

Impact in Mexico of the U.S. 2026 Anti-Drug Strategy and the New Trade and Financial Compliance Paradigm Linked to National Security

On May 4, 2026, the White House Office of National Drug Control Policy released the National Drug Control Strategy 2026¹ (“**NDCS 2026**”), a document that sets forth the U.S. government’s comprehensive strategy to, among other things, address the synthetic drug crisis (particularly fentanyl and methamphetamine) through a national security approach involving diplomatic, military, financial, and intelligence tools.

This note briefly outlines certain practical implications of NDCS 2026, as it reshapes the expectations regarding cooperation and compliance that the United States will require of Mexico and, by extension, of companies operating within Mexico.

The NDCS 2026 redefines the compliance standard applicable to companies operating in Mexico: mere compliance with local regulations is insufficient when the United States treats drug trafficking as a terrorist threat and deploys financial, commercial, and criminal tools of extraterritorial reach against any person or entity (domestic or foreign) that facilitates, even unintentionally, the value chain of cartels designated as terrorist organizations.

I. The southwest border

The NDCS 2026 identifies the western part of the Mexico-United States border as the “principal corridor” for illicit drugs that pose the gravest threat to American lives. The document recognizes that Mexican cartels designated as Foreign Terrorist Organizations (“**FTOs**”) control sophisticated global networks that manage the entire synthetic drug supply chain, from the acquisition of precursor chemicals to clandestine production in Mexico and their subsequent distribution in the United States. The NDCS 2026 states that these organizations operate with levels of impunity that directly challenge the sovereignty of the Mexican state. Consequently, an intensification of interdiction, surveillance, and intelligence-sharing operations along the border strip is anticipated, as well as increased pressure on Mexican authorities to demonstrate verifiable results in terms of precursor seizures, reducing synthetic drug production, dismantling laboratories, and extraditing priority targets.

II. New Model for Commercial Compliance with National Security Requirements

The strategy requires the implementation of supply chain integrity principles, understood as a chain of custody for goods, including: (i) transparency and accountability throughout the entire supply chain, through verifiable records of the entities involved; (ii) due diligence measures for companies to better know their business partners and customers, analyze risks, and adopt mitigation measures; and (iii) enhanced data collection, standardization, and verification to ensure the legitimacy of transactions.

¹ <https://www.whitehouse.gov/releases/2026/05/2026-national-drug-control-strategy-released/>

The Customs-Trade Partnership Against Terrorism (“CTPAT”), a voluntary public-private partnership program administered by U.S. Customs and Border Protection to strengthen the security of international supply chains. The NDCS 2026 provides for expanding that program through stricter data requirements to include, among other sectors, transportation and parcel companies, and chemical, pharmaceutical, laboratory equipment, and pill press manufacturing companies.

Additionally, the U.S. administration will seek to have origin and transit countries, including Mexico, adopt similar and compatible incentive frameworks for supply chain security for transportation and parcel companies, as well as companies in the chemical, pharmaceutical, and logistics sectors.

In addition, through the global suspension of *de minimis* tariff treatment, the U.S. administration closed a low-scrutiny space that allowed commercial shipments valued at less than USD \$800 to enter the United States duty-free and with minimal customs processing. This measure applies to all countries (not just China), thereby affecting Mexican e-commerce and export companies by subjecting their shipments to the formal U.S. customs entry process, with greater data availability and review by authorities.

III. Measuring Cooperation: Broader standards for Mexico

For Mexico, the assessment of cooperation is shifting toward broader standards. The NDCS 2026 establishes specific priorities that link assistance and bilateral relations to tangible results, including: the seizure of chemical precursors; reducing the production of synthetic drugs; eliminating the cartels’ ability to threaten U.S. security through their extraterritorial command and control structures; and the arrest, prosecution, and extradition of FTO leaders, as well as the dismantling of synthetic drug laboratories.

However, one of the most significant implications of the NDCS 2026 lies in the financial strategy. The United States aims to involve Mexico in a wide-ranging financial offensive against the cartels, focused on tracking illicit flows, restricting their access to the financial system, sharing intelligence, freezing assets, prosecuting their facilitators, and dismantling money-laundering schemes.

Of particular relevance is the implementation of special measures authorizing the Secretary of the Treasury to issue orders prohibiting or restricting U.S. financial institutions from conducting business with jurisdictions, institutions, accounts, or types of transactions identified as primary money laundering activities linked to illicit opioid trafficking. Added to this is the continued use of Executive Order 14059, which has served as the basis for designating individuals and entities linked to the synthetic drug supply chain.

The NDCS 2026 prioritizes investigations into Chinese Money Laundering Networks, which use informal value transfer systems to launder cartel proceeds. This effort seeks to dismantle parallel banking systems and strengthen the ability to track and seize illicit proceeds channeled through cryptocurrencies, digital payment or cash transfer apps, and other emerging financial technologies. This directly involves banks, money transmitters, currency exchange houses, fintech companies, foreign trade operators, logistics providers, and informal clearing structures operating in or from Mexico.

Furthermore, the NDCS 2026 stipulates that the U.S. government will impose significant penalties, including financial sanctions and criminal prosecutions, on any business entity or individual, whether foreign or domestic, that facilitates illicit drug trafficking.

IV. Key sectors at risk

Based on the NDCS 2026, Mexican companies or those operating in Mexico in the following sectors face a high risk of exposure:

- a) Financial and payment services sector. Banks, currency exchange bureaus, money transmitters, fintech companies, and any institution that processes cross-border payments should anticipate heightened scrutiny. The Financial Crimes Enforcement Network (“FinCEN”), the financial intelligence unit of the U.S. Department of the Treasury, will coordinate actions with Mexico’s Financial Intelligence Unit (*Unidad de Inteligencia Financiera*)

and may use its authority to impose special measures and require additional information. Additionally, the FEND Off Fentanyl Act of 2024 (21 U.S.C. § 2313a) authorizes the Secretary of the Treasury to issue orders prohibiting U.S. financial institutions from doing business with foreign jurisdictions or accounts deemed to be of “primary money laundering concern” linked to opioid trafficking.

- b) Chemical and pharmaceutical sector. Companies involved in the production, storage, transportation, or sale of chemical precursors face direct exposure to sanctions if their supply chains are exploited by trafficking networks and, where there is knowledge or willful blindness to red flags, possible criminal proceedings for facilitating the illicit trade of drugs or precursors.
- c) Logistics and foreign trade sector. Land transport companies, port operators, customs brokers, parcel companies, and other logistics providers face heightened traceability requirements and could be exposed to sanctions if they lack sufficient controls to prevent their operations from being used to move drugs, chemical precursors, or related equipment.
- d) Telecommunications and technology sector. The strategy seeks to dismantle virtual drug markets and will require greater cooperation from social media platforms and technology companies to identify and remove accounts used by FTOs in sales, recruitment, and communications activities.
- e) Real estate and property sector. Investigations by the U.S. government into the cartels’ logistics infrastructure—in particular, those aimed at dismantling warehouses and collection or consolidation centers located in border areas—pose a risk of association for property owners or landlords who lease or otherwise permit the use and enjoyment of spaces employed, directly or indirectly, in activities associated with FTOs.

V. Conclusions and Recommendations

The NDCS 2026 represents a paradigm shift that should not be underestimated. The strategy does not seek merely to intensify interception operations or bilateral police cooperation. The U.S. government seeks to rebuild the comprehensive architecture for addressing drug trafficking within a national security and counterterrorism framework, with financial tools serving as the central pillar.

For companies operating in Mexico, this means that compliance standards are no longer limited to local regulations, including anti-money laundering, tax, and customs obligations. Companies must also be able to demonstrate, both to commercial partners, customers, suppliers, financial institutions, or other counterparties linked to the United States and within their own compliance programs, that their operations, suppliers, and financial flows are not used, directly or indirectly, as support infrastructure for FTOs.

In this context, we recommend that companies carry out a priority and comprehensive review of their controls, with particular emphasis on:

- a) the effectiveness and documentation of their anti-money laundering and counter-terrorist financing programs, including the identification of beneficial owners and the express incorporation of the U.S. State Department’s FTO lists into due diligence procedures and internal compliance policies;
- b) the traceability, documentation, and auditing of their supply chains, particularly in the chemical, pharmaceutical, and logistics sectors, as well as the review of contracts with logistics providers, customs brokers, and other critical third parties;
- c) enhanced training for legal, compliance, logistics, procurement, treasury, and asset security teams to identify red flags, document decisions, and escalate risky transactions;
- d) exposure to counterparties, customers, suppliers, intermediaries, or financial institutions that may appear on sanctions lists, be linked to FTOs, or be subject to FinCEN special measures;
- e) adapting internal controls to due diligence standards consistent with CTPAT’s Supply Chain Integrity principles, including verification of customers, suppliers, goods, routes, and supporting documentation; and

f) preparing contingency plans for transnational investigations, information requests, restrictive measures, or situations that may create reputational, operational, or business continuity risks.

We hope this note is useful to you and for more information or clarification of any matter, please find below the contact information of our experts:

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