 2022, a couple from the frontline of Donetsk region fled with their two children to a settlement in Lviv region. In economic need, the couple inquired about work opportunities and were directed to a farm run by the head of the NGO who organized their shelter. The woman began working under harsh conditions without proper protective clothing. Despite her deteriorating health, she received no medical support or necessary medication. Subsequently, the man also joined in the farm work, while their children were placed in a boarding school due to the lack of local educational facilities.

Because of their working hours, the couple de facto lived on the farm, where the conditions were dire. The couple worked from dawn until dusk between September 2022 and August 2023. They were not paid and instead received food – leftovers from the hotel kitchen – or were allowed to collect for themselves eggs and goat milk from the farm.[198] The people overseeing the couple took control of the woman's bank card, which contained the state payments intended for her and the children as IDPs.[199]

As of June 2024, the criminal case related to this situation was still ongoing in a Lviv court.

---

[195] Ibid.

[196] Interview with the Head of the Human Trafficking Prevention Initiative at the Support to Government Reforms in Ukraine (SURGE) project, Interview with Key Informant (KI27) – see Annex A, 20 June 2024.

[197] The account is based on an interview with an expert on human trafficking from a non-governmental organization, Interview with Key Informant (KI23) – see Annex A, April 2024; as well as on court records for criminal case no. 12023140000001007 from 1 September 2023, see the original indictment in: Ukraine, Halych District Court in Lviv City, case no. 461/9758/23, 20 November 2023. Available at: https://reyestr. court.gov.ua/Review/115023810. The details of the case revealed to us in the interview matched those of the case beyond reasonable doubt.

[198] Another key informant referred to a case of 40 IDPs working for shelter and farm in Stryi district - most likely referring to this case, although charges have been pressed against the head of the NGO only for the alleged exploitation of two people. Interview with the Head of the Human Trafficking Prevention Initiative at the Support to Government Reforms in Ukraine (SURGE) project, Interview with Key Informant (KI27) – see Annex A, 20 June 2024.

[199] This information comes from Interview with Key Informant (KI23) – see Annex A, April 2024.

A review of court cases of human trafficking since 24 February 2022 indicated a total of eight cases[200][201][202] where "rehabilitation centres" for people in need effectively functioned as trafficking hubs where victims were dispatched for forced labour to local businesses. In some cases, these operations paid a share of their revenues to "legitimate" charities to appear as legitimate operations; in others, charitable rehabilitation operations appeared as a façade for entirely illicit operations.

Box 6.2. The recruitment of children in the context of armed conflict

Children have taken a heavy toll in the war against Ukraine. The United Nations Human Rights Office documented thousands of children killed or injured between 24 February 2022 and 31 December 2024 in Ukraine. And at the end of December 2024, 737,000 children were estimated to be internally displaced,[203] experiencing a higher risk of trafficking. As documented by UNODC, people displaced by the war against Ukraine face risks in relation to trafficking in persons.[204]

Children living in conflict areas are in general vulnerable to trafficking. Trafficking of children by armed groups has been documented in conflicts across many regions, including Europe, the Middle East, sub-Saharan Africa and Asia.[205] According to the Special Representative of the Secretary-General on Children and Armed Conflict, the recruitment and use of children associated with armed groups nearly always constitutes trafficking in persons.[206]

In the context of the war against Ukraine, UN Reports indicated the recruitment of children for intelligence gathering and sabotage activities in conflict zones, including

---

[200] A search of all decisions in the https://reyestr.court.gov.ua database was made between 24 February 2022 and 18 June 2024, using the following search term: 'ст. 149 КК України реабілітаційний центр торгівля людьми'. This resulted in some 35 decisions pertaining to 8 criminal cases (technically, 9, because the main Dnipro case in section 7.2.2 was split into two separate processes ('провадження').

[201] Summary based on: Ukraine, Amur-Nyzhnodniprovskyi District Court in Dnipro, Case Nr. 199/2273/24. Court decision on the leader of the group, of 27 May 2024, is available at: https://reyestr.court.gov.ua/Review/119309319; and on group members, of 22 March 2024, at: https://reyestr.court.gov.ua/Review/117841193.

[202] Ukraine, Office of the Prosecutor General, "Verbuvaly ta utrymuvaly v trudovomu rabstvi 50 liudei – u Dnipri zatrymano hrupu osib" (11 January 2024). Available at: https://www.gp.gov.ua/ua/posts/verbuvali-ta-utrimuvali-v-trudovomu-rabstvi-50-lyudei-u-dnipri-zatrimano-grupu-osib. No information is provided in the reports about gender composition of the victims. Photos published by the authorities suggest the victims were mostly male. There is no mention of underage persons in the OPG press release or court documents regarding the case.

[203] United Nations Human Rights Office of the High Commissioner, "The Impact of the Armed Conflict on Occupation on Children's Rights in Ukraine, 24 February 2022 – 31 November 2024", pp. 6-9. Available at: https://ukraine.ohchr.org/sites/default/files/2025-04/2025-03-21%20OHCHR%20Report%20on%20Children%27s%20Rights%20in%20Ukraine.pdf.

[204] For further information of this see *UNODC Study on Trafficking in Persons and Smuggling of Migrants in the Context of Displacement caused by the War in Ukraine,* UNODC publication, February 2025.

[205] United Nations General Assembly and United Nations Security Council, Report of the Secretary-General. Children and Armed Conflict, A/72/361.

[206] United Nations Human Rights Council, Annual report of the Special Representative of the Secretary-General for Children and Armed Conflict, A/HRC/37/47, paras 15-16.

car bombings.[207] OHCHR recorded an increase in alleged recruitment of children to conduct, among other things, surveillance and share information on military activities and to sabotage or commit arson on objects or public property tied to the military.[208] In most cases these boys and girls were recruited over social media and promised monetary compensation to set fire to military-affiliated objects such as buildings, vehicles or railway equipment.[209]

---

[207] United Nations General Assembly Security Council Annual Report in Children and Armed Conflict. A/78/842-S/2024/384, p.38; United Nations General Assembly Security Council Annual Report in Children and Armed Conflict. A/77/895-S/2023/363, p.38.

[208] United Nations Human Rights Office of the High Commissioner, "The Impact of the Armed Conflict on Occupation on Children's Rights in Ukraine, 24 February 2022 – 31 November 2024", p.12. Available at: https://ukraine.ohchr.org/sites/default/files/2025-04/2025-03-21%20OHCHR%20Report%20on%20 Children%27s%20Rights%20in%20Ukraine.pdf.

[209] Ibid.

7

Facilitation of illegal border crossing of men and draft evasion

> ***Key findings in facilitation of illegal border crossing and draft evasion***
>
> The war has limited the smuggling of migrants from third countries headed through Ukraine to the European Union.
>
> Migrant smugglers appear to have diversified their activity to facilitating the irregular exit of Ukrainian men across the Western borders to evade conscription.
>
> Offenders facilitating the irregular exit seem to operate as criminal organizations, active from both sides of the border to facilitate the passage across forest pathways, rivers and avoiding official checkpoints.
>
> Draft evasion is further supported by fraudulent schemes or corruptive practices aimed at removing the person from military registration, mainly by feigning health, family or other issues defined by law.

Intensified patrolling of the Ukrainian border and almost the complete closure of the Eastern and Northeastern borders have affected the smuggling of migrants through Ukraine. The last detected group, consisting of 10 migrants, was smuggled from Asia, crossing Ukraine and headed for the European Union. They were stopped at the Ukraine-Slovak border in March 2022.[210] According to law enforcement experts, the closure of ports and intense hostilities had the effect of ceasing migrant smuggling of third country nationals to the EU through Ukraine.[211]

With migrant smuggling from Ukraine into the EU declining, smugglers have turned to the facilitation of illegal exits of Ukrainian citizens seeking to avoid conscription.[212]

With the escalation of the war in February 2022, the Ukrainian government restricted foreign travel abroad of men between the ages of 18 and 60. Almost immediately after the travel ban was imposed, law enforcement officials began to report detection of efforts to facilitate the illegal exit of men from the country to evade mobilization.

In the first five months of 2024, according to NPU's Strategic Investigations Department, 161 criminal proceedings were opened against 519 people for facilitating the illegal border crossing out of the country for draft evasion.[213]

On 11 April 2024, Ukraine's Parliament passed a law to toughen military mobilization measures, lowering the minimum age for men subject to mobilization from 27 to 25 years and significantly increasing fines for not being registered for military service and not updating personal data at territorial recruitment centres.[214]

---

[210] Interview with Key Informants (KI5) – see Annex A, January 2024.

[211] Interview with Key Informant (KI8) – see Annex A, February 2024.

[212] Interview with Key Informant (KI18) – see Annex A, 2 March 2024.

[213] Ibid.

[214] Ukraine, Parliament of Ukraine, *Verkhovna Rada Ukrainy pryiniala u druhomu chytanni i v tsilomu Zakon №10449 «Pro vnesennia zmin do deiakykh zakonodavchykh aktiv Ukrainy shchodo okremykh pytan prokhodzhennia viiskovoi sluzhby, mobilizatsii ta viiskovoho obliku»,* press release, Kyiv, April 2024. Available at: https://www.rada.gov.ua/news/razom/248328.html.

The Strategic Investigations Department of the Main Directorate of the National Police of Ukraine (SID) has noted that all "schemes" for enabling travel of persons liable for military service abroad who do not have grounds for doing so are a priori illegal. However, they can be divided into illegal crossings and those that, while still illegal, are given the appearance of legality.[215]

SID defines illegal border crossings as those outside of official checkpoints. For example, by swimming or going by boat across the Tisza River in Chernivtsi and Zakarpattia regions, through forest belts, hiding in trucks, etc. In the second category are those seeking to leave the country with illicitly obtained legal (or legal looking) paperwork allowing them to leave Ukraine at an official border crossing.

Ukrainian legislation allows men subject to mobilization to travel abroad on several grounds: if they are removed from military registration for health reasons, have a deferral from conscription, have three or more children below the age of 18 or a child with a disability, are raising a child alone, accompany a person with a disability or a person recognized by a court as incapacitated, or are students, postgraduates, doctoral students studying abroad, etc.[216]

> ## Box 7. Illicit provision of draft exemption and travel permits
>
> Illicit cross-border travel for men between 18 and 60 years of age has been organized using legal exemptions and loopholes, obtained illicitly. Fictitious marriages with women who have disabilities or have many children have been used, among other methods, to enable men to leave the country.[217]
>
> One widespread scheme includes removal from military registration for health reasons – the so-called "white ticket" – based on a decision of the military medical commission (VLK in Ukrainian). Usually, the scheme involves officials of the Military Draft Commission (TTsK in Ukrainian) and doctors of the VLK. These are often facilitated through organised intermediaries who reside in border areas.[218]
>
> In response to these schemes, the National Security and Defence Council recommended in August 2023 that law enforcement agencies take additional measures to counteract

---

[215] Ukraine, National Police, "Holova DSR Andrii Rubel: Levova chastka shakhraiv na temi viiny – areshtanty SIZO i uviazneni", 4 June 2024. Available at: https://www.npu.gov.ua/news/holova-dsr-andrii-rubel-levova-chastka-shakhraiv-na-temi-viiny-areshtanty-sizo-i-uviazneni.

[216] Ukraine, Legislation regarding the crossing of borders of Ukraine No. 57, Revision of the Resolution of the Cabinet of Ministers of Ukraine No. 597 (13 June 2023) Available at: https://zakon.rada.gov.ua/laws/show/en/57-95-%D0%BF#Text.

[217] Ukraine, National Police, "Holova DSR Andrii Rubel: Levova chastka shakhraiv na temi viiny – areshtanty SIZO i uviazneni", 4 June 2024. Available at: https://www.npu.gov.ua/news/holova-dsr-andrii-rubel-levova-chastka-shakhraiv-na-temi-viiny-areshtanty-sizo-i-uviazneni; Kristina But, "Spochatku vidihralemo love story, a potim roziidemosia". Yak v Ukraini sudiat za skhemy ukladennia fiktyvnykh shliubiv dlia peretynu kordonu", *Graty,* n.d. [2024] Available at: https://uhilennya-vid-mobilizaciyi-shemi-ta-nas.webflow.io/posts/love-story.

[218] National Police of Ukraine, "U Chernivetskii oblasti vykryto orhanizovanu zlochynnu hrupu, yaka nalahodyla masshtabnyi kanal perepravlennia ukhyliantiv do Moldovy" Press release in a Telegram group, 20 November 2023. Available at: https://t.me/UA_National_Police/16089.

corruption among TTsK officials, and the President announced the dismissal of all heads of regional TTsK.[219] By the end of 2023, the State Bureau of Investigation, which investigates crimes committed by public officials, had opened 260 proceedings against TTsK and VLK officials.[220]

To prevent corruption schemes in the issuance of certificates of unfitness for military service, the Ministry of Defence changed the rules for passing the military medical commission in May 2024. The Ministry of Defence abolished the status of «partially fit,» and all persons liable for military service who were declared unfit or partially fit for service were obliged to undergo a second medical examination.[221]

Another common scheme for obtaining a permit to travel abroad is the inclusion in the *Shlyakh* electronic system. The Cabinet of Ministers introduced *Shlyakh* in May 2022[222] as a way of allowing drivers delivering humanitarian aid to travel abroad and stay there for up to 45 days. As with other legal grounds for crossing the border, the *Shlyakh* system was abused. According to the State Border Guard Service, 192,500 Ukrainians used the system up until April 2023, of whom 19,000 did not return to Ukraine.[223]

The National Police's Department of Strategic Investigations notes that in the first five months of 2024, out of 155 defendants in criminal proceedings for the facilitation of illegal exit and draft evasion, 40 used the *Shlyakh* system, and out of 50 indictments sent to court during this period, 12 related to the *Shlyakh* system.[224]

Already in March 2022, law enforcement officials began reporting male Ukrainian citizens' attempts to illegally cross the state border in neighbouring EU countries, presumably to avoid the draft.[225]

---

[219] Ukriform, "Zelenskyi: Zvilniaiemo vsikh oblasnykh viiskkomiv", 11 August 2023. Available at: https://www.ukrinform.ua/rubric-society/3747143-zelenskij-zvilnaemo-vsih-oblasnih-vijskkomiv.html.

[220] Ukraine, State Bureau of Investigations, "DBR rozsliduie 260 kryminalnykh provadzhen za faktamy porushen u viiskkomatakh ta viiskovo-likarskykh komisiiakh", press release, 10 October 2023. Available at: https://dbr.gov.ua/news/dbr-rozslidue-260-kriminalnih-provadzhen-za-faktami-porushen-u-vijskkomatah-ta-vijskovo-likarskih-komisiyah.

[221] *Ukraine, Order of the Ministry of Defense of Ukraine on Approval of Amendments to the Regulations on Military Medical Examination in the Armed Forces of Ukraine No. 402,* and *No.490* (18 August 2023). No. 402 available at: https://zakon.rada.gov.ua/laws/show/z1109-08#n14. No. 490 available at: https://zakon.rada.gov.ua/laws/show/z1467-23#Text.

[222] Ukraine, Ministry of Infrastructure, "Kabinet Ministriv Ukrainy zminyv pravyla peretynu kordonu avtomobilnymy pereviznykamy", press release, 26 May 2022. Available at: https://www.kmu.gov.ua/news/kabinet-ministriv-ukrayini-zminiv-pravila-peretinu-kordonu-avtomobilnimi-pereviznikami.

[223] Ihor Serov, "Cherez systemu «Shliakh» vtekly za kordon i ne povernulysia maizhe 19 tysiach cholovikiv: nazvano seredniu vartist khabaria", TSN, 27 June 2023. Available at: https://tsn.ua/exclusive/vtekli-za-kordon-ta-ne-povernulis-mayzhe-19-tis-cholovikiv-nazvano-serednyu-vartist-habarya-2357881.html.

[224] Ukraine, National Police, "Holova DSR Andrii Rubel: Levova chastka shakhraiv na temi viiny – areshtanty SIZO i uviazneni", 4 June 2024. Available at: https://www.npu.gov.ua/news/holova-dsr-andrii-rubel-levova-chastka-shakhraiv-na-temi-viiny-areshtanty-sizo-i-uviazneni.

[225] National Police of Ukraine, "Na Zakarpatti politsiia zatrymala zlovmysnyka, yakyi namahavsia nezakonno perepravyty cherez derzhkordon dvokh ukraintsiv pryzovnoho viku", press release in a Telegram group, 15 March 2022. Available at: https://t.me/SBUkr/11286; https://t.me/UA_National_Police/2550. See for example, a case from Vinnytsia region: National Police of Ukraine, "3000 yevro za nezakonnyi peretyn kordonu: pravookhorontsi Vinnychchyny zatrymaly dvokh cholovikiv", press release in a Telegram group, 21 March 2022. Available at: https://t.me/UA_National_Police/2691.

The NPU's State Security Department notes that people facilitating the exit from Ukraine are often residents of border regions outside official checkpoints. Law enforcement reports on illegal border crossing schemes organized by residents of the border areas describe these type of operations and the labour distribution between the involved groups as follows: typically, one of the group members finds willing clients; once a certain number of clients is reached, ranging from three or four up to 15-20, the clients are taken to a pre-arranged location near the border. From there, they are instructed on the routes to take.[226]

On the other side of the border, those leaving Ukraine are met by another member of the group, who takes them out of the border control zone.[227] If the border is along a river, they may be transported by boat or given wetsuits.[228]

According to NPU's State Security Department, there are reports that criminal actors seek to profit from these operations. In February 2024, a law enforcement operation found[229] that a criminal actor was transporting clients who wanted to leave Ukraine for $8,000. The clients paid upfront in Kyiv. The men were transported to the border under the guise of providing taxi services and then taken by boat across the Dniester River. On the opposite side in Moldova, other members of the group met them and provided safe escort.[230] In May 2024, authorities identified and arrested members of criminal groups who had participated in a meeting to discuss the redistribution of spheres of criminal influence and control over the illegal transportation of people across the border.[231] The NPU noted that after the law on strengthening mobilization came into force on 18 May 2024, the prices of illegal carriers increased significantly.[232]

---

[226] National Police of Ukraine, "U Chernivetskii oblasti vykryto orhanizovanu zlochynnu hrupu, yaka nalahodyla masshtabnyi kanal perepravlennia ukhyliantiv do Moldovy", press release in a Telegram group, 20 November 2023. Available at: https://t.me/UA_National_Police/16089.

[227] National Police of Ukraine, "Na Zakarpatti politsiia zatrymala hrupu osib, yaki za 5000 dolariv SShA perepravlialy cholovikiv za kordon", press release in a Telegram group, 29 May 2022. Available at: https://t.me/UA_National_Police/4253.

[228] National Police of Ukraine, "6000 dolariv SShA za nezakonnyi peretyn kordonu: stolychni politseiski zneshkodyly zlochynnu skhemu", press release in a Telegram group, 27 October 2023. Available at: https://t.me/UA_National_Police/15502.

[229] National Police of Ukraine, "U Kyievi operatyvnyky zatrymaly cholovika, nablyzhenoho do kryminalnoho avtoryteta «Lavasohly-Batumskoho»", press release in a Telegram group, 23 February 2023. Available at: https://t.me/UA_National_Police/19235.

[230] Ukraine, National Police, "U Kyievi operatyvnyky zatrymaly cholovika, nablyzhenoho do kryminalnoho avtoryteta «Lavasohly-Batumskoho»", 4 June 2024. Available at: https://www.npu.gov.ua/news/u-kyievi-operatyvnyky-zatrymaly-cholovika-nablyzhenoho-do-kryminalnoho-avtoryteta-lavasohly-batumskoho.

[231] National Police Ukraine, "Holova DSR Andrii Rubel: Levova chastka shakhraiv na temi viiny – areshtanty SIZO i uviazneni", 4 June 2024. Available at: https://www.npu.gov.ua/news/holova-dsr-andrii-rubel-levova-chastka-shakhraiv-na-temi-viiny-areshtanty-sizo-i-uviazneni; National Police of Ukraine, "Natspolitsiia zatrymala lideriv ta uchasnykiv band, diialnist yakykh koordynuvaly «vory v zakoni» z trokh kryminalnykh klaniv", press release in a Telegram group, 22 May 2024. Available at: https://t.me/UA_National_Police/22935.

[232] Before the new mobilization law, facilitators of irregular crossings charged $4-5,000 on average. After May 18, the prices may have increased and can reach $20,000. See Ukraine, National Police, "Holova DSR Andrii Rubel: Levova chastka shakhraiv na temi viiny – areshtanty SIZO i uviazneni", 4 June 2024. Available at: https://www.npu.gov.ua/news/holova-dsr-andrii-rubel-levova-chstka-shakhraiv-na-temi-viiny-areshtanty-sizo-i-uviazneni.

8

Recommendations

Based on emerging analytical results presented in this study, the following provisional recommendations have been formulated in order to counteract and mitigate changes and exacerbations in the discussed areas of organized crime, which may result from the shifting modi operandi of illicit actors during and after the war.

Organized Crime

- Establish a centralized monitoring system and analytical reporting capabilities to inform timely decision making to prevent and preempt escalating organized crime activity in conflict and post-conflict scenarios. This could include the collection and analysis of sex-disaggregated data on organized criminal groups in the context of the war, monitoring cross border flows and border crossing dynamics and groups political and international alliances with other groups.

- Develop a comprehensive, multi-stakeholder, gender-responsive and human rights-compliant organized crime strategy for Ukraine aimed at preventing organized crime, pursuing organized criminal groups and their illicit gains, protecting those affected by organized crime and promoting a whole-of-society approach as well as international cooperation in criminal matters. The current national strategy to fight organized crime expires at the end of 2025 and the new strategy will need to take into consideration the changed landscape where organized crime groups have been operating since the full-scale invasion. As the research presented here has shown, the full-scale invasion has created some new opportunities for the illicit economy, while challenging some pre-existing dynamics and criminal markets. The drivers and enablers of organized crime, such as corruption and money laundering, have also been affected as the impact that organized crime has had on communities and persons in situations of vulnerability. These changes call for the development of a new national strategy against organized crime to be aligned with international best practices.

- Improve and maintain inter-agency and cross border cooperation between law enforcement agencies and the military to have greater information sharing and joint interventions.

- Strengthen and increase resources for law enforcement, the judiciary and investigative institutions, to investigate, charge and prosecute organized criminal groups that are operating in and taking advantage of the conflict situation.

- Coordinate Ukraine's participation in the Mechanism for the review of the implementation of United Nations Convention against Transnational Organized Crime (UNTOC) and the Protocols thereto and the United Nations Convention against Corruption (UNCAC) review mechanism with the UNODC office in Ukraine. Facilitating these review mechanisms will support Ukraine to identify effective strategies to combat organized crimes and define a roadmap to implement emanating recommendations and relevant outcomes.

- Design and implement programs to reintegrate into the society veterans and their families, supporting programs on employment, information on and access to health and psychological support, as well as crime prevention, re-skilling, and community inclusion programs.

- Assess in more details the extent of Khimprom's infiltration in the Ukraine's organized crime landscape during the war to effectively disrupt their operations.

Drug Use and Trafficking

- Design and implement drug demand reduction programmes specifically targeted to military personnel in active or off duty and veterans.

- Design border control frameworks that can prevent and intercept drug trafficking in the context of conflict and post conflict scenarios including provisions that incorporate institutional reforms in law enforcement institutions that meet EU accession requirements and prevent the resurging of drug trafficking patterns existing before 2021 of drugs through and across Ukraine.

- Develop specific strategies to respond to production of synthetic drugs including improved monitoring of precursors diversion and trafficking and establishment of processes for safe dismantling of illicit laboratories and disposal of drugs and waste.

- Reinforce border controls in the southern borders including in Seaports where most heroin was entering and transiting Ukraine before the start of the full-scale invasion.

- Strengthen responses to tackle the selling of drugs and precursor chemicals involving deliveries in Ukraine through the clear and deep web and darknet marketplaces.

- Bring together representatives from law enforcement, health professionals and civil society to identify emerging patterns in drug consumption and trafficking in the context of war.

- Expand on public health policies, including consistantly updating and renewing tailored interventions in prevention and treatment of drug use and drug use disorders and harm reduction strategies to protect both law enforcement personnel and people who use drugs from the health risks associated with the uncertain composition of new psychoactive substances.

Scams, Online Fraud, Call Centers

- Develop awareness raising and effective communication strategies for fraud prevention, informing and reducing vulnerability to fraud and scams, especially online, among Ukrainian diaspora and displaced population, who are more typically targeted by fraudsters.

- Develop public-private partnership with telecommunication and banking sectors to prevent fraud and to identify and punish fraudsters.

- Develop multi-disciplinary and multi-agency mechanisms involving private sector collaborative responses/task forces to combat online fraud.

- Strengthen international cooperation including mutual legal assistance (MLA) to investigate and convict fraudsters.

- Raise political awareness with regard to scams and online fraud to strengthen regulatory and legislative frameworks, including victim-centered approaches within existing legal and policy frameworks

- Consider the establishment of a coordinating institution or mandating an existing institution to centralize the response to fraud at the national level.

Firearms Trafficking

- Create a plan of action for firearms management outside war zones, considering the potential use of drones for criminal activities by civilians or organized criminal actors. Design such management system on the basis of possible future scenarios and past experiences.

- Train border and internal security police personnel to specifically detect and intercept arms trafficked across borders during and especially after the war, when a surplus of unused weaponry will likely be available.

- Keep detailed records of all arms in circulation licitly used and maintain a wide-reaching intelligence information system that monitor the illicit arms market, as well as.

- Strengthen a European-wide cooperation to counter arms trafficking across borders.

Smuggling of Goods:

- Continue to harmonize the Customs Code of Ukraine with the Customs Code of the EU, particularly in the areas of customs procedures, simplification of customs formalities, pre-departure information exchange and enforcement of intellectual property rights

- Adopt legislation that criminalize large-scale smuggling of all types of goods and to build up administrative capacity for its implementation.

- Establish coordinating mechanisms between law enforcement and regulatory agencies of Ukraine and the relevant authorities of neighboring countries

- Increase awareness of the threat that Ukrainian consumers may turn to counterfeit products if the war limits the trade of regulated products.

- Incorporate in national economic and reconstruction plans provisions to avoid economic vacuum that could give opportunities to OCGs.

Trafficking in Persons:

- Develop a national comprehensive, multi-stakeholder, gender-responsive and human rights-compliant trafficking in persons (TIP) strategy with an action plan and monitoring end evaluation mechanisms.

- Revise relevant laws and regulations in order to improve and strengthen coordination mechanisms for preventing and countering TIP at central and regional levels, with a referral mechanism for victims of TIP.

- Strengthen efforts on prevention of TIP through information campaigns, increase efforts to identify victims of trafficking, enhance law enforcement cooperation and continue other anti-trafficking policies and actions by state and non-state actors which have proven effective to date.

- Continue to implement training of law enforcement, prosecution and judiciary on detection, investigation, prosecution and adjudication of TIP cases based on a victim centered approach.

- strengthen capacities for provision of assistance, support and protection of victims of TIP in collaboration with specialized non-governmental organizations.

Facilitation of irregular exit of conscript:

- Ensure that the criminal industry involved in border crossing facilitation can be dismantled.

- Strengthen prevention and detection capacities to address the infiltration of organized crime in the public administration and the use of corruption to fraudulently justify the draft exemption and enable the irregular exit of conscripts.

- Monitor methods and routes of border crossing now used for irregular exist to avoid that the same routes can be exploited after the war for other forms of smuggling or trafficking.

Annex A Interview Sources

Interview number	Interview citation
KI1	Interview KI1 with an Officer at the State Customs Service, February 2024
KI2	Interview KI2 with an Administrator in the Zakarpattia region, February 2024
KI3	Interview with an Offender (KI3), February 2024
KI4	Interview KI4 with an Officer of a regional prosecutors' office, February 2024
KI5	Interview KI5 with an Officer in Zakarpattia region, January 2024
KI6	Interview KI6 with an Officer of Zakarpattia regional prosecutors' office, February 2024
KI7	Interview KI7 with an Officer of Zakarpattia regional prosecutors' office, February 2024
KI8	Interview KI8 with an Officer involved in countering organised crime, February 2024
KI9	Interview with an Expert in international arms tracing (KI9), 16 February 2024
KI10	Interview KI10 with an Officer of the Armed Forces of Ukraine, January 2024
KI11	Interview KI11 with an Officer of the Armed Forces of Ukraine, February 2024
KI12	Interview KI12 with an Officer of the Armed Forces of Ukraine, February 2024
KI13	Interview KI13 with an Offender from Kyiv, March 2024
KI14	Interview KI14 with a former Offender from Kyiv, March 2024
KI15	Interview KI15 with a former Offender from Kyiv, March 2024

KI16	Interview KI16 with an Offender from the Khimprom drug syndicate, March 2024
KI17	Interview KI17 with an Expert in March 2024 (KI17)
KI18	Interview KI18 with a former Officer of the Main Directorate of the Security Service of Ukraine, 2 March 2024
KI19	Interview KI19 with a Practitioner specializing in defence from hostile property takeovers, March 2024
KI20	Interview KI20 with a Practitioner in the medical psychiatry sector, March 2024
KI21	Interview KI21 with a Member of the Parliamentary Commission on Special Inquiry into Call Centres, April 2024
KI22	Interview KI22 with an Expert in the area of combatting human trafficking, 23 March 2024
KI23	Interview KI23 with an Expert in the area of combatting human trafficking, 27 March 2024
KI24	Interview KI24 with an Officer of the Criminal Investigation Department, National Police of Ukraine, 1 April 2024
KI25	Interview KI25 with an Expert in the area of combatting human trafficking, 6 June 2024
KI26	Interview KI26 with an Expert for Children's Rights and Child Rehabilitation, 20 May 2024
KI27	Interview KI27 with an Expert at the Human Trafficking Prevention Initiative at the Support to Government Reforms in Ukraine (SURGE) project, 20 June 2024
KI28	Interview KI28 with an Officer in the Armed Forces of Ukraine, 20 June 2024
KI29	Interview KI29 with a Practitioner in the security services in countering cyberfraud, July 2024
KI30	Interview KI30 with an Officer in the Armed Forces of Ukraine, June 2024

Annex B. Scope and methods

This report is based on desk research and in-country fieldwork, with analysis of publicly available official statistics and secondary literature, court decisions, and key informant interviews. Field data collection and analysis were conducted from December 2023 to June 2024. Across all areas of focus, this research collects and analyses evidence from the following sources:

- government statistics and data and information from private and non-governmental sources such as civil society organizations, companies and industrial and professional associations;

- data already gathered by UNODC and other UN organizations in the course of prior research;

- open-source information from court records, registries and the press;

- key informant interviews with Ukrainian state officials and other stakeholders.

The research process has been built around a series of official statistical data and interview requests and subsequent examination, triangulation and verification of this information through alternative sources, additional official data requests and interviews with state officials, as well as interviews and data requests from non-governmental sources. In recognition of the sensitive character of this research, the information obtained has been verified and triangulated, to the extent possible, through at least three different sources. Levels of confidence, and reasons for assigning them, are indicated in the text. While recognizing the challenges of operating in a country in war, the collection of quantitative and qualitative data has strived to be impartial and unbiased, reflecting diverse perspectives and differing impacts of organized crime on girls, boys, women, men, youth and different segments of society.

Official data collection: The research began with a desk review of available data and analytical publications on the topic and internal UNODC data, as well as data provided by Ukrainian state bodies upon request, including the Ukrainian Ministry of the Interior (MoI) and National Police (NP) for drugs and arms, the Ministry of Environmental Protection and Natural Resources for crimes that affect the environment, and so forth. Data was collected at the most granular level as possible, both by category and time series, and sex-disaggregated where relevant and feasible. The data collected have covered a period spanning at least one year before the start of the full-scale invasion of Ukraine by the Russian Federation in February 2022 (i.e., from the beginning of 2021, but where possible to the beginning of 2019 for background) to enable establishing a baseline for the immediate pre-invasion period and identify key trends since.

Open-source data collection: Official data has been complemented with information from other sources, such as the Registry of Court Cases, academic literature, grey literature and media. For the categories of crimes of interest to this research, samples of court cases have been determined and collected to complement administrative data. These cases have been analysed to reveal changes in patterns of criminal activity;

analysing the criminal justice response to this activity has been outside the scope of this research. The information has been triangulated with other sources.

Key informant interviews to interpret and elaborate upon the official data: The above data collection has informed a series of key informant interviews with the following categories of research participants, including both women and men where possible:

- Officials in the relevant departments of government bodies. To allow for triangulation, where possible, these interviews have covered distinct positions within the relevant field (organizations with different mandates or interests; distinct professional roles and levels of hierarchy within organizations);

- Representatives of licit private and non-governmental organizations with a stake in and knowledge of the relevant field;

- Actors involved in illicit activities in the field, or actors with knowledge of emerging challenges in the field;

- Local and international independent experts.

Wherever informants' expertise and the rapport between the researchers and the informant have allowed for it, interviewees have been asked to comment on official data and identify gaps and ways of addressing those gaps. They have been asked to share further data and make connections to key contacts within agencies releasing the data who could assist in verifying the data released to the team.

Key informants have been offered a chance to speak anonymously and confidentially if they wished. Interviews were semi-structured and relied on questionnaires agreed upon by the team of research consultants prior to specific interviews; these were adapted as required. The interviews have followed the standard of good practice and ethical guidelines:

- Prior informed consent has been solicited;

- Interviewees have been guaranteed the right to withdraw or modify their statements;

- Interviewees have had an iterative opportunity to determine the level of anonymity of the interview or its parts, strengthening it where necessary and where full anonymity was not originally opted for.

B.1. Code of Conduct for research consultants[233]

B.1.1. Overview and Guiding Principles

Because this research involves interviews on sensitive topics with human subjects standing in different relations to the law, the **ethical principles of social science research involving human participation** apply throughout the research process.[234] Because of the location of this research, participants and topics involved, and the broader threats of instrumentalization of results, this research involves higher than minimal levels of risks.[235] This necessitates both procedural ethics in the methodology and the application of this Code of Conduct throughout the research process.

In view of the context in which the research will be undertaken, full anonymity of research subjects and informants will be maintained by default.

A note on safety in the context of the war is in order. Field research will take place in Ukraine, in Kyiv and other major cities in the rear. At no point will the research consultants travel to frontline cities (closer than 50km to the frontline); any trips to Kharkiv, Dnipro and Zaporizhzhia regions will be discussed in advance with the research team. The consultants will follow the Ukrainian government's and local authorities' advice and instructions on safety during air raids.

The underlying principles of ethical social science research include:

- respecting the dignity, integrity, safety and well-being of all those involved in the research;

- protecting vulnerable individuals;

- minimizing harm and maximizing benefit;

- ensuring honesty and transparency towards research subjects;

- respecting individual autonomy and obtaining free and informed consent (as well as assent whenever relevant);

- ensuring privacy and confidentiality;

---

[233] This Code of Conduct has been adapted, with modifications, from the Methodological Guide of the UNODC SOM Observatory.

[234] European Commission (2018). *Ethics in Social Science and Humanities.* Commissioned by DG Research and Innovation. Available at: https://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020_ethics-soc-science-humanities_en.pdf.

[235] The notion of minimal risk is used in social science research to denote research in which the probability and magnitude of harm or discomfort anticipated are not greater than those ordinarily encountered in daily life.

- promoting justice and inclusiveness;

- sharing the benefits with disadvantaged populations;

- respecting and protecting the environment and future generations.

This Code of Conduct has been developed in order to operationalize these ethical principles in the context of this research.[236] <u>Procedural ethics</u> are incorporated into the methodology of this research methodology, while <u>ethics in practice</u> involve the incorporation of these ethical principles and the Code of Conduct into all research activities.

Research Consultants involved in this research are expected to **accept these principles, to interpret them in good faith, to respect them and to make sure they are respected by others.** All Researchers working in any capacity on this project should be fully aware of the ethical issues involved in the research, including any interpreters and transcribers. Each Researcher supplements the Code of Conduct based on her/his own personal values, culture and experience, without violating the Code of Conduct. It is the individual responsibility of each Researcher to aspire to the highest standards of conduct.

B.1.2. Ethical Standards:

1. **Welfare as the Primary Concern:** The research should avoid undue intrusion into the lives of individuals or communities. The welfare of the interviewees should have the highest priority; their dignity, privacy and interests should be protected at all times, and interviews should not be conducted if this cannot be guaranteed.

2. **Avoiding Potential Harmful Effects:** The Researcher should consider the effects and potential effects of her/his work, including safety concerns, unintended consequences, harmful effects and the consequences of misuse, for interviewees, colleagues and for the wider society. Interviewees should be protected against any and all potentially harmful effects and should be informed of any potential consequences of their participation. The choice of

---

[236] Adapted from: the International Sociological Association's (ISA) Code of Ethics, as approved by the ISA Executive Committee in 2001. Available at: www.isa-sociology.org/en/about-isa/code-of-ethics; European Commission (2018). Ethics in Social Science and Humanities. Commissioned by DG Research and Innovation. Available at: https://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020_ethics-soc-science-humanities_en.pdf; European Commission, DG Research and Innovation (2020). *EU Grants: Guidance note — Research on refugees, asylum seekers and migrants: V1.1.* Available at: https://ec.europa.eu/research/participants/data/ref/h2020/other/hi/guide_research-refugees-migrants_en.pdf; Code of Ethics for Research in the Social and Behavioural Sciences involving Human Participants (2016). As accepted by the Deans of Social Sciences in the Netherlands. Available at: https://bmslab.utwente.nl/wp-content/uploads/2017/03/DSW_code-ethics-social-and-behavioural-sciences-jan16.pdf; and UNESCO Code of Conduct for Social Science Research (no date). Available at: www.unesco.org/new/fileadmin/MULTIMEDIA/HQ/SHS/pdf/Soc_Sci_Code.pdf.

research topics should be based on the best scientific judgement and on an assessment of the potential benefit to the participants and society in relation to the risk to be borne by the participants. Any potential harm should be minimized, alternative methods sought if necessary, or particular activities avoided if the risk is too high.

3. **Competence and Avoiding Bias:** The research should be conducted in a competent fashion, as an objective scientific project and without bias. All research personnel should be qualified to use all of the procedures employed by them. Researchers should be aware of the fact that their assumptions may have an impact upon the research results. Hence their duty is, on the one hand, to keep an unbiased attitude as far as possible, while, on the other hand, not to conceal their own ideological position(s).

4. **Compliance:** The research should be carried out in full compliance with, and awareness of, local customs, standards, laws and regulations.

5. **Free and Informed Consent:** Freely given informed consent should be obtained from all human subjects. The consent of research subjects and informants should be obtained in advance. Covert research should be avoided. Potential participants should be informed, in a manner and in language they can understand, of the context, purpose, nature, methods, procedures and sponsors of the research. There should be no coercion. Participants should be fully informed of their right to refuse, and to withdraw consent at any time during the research. Research teams should be identified and contactable during and after the research activity.

6. **Privacy and Confidentiality:** The anonymity and privacy of research subjects and informants should be respected rigorously, in both quantitative and qualitative research. Participants should be informed of any potential limitations to the confidentiality of any information supplied. Where informants are in principle easily identifiable (e.g. because they are public figures), researchers should anonymize them as thoroughly as possible, but remind the informants explicitly of the consequences that may follow from the publication of the research data and outcomes. Procedures should be put in place to protect the confidentiality of information and the anonymity of the participants in all research materials. The sources of personal information obtained by Researchers should be kept confidential (see 5.2.3, 2. Anonymity). No photos should be taken or videos recorded of any interviewees or other people at research sites, unless every person in the photo/video has expressly requested it and freely consented to its use and reproduction. Confidential information provided by research participants should be treated as such by researchers even if there is no legal protection or privilege to do so. The obligation to maintain confidentiality extends to members of research or training teams and collaborating organizations who have access to the

confidential information. To ensure that access to confidential information is restricted and respected, it is the responsibility of researchers, collaborators and administrators to instruct and supervise staff and research workers to ensure they take the steps necessary to protect confidentiality.

7. **Access to Research Findings:** Research participants should be offered access to research results, presented in a manner and language they can understand.

8. **Responsible Research:** Researchers should provide adequate information in all publications and to colleagues to permit their methods and findings to be properly assessed. Limits of reliability and applicability should be made clear. Researchers are responsible for properly acknowledging the unpublished as well as published work of others.

This Code of Conduct is non-exhaustive. The fact that a particular conduct is not addressed specifically by the Code of Conduct does not mean the conduct is necessarily either ethical or unethical.

B.1.3. How to apply the Code of Conduct: Practical Guidelines

1. **INFORMED CONSENT:** Whenever possible, consent should be given by the informant in written form in a language they understand (by signing the printed consent form or by e-mail), however oral consent is also acceptable. Oral consent should be recorded in the voice recording of the interview wherever possible. A precondition for informed consent is that informants are briefed about the purpose of the research. Researchers shall introduce each interview with a short description of purpose of the research. Whenever possible, Researchers shall also describe UNODC, its purpose and outputs and how the information will be used.

2. **ANONYMITY:** For **Key Informants**, they will not be referred to by their real names in the final analysis as a default, with possible exceptions depending on the level of anonymity requested and the nature of the research being undertaken. In cases where the informant requests anonymity, record personal information only to allow follow up contacts and ensure that the details are kept safely and apart from the rest of the interview notes. Explain the principle of anonymity to the interviewee and make absolutely sure (a) that they understand what is meant, and (b) that you as the Interviewer understand which level of anonymity they are requesting. The interviewees will be by default offered full anonymity, but can alternatively request Citation of their Position and Organization only; Citation of their Organization only; or Full Citation. In the default case of Full Anonymity, the Researcher should note the type of organization they represent. The principal of <u>effective anonymity</u>

applies – this means that whatever details are included about the interviewee should effectively respect the level of anonymity they requested and not lead to them being easily identified. In the case of surveys, primary identifiers will not be collected or stored. Secondary identifiers may be collected and treated according to UNODC guidelines.

Other **research participants** (e.g. drug traffickers) should be offered anonymity in all research communications and data as a default. Record personal information only to allow follow-up contacts and ensure that the details are kept safely and apart from the rest of the interview notes. Explain the principle of anonymity to the interviewee and make absolutely sure that they understand what is meant. The principle of <u>effective anonymity</u> applies – this means that whatever details are included about the interviewee should effectively respect their anonymity and not lead to them being easily identified. In practice, anonymity means thorough pseudonymization of participants' data, with a key to pseudonyms being kept in a separate encrypted file.

3. **TRUST:** Establishing trust between interviewer and informant is crucial for the success of interviews. To establish trust requires that general principles of interviewing as well as the selection of the interview setting are considered to the greatest extent possible, to ensure that interviewees provide information of their own free will, that they understand the principles of anonymity and that there are no safety risks for the informant or the interviewer.

4. **LIMITS TO CONFIDENTIALITY:** In rare cases, researchers may not be required to adhere to these confidentiality obligations. These cases include (a) crime witnessing and (b) prospective health- or life-threatening crimes.

    (a) **Reporting obligations in case of crime witnessing:** researchers have the obligation to report on witnessed crimes which are NOT the object of the crime research activities, nor are strictly connected to it. Reporting abuse of children is mandatory. Researchers should ensure they are aware of the legal obligations in the country of research in this regard.

    (a) **Reporting obligations in case of prospective health- or life-threatening crimes.** Researchers may confront unanticipated circumstances where they become aware of confidential information that is clearly health- or life-threatening to research participants or others. In these cases, before taking action, researchers shall evaluate, with applicable law and regulation in mind, the importance of assurances of confidentiality as specified in this Code of Conduct. It is the responsibility of researchers, collaborators and administrators to instruct and supervise staff and research workers to ensure they take the steps necessary to report such cases to relevant authorities.

5. **NEUTRALITY:** Researcher should always ensure to be neutral in organizing the interview, throughout the interview itself, and to be perceived by the informant as neutral.

! The objective is to <u>obtain information</u>, without making judgments or evaluations in relation to informants.

6. **FEEDBACK:** Providing feedback to participants is essential in ethical research. Especially during qualitative field work, if key informants request it, Researchers should send them their Interview Summary. Sections of the analysis that concern their interview may also be shared with the Informant if requested.

6. **DO NO HARM:** If research site is located in an area that poses relatively high risks to you or your potential participants, researchers or implementing partners shall provide clear strategies for keeping research participants/ informants and research staff safe. The Research Team may request a risk assessment to be made, in which the Researcher should include details of safety measures undertaken, including training for staff, insurance cover, and taking into account the implications of female-male interactions. Reasonable steps must be taken to minimize and repair any harm, should researchers become aware that research procedures have proven detrimental to an interviewee.

B.2. Guidelines for interviews

B.2.1. Key Informant Interviews

In conducting interviews, Researchers will strictly adhere to the Code of Conduct, comply with international and national legal requirements regarding safe working practices, data protection and participants' rights to confidentiality and privacy, and develop personalized and context-specific steps to fulfil such requirements. If there is a doubt or concern about an interview adhering to these guidelines and principles, it should be re-scheduled or cancelled.

The Key Informant Interviews (KIIs) for this research project involve interviews with institutions, organizations and individuals with direct access to, or information about, the areas of focus (drugs trafficking, arms proliferation etc.). Where feasible, they should be conducted in person, but also by phone, videoconference, email or any other useful means. The interviews are semi-structured and open-ended, based on a set of guiding questions and probing topics, and conducted according to these guidelines. With the informed consent of participants, interviews will be voice-recorded, or, if the interviewee prefers not to be recorded, notes will be taken. Notes should also be taken if interviews are voice-recorded, to note down additional details and provide a record in case the recording does not work.

Interview cover sheets and short typed-up summaries of each interview should be produced in Ukrainian and can be translated to English. They should be around 2-4 pages in length, depending on the quantity of relevant information obtained, clearly stating the level of anonymity requested by the key informant. They will be prepared for sharing within the team of research consultants and can be shared with a relevant team at UNODC HQ (and only with this Research Team), using the templates provided/ agreed. When the interviews are concluded, a complete list in English of the interviews, with the agreed interview codes, dates and a profile of the interviewee including gender but as vague as needed to preserve anonymity, is to be shared with the UNODC team.

After the interview, recordings should be renamed according to the guidelines below. Codes for interviews should be entered into a separate key spreadsheet, where they are recorded against the names of research participants together with interview date and place. This key spreadsheet is to be kept securely, separately from the recordings themselves.

B.2.2. General Tips

1. It is recommended that the interview cover sheet and other research instruments (if used) are filled in or updated electronically after each procedure, where possible during the field research, so that the workload is not so overwhelming during the analysis of the findings. These files should be kept, as you may need to refer to them again.

2.   Field journals that record observations, ideas, insights, codes, concepts, patterns, hypotheses and conclusions, or moments of saturation on the topic, may also be an important source to refer to later.

3.   Familiarize yourself completely with these Interview Guidelines before commencing your first interview. Make sure you are clear on the objectives, guidelines, ethical safeguards, etc. If you still have any questions, contact the Lead Researcher!

4.   You may wish to ask other research consultants to simulate interviews with you, before you conduct your first interview, whereby the partner plays the role of the key informant. This can be useful in bringing up issues that you would not have otherwise considered.

5.   Even after informants have confirmed their participation in an interview, it is a good idea to briefly contact the person the day before to confirm the date, time and location.

6.   Try to identify suitable places and settings for the interviews which offer privacy and safety, and try to arrange times and places for interviews as conveniently <u>as possible for the key informant</u>. Remember they are doing you a favour!

7.   If someone else is present at the interview, you should also explain to them the research guidelines and ethical principles, particularly with regard to <u>confidentiality, anonymity and neutrality</u>.

8.   Some informants may request the interview questions in advance so that they can prepare. The document can be sent on to them, but it is important to stress that they are open-ended questions and that the interviews are semi-structured, and so it is not necessary for them to have an answer to every single question.

9.   Take into account that the absence or unavailability of data or information is also a finding in itself and should be noted.

10.   The Guiding Questions are flexible and adaptable, and can be re-phrased, added to and omitted where necessary, and asked in whatever sequence is most appropriate.

11.   It is <u>not important how, and using what terminology, the informants provide you with the information</u> – what is important is the content of that information itself.

12.   It is to be expected that there will be a number of 'failed interviews', as a result of which interviews may be relatively short and contain little relevant information, or not take place at all due to concerns related to the interviewee's or interviewer's safety or lack of trust.

13.   You should not offer any compensation to the interviewees. As a token of appreciation for their time, you may want to offer tea or coffee, or a meal, but it should be clear that these are not inducements to the interviewee.

B.2.3. Conducting the Interviews

AT THE BEGINNING OF THE INTERVIEW

1. Introduce yourself, ensure that the interviewee is fully informed about the objectives of the research project and the purposes for which the information from the interview will be used. Ask the interviewee to sign the informed consent form, just with their initials if they are more comfortable with that, or, if that is not possible, to consent verbally.

2. You should give the interviewee an overview of the topics that you wish to discuss during the interview. For Key Informants, if you have not already sent them your Introductory Letter in advance, you should present this to them before commencing the interview.

3. For Key Informants, always offer the option of remaining (a) completely anonymous. Other options include citing (b) only the position of the interviewee, (c) only the organization that they represent, or (d) full description including the interviewee's name. Full anonymity should be offered as a default option to all interviewees. Carefully make a note of their request in this regard, and make sure the level of anonymity is clearly stated on all documents related to the interview.

4. If the interviewee agrees, the interviews should be digitally recorded for future reference within the project context. If the interviewee does not agree to this, simply take notes. Interviewers should take notes during the interview, regardless of whether it is being tape-recorded. These notes serve as a backup when recording fails and to capture nonverbal information. They are also valuable when a respondent asks the interviewer to turn off the tape recorder during discussion of particularly confidential information.

5. Fill in a cover sheet at the beginning of every interview, using the appropriate template.

DURING THE INTERVIEW

6. The Key Informant interviews are semi-structured and open-ended. Keep in mind that this is not a journalistic interview; **the objective is to collect as much information as possible, both qualitative and quantitative** — not to bring the interviewee to account for something they've said or done.

7. Establish rapport with the interviewee, providing for an atmosphere that is positive, relaxed, and mutually respectful. Interviewees are more likely to talk freely, openly, and honestly about the research topic if they feel comfortable in the interviewer's presence, feel secure about confidentiality, believe the interviewer is interested in their story and do not feel judged. Practically, this means adopting a friendly manner, smiling, using a pleasant tone of and relaxed body language, avoiding patronizing remarks and being patient. The interviewer should refrain

from making comments about other people s/he has interviewed, which provides additional assurance of anonymity.

8. Adapt the **terminology** and words you use, as well as the formal/informal nature of the interview, according to the profile of each interviewee. Do not expect the interviewees to be familiar with our project terminology, and <u>it is not your role to explain it to them</u>, unless this is necessary in order to obtain the information, or unless they specifically request this.

9. Ask for **specific details** as much as possible – gender, age, nationality/ethnicity, group composition, etc.

10. Some questions will be more relevant for some interviewees than others. The **order of the questions and the duration** allotted to each question can be adapted according to each informant's expertise and knowledge, according to how the interview naturally progresses and according to the progress of the field research and data collection in the country in question. You do not need to ask every question, if you are sure that the interviewee does not have relevant information in relation to certain questions.

11. Feel free to provoke ("**probe**") the interviewee to speak more and provide more detailed information in relation to certain topics that are specifically relevant to the research project. However, use probes sparingly and strategically. Do not probe the informants for each and every detail that may be relevant and use your judgment to prioritize certain themes and bits of information over others.

12. **! The interview should not be a dialogue** – avoid expressing your own opinions or responding directly to what the interviewee says, as this runs the risk of "leading" the interviewee. Your role is to probe the interviewee in such a way that he/she is able to provide as much information as possible in relation to the topics covered in the questions. If you do wish to provide some feedback, response, or interesting information from your side, wait until the interview has been completed before engaging in a discussion with the interviewee.

13. **Do not judge** what your respondent says ("Every answer is right"). Show understanding for their difficulties and their point of view.

14. Maintain a **conversational** style and formulate questions as open questions to maintain the flow of conversation. Avoid asking a series of closed questions with short answers.

15. **Verify unclear responses.** If you are unsure whether you understood correctly, and verify the response before going to the next question.

16. **Avoid leading questions,** which – intentionally or not – influence the interviewee's answers. In answering such a question, the interviewee is likely to provide an answer which agrees with it because s/he might be reluctant to contradict the interviewer.

17. If an interviewee provides you with information that reveals **confidential personal information** about another person, ensure that you do not share that information

further, even with other members of the research team.

18. If an interviewee provides you with information indicative of a **crime or a protection concern,** in accordance with research ethics and national legislation, and in consultation with the informant in question, the case should be properly referred.

ENDING THE INTERVIEW

19. Give the interviewee your contact details, if they do not already have them, inform him/her when the analysis will be available and refer them to the UNODC webpage/ website.

20. Thank the interviewee for taking the time out of their schedule and making the effort to participate in the research.

21. Write the Interview Summary **as soon as possible after the interview,** to ensure that the details are fresh in your mind, and include any interesting and relevant direct quotes. If you wish to include any of your own judgements, assumptions or impressions, clearly distinguish them from the main interview summary by using square brackets [ ] or including comments at the end. Otherwise the summary should directly reflect what the informant said. For key informants, **clearly state the level of anonymity requested in the Interview Summary.** Assign a code to the Interview.

22. Interview Coding: Interviewer initials – Number of Interview. For example, Taras Fedirko's third interview will be coded as follows: TF-03.

23. Share the relevant files with the research team according to the procedures specified above (at 5.3.1). Assign the interview to a transcriber.

B.3. Templates for Interviews with Key Informants

Template A: Key Informant Interview Consent Form

1. **I agree to participate** in an interview for the UNODC research project Assessment of the impact of the war on illicit markets in Ukraine.

2. I am aware of my right **to change** any part of the recorded data if I so wish, and also to withdraw my statements and participation from the interview at any time.

3. The interview will **only be used for** this research project or for future published work on this topic by the members of the research team.

4. I am aware that it is my decision about the level of **anonymity,** and this will be fully respected in all research work and publications by the research team. I wish my responses to be:

(a) cited with my name and full details

(b) cited only with my position and organization

(c) cited only with my organization

(d) anonymous

_____   _____

Interviewee's signature/initials   Place, Date

_____   _____

Researcher's signature   Place, Date

Template B: Key Informants Interview Cover Sheet –

Confidential

Name of Interviewee:

Position:

Organization:

Contact Details:

Date and Time: Duration of Interview:

Interview Code:

Location:

Interviewer:

Allowed audio recording of interview?

Level of Anonymity requested:

Additional comments or observations in relation to the interview: