



Resilient Drug Economy and Politicised Control: The Rise and Fall of the Administrative Bureau of Prohibited Drugs in China, 1922–1925

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RESEARCH



ABSTRACT

This paper examines the rise and fall of the Administrative Bureau of Prohibited Drugs in 1920s Shanghai. It identifies the factors associated with the endeavours of the central government to experiment with establishing a Bureau dedicated to regulating refined drugs and the reasons why the Bureau operated for just about two years. It argues that the concerns regarding the widespread of refined drugs and the expected profits of regulating the business pushed the central government to experiment establishing the Bureau. Moreover, this experiment was a tool with which the Beiyang government aimed to centralise its authorities on the issue of drug control. However, the room for manoeuvring the Bureau was limited, mainly because of the resilience of the drug economy and the politicised regulations. Struggling in the narrow space between the colonial powers, the merchant groups, and the local authorities acting under the influence of warlords, the Bureau was doomed to be short-lived. Its history reveals the resilience of both licit and illicit drug economy and the power struggles that resulted from efforts to regulate refined drugs.

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In the second half of the nineteenth century, refined drugs including morphine and cocaine were introduced into China, initially for medical purposes, although gradually the non-medical use of these drugs emerged and spread.¹ The Qing authorities issued regulations controlling the import of these two drugs in 1909 and 1910 respectively, and hosted the Shanghai Opium Commission in 1909, an event which was generally acknowledged as the beginning of the international drug control system. However, the Qing Dynasty collapsed under the 1911 revolution and the Republican China was established in 1912. During this turbulent transit period, the misuse of refined drugs spread further, leading the Beiyang government to issue another round of regulations. However, the political situation in the 1910s became more chaotic after the demise of the powerful man Yuan Shi-kai in 1916 and the beginning of the 'warlord period' with a weak central government in Beijing. Shanghai, then the economic hub of China, saw the burgeoning of the medical business, including the trade and smuggling of refined drugs. In this context, the central government initiated the experiment of establishing an Administrative Bureau of Prohibited Drugs in Shanghai in 1922.

This article explores how this Bureau operated, which factors led to its dissolution, and what its struggles reveal about the power rivalries that resulted from efforts to control refined drugs. For a long time, historians researching the history of drug control in the Republican China have overwhelmingly focused on opium while relatively neglecting refined drugs. Some recent studies have paid attention to the refined drugs issue, but this Bureau was neglected (Dikötter, Laamann & Zhou 2016; Rimner 2018; Thilly 2017). In their research on the history of the professionalisation of physicians in modern China, Zhu Ying and Yin Qian briefly mention that the Bureau asked the Wusong and Shanghai Police Office to investigate the situation of physicians in Shanghai to evaluate who were eligible to import narcotic drugs (Zhu & Yin 2009). Other than this, some general history of drugs in modern China (Zheng 2005; Baumler 2008; Su et al. 2009; Zhang & Du 2016; Thilly 2022) and history of refined drugs in other countries and regions (Gootenberg 1999; Hoogte & Pieters 2013; Gootenberg 2022) provide the context to understand this questions.

While historians have relatively neglected this Bureau, its history is vital to understand the refined drugs issue in modern China. Its establishment was partly related to the spread of non-medical use of refined drugs, such as various forms of pills as substitutes for opium smoking. Moreover, this Bureau was the precursor of the National Narcotic Bureau established in 1935, which operated until the Nanjing Nationalist government withdrew from mainland China. The short history of this Bureau indicates the burgeoning of business in pharmaceuticals in Shanghai, the intention of the central government to exert its influence in Shanghai, and the political tensions at this economic hub. The rise and fall of the Bureau indicate the resilience of drug economy and the politicised control. These two dimensions of the issue of refined drugs were intimately related because of the profits from the drug trade. The history of this Bureau is important also because the first half of the 1920s was when some European and American countries took significant steps to regulate refined drugs, such as the Dangerous Drugs Act 1920 by the British government. Adding the Chinese case to the historiography could help understand the origins of the international control of refined drugs at the beginning of the twentieth century.

To analyse how the arrangement of establishing the Bureau emerged and the driving forces of its establishment and demise, this article draws on a wide range of Chinese and English primary sources. Although there are no available archives relating to the rise and fall of this Bureau, I have explored some previously unused archival sources to address the refined drugs issue in the 1910s, such as the police records from the Beijing Municipal Archives and archives of the Foreign Ministry at the Academia Sinica. Other than these archival sources, the article uses diverse newspapers, magazine, and journals, such as *Shen Bao* and the *North-China Herald*. Bearing in mind that using primary sources like newspapers may bring a discrepancy between facts and the records, the author has critically used these sources by comparing the accounts of the same events in different newspapers and contextualising the accounts. Moreover, although we need to be cautious of using newspaper reports, newspapers were the battlefields

1 According to Cambridge dictionary, a refined substance means 'a substance which has been made pure by removing other substances from it'. 'Refined drugs' in this article refer to substances such as morphine and cocaine which were processed and manufactured from raw materials, including opium poppy and coca leaves.

REFINED DRUGS IN 1910S CHINA

CONSUMPTION AND DEMAND OF REFINED DRUGS

The regulations on morphine that came into force in 1909 and cocaine in 1910 permitted importation for medical purposes and prohibited that for other purposes. The former was important use during the early Republican China period. Medical missionaries used it in their mission hospitals.² Doctors in some other hospitals also used it, such as those at the Red Cross General Hospital in Shanghai in 1917,³ and the Outer City Governmental Hospital in Beijing in 1919.⁴

Compared with the medical use of morphine in Late Qing, the patterns in the early Republican period showed both continuities and discontinuities. As in the last several decades of the Qing Dynasty, the medical use of those drugs was principally in the hands of medical missionaries and other Western medical professionals. This phenomenon was not simply because they had training in Western medicine but because this training gave Western medical men easier access to those regulated drugs. Regulations on morphine and cocaine issued by the Imperial Maritime Customs provided privileges for the Western medical professionals. Unsurprisingly, this incurred the criticism of their Chinese counterparts.⁵

Another continued pattern of the consumption of refined drugs was that the non-medical use continued in the 1910s despite the regulations designed to eradicate supplies for this purpose, which indicates the resilience of drug economy. In terms of the injection of morphine for non-medical purposes in the early 1910s, it was mainly by foreigners in some coastal cities. In comparison, morphine pills were much more widely used.⁶ Morphine injection for non-medical had emerged in late 1880s Shanghai, shortly after medical missionaries introduced it into China as a cure for opium craving in the 1870s (Huang 2022). As early as the turn of the twentieth century, non-medical use of morphine had emerged in Manchuria, especially in Jilin province, which bordered Korea.⁷ The non-medical use of morphine continued into the 1910s, and by that time, it had spread widely in China, mainly in four regions in addition to Shanghai; Manchuria, Zhili, Shandong, and Fujian provinces, all of which had port cities. While the hypodermic injection of morphine and cocaine for non-medical purposes in the 1910s was a phenomenon mainly in the coastal regions, drug-containing pills, which were easier to use and transport, were more commonly consumed in inland China. Usually, traders transported them from the coastal to the interior areas.⁸

Generally, those pills were made of mixed materials, and their formulas changed from time to time. There were changed patterns in the use and supply of these pills in the 1910s, such as new marketing strategies. Medical missionaries and other Western medical professionals began to criticise their use in the 1890s. Their criticism coincided with the government's regulation, both leading to a change in advertisements for those pills. Rather than being promoted as anti-opium substances, they were now used as material to manufacture medicines and tonics, without mentioning their anti-opium function. At the first annual meeting of the China National Medical Association in 1916, the Health Officer of the Shanghai Municipal Council (SMC) announced

2 Anon. 1909. China's need of medical missions. *Mercy and Truth*, 153(13 [September 1909]): 296–298.

3 Anon. 1917. Tragedy at a police station: A Chinese laundryman fatally wounded. *The North-China Herald*, 14 April 1917.

4 Beijing Municipal Archives. 1919. J181-018-11008-001, 京师警察厅卫生处关于外城官医院需用吗啡请予酌发的公函 (Permission of the Health Bureau of the Capital Police for Distributing Morphine to the Outer City Governmental Hospital), August 1919.

5 Anon. 1916. Regulations for the medical use of morphia and cocaine. *The National Medical Journal*, 2(3): 14–17; Anon. 1917. In the field of business and finance: The menace of morphine. *Millard's Review of the Far East*, 18 August 1917.

6 Anon. 1916. The steamy side of Shanghai: Morphine and cocaine. *The North-China Herald*, 19 August 1916.

7 Anon. 1913. *Decennial Reports, 1902–1911*, vol. I, Northern and Yangtze Ports, Shanghai: Statistical Department, Inspectorate General of Customs, 1913, p. 78.

8 Anon. 1917. Kueichow-Yunnan border life: Our own correspondence. *The North-China Herald*, 31 March 1917; Anon. 1919. Drugs in Kiangsu: Our own correspondent. *The North-China Herald*, 1 March 1919.

that many of the advertised cough medicines contained morphine.⁹ This was a period when the Western medicine business obtained a chance to accumulate capital and develop. During WWI, the import of Western medicines from Europe and America decreased, but the Japanese export to China increased. Meanwhile, because of the shortage of Western medicines in China, the price of existing supplies soared, with some having increased 20–30 times by the war's end. Chinese drug stores earned hefty profits during that period. Moreover, some Chinese-run drug stores with businesses in Western medicines manufactured their patent medicines (*Shanghai Pharmaceutical Company et al.* 1988: 55–59).

It is worth noting that new psychoactive substances such as heroin became an ingredient for those pills towards the end of the 1910s. In March 1919, the Capital Police Officers in Beijing confiscated 65 bags of 'lung-nourishing pills' from two passengers at Feng-tai railway station. The two passengers, Lu Yin-tang and Cheng Kai, took a train to Tianjin, where they purchased the pills at 20 yuan per bag. The pills were seized on their way back to Henan province because the police officers suspected they might contain opium. During their interrogation, the detained men claimed that the pills contained no opium and that they only knew that the pills could kill the craving for opium because consumers commonly used them in Henan province. However, they had no idea that those pills were prohibited drugs. An analysis of the sample showed that they contained mainly four materials: heroin (6%), cocaine (2%), lactose (75%), and amyloid (7%). The samples varied in percentages of heroin and cocaine and were of different weights, suggesting that they were handmade. The instruction from the Health Bureau of the Capital Police in this case was that since the pills were used as medicines to eliminate the opium craving, the men could be released. After Lu Yin-tang and his partner paid the bail, the police let them leave after a few days of custody and gave back their 65 bags of pills.¹⁰

This case not only indicates that manufacturers used heroin as material to make anti-opium pills in late 1910s China but also shows a discrepancy between the regulation on refined drugs and its implementation, one of factors that contributed to the resilience of drug economy. When Lu Yin-tang and his partner were detained because of a refined drugs offence in 1919, the central government had already issued a group of regulations. Although the 'lung-nourishing pills' contained no morphine, the Regulation for Punishing Morphine Offences issued by the central government in 1914 stipulated that before the issuance of pharmacy laws, offences related to cocaine and heroin were subject to the same punishment as morphine offences. Officially, the police officers released them and their pills for their medical use of curing opium cravings. Although the analysis showed that they contained cocaine and heroin, presumably, Lu bribed the police to free him and his accomplice. Lu's smuggling of narcotic pills with the camouflage of medicine was not a novel method, as pills were the main consumption pattern when the non-medical use of morphine first emerged in China in the late nineteenth century. However, some aspects of this case were new, revealing significant reasons for a rising market for these refined drugs in the 1910s. In their confession, Lu and his partner stated that many grocery stores in Henan province sold lung-nourishing pills. Having worked in several shops, Lu was aware of the profit of that business and decided to source his supplies directly from Tianjin to sell them in Henan province. They confessed that they could earn 4–5 yuan for each bag.¹¹ Generous profits and the relative safety of this business must have lured many people like Lu and his partner to step into this business and work as middlemen keen to build a market for their products.

Regarding the reasons for consuming refined drugs in 1910s China, a well-trodden narrative is that the opium suppression policy prompted opium users to shift to refined drugs such as morphine, because opium became harder to access. This may be part of the explanation. Other than availability, price was also an important factor that prompted opium users to shift to inject morphine or using morphine-containing pills. In 1916, an editorial about the growing morphine market in Manchuria listed the main reasons: Firstly, the price was low, from 2 to 5 cents; secondly, 'many moderate opium-smokers of the poorer classes can no longer afford to buy

9 Anon. 1916. National Medical Association: The opening meeting. *The North-China Herald*, 12 February 1916.

10 卫生处函为卢阴堂等携带润肺丸内含有吗啡一类毒质请讯办卷 [Instruction of the Health Bureau on the Case that Lu Yin-tang and His Partner Traded Pills Containing Poisons like Morphine], Beijing Municipal Archives, J 181-018-11017, March 1919. It is worth noting that Heroin in 1919 in China was not only used for making drugs pills but also for hypodermic injection. See: Anon. 1919. Local and General. *The Shanghai Times*, 27 August 1919.

11 卫生处函为卢阴堂等携带润肺丸内含有吗啡一类毒质请讯办卷 [Instruction of the Health Bureau on the Case that Lu Yin-tang and His Partner Traded Pills Containing Poisons like Morphine], Beijing Municipal Archives, J 181-018-11017, March 1919.

opium'; thirdly, drug 'fiends' asserted that they could give opium smokers as much as pleasure by injecting morphine.¹² Dr Wu Lien-teh, president of the China National Medical Association, also highlighted the price when he addressed the Joint Medical Conference in 1917, emphasising that 'for at the cost of 4 to 5 cents a coolie could satisfy his cravings and obtain immediate satisfaction'.¹³ In 1919, an editorial stated that 'Opium, to a great extent, is not now obtainable by the masses in China, but a hypodermic syringe and morphine can be got for a few cents'.¹⁴ Morphine seems to have been a more economical and reasonable choice for poor users.

However, not all refined drug users consumed opium before changing to morphine or other refined drugs. Even for those opium users who changed to using morphine later, it was not merely because of the rising price of opium. Frequently underestimated, the intermediaries played an important role. The 'masters of the needle' introduced consumers to morphine injection as early as the 1880s (Huang 2020, 23–26; Huang, 2021; Huang 2022). When the Governor of the Three Eastern Provinces consulted the Board of Laws in 1911 about how to punish morphine users, he used the term 'injector' to refer to these suppliers and 'injected person' for consumers and argued that 'Almost all people who are injected morphine are silly countrymen. They are enticed, ignorant that morphine is a poison, and try it'.¹⁵ While it is unclear whether those enticed 'countrymen' were already opium smokers, this case suggests that suppliers continued to do more than sell the drug. They actively persuaded potential consumers to accept their technology and substance from them.

SUPPLY OF REFINED DRUGS

The supply of refined drugs consumed in 1910s China was much more complicated than previously established, not least of all, as it changed frequently. While it is hard to draw the whole picture, we can glean valuable information from the *Returns of Trade* of the Maritime Customs. Taking cocaine as an example, it's a drug the history of which in modern China has long been neglected by historian although the Maritime Customs recorded imports of this drug from 1908 to 1915. The Table 1 below is one page from the *Returns of Trade*, which recorded the imports of cocaine from 1909 to 1912.

208 CHINA.—TRADE RETURNS, 1912.								
Article No. 168. COCAINE.								
COUNTRY FROM WHICH IMPORTED.	1909.		1910.		1911.		1912.	
	Quantity.	Value.	Quantity.	Value.	Quantity.	Value.	Quantity.	Value.
	Ounces.	Hk. Tls.	Ounces.	Hk. Tls.	Ounces.	Hk. Tls.	Ounces.	Hk. Tls.
Hongkong.....	12,037	44,322	29,378	100,019	6	79	10	32
Great Britain.....	44	185	71	262
Germany.....	100	244	124	390	28	79	239	651
Belgium.....	175	455
Switzerland.....	16	32
Japan (including Formosa).....	2	10	373	746
United States of America (including Hawaii).....	2	9
GROSS IMPORT from Foreign Countries.....	12,137	44,566	29,677	100,864	82	362	709	1,723
RE-EXPORTED to " ".....	410	1,422	1,800	6,610	13	53
NET IMPORT from Foreign Countries direct.....	11,727	43,144	27,877	94,254	69	309	709	1,723
DISTRIBUTION THROUGH EACH CUSTOMS DISTRICT.								
Dairen.....	27	133	372	743
Tientsin.....	35	107
Kiaochow.....	4	41
Kiukiang.....	1	5
Shanghai.....	100	244	399	845	48	204	287	797
Soochow.....	3	13	1	3
Amoy.....	11,727	43,144	27,578	93,409	1	4	10	32
Swatow.....	568	1,136	2	3
TOTAL.....	11,827	43,388	28,445	95,390	82	362	709	1,723

Table 1 Cocaine importation from 1909 to 1912.

Source: The Maritime Customs, *Returns of Trade and Trade Reports 1912 Part III.—Analysis of Foreign Trade, with Appendix*, Shanghai: The Statistical Department of the Inspector General of Customs, 1913, p.208.

12 Anon. 1916. Morphia in Manchuria: Growing use of the drug. *Peking Daily News*, 28 January 1916.

13 Wu Lien-teh. 1917. The menace of morphine. *Peking Gazette*, 27 February 1917.

14 Anon. 1919. The outside of the platter. *The North-China Herald*, 25 January 1919.

15 两江督院札禁烟公所准法部咨议复东三省被打吗啡人犯治罪一案文, *南洋官报*, 第144期, 1911年, 第22页. 1911. Governor Zhang of Liangjiang Provinces sent the Opium Suppression Bureau the instruction from the Board of Law on the case about morphine injection in the northern-east three provinces. *Gazette of Southern Coastal China*, 144: 22).

The statistics in the *Returns of Trade* provides a glimpse of the change of patterns of the supply of refined drugs at the beginning of the 1910s. One change was that the previous key imports port Xiamen declined significantly, and new import points emerged in eastern and northern China. The statistics also show that the countries and regions which exported most cocaine to mainland China was changing. It was Hong Kong in 1910, Britain in 1911, Japan in 1912, and Russia in 1913.¹⁶ Presumably, the change of main imports ports was partly because Xiamen was the first place where local authorities noticed and reported cocaine imports, and control of cocaine imports was more strictly implemented there since its issuance in 1910. This change was also related to the changing economic situation in China, such as the economic status of Shanghai was improved. Regarding the change of the main countries exporting cocaine to China reflected in the *Returns of Trade*, it was a representation of the changing global pharmaceutical market. As Paul Gootenberg argues, by the 1910, the world commodity networks around coca and cocaine had been created, a process which started from the 1860s (Gootenberg 2006). Although it was German chemists who first isolated cocaine from coca leaves and German pharmaceutical company Merck first commercialised the production of this drug in the 1880s (Karch 2005), by the beginning of the 1910s, increasing countries had joined this business and the competition became harsh. The changing of main export countries of cocaine in the table demonstrates this fact.

Regarding the supply of morphine, the *Returns of Trade* shows that Britain and Germany were the main countries that exported morphine to China from 1908 to 1913. Then it was Japan for the years 1914 and 1915.¹⁷ As Terry Parssinen argues, the high level of production of morphine in Britain from the 1890s onward primarily served the non-medical use in China. He also estimates that an average of around 10,631 to 11,340 kilos per annum of British produced morphine was sold into non-medical market, mostly China, during the non-war years between 1911 and 1920 (Parssinen 1983: 152–153). The *Returns of Trade* did not record the cocaine imports after 1913, but the statistics for morphine were noted until 1915. In 1914 and 1915, there was sharp increase importation of morphine from Japan. This was partly because WWI impeded the exportation of refined drugs of European countries. According to Chinese news, the Tokio Hygienic Laboratory in Japan had, since 1914, ‘engaged in assiduous manufacture of numerous medicine and chemicals for whose supply Japan depended upon Germany and some other countries’. The morphine production at that laboratory had increased ‘to some fifty kilograms and will be soon, it is understood, sold by auction’. In addition to this official producer in Japan, the Hoshi Pharmaceutical Company played a more critical role in the morphine market after 1913, using opium from the Ottoman and Persian empires (Rimner 2018: 233).

Undoubtedly, the whole picture of the supply of refined drugs must be more complicated than those reflected in the statistics of the *Returns of Trade* because it did not include the smuggled quantities. From the early 1910s, when regulations on both morphine and cocaine imports were put into place, the confiscations of refined drugs began. In May 1912, to show its appreciation, the Red Cross Society of China listed in a newspaper the contributions it received from government agencies between October 1911 to April 1912. Among those donations, four pounds of cocaine was from the Maritime Customs.¹⁸ Drug smugglers also used the trade routes for licit imports as importation ports were where large amounts of cocaine and morphine were confiscated. While the importation of cocaine from Hong Kong to other Chinese ports dropped sharply after 1910, many journalistic reports indicate that it was still a nexus of cocaine smuggling in the 1910s.¹⁹

Imports of cocaine and morphine were lumped together in the ‘medicine’ category in the *Returns of Trade* after 1915, so no details are available after that, but other sources and anecdotal

16 For the statistics of 1913, see The Maritime Customs (1914), p.282.

17 **The Maritime Customs.** 1912. *Returns of Trade and Trade Reports, 1911, Part III.-Analysis of Foreign Trade*, Shanghai: The Statistical Department of the Inspectorate General of Customs: 254; **The Maritime Customs.** 1914. *Returns of Trade and Trade Reports, 1913, Part III.-Analysis of Foreign Trade, with Appendix*, Shanghai: The Statistical Department of the Inspectorate General of Customs: 388; **The Maritime Customs.** 1916. *Returns of Trade and Trade Reports, 1915, Part III.-Analysis of Foreign Trade, with Appendix*, Shanghai: The Statistical Department of the Inspectorate General of Customs: 397.

18 **Anon.** 1912. Miscellaneous articles received in aid of fund. *The North-China Herald*, 11 May 1912.

19 **Anon.** 1913. Local and general news. *The North-China Herald*, 22 February 1913; **Anon.** 1913. The Hong Kong Drug Case Conviction of Foreign Merchant. *The North-China Herald*, 20 September 1913; **Anon.** 1918. Government’s opium scheme: Uproar in the Senate. *The North-China Herald*, 28 September 1918.

evidence suggest that morphine imports continued.²⁰ At the Joint Medical Conference held in 1917,²¹ Wu Lien-teh warned about the problematic situation of morphine consumption in China. He estimated that between 5.5 and 14 tons had reached China between 1911 and 1914, mainly produced by two firms in Edinburgh and one in London.²² He described morphine as usually made up into small packets or placed into small bottles, labelled in different ways, including morphine, white powder, soothing stuff, and dreamland elixir, and exported openly or smuggled secretly into China by way of Dalian, Antung, and Taiwan.²³

Roughly from 1915 newspapers in China increasingly pointed the finger at Japanese smugglers. This does not mean that Japanese smuggling started that year. As Steffen Rimner has argued, the emergence of those reports resulted from the changing global political economy of drugs (Rimner 2018: 239). Indeed, the activities of Japanese smugglers in shifting morphine and cocaine in Asia were revealed at the Hague international opium conference of 1911–12 because the British government required participating countries to investigate the situation of morphine and cocaine in their territories (Mills 2014). By 1914, the illegal sale of morphine and cocaine by Japanese smugglers was brought up by the Chinese Ministry of Foreign Affairs in discussions with the Japanese Minister. As a result, it was agreed that illegal sellers caught by the Chinese authorities would be sent to Japanese Consulates and then deported or duly punished.²⁴

CHANGING CONTROLS AND REGULATION

As mentioned above, the newly established Republican China issued a range of regulations on opium and refined drugs, especially a specific regulation on morphine, the Regulations for Punishing Morphine Offences, enacted in 1914. Its last clause stipulated that before a pharmacy law was issued, all cocaine and heroin products and their derivatives offences were liable to the regulation. After that, a pharmacy law on the medical use of those refined drugs was issued in 1915. This control set focused on defining legitimate and illegitimate uses of these products and setting out punishments for those consumers seeking them for non-medical purposes. When it came to supplying these refined drugs, the Republican government continued to use the Maritime Customs System to control importation. Strategies included import restrictions, the confiscation of smuggled goods, and increased rewards for Customs staff who seized contraband, designed to act as an incentive to do strict controls while discouraging the acceptance of bribes.²⁵

However, the implementation of those regulations met difficulties. Smugglers invented increasingly sophisticated methods to evade the inspection of Customs officers, such as under the camouflage of various anti-opium remedies.²⁶ The political situation in the 1910s also made implementing anti-narcotic policies very difficult. The central government had only weak control over limited areas, further deteriorating the situation when President Yuan Shi-kai died in 1916. The country splintered into several competing regions run by various leaders who came to be known as warlords. The semi-colonial conditions of extraterritoriality added another layer of difficulties. The authorities certainly felt that Japanese smugglers used extraterritoriality to shield their illegal business. Usually, Japanese offenders would be sent to the nearest Japanese

20 Anon. November 1915. The morphine evil in China. *The China Medical Journal*, 29(6): 401–402. (Name of *The China Medical Missionary Journal* was changed to *The China Medical Journal* in 1907).

21 Held by the China National Medical Association and the China Medical Missionary Associations.

22 Wu Lien-teh. 1917. The menace of morphine. *Peking Gazette*, 27 February 1917.

23 Wu Lien-teh. 1917. The menace of morphine. *Peking Gazette*, 27 February 1917.

24 Anon. 1914. Secret sale of morphine and cocaine. *Peking Daily News (1914–1917)*, 23 April 1914.

25 Inspector General. 1915. Morphia, cocaine, etc.: Regulations for punishment of people guilty of dealing in, etc.: instructions, 24 April 1914, *Inspector General's Circulars Vol. 13*, Shanghai: Statistical Department of the Inspectorate General of Customs, 541; Inspector General. 1917. Cocaine and heroin: seizures of, to be treated like morphia seizures, 13 May 1915, *Inspector General's Circulars Vol. 14*, Shanghai: Statistical Department of the Inspectorate General of Customs, 178; Inspector General. 1919. Seizure rewards for ship's officers handing over opium, morphia, cocaine, heroin, and poppy seed: new scale introduced; instructions, 26 October 1917, *Inspector General's Circulars Vol. 15*, Shanghai: Statistical Department of the Inspectorate General of Customs, 346; Inspector General. 1919. Seizure rewards for opium, morphia, cocaine, heroin, poppy seed, etc.: Revised scale and method of payment; instructions, on 14 March 1918, *Inspector General's Circulars Vol. 15*, Shanghai: Statistical Department of the Inspectorate General of Customs, 508.

26 Inspector General. 1933. Morphia and cocaine: Copy of letter showing methods employed to evade Customs detection circulated for Commissioners' information. *Inspector General's Semi-official Circulars, vol. 1, 1911–1933*, Shanghai: Statistical Department of the Inspectorate General of Customs, 12–15.

Consulate for trial.²⁷ Even when Japanese offenders were caught by Chinese authorities and sent to the Consulates, they could still elude punishment.²⁸

On the other hand, in their efforts to curtail the non-medical use of refined substances, the government increasingly received support from civil society organizations, such as the International Anti-Opium Association (IAOA), founded in 1918. The IAOA connected with medical professionals, merchants, educated elites, journalists, politicians, and diplomats (Rimner 2018: 267–278). It worked into the 1920s until the National Anti-Opium Association took over its role in 1924 (Slack 2000).²⁹ By 1920, the IAOA had about two hundred sub-branches across China (Rimner 2018: 268).³⁰ They enabled the Association to collect information on the drug issue nationwide. Though mainly concerned about opium, IAOA also paid attention to the issue of refined drugs and contributed to the formulation of discourse of control. At a meeting held on 20 June 1919, one member of the IAOA, A.E. Blanco, bemoaned that coolies shifted from opium smoking to morphine injection because of its lower price and alerted the increase of the morphine trade to China.³¹ Moreover, IAOA distributed notices to criticise Japanese citizens smuggling morphine to China, and these notices were circulated and finally discussed at the meetings of the Opium Advisory Committee of the League of Nations.³²

These organisations can, in part, be seen as a civil response to the loss of central government power over the drugs issue after the collapse of the Qing Dynasty. They can also be accounted for by rising nationalism at the beginning of the twentieth century (Zhou 1999: 32–37). When Republican China was established, many people expected the new government to initiate a new era. When those anti-opium associations appealed to the central government to terminate the Ten-Year Agreement with Britain, one main argument was that China should retrieve its ‘sovereign rights’ over the suppression of opium.³³ Thus, the anti-opium movement connected with the contemporary discourse of getting rid of all forms of colonial government on Chinese soil by foreign nations. Under the pressure of public opinion, for example, President Xu Shi-chang purchased the last legally imported Indian opium from Shanghai merchants and burned it at the Bund in 1919 (Zhou 1999: 41). Action on morphine, heroin, and cocaine quickly became integrated into the agendas of the central government.

THE RISE AND FALL OF THE BUREAU

It was the Maritime Customs that first appealed to establish a governmental bureau in charge of narcotic drugs issue. In 1909, the Maritime Customs officials took the initiative in calling for the inclusion of cocaine in the morphine imports control (Huang 2021). One decade later, in March 1918, Francis Aglen, the Inspector General of the Chinese Maritime Customs Service, appealed to the Revenue Council of the Ministry of Finance to establish an ‘Administrative Bureau of Poisons’ to control and guard against the smuggling and illicit sale of narcotic drugs. After some discussion, a meeting of the Cabinet of the central government decided that the Epidemic Prevention Office of the Ministry of the Interior would establish that bureau. However, soon after, newspapers reported that this plan was indefinitely postponed. Whether this was because of

27 日人贩卖吗啡被扣邮件事 [Japanese Merchants’ Mail were Detained because Selling Morphine], Archives of the Institute of Modern History of Academia Sinica, 03-02-052-02, 1917-1918.

28 Anon. 1919. New books and publications: The anti-narcotic society. *Millard’s Review of the Far East*, 13 December 1919.

29 Edward R. Slack Jr. “The National Anti-Opium Association and the Guimindang State, 1924–1927”, in Timothy Brook and Bob Tadashi Wakabayashi eds. *Opium Regimes: China, Britain and Japan, 1839–1952* (Berkeley and Los Angeles: University of California Press, 2000), pp. 248–269.

30 Steffen Rimner, *Opium’s Long Shadow: From Asian Revolt to Global Drug Control*, p. 268.

31 Anon. 1919. Meeting of the International Anti-Opium Association, Speaker Condemns the ‘Horrible, Sordid Trade’ in Morphia. *The Shanghai Times* (1914–1921), 28 June 1919.

32 万国禁烟会布告日人私运鸦片等物 [The IAOA Distributed Notice about Japanese’s Smuggling of Opium and Other Narcotics]. Archives of the Institute of Modern History of Academia Sinica, 03-23-119-01-015, January of 1922.

33 丁义华, “论鸦片之迫不及待,” *申报*, 21 November 1910. (Edward Waite Thwing, “On the Urgency of Abolishing the Opium Agreement,” *Shen Bao*); “中国争废鸦片条约大会纪事,” 22 November 1910, *申报* (Anonymous, “Notes of the Meeting for Appealing to Abolish the Opium Agreement,” *Shen Bao*).

'political disturbances', lack of funding, or a combination of both, is hard to know.³⁴ A year later, the Inspector General appealed again for such a Bureau, and it was eventually founded in 1922 in Shanghai. In fact, by that time, ambitions were bigger, with the Bureau in Shanghai only forming an experimental prototype, which, if successful, could be replicated elsewhere.³⁵ Other newspapers reported that the central government planned to establish six bureaus in Shanghai, Guangzhou, Wuhan, Fengtian, and two places in Sichuan province. The first was to be established in Shanghai because, as one article explained, 'Shanghai, besides other places, is a hotbed of such drugs'.³⁶ The city was also the biggest treaty port in China and essential for the economy of the Republican government.

The proposed Bureau was first named 'The Administrative Bureau of Poisons', suggesting that the central government officials at the early Republican era adopted some ideas of their predecessors during the Qing Dynasty because morphine was viewed as 'poison' during the discussions about issuing an import control. The change of name from 'Administrative Bureau of Poisons' to 'Administrative Bureau of Prohibited Drugs' was suggested by Wu Lien-teh, the Cambridge graduate who had established his reputation in leading the successful campaign to tackle the 1910 plague in Manchuria. Wu Lien-teh exerted more influence on public health policies based on growing respect in government circles for those practicing Western medicine.³⁷ When the Bureau was finally established in 1922, the person picked by the central government to direct the Bureau was Li Ying-mi. Li worked as an Imperial Physician in the Late Qing Court, then passed the selection examination in 1906 and studied medicine at St Louis University in Missouri with a state scholarship. He worked in the Ministry of the Army from 1908 and was named Director of the Bureau in December 1922.³⁸

Li did not waste time. After just eleven days on his post, he sent to the Ministry of the Interior the Provisional Articles of Association for the Bureau, the Articles of Association about Registration for Chinese and Western Drug Stores, and the Provisional Articles of Association for Issuing Special Licenses. After making some revisions, the Ministry of the Interior sent them to the Jiangsu provincial government and instructed the latter to assist the Bureau by implementing those regulations.³⁹ According to those regulations, all drug stores must register at the Ministry. Prices of licenses varied and were based on the amount of the registered capital of the drug stores. If the drug store increased its registered capital or changed its name, it had to register again. Other than this 'basic' license, if the drug store wanted to sell morphine, cocaine, and heroin, it needed a special license issued by the Ministry. The Bureau sold three kinds of special license: an 'Annual special license', which permitted the drug stores to keep a small number of refined drugs for medical use; a 'Provisional special license', which permitted pharmacies to temporarily keep some refined drugs for emergencies such as a plague outbreak; and a 'wholesale license' which permitted the pharmacies to run a wholesale business. The provisional license was permanent. The two others needed to be renewed every year, with fees.⁴⁰

Anti-narcotics civil societies such as the IAOA hailed the establishment of the Bureau,⁴¹ but when Director Li intended to implement those regulations, he was confronted with various difficulties. The first difficulty was the intense resistance of drug stores since they needed to pay fees to register and more annual fees if their business involved refined drugs. By February 1923, the Medicine Research Society of Northern Shanghai had convened more than ten times to discuss the regulations of the Bureau. In February 1923, it threatened action; 'if the Bureau

34 Anon. 1922. Drug Inspection Bureau: Chinese Government Office for Shanghai, *The North-China Herald*, 16 December 1922; 开办违禁药品管理局, 24 December 1922, *申报*, ("Establishing the Administrative Bureau of Prohibited Drugs," *Shen Bao*).

35 Ibid.

36 "违禁药品管理局之内容," *申报*, 3 February 1923, ("Declaration and Tentative Prospectus of the Bureau," *Shen Bao*); "Drug Inspection Bureau: Chinese Government Office for Shanghai," *The North-China Herald*, 16 December 1922.

37 "毒药管理局不日成立," *申报*, 2 December 1922. ("An Administrative Bureau of Poisons will be Established Soon," *Shen Bao*); "开办违禁药品管理局," *申报*, 24 December 1922. ("Establishment of the Bureau of Drug Inspection and Standardization," *Shen Bao*).

38 "京师近事," *申报*, 15 June 1908. ("News in the capital," *Shen Bao*).

39 "开办违禁药品管理局," 24 December 1922, *申报*. ("Establishment of the Administrative Bureau of Prohibited Drugs," *Shen Bao*).

40 Ibid.

41 Anon. 1923. Control of narcotics by Chinese, *The North-China Herald*, 3 February 1923.

sends someone to inspect our stores, or the Bureau takes some other actions, we will not cooperate in any case, to show our determined objection'.⁴²

Chinese drug stores were particularly resistant. They argued that they merely sold Chinese medicine rather than 'prohibited drugs' and did not have to register. The drug stores which should register at the Bureau were those 'Chinese-Western drug stores'.⁴³ According to the research of Huang Ko-wu, at the beginning of the Republican period, there were many more Chinese than Western medicine stores in Shanghai, although the latter placed many more advertisements in the newspapers (Huang 1988). This situation changed during WWI when western-owned drug stores developed more slowly while Chinese-owned 'Western medicine drug stores' had the opportunity to expand with supplies from Japan. Gradually, those Chinese-operated drug stores, which sold Western medicine or both Western and Chinese medicine, became rivals to the Chinese Medicine drug stores. After WWI, as imports from Europe returned, the competition became much harsher because the businesses of Westerners in China gradually recovered (Shanghai Pharmaceutical Company et al. 1988: 54–120).

The Bureau also came into conflict with the local authorities in Shanghai. The first to object was the Wusong and Shanghai Military Officer, because it was the real power in Shanghai. At the beginning of 1923, when the Minister of Portugal in Beijing complained that the Ministry of the Interior had established this Bureau in Shanghai without getting their consent, it was to the Wusong and Shanghai Military Officers that they turned.⁴⁴ However, this measure appears to have had little impact. In 1923, the Wusong and Shanghai Military Officer reported to the Ministry of the Interior that the Bureau conflicted with the drug stores in Shanghai. In November 1923, the Ministry of the Interior instructed the Bureau to ignore the Chinese drug stores' resistance and notify the Chamber of Commerce that the registration system would continue.⁴⁵

The Bureau also found itself attracting unwanted attention from the foreign powers in Shanghai. They were represented in the SMC. In January 1923, the SMC was disturbed by a recent article in the *Shanghai Sunday Times* which suggested that the Bureau might be endeavouring to get chemists and druggists in the Settlement to take out licenses and that the SMC should publish a notice in its Gazette to notify the chemists and druggists that the Bureau did not have the power to operate in the jurisdiction of the SMC. Its members found this account misleading. After some discussion, they concluded that they should not take any action before consulting with the Senior Consul.⁴⁶

In response to this opposition, the Bureau published a lengthy declaration in *Shen Bao* on 3 February 1923, justifying its existence and laying out its remit.⁴⁷ Only in June, after it had already existed for half a year, did the Bureau finally begin its actual work of inspections and issued a notification asking the drug stores to register.⁴⁸ The problem was that the *Provisional Articles of Association of Issuing Special Licenses* of December 1922 were vague on enforcement. They stipulated that the Bureau 'will send inspectors to check whether the narcotics in the stores matched the number stipulated on their licenses. If not, they would be sent to "accountable department" to accept punishment'.⁴⁹ However, it was left unclear which department was responsible for these inspections.⁵⁰ Moreover, to implement its regulations, the Bureau needed

42 "反对违禁药品管理局," *时报*, 20 February 1923. ("Resist the Administrative Bureau of Prohibited Drugs," *Shi Bao*).

43 "沪北医药会呈内务部文反对违禁药品注册新章," *申报*, 4 September 1923. ("The Medicine Society of Northern Shanghai Submitted a Document to the Ministry of the Interior to Object the New Registration Policy," *Shen Bao*).

44 "护军使饬查违禁药品管理局," 4 February 1923, *申报*. ("The Guardian Ordered to Investigate the Bureau of Drug Inspection and Standardization," *Shen Bao*).

45 "违禁药品管理局仍需进行," 4 November 1923, *申报*. ("The Administrative Bureau of Prohibited Drugs should Continue Its Work," *Shen Bao*).

46 *The Minutes of Shanghai Municipal Council*, volume XXII, 1922–1924, pp. 268–269.

47 "违禁药品管理局之内容," 3 February, 1923, *申报*. ("Declaration and Tentative Prospectus of the Bureau," *Shen Bao*).

48 "违禁药品管理局实行稽查," 10 June 1923, *申报*. ("The Administrative Bureau of Prohibited Drugs Initiated the Inspection," *Shen Bao*); "药商均应注册之会衔布告", 15 June 1923, *申报*. ("Joint-issued notification about pharmacies should register," *Shen Bao*).

49 "违禁药品管理局之内容", 3 February, 1923, *申报*. ("Declaration and Tentative Prospectus of the Bureau," *Shen Bao*).

50 *Ibid.*

the assistance of the police office. However, the Bureau was affiliated with the Ministry of the Interior of the central government in Beijing. Not surprisingly, the Police Office was unwilling to cooperate with the Bureau since the registration fees and license fees paid by drug stores in Shanghai would go to the central government rather than the Shanghai police.⁵¹

The situation of the Bureau gradually became even more complicated. The Wusong and Shanghai Military Office established its own bureau for inspecting the business of narcotic drugs in 1923, directly competing with the bureau directed by Li Ying-mi. In addition, the SMC established a committee to investigate the issue in the foreign settlements. One report of the Committee published in November 1923 recommended establishing a board to deal with the issue of refined drugs in Shanghai.⁵² Director Li fought back and wrote a report for a newspaper directly linking the reluctant drug stores to illegal activities, stating that most drug stores produced and advertised drugs under the camouflage of medicine, such as various colour pills containing refined drugs. Moreover, these pills spread from Shanghai to Nanjing and other inland areas along the railway and waterway.⁵³ He sent this report to the Jiangsu provincial government and asked for their help when the Bureau sent staff to investigate the drug issues there. He expected that when investigators found drug stores sold products containing refined substances, the local authorities in Jiangsu province would arrest the shopkeepers involved.⁵⁴ Since Li was an official of the central government in Beijing, which Zhi warlords controlled, and Jiangsu province was under the power of the Wan warlords, Li's strategy seemed optimistic. In fact, instead of supporting the Bureau, the Jiangsu authorities responded with objections to the Bureau's registration policy and called for revisions, siding with the Chinese drug stores that had already resisted that policy.⁵⁵

In response, the Bureau changed its registration policy. The new rule stipulated that drug stores that merely sold Chinese medicine could register at the Bureau without paying the registration fees. Chinese drug stores which sold pills and patent medicines still needed to register at the Bureau but paid a mere 10% of the previously required registration fees. In addition, they had to send samples of the pills and patent medicines to the Bureau for examination.⁵⁶ However, these conditions were also resisted by the Chinese drug stores. In the note sent from their association to the Bureau, they applauded Jiangsu provincial government and opposed the registration policy. In addition, they protested that their drug stores had already paid tax to the government and, therefore, should not be burdened with further charges.⁵⁷ Another editorial penned by this association argued again that the unit's name was the Administrative Bureau of Prohibited Drugs, and the Chinese drug stores did not use prohibited drugs, so it was not its responsibility to require registration and samples.⁵⁸

Despite these setbacks, the Bureau developed. Under its new Director Gu Cheng, who succeeded Li Ying-bi in the middle of 1924, it opened branches in Suzhou, Zhenjiang, Yangzhou, and Xuzhou, and another in Shanghai.⁵⁹ However, this growth was not the result of Gu Cheng's strategy but more of the outcome of the 'Jiangzhe War', a series of battles between various warlords in Zhejiang and Jiangsu provinces between September 1924 and January 1925. Shanghai and other parts of Jiangsu province were seized by Feng Warlords, who also had a grip on the central government in Beijing. The Bureau seized this opportunity and expanded

51 Before the establishment of the Bureau, the drug stores registered with the police office. Unsurprisingly, the establishment and operation of the Bureau created tension with the police office.

52 **Anon.** 1923. News from the Municipal Gazette. *The North-China Herald*, 1 December 1923; **Anon.** 1923. Sale of dangerous drugs. *The North-China Herald*, 8 December 1923.

53 “违禁药品局请协助调查”, 12 May 1924, *新闻报*. (“The Administrative Bureau of Prohibited Drugs Asked Assistance for its Investigation,” *Xin Wen Bao*).

54 *Ibid.*

55 “本会致违禁药品管理局公函”, *神州医学杂志*, 1925. (“A Letter from this Association to the Administrative Bureau of Prohibited Drugs,” *Shen Zhou Medical Journal*).

56 “违禁药品管理局之布告”, 5 March 1925, *新闻报*. (“Notification of the Administrative Bureau of Prohibited Drugs,” *Xin Wen Bao*).

57 “本会致违禁药品管理局公函”, *神州医学杂志*, 1925. (“A Note from this Association to the Administrative Bureau of Prohibited,” *Shen Zhou Medical Journal*).

58 “责任”, *神州医学杂志*, 1925. (“Responsibility,” *Shen Zhou Medical Journal*).

59 “设立违禁药品分局”, *新闻报*, 25 August 1924. (“The Administrative Bureau of Prohibited Drugs will Establish Branches,” *Xin Wen Bao*); “组设违禁药品管理分局”, *新闻报*, 10 March 1925. (“The Administrative Bureau of Prohibited Drugs has Established Branches,” *Xin Wen Bao*); “浦西违禁药品管理局布告”, *新闻报*, 24 March 1925. (“Notification of the WesternHuangpu River Office of the Administrative Bureau of Prohibited Drugs,” *Xin Wen Bao*).

during the first months of their control. However, this success did not last long due to continued determined resistance. In February 1925, the Jiangsu provincial government instructed the local authorities to end the branches of the Bureau in Nantong and Rugao counties because 'they were illegal and disturbed the populace there'.⁶⁰

The final blow came about under its third director, Shi Feng-xiang, who succeeded Gu Cheng at the beginning of 1925. During the first two months in that position, he further weakened the position of the Bureau when he abused his power for personal gains and thus angered citizens in Shanghai. On 28 April 1925, several Shanghai citizens appealed to the NAOA to join in opposition to the Bureau and to telegraph the central government to investigate the Bureau and punish its director.⁶¹

It is unclear whether the NAOA joined the citizens in appealing to the central and regional authorities to abolish the Bureau and punish the directors. As the above report suggests, several Shanghai citizens also sent an appeal to the Ministry of the Interior and the Governor of Jiangsu province.⁶² After receiving the appeal, the Ministry of the Interior, Gong Xin-zhan, first sent an official to investigate the case and then sent another official to cooperate with the first.⁶³ In addition, the Ministry notified the Governor of Jiangsu province, Zheng Qian, of those measures. It is noteworthy that in its communication, the Ministry did not state that it would punish the directors of the Bureau. He only told the Governor that he instructed the Bureau to stop the operation and let the two officials he sent Shanghai tackle the case.⁶⁴

Subsequently, things changed quickly. In a last note to the Pacification Commissioner for Jiangsu and Anhui Provinces, Lu Yong-xiang, and the Governor of Jiangsu province, Zheng Qian, the Ministry of the Interior recognised that the Director of the Bureau had abused his power by issuing 'revenue stamps' on drugs and insisted that they had never authorized this action. In the view of the Ministry, the Director of the Bureau was 'definitely undaunted and reckless'. In addition, the Ministry asked the Commissioner and the Governor to instruct the Wusong and Shanghai Police Office to survey and possibly punish the Director, Shi Feng-xiang.⁶⁵

The fate of the Bureau was determined mainly by the political and economic situation of the time. The most important was the power struggles between the central government, provincial government, and authorities in Shanghai. The Ministry would have preferred to solve the problem using its authority and keeping a lower profile. It is likely that the Ministry did not intend to punish the Director at first. After all, it was the Ministry that established the Bureau in Shanghai. If something went wrong, the Ministry might prefer to send their personnel from Beijing to Shanghai to tackle the issue, not the local authorities. It was embarrassing for the Ministry that there was a scandal regarding the Bureau established by that department and situated in the judiciary of the Pacification Commissioner for Jiangsu and Anhui Provinces and the Governor of Jiangsu province. The Minister's first plan to solve the problem might just have been to abolish the Bureau to appease the anger of the Shanghai citizens. However, the reports in some Beijing newspapers impelled him to take a stand to punish the Director.

When the Minister decided to punish the Director Shi Feng-xiang, he obtained the help of the local authorities to investigate and detain the Director. This could have been a strategy to show his stance on this scandal. It was also for practical reasons. In that situation, if he wanted to capture the Director (and probably other involved officials), he needed the help of the Jiangsu provincial government and local authorities in Shanghai. After receiving the note of the Ministry

60 “假名设立违禁药品局之查禁,” *新闻报*, 28 February 1925. (“Ban the Fake Branches of the Administrative Bureau of Prohibited Drugs,” *Xin Wen Bao*).

61 “沪公民责难违禁药品管理局,” *申报*, 29 April 1925. (“Shanghai Citizens Condemn the Administrative Bureau of Prohibited Drugs,” *Shen Bao*).

62 “内部查办违禁药品管理局,” *申报*, 1 June 1925. (“The Ministry of the Interior Investigates and Prosecutes the Administrative Bureau of Prohibited Drugs,” *Shen Bao*).

63 “部令查办违禁药品局,” *时报*, 30 May 1925. (“Ordinance of the Ministry of Interior to Investigate and Prosecute the Administrative Bureau of Prohibited Drugs,” *Shi Bao*); “内部查办违禁药品管理局,” *申报*, 1 June 1925. (“The Ministry of the Interior Investigates and Prosecutes the Administrative Bureau of Prohibited Drugs,” *Shen Bao*).

64 “部令查办违禁药品局,” *时报*, 30 May 1925. (“Ordinance of the Ministry of Interior to Investigate and Prosecute the Administrative Bureau of Prohibited Drugs,” *Shi Bao*).

65 “内务部查办违禁药品管理局,” *时报*, 1 June 1925. (“The Ministry of the Interior Investigates and Prosecutes the Administrative Bureau of Prohibited Drugs,” *Shen Bao*).

of the Interior, the provincial authorities consented to the decision of the Ministry of the Interior and instructed the Wusong and Shanghai Military Officers to carry out the instruction.⁶⁶ There is no further newspaper report on the result of the investigation, but sources in 1926 indicated that his action signalled the end of the Bureau.⁶⁷

CONCLUSION

Establishing a governmental bureau dedicated to regulating refined drugs at the beginning of the 1920s first resulted from the deteriorating drug situation in 1910s China. A larger consumption market in that decade was partly a result of the anti-opium campaigns initiated in the late Qing period, which produced a group of consumers who needed alternatives to opium for smoking to meet their cravings. Continuing medical education and practice also required refined drugs for medical use. In addition, the 1910s was also a period when more significant quantities of these substances became available on the global market. When European supply was interrupted during WWI, Japan promptly filled the gap. Between those sources of supply and their consumers, there were countless intermediaries of various nationalities eager to profit from running the gauntlet of the authorities. This ‘motley gaggle of small-time and uncoordinated entrepreneurs’ (Mills 2007: 359) played an essential role in growing the market for refined drugs in China during this period.

Anxieties about consumers did not simply dictate the timing and nature of the government response to this. The Inspector General of Maritime Customs asked for a specialist bureau to enforce regulations on refined drugs in 1918, but it only came about in 1922. The Chinese government faced difficulties in setting up the office in the first place because its ability to assert itself in Shanghai was often limited due to the unstable political situation in the period. Once established, this instability continued to affect the Bureau. It also faced local opposition. This was partly economic as a well-organised body of drug store owners fought off efforts to impose greater regulation of their businesses and levies on their profits. It was also partly political, as the local authorities resisted interference from the central government in Beijing, and those in charge of the foreign settlements in the city ensured that it did not claim jurisdiction over transactions in refined drugs in their parts of town. The opportunistic effort by its final Director to line his own pockets was just the pretext to close it down. Although there were sporadic appeals to re-establish a drugs inspection bureau after its demise,⁶⁸ it would be until 1930 that the central government would again return to the idea and finally successfully established a National Narcotic Bureau and operated until the end of the administration of the Nationalist government (Huang 2020: 164–216). The short life of the Bureau was closely tied to the resilient drug economy and the political struggle in Shanghai and beyond during the era of the Republican China.

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66 “部令查办违禁药品局”, *时报*, 30 May 1925. (“Ordinance of the Ministry of the Interior to Investigate and Prosecute the Administrative Bureau of Prohibited Drugs,” *Shi Bao*).

67 “呈请设局取缔违禁药品,” *新闻报*, 8 August 1926. (“Appeal to Establish a Bureau to Suppress the Prohibited Drugs,” *Xin Wen Bao*).

68 “恢复违禁药品管理局之呈请”, 8 August 1926. (“Appeal of Re-establishing the Administrative Bureau of Prohibited Drugs,” *Shen Bao*).

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