The Reframing of the War on Drugs as a "Humanitarian Crisis"
Costs, Benefits, and Consequences
by
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The War on Drugs has had grave humanitarian consequences for Latin America. It has encouraged a highly militarized and ultimately unsuccessful approach to drug control, leading to violence, displacement, and human suffering throughout the region. In acknowledging and responding to this suffering, humanitarian organizations have recently begun to frame this situation as a "humanitarian crisis" to facilitate humanitarian entry into new spaces. There is a need for a conceptual conversation about the use of the label "humanitarian crisis" in reference to the human costs of the War on Drugs in Latin America, particularly its rhetorical and normative use by the media and civil society and its strategic and moral use by humanitarian actors.

La Guerra contra las Drogas ha tenido grave consecuencias humanitarias para América Latina. Ha promovido un enfoque altamente militarizado y en última instancia fallido, para controlar las drogas, lo que ha provocado violencia, desplazamientos y sufrimiento humano a través de la región. Como reconocimiento y respuesta a este sufrimiento, las organizaciones humanitarias recientemente han empezado a plantear esta situación como una "crisis humanitaria" para así facilitar la entrada humanitaria en nuevos espacios. Es necesario que se dé una conversación teórica sobre el uso de la categoría "crisis humanitaria" en referencia a los costos humanos de la Guerra contra las Drogas en América Latina, especialmente su uso retórico y prescriptivo por parte de los medios de comunicación y la sociedad civil y su uso estratégico y moral por parte de los agentes humanitarios.

Keywords: War on Drugs, Humanitarianism, Urban violence, Colombia, Mexico, Brazil

In 1971, U.S. President Richard Nixon declared a War on Drugs in an attempt to eradicate the supply of and demand for illegal narcotics. Both directly and indirectly, this decision has had grave humanitarian consequences for Latin America. In the past five decades, the provision of military equipment, training, and intelligence services to countries involved in narcot-

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ics production and transshipment by the United States and its partners has engendered violence, displacement, and human suffering. The costs of this war, human and financial, have been enormous. In Colombia alone, for instance, more than 15,000 people have been killed in the past two decades, and between 2000 and 2010 the United States poured in over US$7 billion (Huey, 2014). The current policy situation is marked by an apparent inability in both North and South America to conceive of alternatives (Walker, 2015). There is, however, reason for cautious optimism stemming from recent debate on drug policy (Abramovay, 2012; Fordham and Youngers, 2013). There is growing recognition that the War on Drugs cannot be won (GCDP, 2014), and this recognition is allowing new approaches, discourses, and framings of the situation to emerge.

The Obama administration, for example, has abandoned the term, launching new policy with greater emphasis on public health and the treatment of addiction and explicitly viewing economic growth as the way to address the influence of criminal trafficking networks (BBC, 2013; U.S. Government, 2013). Decriminalization is considered a genuine policy option, with Uruguay and five U.S. states and territories having legalized the possession of marijuana. Reflecting these emerging policy positions, the Organization of American States released a groundbreaking report in May 2013 calling for the legalization of the drug trade (Economist, 2013; OAS, 2013), and countries outside of Latin America increasingly tend to support an end to interdiction (Guardian, November 30, 2013). Given this, considerable expectations surrounded the April 2016 UN General Assembly special session dedicated to developing more effective responses to drug trafficking based on public health, respect for human rights, and harm reduction.

At present, however, the shift in global perceptions generally and U.S. policy specifically has yet to impact the War on Drugs in Latin America. Powerful organized criminal networks and violence entrepreneurs funded largely by the trafficking of illicit substances continue to pose a serious challenge to democratic governments and civil society. Consequently, when regional politicians and intellectuals demand an end to the War on Drugs in Latin America, this call is increasingly framed in terms of the tremendous human suffering caused by prohibitionist militarized responses, labeled as a “humanitarian crisis.” As violence and displacement in rural drug-producing and transshipment areas have declined in recent years, humanitarian organizations have been using a War on Drugs narrative to justify engaging in contexts of urban violence under the label of “nonconventional violence.” In both contexts the humanitarian frame has a double meaning, implicitly referring to both the suffering resulting from drug trafficking and that stemming from the prohibition regime itself.

This situation points to a paradox. While the rest of the world is facing humanitarian crises, many countries in Latin America are seen as stabilizing, middle-income territories requiring less attention from development and humanitarian actors (e.g., Herbert, 2012). Yet humanitarian organizations are increasingly talking about moving into urban areas in the region (Muggah and Savage, 2012). We suggest, therefore, that the logic of the War on Drugs as a source of urban violence amounting to a humanitarian crisis is important to the reimagining of the
humanitarian project and the remaking of humanitarian-institutional relevance in Latin America (Moulin and Tabak, 2014; Nogueira, 2014).

Humanitarianism has significant political and moral currency. Humanitarian reason has become a way of telling the major “moral histories of the present” (Fassin, 2012), with narratives of human suffering occupying a key role (Wilson and Brown, 2009). In light of this, there is a need for a conceptual conversation about the use of the label “humanitarian crisis” in reference to the human costs of the War on Drugs in Latin America, particularly its rhetorical and normative use by the media and civil society and its strategic and moral use by humanitarian actors.

Despite a flurry of interest in “humanitarian crisis” discourse, a consolidated humanitarian policy narrative has yet to emerge. Moreover, the academic literature on this topic, while valuable, largely lacks a coherent, conceptual analytical position, most of it addressing the U.S. and/or Colombian context (e.g., Gibbs and Leech, 2006; for a recent examination of the Mexican case, see Pérez and Shelley, 2013). Consequently, there is a relative absence of critical scholarship reflecting upon the possible challenges and costs of using the label “humanitarian crisis” in reference to the War on Drugs in Latin America.

Our concern with the aforementioned framing of the War on Drugs has evolved organically from our work on internal displacement in Colombia (Sandvik and Lemaitre 2013; 2015; Lemaitre and Sandvik, 2014; 2015) and urban violence in Brazil (Hoelscher, 2013; 2015; Hoelscher and Norheim-Martinsen, 2014; Hoelscher and Nussio, 2016) and from puzzlement over the increasing frequency with which humanitarian actors draw analogies between the human costs of the War on Drugs and those of that other “grand U.S. project,” the War on Terror. Humanitarian actors wonder whether the humanitarian consequences of the drug wars are as great as those of Iraq or Afghanistan. We aim to examine what it means to position the War on Drugs as an object of humanitarian action and intervention and to reflect on the political considerations and priorities upon which a humanitarian narrative would be based. Underlying this discussion is the question whether the War on Drugs should be framed as a humanitarian crisis and what the consequences of this framing might be.

Starting from this set of conceptualizations, the paper proceeds as follows: First, the War on Drugs is mapped as an intervention that produces and reinforces widespread human suffering on the Latin American continent. Second, starting from the notion that the humanitarian label engages public resources and affects power allocations, we describe the features of the humanitarian frame. In the third section we examine how the War on Drugs frame operates through the extension of the humanitarian project to new localities and new types of violence in the Latin American setting. Fourth, we examine the extent to which the War on Drugs should be framed as a humanitarian crisis and whether the adoption of that framing is likely to promote more appropriate responses to human suffering. We conclude that while it is crucial for policy makers and the global public to recognize the enormous human cost of the War on Drugs in Latin America, we remain unconvinced that the frame of humanitarianism is appropriate for understanding and addressing this cost.
THE WAR ON DRUGS AS A HUMANITARIAN CRISIS IN LATIN AMERICA

Many stakeholders now argue that the militarized prohibitionist stance has failed to reduce the production, transshipment, and supply of narcotics to the United States and instead has created conditions that directly and indirectly undermine human security (see Collins, 2014, for a review). The War on Drugs is seen to have enabled governments to become increasingly authoritarian, abandoning democratic legal norms, flouting the principle of habeas corpus, and violating basic human rights through the adoption of a “wartime” mindset (Lindau, 2011; Youngers and Rosin, 2005). Yet this stance has failed to address the involvement of criminal groups, paramilitary forces, guerrillas, and regular armies in drug production and trafficking, which has led to widespread fear, violence, and displacement (Cantor, 2014; Rios Contreras, 2014). There is mounting empirical evidence of the impact on the health, safety, security, and well-being of rural communities of a de facto state of siege in heavily militarized urban areas where government forces engage drug gangs in urban warfare (Bargent, 2013; Hoelscher and Norheim-Martinsen, 2014; Müller, 2012).

At the same time, however, the narrative of the War on Drugs as a humanitarian crisis encompasses heterogeneous arguments concerning suffering, human rights violations, and violence. This “crisis” is often framed around three main terms: location, agent, and impacts. The phrase “humanitarian crisis” has until recently most often appeared in relation to the War on Drugs in Colombia—both the violent actions of drug producers and traffickers and the human cost of the government’s prohibition agenda (Tickner, 2006; Vargas, 2009). The conflict has engendered land grabs, political corruption, civil strife, human rights violations by paramilitary forces, and widespread forced displacement. In response, the United Nations Office for the Coordination of Humanitarian Affairs declared in 2004 that Colombia was experiencing “the biggest humanitarian crisis in the Western Hemisphere,” and Jan Egeland, the UN’s undersecretary general for humanitarian affairs and emergency relief coordinator, said that “the drug trade, while causing misery on both receiving and producing ends, caused even more misery on the production side” (UN News Centre, 2004). Aerial fumigation and crop eradication are deemed to have seriously exacerbated the humanitarian crisis in Colombia (WOLA, 2007) despite being “nonviolent” approaches to interdiction. Equally detrimental was organized violence. In April 2013 Jordi Raich, chief of the International Committee of the Red Cross in Colombia, insisted that organized crime caused “at least as many deaths, threats, displacements, and disappearances than the war [with the Fuerzas Armadas Revolucionarias de Colombia]” (Escobar and Jiménez, 2013).

In concert with U.S. government funding and national policy efforts focusing on eradication and interdiction, parallel developments across the region have increasingly generated human rights concerns that are framed in terms of a “humanitarian crisis.” In Mexico, widespread drug-cartel-related violence and the state’s war against the cartels since 2006 are considered to have contributed to a humanitarian emergency (Carasik, 2014; Ertekin, 2014) and disappearances to amount to a humanitarian crisis (Godoy, 2015). Furthermore, regional...
transshipment countries, particularly in Central America, are increasingly experiencing their own crises of forced migration and displacement. In 2014, for example, the presence of unaccompanied children from Central America at the U.S. border was described as a humanitarian crisis resulting from the War on Drugs (see Abuja, 2014; Tuckman, 2014). Moreover, the conditions in the region’s penal system and the substantial rise in incarceration rates, particularly in Brazil, have also been described using the language of “humanitarian crisis,” reflecting deep concerns that exploding prison populations continue to be detained in dismal conditions (Garrido, 2014; IBA, 2010; Müller, 2012; Wacquant, 2003). The burden of violence associated with the War on Drugs continues to exacerbate the public security and human rights situation in Latin America, but labeling it a humanitarian crisis needs to be critically questioned.

**THE HUMANITARIAN FRAME**

The framing of the War on Drugs as a humanitarian crisis must be located within the broader strategic context of humanitarian organizations’ employment of new frames to drive new discourses—particularly those enabling the accumulation of new resources and justifying humanitarian entry at new sites. Fundamental to this perspective is that the humanitarian agenda has vested interests. The international humanitarian enterprise is a thriving business that devotes enormous sums not only to development aid but increasingly also to the maintenance and reproduction of national and international bureaucracies (Weiss, 2013). A frame is a conscious effort to fashion shared understandings of the world that legitimate and motivate collective action (McAdam, McCarthy, and Zald, 1996). Humanitarian organizations have (at least partly) a disinterested desire to alleviate the human suffering arising from emergencies (Fearon, 2008; Forsythe, 2006: 234). Key to the humanitarian enterprise is the imperative to provide assistance where needed (Terry, 2002). For relief organizations humanitarian crises are construed as structural, in that the events involved represent a critical threat to the health, safety, security, or well-being of a community or group, usually spread over a wide area (Humanitarian Coalition, n.d.). The terms “humanitarian crisis” and “humanitarianism” are ambiguous and contested; they are frames that can be appropriated or transformed (Joachim and Schneiker, 2012: 367). Framing recent suffering stemming from linkages between organized criminality, narco-trafficking, and conflicts between the state and nonstate armed groups as a humanitarian crisis can therefore be understood as strategic. Drawing analogies between the human cost of the War on Drugs and the kinds of human suffering falling squarely within the scope of traditional humanitarianism enables a recharacterization of the War on Drugs that can be used to establish the humanitarian sector as the appropriate responder. We regard humanitarianism so conceived as an important but ultimately unaccountable governance project whose colonial and postcolonial foundations are reflected in the “comprehensive models” of international humanitarian aid (Ramalingam and Mitchell, 2014). Here the international (Western donor) community defines the problem, its solution, and the manner of implementation and achieves legitimacy through visible
regimes of intervention (Marcus, 2010) focusing on the suffering and pain of the Other (Sandvik, 2009).

Viewing situations through a humanitarian lens has significant policy implications. Humanitarians are preoccupied with having access to the “humanitarian space,” an environment in which agencies can operate freely and meet needs in accordance with the principles of humanitarian action (Collinson and Elhawary, 2012) but are independent of (and may challenge or undermine) external political agendas (Hubert and Brassard-Boudreau, 2010). This freedom is increasingly being challenged. Humanitarianism globally faces a growing operational and financial capacity deficit (OCHA, 2014), and humanitarian agencies are proactively looking to enter new territories and maintain or expand their presence in Latin America and elsewhere.

Considering the War on Drugs in terms of a humanitarian frame is therefore a deeply political position with consequences. There is a rich literature critiquing the apolitical assumptions and the implications of global humanitarianism and pointing to the numerous unforeseen costs due to the failure of policy makers and humanitarian actors to take these critiques seriously (Donini, 2012; Kennedy, 2004; Rieff, 2003). Humanitarianism, like other legal and political frames that legitimate power, allows for certain actors and debates to occupy public space and others to be excluded from it. In particular, it sets the stage for international humanitarian aid agencies and nongovernmental organizations to express concern over certain events and eventually demand a presence on the ground. To this end, humanitarian actors often end up occupying political space to the detriment of local efforts at social mobilization and resistance.

NEW HUMANITARIAN CHALLENGES: COMPLEX URBAN EMERGENCIES

For Latin America, the most relevant humanitarian reframing concerns situations of chronic urban violence. Under the label of “nonconventional violence,” humanitarian organizations are increasingly exploring how to engage in contexts of urban insecurity. While “conventional” violence is produced by armed conflict, nonconventional violence is generated by phenomena including turf wars between organized criminal groups engaged in narco-trafficking and the state. In response, an emerging frame sees nonconventional violence as a “complex urban emergency.” As defined by the International Federation of Red Cross and Red Crescent Societies, complex emergencies are disasters that result from “a complex combination of both natural and man-made causes and different causes of vulnerability” (IFRC, n.d.). They are characterized by extensive violence and loss of life, significant displacement of populations, widespread damage to societies and economies, political and military constraints on humanitarian assistance, and significant security risks for humanitarian relief workers (IFRC, n.d.). They are also characterized by the need for large-scale, multifaceted humanitarian assistance. In response to the violence that has political, economic, and social motivations and is carried out by state agents, armed nonstate actors, and criminal gangs, the IFRC’s World Disaster Report noted (2010: 73, 89) that “in Latin America . . . the bloodshed reaches a scale as
bad as, or worse than, that of many wars” and that “international assistance is . . . needed to tackle the tidal wave of urban violence driven by drug production and trafficking in Latin America.”

It is certainly true that, compounded by severe deprivation, extreme inequality, and limited access to basic services, urban violence frequently occurs around the embedded narco-trafficking industry in the poorer informal communities of large and mid-sized cities (IASC, 2010). This is particularly evident where the state has neglected or abandoned its monopoly on the use of violence and marginal communities are controlled by illegal actors or parallel authority structures (Arias, 2013; Arias and Goldstein, 2010). Such situations can lead to further violence and intimidation and exacerbate displacement (Apraxine et al., 2012). Whether such instances constitute humanitarian crises remains unclear, but the interest humanitarian organizations have shown in engaging in urban environments is understandable. Broadly, the reconfiguration of urban violence as a humanitarian problem stems in part from a greater engagement with the implications of global urbanization, which has increasingly led humanitarian organizations to urban settings (IFRC, 2010). These organizations’ work has gradually evolved beyond their presence in urban refugee camps and conflict zones, reflecting a position that chronic violence in marginal urban areas is a concern for the humanitarian agenda. Many agencies are adopting unconventional approaches in sites of chronic urban fragility, working with stakeholders at the state, municipal, and community levels on sensitive issues of criminal and gang-related violence (Lucchi, 2010; 2012; Muggah and Savage, 2012), but they are arguably poorly placed, undertrained, and ill-equipped to do so.

**BENEFITS AND CHALLENGES**

From a normative standpoint, the impulse to regard the human costs of the prohibitionist approach to the War on Drugs as a humanitarian crisis is attractive. Moreover, numerous national and international organizations specialize in humanitarian relief and are often willing to and have some experience in negotiating with local armed actors for the safe passage of civilians. While more traditionally applied in rural areas, this intervention may result in a better response to acute human suffering even in complicated urban environments. In such situations the complex mandates of humanitarian organizations, which often include development and human rights in addition to humanitarian concerns, may be advantageous. The multifaceted nature of these mandates of engagement may help persuade governments that urban humanitarian operations do not necessarily signify armed conflict that may challenge their authority.

However, despite the attractiveness of this framing, it has significant costs and challenges. Key among these is the humanitarian industry’s well-documented problems concerning operational inefficiencies, inter- and intra-agency competition, project duplication and delays, and top-down, one-size-fits-all approaches. As recently exemplified in the response to the Haitian earthquake in Port-au-Prince, the complicated mandates of humanitarian organizations and intrainstitutional competition can generate
significant coordination problems and waste of resources and undermine local political structures, civil society participation, and urban social movements (Altay and Labonte, 2014; O’Connor, Brisson-Boivin, and Ilcan, 2014).

More important, the assumed impartiality and neutrality of the humanitarian frame response may help governments avoid political responsibility for what are frequently the results of policy choices and not unmitigated natural disasters or for their complicity in the “routinization of states of emergency,” which normalizes the deaths of poor young urban men (Lemaitre, 2015). Thus the humanitarian frame may contribute to obscuring the range of government choices available to address the challenges that states and societies face. Specifically, it may limit responses to some narrow combination of military and humanitarian approaches to intervention. For example, involvement in the truce negotiated in El Salvador between gangs was officially denied by the government but rumored to be the brainchild of the minister of justice (Lemaitre, 2015). Other examples suggest that government-negotiated pacts can be useful in combating urban violence and lead to declines in lethal violence (e.g. Cruz, 2011; Whitfield, 2013). Further, while the military is often a more trusted institution than the government or the police in Latin America, militarized state responses and use of the army instead of civilian police forces in counternarcotics operations remain a roadblock to building accountable police capacity (Dammert, 2013).

Alternatives to intervention in situations of chronic urban violence that fall outside of militarized or humanitarian frames center around and encourage a positive conception of peace, such as focusing on development strategies or redistributive policies. Numerous efforts have been successful at identifying and working with the at-risk youth who are the principal perpetrators and victims of urban violence and are frequently enrolled in or targeted by criminal narco-trafficking organizations, among them job training and income generation, youth clubs and social programs incorporating sports and the arts, and the adaptation of public urban spaces such as parks and libraries to the needs of adolescents (e.g., Hoelscher and Nussio, 2016). However, framing such situations as complex urban emergencies makes these policy choices secondary.

The United Nations Development Program (UNDP, 2013: 12) notes in its recent Latin American report that “improving citizen security does not stem from a single isolated policy or action, but from a multi-sector approach and a series of policies including preventive measures, institutional reforms, sufficient public investment, changes in the relationship between the State and communities, broad and sustained political will, and the adoption of more modern and effective systems of information and intervention.” The humanitarian frame applied to situations of urban violence may therefore serve to discourage certain programming and policy approaches that may play important roles in reducing violence.

A further concern with the humanitarian frame is that it contributes to a depoliticization or dismissal of international responsibility for the demand for drugs and the supply of light arms that contribute to narcotics-related violence in Latin America. Despite its consequence, large-scale transfer of sophisticated assault weapons from the United States to Latin America is largely off the radar of the international community, as is the U.S. support for counterinsurgency
operations whose strategies are replicated in drug wars against unarmed civilians (e.g., Felbab-Brown, 2009).

Broadly speaking, the debate on international responsibility seems to center on the pressing demand from Latin American governments for withdrawal of U.S. support for prohibition. This is evidenced by emerging discussions distilled in the OAS (2013) report calling for drug legalization and the consideration of postlegalization scenarios in several Latin American states. Rather than driving postprohibition framework discussions forward, a humanitarian frame may contribute to the postponement of these debates. This may occur through a refocusing of debates on how and where humanitarian organizations may engage and away from arguably more important questions such as how to shift to public-health- or economic-growth-based approaches.

Another major problem with the humanitarian frame is the subsidiary role it assigns to local governance structures, which are often bypassed by humanitarian actors (e.g., Smillie, 2001). Humanitarian organizations may refrain from engaging with local governments because doing so would appear to be a breach of neutrality. Fundamental to this impasse is that framing engagement as an imperative according to humanitarian organizations’ mandates justifies humanitarian entry without the need to engage in or grapple with domestic or regional politics. Moreover, framing contexts of urban violence as complex emergencies and humanitarian crises assumes a breakdown of authority when in fact situations of urban violence inherently involve profoundly complex formal and informal political economies (Moncada, 2013). Given that local civilian governments may also be weak vis-à-vis local armed actors, the independence of humanitarian relief and development programs can deeply misread logics of power and contribute to or exacerbate the weakness or lack of accountability of local governments.

Finally, humanitarian action can undermine social movements. In some localities, for example, local activists have a contentious mode of engaging with municipal governments, and social movements mobilize to demand services and attention by using the assertive language of political denunciation, often entailing personal risks (e.g., Bayat, 2000; Tarrow, 1994). In contexts of urban violence in Latin America, they also frequently broker truces and develop informal community “rules” with local drug dealers. Problematically, humanitarian actors, with their stance of neutrality and ready access to finances, may unwittingly upend these local processes and balances of power by gaining support from particular stakeholders at the expense of local community leaders.

Moreover, the mere act of intervention can have perverse effects. Populations living in contexts of urban violence, for example, may scramble for scarce new resources, competing with each other for the attention and largesse of humanitarian actors. In intervening in these situations, the humanitarian bureaucracy itself therefore becomes a local actor. The impact of this is that the humanitarian agency’s presence reinforces competition for urban political space while remaining unaccountable to democratic politics (Büscher and Vlassenroot, 2010). Therefore, despite the discourse of good intentions, humanitarian organizations come with their own guiding set of principles, interests, bottom lines, and accountabilities and in reflecting the “business of humanitarianism” are frequently donor- rather than recipient-focused.
CONCLUSION

The aim of this paper has been to contribute to a critical conversation about the consequences of drug policy in Latin America. We have argued that humanitarian actors’ strong motivation to contribute to human security in Latin America and their professional interest in maintaining their on-the-ground presence are mutually constitutive and that the War on Drugs frame does important work in enabling, maintaining, and increasing the presence of humanitarian actors in Latin America.

We remain unconvinced that humanitarianism is the appropriate frame for understanding the enormous human costs of the War on Drugs in Latin America. While it may be suggested that Western humanitarian entry is an alternative form of imperialism or colonialism (see Bricmont, 2006), our caution stems from the policy implications of this frame. We suggest that it shifts the focus from the role of states in addressing the structural conditions and policy failures that have contributed to the way the War on Drugs has undermined human security.

A key concern is that this framing minimizes space for more nuanced and transformative discussions about drug policy in the Americas. If humanitarian organizations are seen as acting on the frontline of the War on Drugs, debates may—in our opinion unwarrantedly—move toward finding ways to support humanitarian services and bureaucracies rather than focusing on ways to reformulate drug policy according to postprohibition logics. Despite this, while there has been widespread recognition of the failures of current policy approaches (Rolles, 2010; UNODC, 2008) and greater consideration of alternative policy approaches (OAS, 2013), new U.S.-led economic-growth or public-health-based strategies still have a considerable way to go to become mainstream in policy arenas.

The violence and civilian suffering that stem from the War on Drugs represent an undeniable crisis, but governments need to be called to account over their responsibility for the policies that have led to this situation. The institutionalization of the War on Drugs as a humanitarian concern may sideline grassroots actions to achieve social justice, undermine transformative political movements, and deflect attention from the policy choices and responsibilities of both national governments and the international community. These challenges will not be assisted by a humanitarian frame that makes invisible the range of political actions available for addressing this situation and understates the costs of the current militarized action. Making these costs visible would open current policy choices to greater scrutiny and likely help steer the debate on illicit drugs toward alternative paradigms, particularly those favoring regulation, distribution, harm control, and special attention to at-risk populations.

NOTES


2. For a similar perspective, see Rathbone (2015).
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