

March 2010

AFGHANISTAN DRUG CONTROL

Strategy Evolving and
Progress Reported,
but Interim
Performance Targets
and Evaluation of
Justice Reform Efforts
Needed



GAO

Accountability * Integrity * Reliability



Highlights of [GAO-10-291](#), a report to congressional addressees

Why GAO Did This Study

The illicit drug trade remains a challenge to the overall U.S. counterinsurgency campaign in Afghanistan. Afghanistan produces over 90 percent of the world's opium, which competes with the country's licit agriculture industry, provides funds to insurgents, and fuels corruption in Afghanistan. Since 2005, the United States has allotted over \$2 billion to stem the production, consumption, and trafficking of illicit drugs while building the Afghan government's capacity to conduct counter narcotics activities on its own.

In this report, GAO (1) examines how the U.S. counter narcotics strategy in Afghanistan has changed; (2) assesses progress made and challenges faced within the elimination/eradication, interdiction, justice reform, public information, and drug demand reduction program areas; and (3) assesses U.S. agencies' monitoring and evaluation efforts. To address these objectives, GAO obtained pertinent program documents and interviewed relevant U.S. and Afghan officials. GAO has prepared this report under the Comptroller General's authority to conduct evaluations on his own initiative.

What GAO Recommends

GAO is making several recommendations to State and Defense to improve performance measurement of U.S. counter narcotics programs and evaluate justice reform efforts. State and Defense generally concurred with our recommendations.

[View GAO-10-291](#) or [key components](#). For more information, contact Charles Michael Johnson Jr. at (202) 512-7331 or johnsoncm@gao.gov.

AFGHANISTAN DRUG CONTROL

Strategy Evolving and Progress Reported, but Interim Performance Targets and Evaluation of Justice Reform Efforts Needed

What GAO Found

The U.S. counter narcotics strategy has changed emphasis across program areas over time to align with the overarching counterinsurgency campaign. The 2005 U.S. counter narcotics strategy focused on five program areas: elimination/eradication, interdiction, justice reform, public information, and alternative livelihoods. Since then, U.S. Department of Defense (Defense) policy and rules of engagement were changed to allow greater military involvement in Afghanistan counter narcotics efforts due to the ties between traffickers and insurgents. Furthermore, the U.S. counter narcotics strategy has shifted to align more closely with counterinsurgency efforts by de-emphasizing eradication, focusing more on interdiction efforts, and increasing agricultural assistance.

The United States' use of total poppy cultivation as a primary measure of overall counter narcotics success has limitations in that it does not capture all aspects of U.S. counter narcotics efforts. In recognition of this, the administration is attempting to develop measures that better capture overall counter narcotics success. U.S. agencies have reported progress within counter narcotics program areas, but GAO was unable to fully assess the extent of progress due to a lack of performance measures and interim performance targets to measure Afghan capacity, which are a best practice for performance management. For example, although Defense is training Afghan pilots to fly interdiction missions on their own, this program lacks interim performance targets to judge incremental progress. Furthermore, a lack of security, political will, and Afghan government capacity have challenged some counter narcotics efforts. For example, eradication and public information efforts have been constrained by poor security, particularly in insurgency-dominated provinces. In addition, other challenges affect specific program areas. For example, drug abuse and addiction are prevalent among the Afghan National Police.

Monitoring and evaluation are key components of effective program management. Monitoring is essential to ensuring that programs are implemented as intended, and routine evaluation helps program managers make judgments, improve effectiveness, and inform decisions about current and future programming. U.S. agencies in all counter narcotics areas have monitored program progress through direct U.S. agency oversight, contractor reporting, and/or third-party verification. For example, eradication figures were routinely reported by U.S. Department of State (State) officials and contractors, and verified by United Nations Office of Drugs and Crime monitors. U.S. agencies also conducted and documented program evaluations to improve effectiveness in the elimination/eradication, interdiction, and public information program areas. However, State has not formally documented evaluations of its justice reform program.

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Abbreviations

CM	Capability milestone
CNPA	Counternarcotics Police of Afghanistan
CSTC-A	Combined Security Transition Command-Afghanistan
DEA	Drug Enforcement Administration
ISAF	International Security and Assistance Force
UNODC	United Nations Office on Drugs and Crime
USAID	United States Agency for International Development

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United States Government Accountability Office
Washington, DC 20548

March 9, 2010

Congressional Addressees:

The illicit drug trade undermines virtually every aspect of the U.S. and Afghan governments' efforts to secure and stabilize Afghanistan and remains a challenge to the overall U.S. counterinsurgency campaign in the country. The production of opium competes with the country's licit agriculture industry, provides funds to insurgents, and fuels corruption in Afghanistan.

In 2003, the Afghan government adopted a National Drug Control Strategy with the goal of eliminating the production, consumption, and trafficking of illicit drugs in Afghanistan. Since 2005, when it became more involved in the counternarcotics effort and developed its first counternarcotics strategy, the United States has allotted over \$2 billion to stem the production, consumption, and trafficking of illicit drugs in Afghanistan through elimination/eradication, interdiction, justice reform, public information, and drug demand reduction.¹

In this report, we (1) examine how the U.S. counternarcotics strategy in Afghanistan has changed over time; (2) assess progress made and challenges faced within the elimination/eradication, interdiction, justice reform, public information, and drug demand reduction program areas; and (3) assess U.S. agencies' monitoring and evaluation of counternarcotics programs.

To address these objectives, we obtained information from pertinent planning, funding, and program documents detailing U.S. counternarcotics efforts and interviewed relevant officials from the U.S. Departments of State (State), Defense (Defense), and Justice, including the Drug Enforcement Administration (DEA) in Washington, D.C., and Afghanistan. To examine how the U.S. counternarcotics strategy in Afghanistan has changed, we reviewed U.S. and Afghan strategy documents and discussed recent strategic shifts with relevant U.S. officials, including the Special Representative for Afghanistan and Pakistan, and with the Office of

¹We will address alternative development, another significant U.S. counternarcotics effort, in a subsequent report due out in spring 2010. As part of the recent strategy shift, alternative development programs are now classified broadly as agriculture programs.

National Drug Control Policy. To assess counternarcotics progress and challenges, we reviewed planning and reporting documentation and discussed performance measures, interim performance targets, and ongoing challenges with State, Defense, Department of Justice, DEA, and contractor officials implementing U.S. projects in Afghanistan, as well as with officials from the Afghan Ministries of Counter Narcotics, Interior, and Justice. To assess U.S. monitoring and evaluation of counternarcotics programs, we examined contractor reports, agency documentation, and available evaluations conducted by U.S. government agencies and third parties such as the United Nations Office on Drugs and Crime (UNODC). Additionally, we discussed these monitoring and evaluation activities with officials from State, Defense, Department of Justice, and DEA.

We conducted this performance audit from January 2009 to March 2010, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. (See app. I for a more complete description of our scope and methodology.)

Background

Opium Poppy



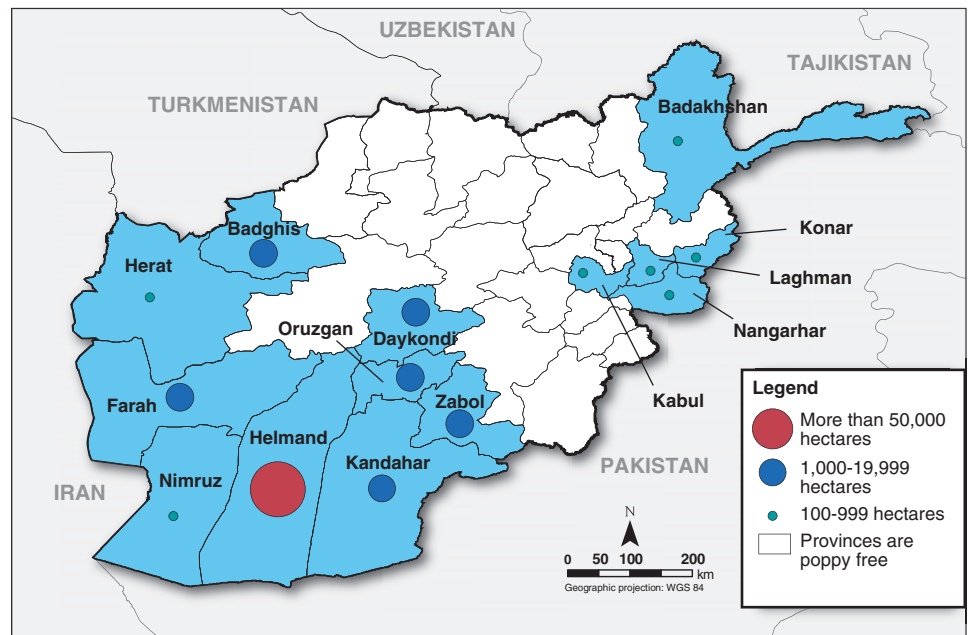
Source: State.

Opium poppy is a hardy, drought-resistant crop that is easily grown throughout Afghanistan's rugged territory. Opium poppy is an annual crop with a 6 to 7 month planting cycle. It is planted between September and December and flowers approximately 3 months after planting. After the flower's petals fall away, the opium, an opaque, milky sap found in the plant's seed capsule, is harvested between April and July. The sap can then be refined into morphine and heroin.

Afghanistan produces over 90 percent of the world's opium, which is refined into heroin in Afghanistan and other countries. According to UNODC, in 2008, the value of the illicit narcotics industry equaled as much as one-third of Afghanistan's licit economy—it is a notable source of funding for the insurgency, competes with licit development, and undermines governance. Processing and transit points for narcotics are spread throughout Afghanistan, and finished opiates are smuggled across Afghanistan's borders and into the global market. Of the roughly \$3 billion dollars generated by the Afghan narcotics trade, UNODC estimates that \$90-\$160 million per year is channeled to the insurgency.

As figure 1 shows, most opium poppy cultivated in 2009 was in Afghanistan's southern and western regions. These are also the most insecure areas with active insurgent elements.

Figure 1: Estimated Opium Poppy Cultivation, 2009



Source: UNODC Afghanistan Opium Survey 2009.

Note: Provinces qualifying as poppy-free are where UNODC estimates there are 100 or fewer hectares of poppy cultivated. One hectare equals approximately 2.47 acres.

Since 2005, the United States has allotted approximately \$2.5 billion for elimination/eradication, interdiction, justice reform, public information, and drug demand reduction activities in Afghanistan. These

counternarcotics-related activities are funded through State's International Narcotics Control and Law Enforcement account, the Global War on Terror supplemental funding account, and Defense's Counternarcotics account (see table 1).

Table 1: U.S. Funding of Counternarcotics-Related Activities in Afghanistan

Dollars in millions						
Allotments	FY 2005	FY 2006	FY 2007	FY 2008	FY 2009	Total
Elimination/eradication ^a	\$258.0	\$134	\$166.7	\$196.4	\$237.0	\$992.2
Interdiction	213.3	102.5	253.2	204.2	193.0	966.3
Rule of law/justice ^b	24.0	26.5	55.5	94.4	182.0	382.5
Public information ^c	8.4	2.0	6.0	2.0	17.0	35.4
Drug demand reduction	0.0	2.7	2.0	2.0	11.0	17.6
Program development and support	12.2	13.2	23.9	21.2	40.2	110.9
Total^d	\$516.0	\$280.9	\$507.3	\$520.4	\$680.3	\$2,504.9

Sources: GAO analysis of State and Defense budgetary documents.

Note: This table excludes alternative development and agriculture programs. Funding allotments for U.S. alternative development and agriculture programs, which we will report on separately in spring 2010, totaled approximately \$1.4 billion from fiscal years 2005 through 2009.

^aWhile these figures include the full cost of State's Air Wing fleet in Afghanistan, these aircraft also support other counternarcotics programs, as well as other Embassy Kabul activities.

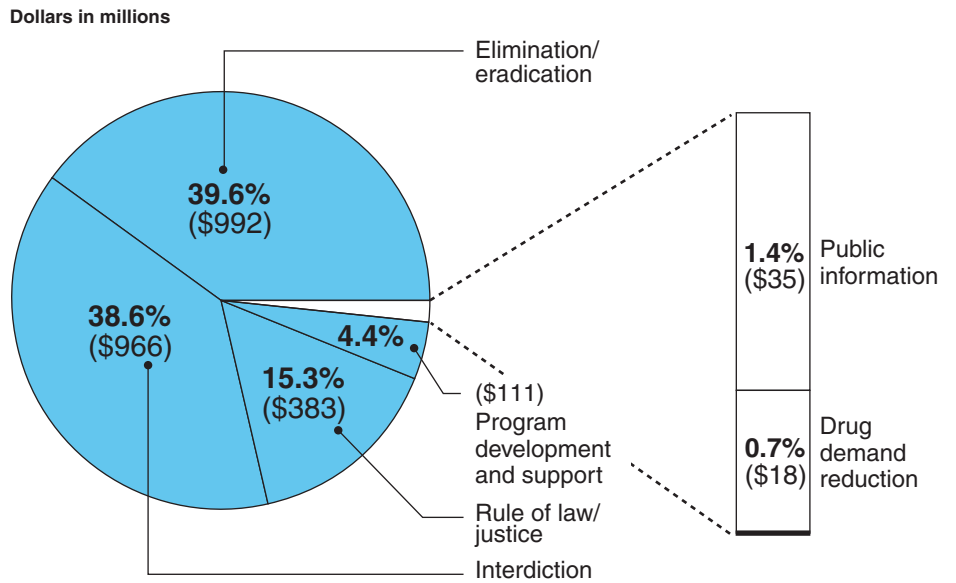
^bDuring the course of our review, State was unable to provide a detailed breakout of counternarcotics-specific activities within the rule of law/justice reform program area. Therefore, this figure includes some activities unrelated to counternarcotics programs.

^cFigures do not include funding for Counternarcotics Advisory Teams, which are counted under elimination/eradication.

^dNumbers may not sum to totals due to rounding.

As figure 2 illustrates, excluding the U.S. investment in alternative development programs, the majority of U.S. counternarcotics-related funding has been in the elimination/eradication and interdiction program areas.

Figure 2: Allotment of U.S. Funding for Counternarcotics Activities in Afghanistan by Program Area from Fiscal Year 2005 to Fiscal Year 2009



Sources: GAO analysis of State and Defense budgetary documents.

Elimination/Eradication

The United States has allotted approximately \$992 million in support of elimination/eradication programs since fiscal year 2005. These programs seek to reduce opium poppy cultivation by destroying opium poppy plants before farmers are able to harvest their illicit crops (eradication) and by providing rewards to provinces for reductions in opium poppy cultivation. State has supported an Afghan central eradication force, a governor-led eradication program, and an incentive program called the Good Performers Initiative, which rewards provinces for reductions in poppy cultivation.

Interdiction

State and Defense have allotted approximately \$966 million for interdiction programs since fiscal year 2005. U.S. interdiction programs aim to decrease narcotics trafficking and processing by conducting interdiction operations, which include, among other things, raiding drug laboratories; destroying storage sites; arresting drug traffickers; conducting roadblock operations; seizing chemicals and drugs; and conducting undercover drug purchases. The interdiction program also seeks to increase the capability of Afghan law enforcement to disrupt and dismantle drug trafficking organizations. DEA plays a significant role in

the U.S. interdiction effort and is the lead U.S. agency responsible for conducting interdiction operations in Afghanistan.² DEA works with the specialized units of the Counternarcotics Police of Afghanistan (CNPA) to conduct investigations, build cases, and arrest drug traffickers, which we discuss in detail later in this report. DEA also works to build Afghan law enforcement capacity by mentoring CNPA specialized units. Defense, which also conducts interdiction operations in support of its counterinsurgency mission, supports the training, equipping, and sustainment of the CNPA specialized units, as well as the construction of CNPA-related infrastructure projects.³

Justice Reform

Since fiscal year 2005, State has allotted approximately \$383 million to support the Afghan government's efforts to establish counternarcotics-specific criminal justice institutions and increase the Afghan government's capacity to arrest, prosecute, and punish traffickers. State supports six Department of Justice attorneys that train, mentor, and assist prosecutors and investigators on the Afghan Criminal Justice Task Force (Task Force) and the judges on the Afghan Central Narcotics Tribunal (Tribunal). These institutions have exclusive national jurisdiction over the adjudication and prosecution of mid- and high-level narcotics cases in Afghanistan.

In addition, Defense constructed the State-funded Counternarcotics Justice Center (Justice Center), which serves as a secure facility for the Task Force and Tribunal to carry out their adjudication missions. The Justice Center consists of a detention building and a courthouse; offices for judges, investigators, and prosecutors; and barracks for members of the protective Afghan Judicial Security Unit. Additionally, the Department of Justice's United States Marshals Service trains and equips the Afghan Judicial Security Unit to provide facility protection at the Justice Center and to serve as a private security detail for Afghan judges and high-threat detainees.⁴

²GAO previously reported on DEA's overseas activities in 2009, see GAO, *Drug Control: Better Coordination with the Department of Homeland Security and an Updated Accountability Framework Can Further Enhance DEA's Efforts to Meet Post-9/11 Responsibilities*, GAO-09-63 (Washington, D.C.: Mar. 20, 2009).

³State funds the operation and maintenance of many of these infrastructure projects, as well as some training and vetting of the CNPA specialized units.

⁴State plans to continue funding the Counternarcotics Justice Center's operation and maintenance costs, estimated at \$3 million per year, until 2011.

Public Information

State and Defense have allotted approximately \$35 million to support the Afghan Ministry of Counter Narcotics in developing and disseminating counternarcotics messages through nationwide public information campaigns and through province-based activities of Counternarcotics Advisory Teams (advisory teams).⁵ Advisory teams are staffed with two contract advisors and eight Afghan Ministry of Counter Narcotics employees that specialize as either public information, gender affairs, alternative livelihoods, or monitoring and evaluation officers. Staffed to seven provinces,⁶ advisory teams work directly with provincial and local leaders to implement counternarcotics plans and disseminate counternarcotics messages. These messages are for the most part developed by State's other public information contractor, which subcontracts with Afghan companies to produce and disseminate counternarcotics messages via radio, television, and print materials in both Dari and Pashto. These messages are also publicized at community events held by advisory teams. State officials report that public information enhances other counternarcotics program areas, and its success is, therefore, tied to the success of the other program areas.

Drug Demand Reduction

Since fiscal year 2006, State has allotted approximately \$18 million to address the drug addiction problem in Afghanistan through technical and training assistance to the Afghan government in creating national drug abuse treatment, intervention, and prevention programs. State's program supports rehabilitation clinics, including clinics exclusively for women and children. The program also supports mosque-based drug intervention services and trains community and religious leaders on counseling drug addicts.

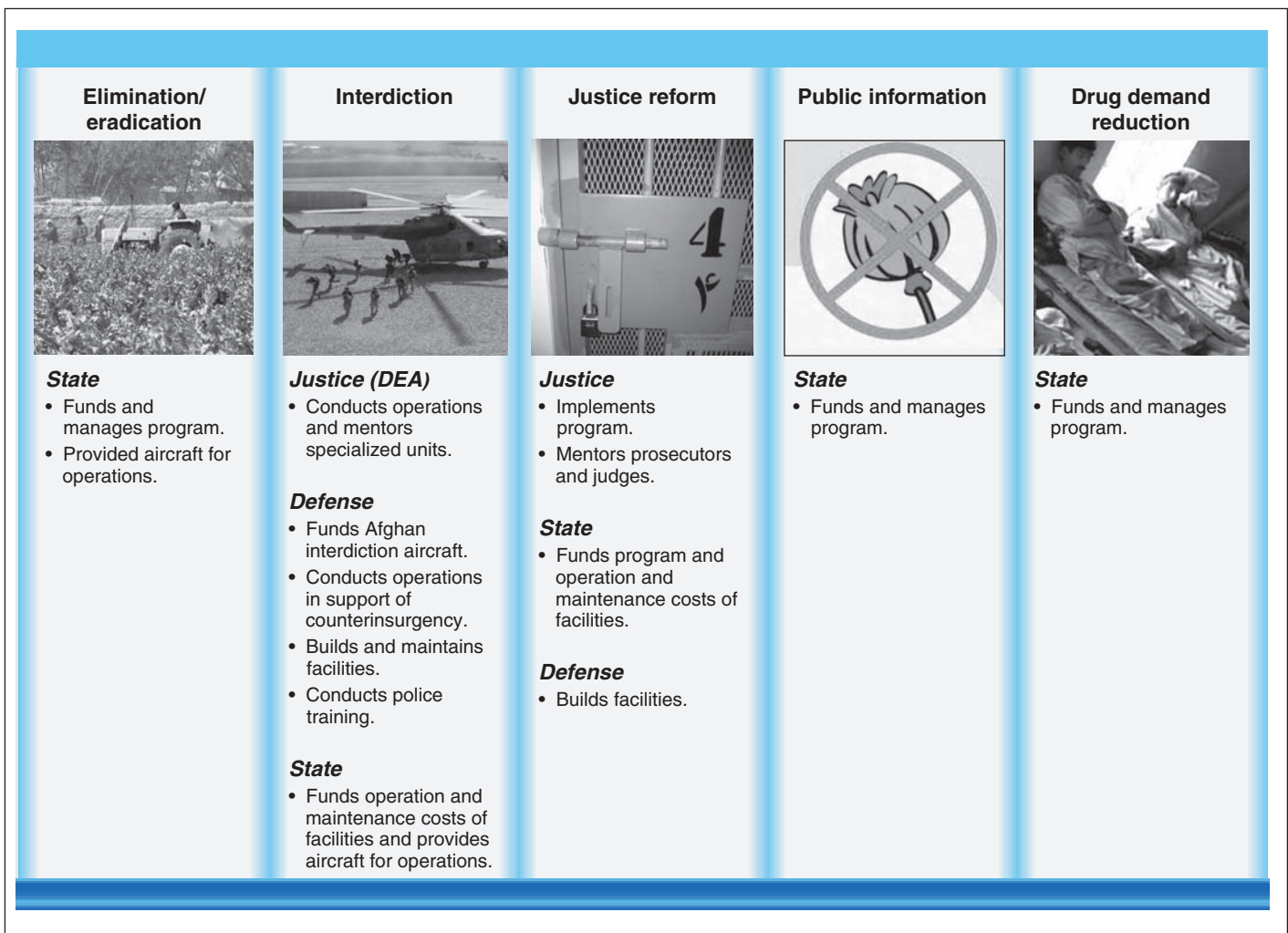
⁵Defense was involved in public information activities prior to State taking the lead in 2006.

⁶Advisory teams are located in Badakhshan, Balkh, Farah, Helmand, Kandahar, Nangarhar, and Oruzgan provinces.

Overview and Coordination of U.S. Agency Involvement

As shown in figure 3, multiple U.S. agencies are involved in U.S. counternarcotics activities in Afghanistan.

Figure 3: U.S. Agency Involvement in Afghanistan Counternarcotics Activities, as of February 2010



Sources: GAO analysis of State, Defense, and Justice program documents; (left to right) State, Defense, GAO, State, and State (photos).

U.S. officials involved in Afghan counternarcotics stated that coordination between agency partners has been largely successful. Agency partners meet regularly through several coordinating bodies in Kabul, such as the Eradication Working Group and Counternarcotics Sync Group.

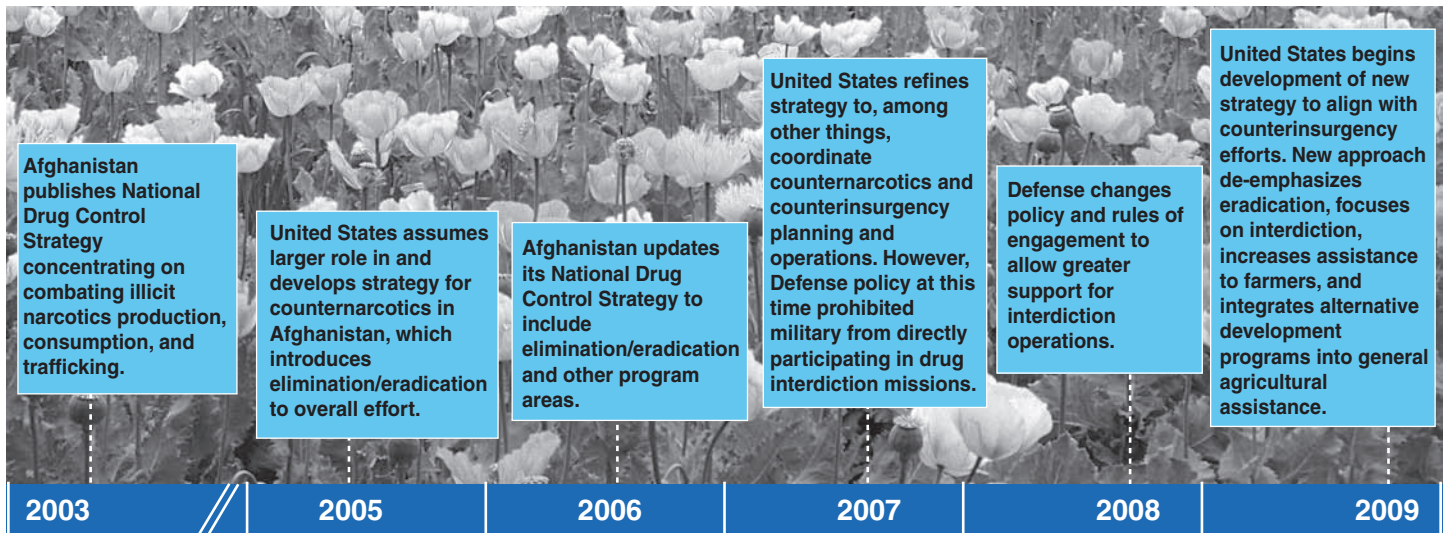
Additionally, interdiction operations and intelligence are coordinated through a variety of mechanisms. The Interagency Operations Coordination Center coordinates and analyzes intelligence information in Kabul to produce targets for interdiction operations and is jointly led by DEA and the United Kingdom's Serious Organized Crime Agency. The Combined Joint Interagency Task Force-Nexus established by Defense in Kandahar is intended to provide coordination support, intelligence, and target packages for DEA interdiction missions as well as International Security and Assistance Force (ISAF)⁷ counterinsurgency operations that target insurgents linked to the drug trade. The Joint Narcotics Analysis Center is an intelligence center jointly led by the United States and United Kingdom in London that provides strategic analysis and operational support to interdiction activities in Afghanistan. Officials involved in the Interagency Operations Coordination Center and Combined Joint Interagency Task Force-Nexus reported that they are exploring ways of formalizing their relationship for enhanced cooperation. Additionally, State recently created and filled a position for a Coordinating Director for Development and Economic Affairs at Embassy Kabul that oversees all U.S. assistance programs, including counternarcotics activities. State also hosts meetings of the interagency Counternarcotics Working Group in Washington, D.C. According to State, the latest revisions to the U.S. Counternarcotics Strategy were coordinated through these working-level meetings.

U.S. Counternarcotics Strategy Changing Emphasis Across Program Areas to Support Overarching Counterinsurgency Campaign

The U.S. counternarcotics strategy for Afghanistan has become more integrated with the broader counterinsurgency effort over time, as depicted in figure 4.

⁷Since 2001, the United States has worked with international partners under a United Nations mandate to assist Afghanistan in creating a safe and secure environment, in part through the ISAF. U.S. forces in Afghanistan are deployed either as part of the North Atlantic Treaty Organization-led ISAF or Operation Enduring Freedom, which includes the Combined Security Transition Command-Afghanistan (CSTC-A), in efforts to secure and stabilize Afghanistan.

Figure 4: Time Line of Counternarcotics Strategies in Afghanistan



Sources: United States and Afghanistan strategies and planning documents; State (photo).

In 2003, Afghanistan adopted a National Drug Control Strategy with the goal of eliminating production, consumption, and trafficking of illicit drugs in Afghanistan. In 2005, the United States assumed a larger role in the counternarcotics effort after several years of increases in opium poppy cultivation and developed its first counternarcotics strategy for Afghanistan. This strategy concentrated on five program areas: elimination/eradication, interdiction, justice reform, public information, and alternative livelihoods. The 2005 U.S. strategy introduced elimination/eradication, which had not been a major focus of previous efforts. The government of Afghanistan added this and other program areas to its 2006 National Drug Control Strategy, which it updated and integrated into its National Development Strategy in 2008.

In August 2007, the United States refined its counternarcotics strategy, seeking to: (1) increase development assistance to encourage licit economic development; (2) amplify the scope and intensity of interdiction and eradication operations; (3) encourage consistent, sustained political will for the counternarcotics effort among the Afghan government, coalition partners, and international civilian and military organizations; and (4) coordinate counternarcotics and counterinsurgency planning and operations with a particular emphasis on integrating drug interdiction into the counterinsurgency mission. At that time, however, Defense policy

prohibited the military from directly participating in drug interdiction missions.

According to Defense and DEA officials, this prohibition of military involvement in interdiction missions prevented or hampered the ability of some missions from occurring in insecure areas and made commanders reluctant to provide support to DEA. However, both Defense and DEA officials stated that this policy ignored a nexus between the narcotics trade and the insurgency. For example, DEA drug raids yielded weapons caches and explosives used by insurgents, as well as suspects listed on Defense military target lists, and military raids on insurgent compounds also yielded illicit narcotics and narcotics processing equipment.

According to Defense, in November 2008 it changed its rules of engagement to permit the targeting of persons by the military (including drug traffickers, if appropriate) who provide material support to insurgent or terrorist groups. Additionally, Defense clarified its policy, in December 2008, to allow the military to accompany and provide force protection to U.S. and host nation law enforcement personnel on counternarcotics field operations, so long as Defense personnel do not directly participate in arrests. According to Defense, these changes are also mirrored in North Atlantic Treaty Organization doctrine, allowing members to participate in interdiction operations. Defense and DEA officials stated that these changes have benefited interdiction-related programs in Afghanistan.

In 2009, the U.S. approach shifted again to align more closely with counterinsurgency efforts. This programmatic shift de-emphasized eradication by ending support for the Afghan central eradication force. According to the Special Representative for Afghanistan and Pakistan, eradication unduly punished and alienated farmers for making a “rational economic decision”⁸ while ignoring the profits gleaned by traffickers and insurgents from the sale of processed opium and heroin. Therefore, based on the reasoning that going after drug labs and traffickers would more precisely target the drug-insurgency nexus, the United States is focusing more on interdiction efforts. According to the Special Representative for Afghanistan and Pakistan, Defense and DEA will continue to lead in the interdiction program area, with State playing the role of coordinator. In addition, this strategic shift increased assistance to farmers and integrated alternative development programs into general agricultural assistance.

⁸Opium poppy generally yields greater profits per hectare than licit crops such as wheat.

According to the Special Representative for Afghanistan and Pakistan, the U.S. counternarcotics strategy will be a subcomponent of the broader counterinsurgency campaign.

Although Counternarcotics Programs Reported Some Progress, They Remain Challenged by Lack of Security, Political Will, and Afghan Government Capacity

The United States' use of total poppy cultivation as a primary measure of overall counternarcotics success has limitations in that it does not capture all aspects of U.S. counternarcotics efforts. In recognition of this, the administration is attempting to develop measures that better capture overall counternarcotics success. U.S. agencies reported some progress within each of the counternarcotics program areas by collecting information on program-specific performance measures; however, it is difficult to fully assess progress in some areas due to a lack of interim performance targets, which can be used to provide decision makers with an indication of the incremental progress toward achieving results. In addition, challenges, such as lack of security, political will, and Afghan government capacity affect progress in all program areas.

Current Measure of Overall Counternarcotics Success Has Limitations

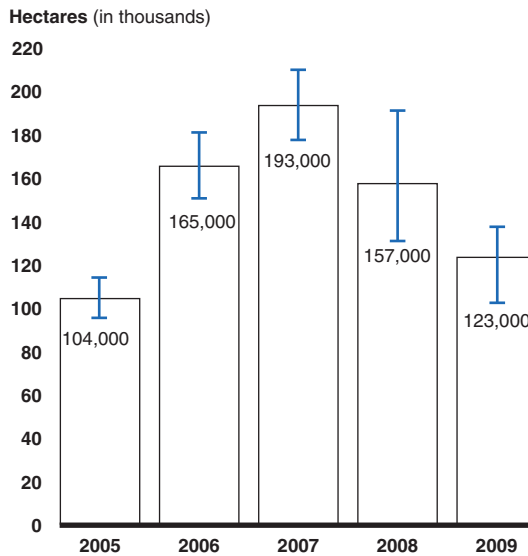
Since 2005, the United States has measured overall success through total hectares under opium poppy cultivation. Each counternarcotics program area has its own program-specific performance measures—which we address later in this section. However, opium poppy cultivation continues to be tracked by the United States and UNODC as an aggregate measure of counternarcotics success.⁹ Evidence based on annual UNODC surveys indicates a peak in production during 2007 with declines in subsequent years. As opium poppy cultivation has declined and more provinces have become poppy-free,¹⁰ it has become more concentrated in the largely insecure south and west of Afghanistan. Changes in poppy cultivation since 2005 are shown in figure 5.¹¹

⁹Other high-level indicators tracked by the United States included provinces reducing cultivation and poppy-free provinces. The United States also collected program-level performance indicators and targets.

¹⁰In 2006, 6 provinces were poppy-free. In 2009, 20 provinces were poppy-free.

¹¹The United States uses UNODC data to inform programmatic decisions, such as determining Good Performers Initiative rewards. However, the U.S. government also independently estimates total opium poppy cultivation to inform policy decisions. U.S. government-estimated totals in hectares are as follows: 107,400 (2005); 172,600 (2006); 202,000 (2007); 157,000 (2008); 131,000 (2009).

Figure 5: Total Opium Poppy Cultivation in Afghanistan, 2005-2009



Confidence interval: displays the upper and lower boundaries of the 90 percent confidence interval for 2005-2008 estimates and 95 percent confidence interval for the 2009 estimate.

Sources: UNODC Afghanistan Opium Survey for 2005, 2006, 2007, 2008, and 2009.

However, U.S. officials pointed out that poppy cultivation fails to capture all aspects of counternarcotics success. For example, although 20 of the 34 Afghan provinces are now poppy-free, some of these provinces may still contain high levels of drug trafficking or processing. Additionally, according to the Special Representative for Afghanistan and Pakistan, the use of opium poppy cultivation as the primary measure of overall success led to an over-emphasis on eradication activities, which due to their focus on farmers, could undermine the larger counterinsurgency campaign. Officials from the Office of National Drug Control Policy also criticized using total opium poppy cultivation as the sole measure of success, stating that measures of success should relate to security, such as public safety and terrorist attacks. Moreover, previous GAO work on U.S. counternarcotics efforts in Colombia, Peru, and Bolivia indicates that government control of drug-growing areas and project sites is essential for counternarcotics success.¹²

¹²GAO, *Drug Control: Efforts to Develop Alternatives to Cultivating Illicit Crops in Colombia Have Made Little Progress and Face Serious Obstacles*, [GAO-02-291](#) (Washington, D.C.: Feb. 8, 2002).

According to preliminary documents, the administration is attempting to develop measures that better capture overall counternarcotics success. Potential measures being considered include interdiction of drugs, volume and value of narcotics in Afghanistan, and successful interdiction and prosecution of narcotics traffickers. However, at the time of our review, no such measures had been finalized.

**Elimination/Eradication:
Efforts Challenged by
Political Will, Security, and
Afghan Capacity**

The goal of elimination/eradication programs is to reduce opium poppy cultivation through forced eradication and economic incentives. State assisted the Afghan government in selecting, training, and fielding a central eradication force¹³ of Afghan police to destroy poppy crops and serve as a deterrent to continued poppy cultivation. The governor-led eradication program reimburses governors that self-initiate eradication of poppy in their provinces. After the eradication is verified by UNODC, the U.S. government transfers funds to the Afghan Ministry of Counter Narcotics, which in turn reimburses governors at the rate of \$135 per hectare eradicated.¹⁴ As the elimination component of this program area, the Good Performers Initiative annually provides political recognition and direct financial incentives to provinces that reduce or eliminate opium poppy cultivation.

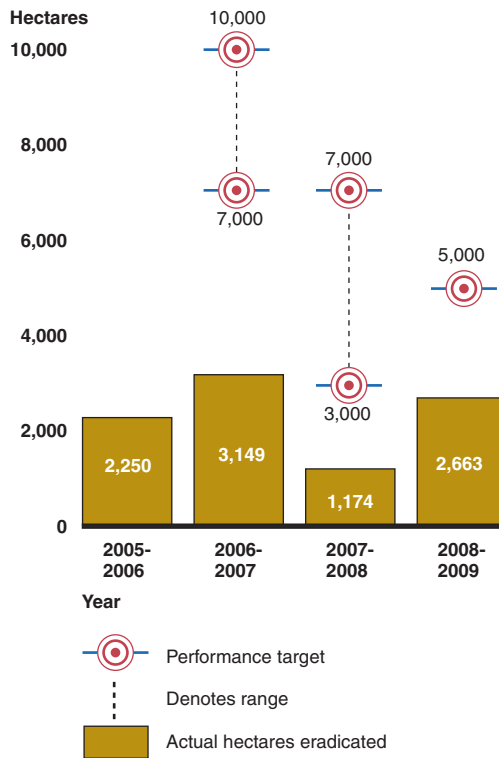
**Central Eradication Force
Consistently Hindered by
Political Will and Security
Challenges That Limited
Effectiveness and Mobility**

State and the Afghan government established annual performance targets for central eradication by setting a specific amount of hectares to be eradicated. Central eradication did not meet its specific targets, as shown in figure 6.

¹³The central eradication force was known as the Central Poppy Eradication Force between 2004 and 2005, the Afghan Eradication Force between 2005 and 2007, and the Poppy Eradication Force between 2007 and 2009.

¹⁴The United Kingdom also contributes to governor-led eradication reimbursements.

Figure 6: Central Eradication Performance Targets and Results, 2005-2009



Sources: GAO analysis of State and UNODC data.

State originally intended a central eradication force comprised of Afghan Counternarcotics Police to be augmented by aerial herbicide spraying, a method the U.S. government has historically used and supported in Colombia.¹⁵ However, the proposed aerial spray eradication met heavy Afghan and international political resistance and was never authorized by the Afghan government. This forced central eradicators to destroy poppy crops with such equipment as tractors, all-terrain vehicles, and sticks. In 2005, State aircraft began supporting the program by transporting personnel and equipment and providing reconnaissance and protection for the central eradicators.

¹⁵GAO, *Plan Colombia: Drug Reduction Goals Were Not Fully Met, but Security Has Improved; U.S. Agencies Need More Detailed Plans for Reducing Assistance*, GAO-09-71 (Washington, D.C.: Oct. 6, 2008).

This force was heavily dependent on large ground convoys for its deployment. For example, during its last eradication season, the central eradicators deployed from Kabul to Helmand in an 80 kilometer-long convoy. According to State officials, the ground convoys were expensive, made the force vulnerable to attack, and caused central eradicators to spend more time deploying and less time eradicating. Maintenance and readiness of vital equipment proved to be a persistent challenge. Additionally, U.S. agency officials and contractors reported incidents of equipment sabotage and dismantling for parts. Opium poppy eradication is illustrated in figure 7.

Figure 7: Opium Poppy Being Eradicated



Source: State.

Another factor that hampered central eradicators was the delay in gaining permission to manually eradicate from Afghan governors.¹⁶ In 2008, the concept for the central eradication force was changed so that central eradicators could operate without governor permission in areas where governors either would not or could not launch eradication efforts themselves. State officials at the time recognized that this forced eradication mission would require greater protection for the central eradication force, which faced growing resistance as poppy growth

¹⁶Prior to 2008, the central eradicators were dependent on governors to approve eradication plans and lead them to poppy fields.

Continued Governor-Led
Eradication Success
Contingent Upon Adequate
Security, Political Will, and
Afghan Capacity

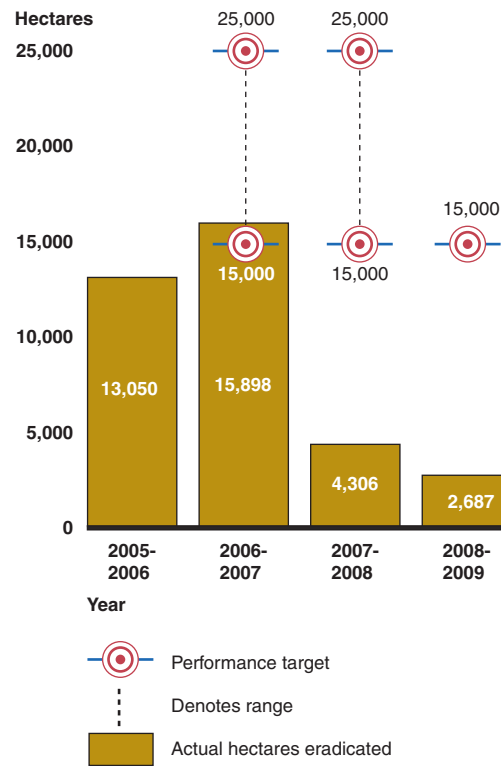
became more concentrated in less-secure areas. A counternarcotics infantry unit from the Afghan National Army deployed with the central eradication force during the 2009 season and, although more hectares were eradicated than in 2008, State officials reported that this unit was unable to provide sufficient force protection.

As a result of these challenges, State officials in Afghanistan said that the central eradication force was not very effective as a large-scale crop elimination tool but maintained that it provided a deterrent against poppy cultivation. However, in 2009, UNODC surveyed Afghan farmers who had stopped growing poppy, and 1 percent of respondents cited fear of eradication as a reason for stopping opium poppy cultivation.¹⁷

Separate targets were established for governor-led eradication. Governor-led eradication met its performance target in 2006-2007, but did not in other years, as shown in figure 8.

¹⁷Farmers reported the following additional reasons why they stopped growing poppy in 2009. The most significant reasons cited included the Afghan government's ban on opium cultivation (33 percent), low sale price of opium (18 percent), and opium cultivation being against Islam (16 percent). No other reason amounted to greater than 6 percent of respondents.

Figure 8: Governor-Led Eradication Performance Targets and Results, 2005-2009



Sources: GAO analysis of State and UNODC data.

Comparisons of both central and governor-led eradication show that substantially more hectares of poppy were eradicated through governor-led efforts in years prior to 2009 (see figs. 6 and 8). However, according to State, as cultivation becomes more concentrated in areas of poor security, and more stable provinces become poppy-free, the opportunities to use governor-led eradication have become more limited. In particular, U.S. officials note that adequate force protection is essential for eradication in the south. Some governors are willing to eradicate, but are constrained by poor security, as in insurgency-dominated Helmand in 2009. Protection for governor-led eradicators relies upon agreements made between governors and local security forces.

In addition, U.S. officials stated that governor-led eradication efforts were challenged by lack of political will among governors. Each autumn, U.S. officials and Afghan governors collectively set targets for the upcoming year's eradication work. Nevertheless, even after agreement is ostensibly reached with all governors, some governors do not take action in their

Thirty-three of 34 Afghan
Provinces Rewarded through
Good Performers Initiative

provinces. A State official noted the case of one governor who was unwilling to eradicate even after receiving 10 tractors for this purpose. The UNODC recently reported that timely eradication could have caused seven more provinces to become poppy-free and directly attributed the absence of eradication in two of these provinces to a lack of planning and will to eradicate.

A State official also noted that while political will exists in some cases, many governors do not have the capacity or resources to initiate eradication. To assist governors with the start-up costs of eradication (rental of equipment, hiring of labor, provision of fuel), the United States and United Kingdom provide advanced payments to governors against future eradication achievements.

Under the Good Performers Initiative,¹⁸ provinces determined by UNODC to be poppy-free receive \$1 million in development assistance. Provinces that reduce poppy cultivation by 10 percent receive \$1,000 per each additional hectare of reduction up to a maximum reward of \$10 million.¹⁹ Annual special recognition awards of \$500,000 are also given to provinces that have taken extraordinary steps to fight narcotics, but which may not qualify under the previous criteria. Projects—such as the construction of irrigation systems or provision of tractors—are selected and funded through a process that includes oversight by both the Afghan Ministry of Counter Narcotics and State. To date, the U.S. government has allotted over \$80 million²⁰ to 33 provinces through the Good Performers Initiative, while the United Kingdom has provided approximately \$12 million.²¹ In 2009, State pledged nearly \$39 million to the initiative. As of September 2009, 7 of 43 projects initiated through Good Performers Initiative were complete.

¹⁸The Good Performers Initiative began with the U.S. Agency for International Development (USAID) and other donors channeling funding for the program through a trust fund administered by the United Nations Development Programme.

¹⁹Nangarhar received the maximum \$10 million reward in 2008, and Helmand is projected to receive the maximum reward as a result of its 2009 cultivation reduction.

²⁰USAID allocated \$10 million to the Good Performers Initiative prior to State taking over funding of the program in 2008.

²¹Oruzgan province did not receive Good Performers Initiative funding between 2006 and 2008. It also does not qualify for 2009 funding. Although UNODC reports that poppy cultivation in Oruzgan dropped 7 percent in 2009, this is below the 10 percent reduction threshold required by Good Performers Initiative criteria.

Determining the precise effect of this program on poppy cultivation in any given province is a challenge. A State review of the Good Performers Initiative found that a combination of variables, including political will and security, as well as incentives like development projects, ultimately contribute to poppy cultivation reductions across provinces. Afghan officials expressed favorable views of the Good Performers Initiative, for example identifying it as a main factor in the rising number of poppy-free provinces. According to State, the efficiency of disbursements has improved with the transfer of the Good Performers Initiative fund and administrative responsibilities from the United Nations Development Programme-administered Counternarcotics Trust Fund to the Afghan Ministry of Counter Narcotics. Inefficiencies at the fund frustrated governors with delays in approving and implementing projects, leading the Afghan government to recommend a different funding arrangement. Due to the slowness of delivery and the high administrative costs of funding projects through the trust fund, the United States created a joint bank account with the Afghan Ministry of Counter Narcotics to administer program moneys more rapidly.

Interdiction: United States Conducting More Operations, but Afghan Capacity Limited

U.S. interdiction programs aim to decrease narcotics trafficking and processing by conducting operations, as well as increasing the capability of Afghan law enforcement to disrupt and dismantle drug trafficking organizations. DEA is the lead agency for conducting narcotics interdiction operations in Afghanistan, and its presence expanded from 13 to 81 permanently assigned agents during fiscal year 2009.²² DEA agents in Kabul and at forward operating bases in Afghan provinces work with specialized units of the CNPA to conduct investigations, build cases, and arrest drug traffickers. These specialized and vetted units include the National Interdiction Unit, a tactical unit intended to conduct raids and seizures; the Sensitive Investigative Unit, intended to gather evidence and develop cases for narcotics investigations;²³ the Technical Investigation Unit, a subunit of the Sensitive Investigative Unit intended to collect evidence through wiretaps; and the Air Interdiction Unit, a force of eight MI-17 helicopters used to transport DEA and National Interdiction Unit personnel on air assault operations. DEA Foreign-deployed Advisory

²²As of December 2009, DEA had filled 65 of these 81 positions.

²³Sensitive Investigative Units are groups of host-nation investigators that DEA polygraphs, trains, equips, and mentors to conduct bilateral drug investigations and collect counternarcotics intelligence.

U.S. Defense Policy Change
Allowing More Interdiction
Missions

Support Teams identify, target, and disrupt drug trafficking organizations, and conduct affiliated counterinsurgency operations in concert with the Afghan National Interdiction Unit, Air Interdiction Unit, and the British-trained Afghan Special Narcotics Force.²⁴ Additionally, State's Air Wing in Afghanistan supports interdiction activities on an as-needed and as-available basis.²⁵

DEA also plays a role in building Afghan law enforcement capacity by mentoring CNPA specialized units and deploying with specialized unit platoons at forward operating bases. Defense supports the construction of these forward operating bases, as well as other infrastructure projects such as CNPA training and basing facilities in Kabul. State supports the operation and maintenance costs of some of these Defense-built infrastructure projects, as well as vetting (through urinalysis and polygraphs) of Sensitive Investigative Unit and Technical Investigation Unit officers. Defense trains, equips, and sustains the CNPA specialized units, including logistics and maintenance support to the Air Interdiction Unit helicopter fleet intended to establish an air interdiction capacity for the Ministry of Interior.

As noted earlier, in late 2008, Defense and the North Atlantic Treaty Organization changed their policies to allow the U.S. military and ISAF forces to participate in interdiction operations in Afghanistan. DEA and Defense officials stated that these changes have enabled higher levels of interdiction operations in areas previously inaccessible due to security problems. DEA conducted 82 interdiction operations in Afghanistan during fiscal year 2009 (compared with 42 in fiscal year 2008), often with support from U.S. military and other coalition forces. These operations include, among other things, raiding drug laboratories; destroying storage sites; arresting drug traffickers; conducting roadblock operations; seizing chemicals and drugs; and conducting undercover drug purchases. The U.S. military and ISAF are also targeting narcotics trafficking and processing as part of regular counterinsurgency operations. For example, ISAF Regional Commands are expected to submit a counternarcotics campaign plan for

²⁴The Afghan Special Narcotics Force is a British-supported CNPA paramilitary unit tasked with carrying out raids against high-value targets and drug infrastructure, e.g., bazaars, and laboratories, with a view to injecting risk into the illicit drugs trade.

²⁵From November 1, 2008, through August 18, 2009, the Air Wing's 10 Huey II helicopters spent about 20 percent of their flight-time providing overwatch, close air support, and casualty evacuation support to DEA-led interdiction operations.

2010, and Defense has established a Combined Joint Interagency Task Force-Nexus in Kandahar intended to provide coordination support, intelligence, and target packages for DEA interdiction missions as well as ISAF counterinsurgency operations that target insurgents linked to the drug trade.²⁶

One way for U.S. agencies to measure progress in this area is by tracking and reporting the results of interdiction operations, as shown in table 2.

Table 2: DEA Interdiction Data for Afghanistan Fiscal Year 2005 through Fiscal Year 2009

	2005 ^a	2006	2007	2008	2009
Interdiction operations	33	48	37	42	82
Opium seized (metric tons) ^b	42.9	7.5	0.892	2.442	25
Heroin seized (metric tons)	5.5	1	0.124	4.083	0.593
Hashish seized (metric tons)	142.4	1.3	0.434	238.935	53.133
Clandestine conversion labs destroyed	247	31	1	13	25
Drug-related arrests	32	79	33	48	56

Source: DEA.

^aAccording to DEA officials, during 2005 the Foreign-deployed Advisory Support Teams primarily engaged in search-and-destroy missions, resulting in extensive narcotics seizures and destruction of processing labs. Today, the Foreign-deployed Advisory Support Teams are building evidentiary cases for eventual trial at the Criminal Justice Task Force.

^bOne metric ton equals 1,000 kilograms or approximately 2,205 pounds.

Agreements between the United States and Afghanistan contain interim performance targets for interdiction operations. For example, for 2008-2009, the agreed upon goal was to produce a 10 percent increase from 2008 of drug and precursor chemical seizures or interception of drug traffickers, with 25 percent of drug seizures resulting in arrests. However, DEA officials in Afghanistan cautioned that seizure and arrest figures alone are not sufficient to show that interdiction operations are having an impact on the Afghan narcotics industry. Furthermore, measuring the results of drug-control actions is difficult because data on illegal drug movements are more difficult to collect than data on most legal

²⁶At the time of our review, plans called for the Combined Joint Interagency Task Force-Nexus to include, in addition to military personnel, representatives from DEA, State, and other government agencies, including analysts attached to the Interagency Operations Coordination Center in Kabul.

Capacity of Afghan
Counternarcotics Police to
Carry Out Interdiction Efforts
Limited

commodities. Without knowing how much was shipped or what got through, the amount of narcotics seized does not yield a meaningful measure of effectiveness. As a result, DEA also measures its performance through its investigative and enforcement efforts against High Value Targets designated by the DEA Kabul Country Office, as well as significant Afghan drug organizations identified by the interagency Organized Crime Drug Enforcement Task Force program. According to DEA, if one of these organizations is disrupted or dismantled, it is reflected in the yearly evaluation of the region. Additionally, DEA officials in the field stated that they attempt to gauge impact of operations on narcotics networks through intelligence information.

With regard to increasing Afghan law enforcement capacity to disrupt and dismantle drug trafficking organizations, CSTC-A²⁷ uses capability milestones (CM), ranging from CM1 (fully capable) to CM4 (not yet capable), as criteria to assess army and police progress in manning, training, and equipping. According to U.S. officials, these ratings incorporate input from DEA and Defense mentors working with the CNPA specialized units. These criteria are summarized in table 3.

Table 3: Capability Milestone Criteria

Capability milestone	Description
CM1	Unit is capable of independently planning, executing, and sustaining counterinsurgency operations at the battalion level with no operational coalition support for organic functions.
CM2	Unit is capable of planning, executing, and sustaining counterinsurgency operations at the battalion level with coalition support.
CM3	Unit is partially capable of conducting counterinsurgency operations at the company level with coalition support.
CM4	Unit formed but not yet capable of conducting primary operational missions.

Source: Defense.

As of June 2009, CSTC-A rated the CNPA's specialized units at CM3 (partially capable) with the exception of the Air Interdiction Unit, which

²⁷Defense's CSTC-A, in partnership with State, the government of Afghanistan, and international partners, trains and equips the Afghan National Security Forces. CSTC-A works with the international community to develop a capable Afghan National Army and Afghan National Police intended to enhance the security and stabilization of Afghanistan.

along with the provincial CNPA, was rated at CM4 (not capable).²⁸ State also reports on the capability levels of the CNPA specialized units in its yearly International Narcotics Control Strategy Report but does not report details that would allow a more accurate assessment of the units' capability. For example, in its January 2009 report, State reported that the National Interdiction Unit was capable of conducting its own operations, including requesting and executing search and arrest warrants, while the Sensitive Investigative Unit was able to independently initiate and complete investigative and undercover cases.

Although U.S. agencies did assess the capabilities of the CNPA and its specialized units, we found that these assessments lacked interim performance targets, which can enable decision makers to more readily understand incremental progress made toward program goals. For example, while Defense officials did provide informal performance targets for the Air Interdiction Unit, such as Afghan pilots and crews being able to conduct transport flights, or flying interdiction missions with mixed Afghan/U.S. crews, these targets were not formalized in an overall training plan or time line that would allow a program manager to judge whether training was on, ahead, or behind schedule. Similarly, while CSTC-A's CM-ratings of the CNPA and its specialized units provided a snapshot of operational capability, there were no interim performance targets to assess what this snapshot means in terms of overall progress. Furthermore, the CM ratings do not assess the CNPA's institutional capability to provide logistics and administrative support. A recent interagency evaluation identified organizational capacity as a critical weakness of the CNPA, and Defense officials stated that Defense is working to develop subratings to measure CNPA support functions such as logistics support, financial management, administration, and training.

U.S. and Afghan officials noted the continued development and increased operational capacity of the CNPA's specialized units. For example, DEA officials cited the National Interdiction Unit's ability to conduct smaller ground-based interdiction operations on its own, the Sensitive Investigative Unit's ability to conduct simple counternarcotics investigations, and the execution of 180 wiretaps by the Technical Investigation Unit between October 2008 and June 2009, stating that this would not have been possible 2 years ago.

²⁸CSTC-A rated the overall CNPA at CM3 (partially capable).

However, a July 2009 interagency evaluation, as well as U.S. and Afghan officials we interviewed, identified weaknesses in broader CNPA capacity and its training program, including the following:

- Lack of a comprehensive strategy for CNPA development and no U.S. agency with clear responsibility for training, leading to “neglect of the force” beyond the specialized units.
- Lack of structure and integrity of operation in CNPA personnel system, causing the exact number of current CNPA personnel, their locations, training and equipping status, and current support to be unclear.
- No institutional capacity within the CNPA to provide daily administrative, logistics, finance, and training support to its various components, leading to dependency of the specialized units on U.S. support.
- No institutional plan for equipping or recruitment to the CNPA.
- Greater lack of priority and logistics support affecting the provincial CNPA, along with questions of ownership and authority with provincial Afghan National Police.

According to Defense officials, Defense is refocusing its efforts to train and equip the CNPA based on this assessment’s findings and recommendations. Since December 2009, Defense has supported the deployment of four advisors from the Department of Justice’s International Criminal Investigative Training Assistance Program to CSTC-A, where they are assessing CNPA training needs, exploring ways to reform, and seeking to coordinate CNPA training requirements with the larger police training mission. Defense officials characterized this as a first step, and the CNPA assessment estimated that it will take at least 3 years before the CNPA, beyond the specialized units, is able to conduct targeted and coordinated investigations at the national level.

Limited Air Assets Force Trade-off between Interdiction Missions and Training of Afghans

The objectives of the Air Interdiction Unit²⁹ are to provide operational airlift for DEA and National Interdiction Unit-led interdiction missions, as well as to build Afghan capacity to conduct such missions autonomously. According to DEA officials, airlift support from the Air Interdiction Unit

²⁹The Air Interdiction Unit consists of eight MI-17 helicopters in Afghanistan and, until recently, was supported by another four MI-17s used for training pilots, flight engineers, and crew chiefs in the United States.

allows DEA and the National Interdiction Unit to act swiftly on intelligence information and perform air assault operations on targets across Afghanistan, including areas that would otherwise be inaccessible by ground due to security concerns. According to Defense officials, only contractor pilots currently fly during actual interdiction operations due to a lack of proficient Afghan pilots.

One key challenge facing the Air Interdiction Unit, in light of limited air assets, is meeting the growing demand for interdiction missions while also training Afghan pilots, flight engineers, and crew chiefs to conduct such missions themselves. Defense officials training the Air Interdiction Unit told us that, because interdiction missions must be flown by contractor pilots, this forces a trade-off between conducting interdiction missions and training Afghan pilots. According to Defense and DEA officials, operations should always take priority over training. Defense is addressing this issue by attempting to procure six additional helicopters in fiscal year 2010 and utilizing flight simulators in Kabul and at its training center in the United States.³⁰ Additionally, the United Kingdom has contributed four helicopters to the Air Interdiction Unit with plans to contribute two more.³¹ Germany has also provided two helicopters for general Ministry of Interior use.

Defense and DEA officials stated that airlift requirements have grown beyond what was originally envisaged for the Air Interdiction Unit, and they also stated they expected these requirements to grow further as DEA expands into forward operating bases.³² Defense officials told us that they expected growing interdiction requirements to continue to compete with efforts to train Afghans over the next year. To address limited air assets, DEA officials stated that DEA is attempting to procure medium-lift helicopters in fiscal year 2011.

³⁰Defense sent Afghan pilots, flight engineers, and crew chiefs to the United States as part of the Air Interdiction Unit's training program.

³¹With the inclusion of these helicopters, the Air Interdiction Unit also assumes responsibility for supporting interdiction missions of the British-trained Afghan Special Narcotics Force.

³²DEA officials expected future air support needs of the expanded DEA presence to grow to include medical evacuation services, logistical lift, and convoy support, all of which they judged would outstrip the air assets currently available to the Air Interdiction Unit.

Justice Reform: While Some Progress Reported, Extent Is Unclear, and Broader Justice Sector-Related Challenges Impede Efforts

2009 Status of Afghan Extradition Law

International extradition is the formal process by which a person found in one country is surrendered to another country for trial or punishment. This process is regulated by treaty between the U.S. government and the government of a foreign country and has been used by DEA in countries such as Colombia and Mexico to extradite high-level drug figures that DEA has determined would be more reliably prosecuted and incarcerated through the U.S. judicial system. U.S. Department of Justice attorneys assisted Afghan counterparts in drafting an extradition law, which, according to Department of Justice officials, is still pending final decision with the Afghan parliament. According to Department of Justice officials, when the Afghan parliament ended session in June 2009, the extradition law remained in draft form and contained three concerns: (1) a requirement for third party consent for the extradition of third party nationals—e.g., Pakistan would have to consent to the extradition of one of its citizens from Afghanistan to the United States; (2) the law would not apply to women; and (3) the law sets up reciprocity in extradition.

As noted earlier, the goal of the justice reform program area is to support the Afghan government's efforts to establish counternarcotics-specific criminal justice institutions and increase the Afghan government's capacity to arrest, prosecute, and punish traffickers. According to DEA officials, the absence of a bilateral U.S.-Afghan extradition agreement that includes narcotics offenses removes a valuable channel for prosecuting higher profile drug traffickers. Without a formal extradition option, DEA generally must rely on the Afghan justice system to prosecute and incarcerate drug violators, which U.S. officials characterized as "embryonic" and often subject to political will.³³

State provides funding for Department of Justice-led mentoring programs with the Afghan investigators and prosecutors on the Criminal Justice Task Force and Afghan judges on the Central Narcotics Tribunal, as well as Department of Justice-led advising activities regarding the development of Afghan laws and procedures.³⁴ The 32 Afghan prosecutors and 35 investigators on the Task Force and 14 Afghan judges on the Tribunal are working out of the completed Counternarcotics Justice Center, which opened in May 2009 after a multiyear delay.³⁵

While the Task Force and Tribunal are now operating within the Justice Center, and laws are being developed as previously noted, the extent of progress in U.S. agency programs cannot be fully assessed due to a lack of interim performance targets. For example, the fiscal year 2009 work plan does not outline interim performance targets that provide specific levels of results to be achieved within an explicit time frame.

In addition, a lack of defined criteria makes it difficult for State and Department of Justice officials to ensure that the Task Force, Tribunal,

³³The Afghan constitution permits extradition of individuals if pursuant to a multilateral convention which allows for extradition, and to which Afghanistan is a party. Afghanistan is a party to the U.N. Convention Against Illicit Trafficking in Narcotic Drugs and Psychotropic Substances which it has cited to justify a limited number of extraditions the United States has requested. Nevertheless, according to State and Department of Justice officials, this process may not be efficient or reliable.

³⁴The arrangement is formalized in an interagency agreement, where Department of Justice provides State with a work plan that outlines programmatic goals and objectives, performance measures, and activities.

³⁵Plans to expand the Justice Center have also been delayed because of insufficient funding and inadequate utilities. Defense's U.S. Army Corps of Engineers has indicated it would work closely with State to ensure completion of the Justice Center's expansion.

and Justice Center are achieving their intended purposes. The Task Force and Tribunal are responsible for narcotics and narcotics-related corruption cases against mid- and high-level drug traffickers, and the Justice Center was constructed to assist the Afghan government in prosecuting and detaining significant or mid- to high-level narcotics offenders. Since 2005, the Task Force and the Tribunal have tried and convicted approximately 1,550 drug traffickers. However, both State and Department of Justice officials acknowledged that the definitions of a low-, mid-, or high-level trafficker are not based on any clear criteria. Instead, according to a State official, subjective judgments are made based on the amount of drugs seized, the extent of a trafficker's political connections, or whether the trafficker is a government official. Additionally, according to the Department of Justice, more appropriate measures than the current low-, mid-, and high-level traffickers may exist.

Provincial-Level Capacity and Corruption Hinder Successful Prosecution of Counternarcotics Cases

According to U.S. and Afghan officials, deficiencies in CNPA training result in inconsistent crime scene investigation, poor evidence gathering, and weakened cases brought before the Task Force. For example, a senior Afghan Ministry of Interior official stated that provincial CNPA personnel often do not correctly follow arrest, reporting, and transfer procedures for suspects referred to the Justice Center. Department of Justice officials also noted that the widespread illiteracy among the CNPA contributes to the poor quality of case documentation. In addition, U.S. and Afghan officials observed that CNPA personnel are generally not arresting high-level traffickers.

State has reported that narcotics-related corruption is particularly pervasive at the provincial and district levels of government, where officials have been known to facilitate drug activities and benefit from revenue streams produced by the drug trade. For example, an Afghan Ministry of Justice official noted that police and prosecutors are easy targets for bribery because they are reportedly not paid sufficiently. A recent Defense-led interagency evaluation also found that CNPA personnel are more susceptible to corruption than regular Afghan National Police officers due to the lucrative nature of the narcotics trade. For example, Department of Justice and Afghan officials noted that, in about one-third of cases from provinces, provincial CNPA personnel have submitted drugs as evidence to the Justice Center but did not arrest the criminal suspect or suspects.

Counternarcotics Justice Center Encounters Operational and Security Challenges

Operational and security challenges continue to hinder the effectiveness of the Justice Center, including the following:

-
- *Sustainment of operations and maintenance costs.* The Justice Center is challenged by high operations and maintenance costs of \$3 million per year, which State will fund through May 31, 2011. While State officials are currently working to develop a transition plan, no documented transition plan yet exists that addresses how the Justice Center will be handed over to the Afghan government in 2011. According to State and Department of Justice officials, the Afghan government will not be able to pay for these costs after the United States withdraws its support in May 2011. We have previously noted that Afghanistan continues to lack the ability to cover its government expenditure plans without foreign assistance.³⁶
 - *Retaining Afghan protective personnel.* The Justice Center suffers from low retention of trained and vetted marshals who provide judicial security for the Tribunal. According to Department of Justice and State officials, conditions continue to be extremely unsafe for Afghan judges; the chief appellate judge was assassinated in September 2008. We have previously reported that trained Afghan staff often leave government or other public agencies to work with donors and contractors who can offer better-paying jobs, and U.S. Marshals Service officials noted that trained personnel are often recruited to Afghan agencies that pay more, resulting in a shortage in vetted staff that can provide protection for prisoners, prosecutors, and judges.

**Public Information:
Activities Difficult to
Measure and Challenged
by Lack of Security and
Political Will**

As previously noted, the goals of the U.S. public information program are to discourage poppy cultivation and build the capacity of the Afghan government to conduct public information activities on its own. However, according to State officials, measuring the effectiveness of public information campaigns is inherently difficult, as it is impossible to know exactly how much opium poppy was not planted due to public information efforts. State collects information on the number and type of public information activities conducted by Counternarcotics Advisory Teams in the provinces and materials produced by public information contractors. In 2008, advisory teams worked with local leaders and provincial authorities to conduct a total of 413 public information events,³⁷ reaching an estimated 79,723 people. From January to June 2009, State's contractor produced more than 80,000 print materials containing counternarcotics

³⁶See GAO, *Afghanistan: Key Issues for Congressional Oversight*, [GAO-09-473SP](#) (Washington, D.C.: April 2009).

³⁷These events included councils with influential community members, sporting events, and others held for women, youth, and farmers.

messages, from billboards and posters to children's booklets. These were augmented by radio and television programs, news stories, and other products that were broadcast nationwide thousands of times. Examples of counternarcotics public information materials are shown in figure 9.

Figure 9: Counternarcotics Public Information Materials for Schools



Source: GAO.

Despite obtaining information on the number and type of public information activities, we were unable to assess the full extent of progress since State did not establish performance targets for its public information activities. A 2009 Inspector General assessment of State's counternarcotics program in Afghanistan found a lack of meaningful performance measures to evaluate public information program effectiveness. While acknowledging this lack of performance targets, State officials told us that

they make qualitative judgments of the program based on the number and type of public information events conducted. They also stated that public information's success is tied to the success of other counternarcotics program areas. For example, if governors and the central government cannot present a credible threat of eradication, previous messages, which warned farmers to switch to wheat or risk destruction of their opium poppy crops, lose credibility. Such messaging also loses effectiveness if alternative crops are not available.

State has established a goal of ensuring that the Afghan government is able to conduct its own effective public information campaign. Although public information campaigns are publicized as originating from the Afghan Ministry of Counter Narcotics, a State official stated that advisory teams and State's contractor actually carry out most operational activities of the public information campaign. Attempts to extend advisory teams' regional reach have been limited by both poor security and the absence of qualified Ministry of Counter Narcotics officials in the provinces.

We were unable to assess Afghan capacity to conduct its own public information campaigns due to a lack of capability measures or interim performance targets. While advisory teams record the number of working group meetings and training sessions they conduct to build Afghan capacity, they do not keep records of who attends that would allow follow-up on the results of this training. Additionally, although State has established a benchmark for turning advisory teams over to the Afghan Ministry of Counter Narcotics, this benchmark is tied only to poppy cultivation levels and does not take Afghan capacity to conduct public information into account.³⁸ It is not clear how advisory teams intend to phase out as poppy cultivation levels decrease, or how the Ministry of Counter Narcotics will be able to sustain public information efforts without advisory team assistance.

Poor security, lack of political will, and significant variances between provinces challenge efforts to develop and spread appropriate counternarcotics messages across Afghanistan. Security concerns largely dictate how often and how far advisory teams can travel outside their base of operations. For example, in the relatively secure northern regions,

³⁸The benchmark states that advisory teams will be phased out as poppy cultivation levels decrease and will be completely turned over to the Afghan Ministry of Counter Narcotics when levels reach 25 percent of 2007 levels, or 50,000 hectares.

advisory teams are able to travel regularly to neighboring provinces to conduct public information events and other outreach. In less secure southern areas, like Kandahar, advisory teams' movements have been limited, while some other teams have been compelled to retreat to military bases for protection. The advisory team in the western Farah province reported its main problem is the lack of security, which restricts it to daylight operations in the provincial capital. Any team travel outside the city must be under heavy armed protection and with advance permission from program officers in Kabul.

Alongside security, political will has been consistently reported as a factor challenging the implementation of public information. In general, State officials maintain that the stronger and more active a provincial governor is in combating narcotics, the more active the local advisory team will be. Currently, the advisory teams in Helmand and Nangarhar are the most active since they receive substantial backing from their respective governors. State officials further noted that some governors are indifferent and at times hostile to public information efforts, making it difficult for advisory teams to coordinate official events, access audiences, and get buy-in from other government officials.

According to a State official, public information constitutes its own program area due to the difficulty of conducting such activities in Afghanistan. This official describes Afghan culture as very interpersonal, requiring sustained contact in order for messaging to be fully effective. Public information has largely become a substitute for not being physically and continuously present in many areas. To account for the lack of physical presence, and for some of the variances in language, security, and levels of involvement in the narcotics industry, the public information program is tailoring messages to specific provinces. Advisory teams work with provincial leaders to create public information messages that will resonate most in their particular provinces. Messages are translated into appropriate local languages and are tailored to be geographically and seasonally appropriate as well. Tailoring counternarcotics messages has been cited as more effective than blanket messaging throughout the country, but it is also more costly and time-consuming.

Drug Demand Reduction: United States Increasing Efforts to Address Drug Addiction

The United States has funded drug demand reduction efforts since 2006 and, in 2009, State increased its funding from \$2 million to \$11 million to support 26 drug treatment clinics, further develop protocols for the treatment of addicts, and train Afghan prevention providers and counselors. The UNODC and the United Kingdom no longer fund drug

demand reduction programs, and State and Afghan officials reported that other coalition partners are not supporting such efforts with funding or personnel.

UNODC recently approached State in an effort to fund community-based mobile treatment teams that address both drug demand and HIV prevention, similar to the type of programming that UNODC discontinued 2 years ago. State is exploring the possibility of supporting UNODC's village-based treatment model for Afghanistan as one of several modalities of treatment in an effort to support comprehensive rehabilitation services.

State has indicated that the demand for treatment services is increasing. A 2005 UNODC survey documented approximately 1 million drug users in Afghanistan, and the 2010 UNODC National Drug Use Survey is expected to report 2 million drug users. According to the Afghan government, drug demand reduction activities encounter several challenges that impede progress, including the following:

- A dearth of treatment subcenters in the districts and facilities for district outreach programs.
- A shortage of health professional staff in the treatment centers with the capacity to practice addictive and behavioral psychotherapy.
- A lack of vocational training courses in the treatment centers and work opportunities for addicts after the rehabilitation process.

According to State officials, 12 to 41 percent of Afghan police recruits at Regional Training Centers test positive for drugs, depending on the province. A State official noted that this percentage likely understates the number of opium users because opiates leave the system quickly; many recruits who tested negative for drugs have shown opium withdrawal symptoms later in their training. A State official also reported that the drug demand reduction program is considering the establishment of dedicated rehabilitation clinics at the regional police training centers; however, because the police recruits leave once they finish their training, these clinics will not be able to provide the same long-term inpatient services that exist at the 26 clinics. While State recognizes that police addiction problems are an issue, a State official said that due to limited State financial resources, its U.S. drug demand reduction programs do not specifically target police forces.

Although no U.S. drug demand reduction programs specifically for Afghan police existed at the time of our field work, after sending a draft of our report to the agencies for comment in February 2010, State and Defense informed us of recent efforts by the Afghan Ministries of Interior and Public Health to establish a drug rehabilitation center in Kabul for priority use by Afghan National Police. Additionally, according to CSTC-A, the Ministries of Interior and Public Health signed a memorandum of agreement in December 2009 that authorizes Afghan National Police access to Ministry of Public Health drug rehabilitation facilities nationwide.

Monitoring and Evaluation of Most U.S. Counternarcotics Programs Under Way

As a component of effective program management, monitoring is essential to ensuring that U.S. counternarcotics programs are implemented as intended. In addition, evaluation uses routine data collection and analysis to provide evidence that can be used to compare alternative programs, guide program development and decision making, and reveal effective practices.³⁹ As shown in table 4, U.S. agencies monitored counternarcotics program progress through direct U.S. agency involvement, contractor reporting, and/or third-party verification. Program evaluations were completed or under way in four of the five program areas (elimination/eradication, interdiction, public information, and drug demand reduction), but not for the justice reform program.

Table 4: Monitoring and Evaluation Activities by Program Area

Program area	Monitoring	Evaluation
Elimination/eradication	<p>State program officers deployed with central eradication force and performed site visits of Good Performers Initiative projects.</p> <p>U.S. contractor deployed with central eradication force and routinely reported on activities to State.</p> <p>UNODC verified number of hectares eradicated by central and governor-led eradication programs.</p>	<p>State completed Good Performers Initiative program evaluation in March 2009.</p> <p>No documented evaluations for central and governor-led eradication programs.</p>

³⁹We utilized as a framework the Government Performance and Results Act, which outlines good management practices such as establishing strategic, long-term goals and planning and reporting progress toward these goals on an annual basis. We also referenced good management practices outlined in previous GAO reports and guidance and considered monitoring and evaluation principles established by the American Evaluation Association. See *Appendix I: Scope and Methodology* for more information.

Program area	Monitoring	Evaluation
Interdiction	<p>Defense conducted oversight of building construction and monitored development of CNPA and its specialized units through training program and logistical support.</p> <p>DEA agents monitored CNPA specialized units through direct mentoring and joint operations.</p>	U.S. government completed interagency evaluation of CNPA capacity and overall training program in July 2009.
Justice reform	Department of Justice attorneys monitored justice sector activities through direct mentoring of Afghan prosecutors, judges, and investigators on the Criminal Justice Task Force and also reported routinely to State.	None documented.
Public information	<p>State program officers conducted site visits of Counternarcotics Advisory Team activities.</p> <p>U.S. contractor worked directly with Afghans on advisory teams to conduct public information activities and reported routinely to State.</p>	<p>Contractor conducted and documented results of provincial focus groups to assess effectiveness of public information messages.</p> <p>UNODC evaluated various counternarcotics media campaigns in October 2008.</p>
Drug demand reduction	<p>State program officers conducted site visits of Afghan drug treatment clinics.</p> <p>U.S. contractor visited clinics to monitor the implementation and administration of drug treatment centers and prevention programs. Contractor also routinely reported on activities to State.</p>	State conducting an evaluation of drug demand reduction projects to assess progress and impact.

Sources: GAO analysis of State, Defense, Department of Justice, DEA, and UNODC program documents.

Defense and DEA directly monitored interdiction program activities through their training, mentoring, and logistical support efforts for the CNPA specialized units. For example, Defense monitored the Air Interdiction Unit's performance by tracking operational readiness rates and the number of interdiction operations conducted against missions requested. In addition to State's efforts to directly monitor its counternarcotics activities through site visits, State also used contractors to directly monitor counternarcotics activities within the elimination/eradication, public information, and drug demand reduction programs. For example, a State official noted that the agency's relationship with its contractor allows the United States to effectively monitor and oversee public information campaigns and drug rehabilitation programs in remote areas. In the justice reform area, Department of Justice attorneys routinely reported on their mentoring of Afghan judges and prosecutors to State. Additionally, State program officers at Embassy Kabul routinely documented State's counternarcotics activities and those of its contractors. For example, a June 2009 embassy report detailed a visit by State program officers to a public event jointly organized by the central eradication force and a Counternarcotics Advisory Team.

U.S. agencies documented evaluations to improve program effectiveness in the elimination/eradication, interdiction, and public information

program areas but not for the justice reform program.⁴⁰ Within the elimination/eradication program area, State conducted a March 2009 evaluation of the Good Performers Initiative that included short-, medium-, and long-term recommendations to improve program performance. Additionally, State officials told us that central and governor-led eradication program performance is evaluated through the annual UNODC Afghanistan Opium Survey. However, while UNODC verifies and reports the number of hectares eradicated, its surveys do not evaluate or make recommendations to improve U.S. program performance. State officials stated that eradication program performance was continually reviewed and assessed but were unable to provide any documented evaluations of eradication programs.

Within the interdiction program area, State, Defense, DEA, Department of Justice, and others completed an interagency evaluation of the CNPA in July 2009 that contained judgments and recommendations regarding overall capability and the training and equipping effort. According to U.S. officials, this evaluation and its recommendations will inform efforts to refocus the training program onto the broader CNPA beyond its specialized units. For public information, State officials reported that evaluating progress in this program area is a persistent challenge. They stated that normally some idea of public information effectiveness can be gathered from nationwide polling, but poor security prevents extensive outreach and the implementation of accurate polling methodology. In the absence of a nationwide polling capability, State is relying on provincial focus groups conducted by its contractor to assess the effectiveness of counternarcotics messaging. An October 2008 UNODC evaluation also attempted to measure the effects of public information messaging through provincial focus groups.

Within the drug demand reduction program area, State is currently evaluating the long-term impact of the State-funded drug treatment assistance programs. This 2009-2011 evaluation is designed to measure long-term impact relating to behavior (e.g., reduction in drug use/relapse rates, reduction in criminal activity and recidivism rates, reduction in intravenous drug use, increase in employment, and mental health). This evaluation will also provide critical information on treatment success with opium and heroin-addicted women and their children. According to State,

⁴⁰An evaluation of the drug demand reduction program was under way at the time of our review.

the results of this evaluation will be used to further improve substance abuse treatment services throughout Afghanistan.

Within the justice reform program area, neither State nor Department of Justice was able to provide us with a documented program evaluation. While a State official noted that program officers conducted informal evaluations of program activities, they did not document any of these evaluations. Therefore, we are unable to validate their completion or determine whether these informal evaluations informed decisions about current and future justice reform programming.

Conclusions

Despite ongoing challenges, including falling short of poppy eradication goals, the United States has reported some reductions in poppy cultivation, increases in interdiction operations, the destruction of drug labs, and the conviction of drug traffickers in Afghanistan. While these are reasonable output measures, absent specific performance targets against which to assess them, they do not sufficiently indicate the success of U.S. efforts to reduce the threat of illicit drugs to the stability, reconstruction, and governance of Afghanistan. As we have previously reported, clearly defined performance targets would enable decision makers to more readily understand the extent of progress made, as well as which program elements are effective and which could be improved. In addition, the development of capable Afghan security forces is essential to the U.S. counternarcotics effort, as well as the larger counterinsurgency campaign in Afghanistan. While capability performance goals have been established, the U.S. government lacks interim performance targets for the Counternarcotics Police of Afghanistan. Such performance targets would better enable program managers to assess whether the U.S. effort is on track or determine if adjustments need to be made. This is particularly important given the U.S. ultimate goal is to build Afghan capacity to independently carry out counternarcotics efforts.

Additionally, best management practices have demonstrated that documentation of routine evaluations enables program managers to identify program vulnerabilities and implement lessons learned, which we found were lacking in some of the U.S. led counternarcotics programs. These routine evaluations can help program managers understand program weaknesses and make needed improvements.

As the United States moves forward with implementing its strategy and measuring success in Afghanistan, we believe the U.S. government has an

opportunity to improve its performance measurement and evaluation efforts.

Recommendations for Executive Action

To improve the U.S. government's ability to assess progress toward counternarcotics goals, we are making the following four recommendations:

- The Secretary of Defense develop performance targets to measure interim results of efforts to train the CNPA.
- The Secretary of State develop performance measures and interim targets to assess Afghan capacity to independently conduct public information activities.
- The Secretary of State, in consultation with the Administrator of DEA and the Attorney General, establish clear definitions for low-, mid-, and high-level traffickers that would improve the ability of the U.S. and Afghan governments to track the level of drug traffickers arrested and convicted.
- The Secretary of State perform an evaluation of the justice reform program.

Agency Comments and Our Evaluation

The Departments of State and Defense provided written comments on a draft of this report, which are reproduced in appendixes II and III, respectively. The Departments of State, Defense, Justice, and the Office of National Drug Control Policy also provided technical comments and updates that we have incorporated throughout the report as appropriate.

Defense concurred with our recommendation to develop performance targets to measure interim results of efforts to train the CNPA and noted that it is in the process of establishing initial and interim program performance metrics in accordance with the U.S. Counternarcotics Strategy for Afghanistan.

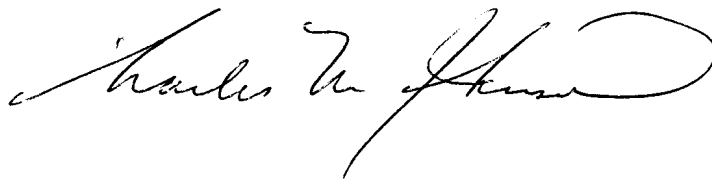
State concurred with our recommendation to develop performance measures and interim targets to assess Afghan capacity to independently conduct public information activities, and noted that it is in the process of developing an assessment tool for its counternarcotics public information campaign.

State deferred to DEA and the Department of Justice concerning our recommendation that it establish clear definitions for low-, mid-, and high-level traffickers in consultation with DEA and Justice to enhance the ability of the U.S. and Afghan governments to track the level of drug traffickers arrested and convicted. While we acknowledge DEA and the Department of Justice's expertise in this area, we believe nonetheless because of State's role in funding and managing the justice reform program in Afghanistan, State holds the primary responsibility for ensuring that measures to gauge progress exist. Therefore, State should remain engaged in the development of more precise definitions for these measures. If State or the Department of Justice develops or identifies measures that are determined to be more appropriate for measuring justice reform progress, then we believe that these would fulfill the spirit of our recommendation.

State concurred with our recommendation to perform an evaluation of the justice reform program, and noted that it is an ideal time to evaluate this program's progress using an outside partner.

We are sending copies of this report to interested congressional committees; the Departments of State, Defense, and Justice; and the Office of National Drug Control Policy. The report also is available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7331 or johnsoncm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix IV.



Charles Michael Johnson Jr.
Director, International Affairs and Trade

List of Congressional Addressees

The Honorable Carl Levin
Chairman
The Honorable John McCain
Ranking Member
Committee on Armed Services
United States Senate

The Honorable John F. Kerry
Chairman
The Honorable Richard G. Lugar
Ranking Member
Committee on Foreign Relations
United States Senate

The Honorable Ike Skelton
Chairman
The Honorable Howard P. McKeon
Ranking Member
Committee on Armed Services
House of Representatives

The Honorable Howard L. Berman
Chairman
The Honorable Ileana Ros-Lehtinen
Ranking Member
Committee on Foreign Affairs
House of Representatives

The Honorable John F. Tierney
Chairman
The Honorable Jeff Flake
Ranking Member
Subcommittee on National Security and Foreign Affairs
Committee on Oversight and Government Reform
House of Representatives

The Honorable Russ Feingold
United States Senate

The Honorable Michael Honda
House of Representatives

Appendix I: Scope and Methodology

To review U.S. counternarcotics activities in Afghanistan, we obtained information from pertinent planning, funding, and reporting documents for U.S. counternarcotics programs and interviewed relevant officials from the Departments of State (State), Defense (Defense), and Justice, including Drug Enforcement Administration (DEA) in Washington, D.C., and Afghanistan. The Federal Bureau of Investigation indicated that it had no involvement in U.S. counternarcotics efforts in Afghanistan and is, therefore, not a part of our review. Additionally, this review focused specifically on the elimination/eradication, interdiction, justice reform, public information, and drug demand reduction program areas, leaving alternative development to be addressed by a later product on broader agricultural assistance to Afghanistan. State and Defense were unable to provide us with programmatic breakouts of counternarcotics funding linked to expenditures within our audit time frames.

To examine how the U.S. counternarcotics strategy in Afghanistan has changed, we reviewed available U.S. and Afghan strategy and planning documents, including the August 2007 *U.S. Counternarcotics Strategy for Afghanistan* and the July 2009 *Counternarcotics Action Plan for Afghanistan*. Although the latest U.S. counternarcotics strategy was not finalized at the time of our review, we discussed the upcoming strategic shifts and their programmatic implications with relevant U.S. officials, including the Special Representative for Afghanistan and Pakistan and officials at the Office of National Drug Control Policy. Additionally, to understand the resource impact of this strategic shift, we examined Congressional Notifications from State's Bureau of International Narcotics and Law Enforcement and U.S. agencies' fiscal year 2010 funding requests.

To assess counternarcotics progress, we reviewed relevant planning and reporting documentation to identify program goals, performance measures, and interim performance targets. We based our analysis of performance targets on best management practices identified in previous GAO work, which states that interim performance targets can be used to provide information on interim results when it may take years before an agency sees the results of its programs. Such information can also provide congressional and other decision makers with an indication of the incremental progress the agency expects to make in achieving results.¹ We also examined Letters of Agreement between the U.S. and Afghan

¹GAO, *Agency Performance Plans: Examples of Practices That Can Improve Usefulness to Decisionmakers*, GAO/GGD/AIMD-99-69 (Washington, D.C.: February 1999).

governments, contractor reports, agency performance plans and reports, and programmatic documentation. In addition, we spoke with State, Defense, Department of Justice, DEA, and contractor officials implementing U.S. projects in Afghanistan, as well as with officials from the United Kingdom and the Afghan Ministries of Counter Narcotics, Interior, and Justice to discuss progress made and ongoing challenges to counternarcotics activities. This included site visits to the State Air Wing Headquarters, the National Interdiction Unit/Sensitive Investigative Unit complex, the Air Interdiction Unit headquarters, the Counternarcotics Training Academy, and the Counternarcotics Justice Center in Kabul, as well as the border crossing at Islam Qalah in Herat province. We also reviewed relevant studies and assessments by the United Nations Office on Drugs and Crime (UNODC) and relevant think tanks.

To assess the reliability of UNODC data, we reviewed the statistical estimation and survey data methods detailed in UNODC's annual Afghanistan Opium Surveys. Additionally, we did not independently assess the reliability of the Afghanistan interdiction data provided by DEA, but we considered these data generally acceptable to provide an overall indication of the magnitude and nature of interdiction operations from fiscal year 2005 to fiscal year 2009. We also reviewed key reports by agency inspector generals and the Special Inspector General for Afghanistan Reconstruction.

To assess U.S. monitoring and evaluation of counternarcotics programs, we first utilized, as a framework, the Government Performance and Results Act, which outlines good management practices such as establishing strategic, long-term goals and planning and reporting progress toward these goals on an annual basis. We also referenced good management practices outlined within previous GAO reports and considered monitoring and evaluation principles established by the American Evaluation Association.² We then examined contractor reports, agency documentation, and available evaluations conducted by U.S. agencies and third parties such as UNODC. Additionally, we discussed these monitoring and evaluation activities with officials from State,

²For a previous GAO discussion of monitoring and evaluation, see GAO, *International Food Assistance: USAID Is Taking Action to Improve Monitoring and Evaluation of Nonemergency Food Aid, but Weaknesses in Planning Could Impede Efforts*, [GAO-09-980](#) (Washington, D.C.: Sept. 28, 2009). See also *An Evaluation Roadmap for a More Effective Government* (Washington, D.C.: February 2009) issued by the American Evaluation Association's Task Force on Evaluation Policy.

Defense, Department of Justice, DEA, and the Office of National Drug Control Policy.

The information on foreign law in this report is not the product of GAO's original analysis, but it is derived from interviews and secondary sources.

We conducted this performance audit from January 2009 to March 2010, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Comments from the Department of State



United States Department of State

Chief Financial Officer

Washington, D.C. 20520

MAR 02 2010

Ms. Jacquelyn Williams-Bridgers
Managing Director
International Affairs and Trade
Government Accountability Office
441 G Street, N.W.
Washington, D.C. 20548-0001

Dear Ms. Williams-Bridgers:

We appreciate the opportunity to review your draft report, "AFGHANISTAN DRUG CONTROL: Strategy Evolving and Progress Reported, but Interim Performance Targets and Evaluation of Justice Reform Efforts Needed," GAO Job Code 320657.

The enclosed Department of State comments are provided for incorporation with this letter as an appendix to the final report.

If you have any questions concerning this response, please contact Sabrina Bahir, Foreign Affairs Officer, Bureau of International Narcotics and Law Enforcement Affairs at (202) 776-8523.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Millette", with a horizontal line extending to the right.

James L. Millette

cc: GAO – Hynek Kalkus
INL – David Johnson
State/OIG – Tracy Burnett

DEPARTMENT OF STATE COMMENTS TO GAO DRAFT REPORT

AFGHANISTAN DRUG CONTROL: Strategy Evolving and
Progress Reported, but Interim Performance Targets And
Evaluation of Justice Reform Efforts Needed
(GAO-10-291, GAO Code 320657)

Thank you for the opportunity to comment on your draft report entitled
*"Afghanistan Drug Control: Strategy Evolving and Progress Reported, but Interim
Performance Targets and Evaluation of Justice Reform Efforts Needed."*

The State Department welcomes the draft GAO report and considers it thorough and its recommendations generally sound. State agrees with the statement that monitoring and evaluation are key components of effective program management, and shares the view that interim performance targets and benchmarks can assist decision-makers in understanding the extent of progress made in fulfilling objectives. State is leading an inter-agency effort to produce implementation plans (IPs) keyed to objectives in the 2009-11 Counternarcotics Strategy that will help to track progress on meeting those objectives. The IPs include descriptions of desired end-states, measures of effectiveness, and – as appropriate – benchmarks against the 2009-11 calendar.

RECOMMENDATION:

The Secretary of State develop performance measures and interim targets to assess Afghan capacity to independently conduct public information activities.

State welcomes this recommendation and is in the process of developing an assessment tool for the Counternarcotics Public Information (CNPI) campaign, which is administered by the Colombo Plan, an international organization, in partnership with the Afghan Ministry of Counter Narcotics (MCN). The Colombo Plan monitors the CNPI campaign in 26 provinces where a regional MCN office is present and engaged, and provides administrative support and skills training for MCN officials.

RECOMMENDATION:

The Secretary of State, in consultation with the Administrator of DEA and the Attorney General, establish clear definitions for low-, mid-, and high-level traffickers that would improve the ability of the U.S. and Afghan governments to track the level of drug traffickers arrested and convicted.

2

The Department of State defers to the Department of Justice, including DEA, to establish clear definitions of low-, mid-, and high-level traffickers.

RECOMMENDATION:

The Secretary of State perform an evaluation of the justice reform program.

State concurs with this recommendation. INL has conducted periodic reviews of the bureau's programs in Afghanistan, as well as receiving periodic updates from our implementers in Afghanistan on their progress towards goals set out in our various statements of work and inter-agency agreements. This includes a 2008 INL study. However, we concur that now that all of our programs are mature; it is an ideal time to evaluate their progress using an outside partner.

INL will shortly seek an organization or institution with significant prior experience in research, evaluation, and statistical analysis to evaluate the effectiveness of the Embassy's justice sector programs and provide recommendations for further changes and modifications to our office.

Appendix III: Comments from the Department of Defense

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



ASSISTANT SECRETARY OF DEFENSE

2500 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-2500

MAR 3 2010

Mr. Charles Johnson Jr.
Director, Director International Affairs and Trade
U.S. Government Accountability Office
441 G Street, N.W.
Washington, DC 20548

Dear Mr. Johnson:

The following are Department of Defense (DoD) comments on the GAO draft report (GAO-10-291), "AFGHANISTAN DRUG CONTROL: Strategy Evolving and Progress Reported, but Interim Performance Targets and Evaluation of Justice Reform Efforts Needed," dated January 29, 2010 (GAO Code 320657). DoD comments refer to two recommendations in the draft report.

RECOMMENDATION 1: The GAO recommends that the Secretary of Defense develop performance targets to measure interim results of efforts to train the Counternarcotics Police of Afghanistan (CNPA). (See page 54/GAO Draft Report.)

DoD RESPONSE: DoD concurs with the recommendation that the Department should develop performance targets to measure interim results of efforts to train the CNPA. In accordance with the U.S. Counternarcotics Strategy for Afghanistan and its associated Implementation Plans, the Department is establishing initial and interim program performance metrics to enable managers to assess CNPA training efforts.

RECOMMENDATION 2: The GAO recommends that the Secretary of State, in consultation with the Secretary of Defense, develop a drug rehabilitation program or other approach to specifically target the drug addiction problem within the Afghan National Police. (See page 55/GAO Draft Report.)

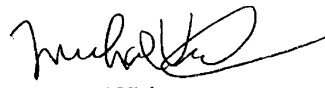
DoD RESPONSE: DoD concurs because the DoD role is limited to consultation. Since 2005, DoD has been the lead agency on manning, training, and equipping the Afghan National Police. In regards to the ANP, DoD currently works with the Afghan Ministry of Interior (MOI) to provide mandatory drug awareness courses for all basic recruits, conduct drug testing, identify drug users, and recommend identified drug users for treatment. DoD will also continue to work with MOI to help it enforce its counter-drug policy. DoD's scope of mission does not include branching into drug rehabilitation programs, nor do we believe that we have the expertise in DoD to take on such an

See comment 1.

**Appendix III: Comments from the Department
of Defense**

additional mission. We believe that if this mission is addressed, it should be addressed by the Executive Branch departments with the necessary expertise in drug rehabilitation.

My point of contact is CDR Jennifer Whereatt, (703) 692-4182, or email jennifer.whereatt@osd.mil.



Michael Vickers

The following is GAO's comment on the Department of Defense's
comment letter dated March 3, 2010.

GAO Comments

1. The draft report we provided the agencies for comment included a recommendation that State, in consultation with Defense, develop a drug rehabilitation program or other approach to specifically target the drug addiction problem within the Afghan National Police. During the agency comment period, State and Defense informed us of recent efforts by the Afghan Ministries of Interior and Public Health to establish a drug rehabilitation center in Kabul for priority use by Afghan National Police. Additionally, according to CSTC-A, the Ministries of Interior and Public Health signed a memorandum of agreement in December 2009 that authorizes Afghan National Police access to Ministry of Public Health drug rehabilitation facilities nationwide. We, therefore, dropped this recommendation from our final report, as these actions fulfilled the spirit of our recommendation.

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Charles Michael Johnson Jr., (202) 512-7331, or johnsoncm@gao.gov

Staff Acknowledgments

In addition to the individual named above, Hynek Kalkus, Assistant Director; David W. Hancock; Steven J. Banovac; Christina Bruff; Virginia Chanley; Carl Barden; Joseph Carney; and Mark Dowling made key contributions to this report. Technical assistance was provided by Jena Sinkfield, Joyce Evans, and Cynthia Taylor.

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