DRAFT FINAL REPORT

GROUP OF EXPERTS ON CHEMICAL SUBSTANCES AND PHARMACEUTICAL PRODUCTS
I. BACKGROUND

The Group of Experts on Chemical Substances and Pharmaceutical Products of the Inter-American Drug Abuse Control Commission (CICAD/OAS) is the technical forum at the hemispheric level for member states to exchange information, experiences, and best practices on the control of precursor chemicals used in the production of illicit drugs in the region, as well as pharmaceutical products and, increasingly, new psychoactive substances (NPS).

During the sixty-fourth regular session of CICAD in Washington, D.C., November 19-21, 2018, the Commission approved the final report on the meeting of the Group of Experts on Chemical Substances and Pharmaceutical Products (CICAD/doc.2413/18) held in Panama City, Panama, May 29-31, 2018. The Commission also approved Argentina’s candidacy to chair the Group for the period 2019-2020.

II. EXECUTIVE SUMMARY

The Group of Experts on Chemical Substances and Pharmaceutical Products of the Inter-American Drug Abuse Control Commission (CICAD/OAS) met in the city of Buenos Aires, August 13-15, 2019 at the Coast Guard Building of the Argentine Naval Prefecture. The meeting participants included 36 experts from 10 member states: Argentina, Brazil, Canada, Chile, Colombia, Guyana, Honduras, Peru, Saint Lucia, and the United States; as well as the United Nations Office on Drugs and Crime (UNODC) and the Cooperation Programme between Latin America, the Caribbean, and the European Union on Drugs Policies (COPOLAD).

As established in the schedule of activities (CHEM/AGE.1/19), the meeting started with a roundtable where participants had the opportunity to present and comment on the principal challenges facing the countries and their agencies in controlling the diversion of chemical substances that can be used in the illicit manufacture of narcotic drugs and psychotropic substances, as well as good control practices/strategies being implemented to address those challenges.

The principal objective of the meeting was to review and update the “Model Regulations for the Control of Chemical Substances Used in the Illicit Manufacture of Narcotic Drugs and Psychotropic Substances.” This document represents an important reference tool that member states can use to develop and/or update their domestic regulations and legislation on this subject.

In addition, during the working sessions, presentations were made on the following topics:

- Proposed controls for addressing trends related to New Psychoactive Substances (NPS) and the challenges posed by “designer” chemical precursors in Argentina;
- The U.S. perspective on the topic of chemical precursors and diversion investigations;
- The United Nations Toolkit on Synthetic Drugs;
- An update on COPOLAD’s work in the area of chemical precursor control.

The meeting’s final report will be subject to approval during the sixty-sixth regular session of CICAD to be held in Miami, United States, November 19-21, 2019.
III. MINUTES

**Tuesday, August 13**

Welcoming remarks presented by the following authorities:

- Eugenio Burzaco, Secretary of Security, Ministry of Security
- Martín Verrier, Under-Secretary for Narcotrafficking Control, Ministry of Security
- Roberto Moro, Secretary of SEDRONAR
- Rafael Parada, Chief, Supply Reduction Unit, OAS/CICAD

During the roundtable, participants had the opportunity to present and comment on the principal challenges their countries and agencies are facing to control the diversion of chemical substances that can be used in the illicit production of narcotic drugs and psychotropic substances, as well as best practices and/or strategies to address them.

The principal challenges identified by the participants were as follows:

1. **Challenges related to the diversion of chemical substances:**
   - Constant change in the methods used by criminal organizations to divert chemical substances;
   - The involvement of increasingly specialized actors in the drug trafficking chain, who are often engaged in legal businesses;
   - The continued emergence of new chemical substances, together with the countries’ difficulty trying to include them rapidly in control lists;
   - The difficulty some countries have in identifying New Psychoactive Substances (NPS);
   - The countries traditionally called “transit” countries are being used to complete the processing of illicit drugs, given easy access to certain key chemical substances;
   - Drug traffickers take advantage of authorities’ lack of knowledge regarding the use of specific chemical substances during these drug synthesis processes.

2. **Legal and regulatory frameworks**
   - Need for countries to continually update their legal and regulatory frameworks on the subject.

3. **Challenges related to the lack of information-sharing and cooperation at the inter-agency, national, regional, and international levels, including:**
   - Various agencies share national-level responsibility for control of precursor chemicals and sometimes there are no mechanisms for effective and secure information-sharing among those agencies;
   - The sharing of information/intelligence for the purpose of updating on the modus operandi of criminal organizations is limited or not sufficiently dynamic with border countries;
   - Lack of information and awareness regarding the increasing importance of certain precursor chemicals used in the manufacture of synthetic drugs, with the result that authorities continue to focus their priorities on traditional chemical substances.
4. Challenges related to private industry:
   — The use of legal chemical substances in the illicit manufacture of narcotic drugs and psychoactive substances hampers controls;
   — On occasion, national restrictions/regulations are challenged by different private entities that argue that industry is being limited;
   — The difficulty of finding effective control mechanisms that do not have a negative effect on legitimate industry.

5. Challenges related to the material resources and technical capacities of forensic laboratories:
   — Limited capacity in some countries to effectively operate their forensic laboratories, recognizing the importance of acting preventively and not reactively.

6. Challenges linked to the need to strengthen operational control, forensic, customs, and seizure mechanisms, including:
   — Lack of analytic capacities and technical knowledge regarding these chemical substances;
   — Need to standardize procedures to address the problem;
   — The importance of control agencies keeping up-to-date given the constant changes and diversification of substances, routes, concealment methods, and other factors;
   — Importance of properly securing and preserving evidence and intelligence from seizures, clandestine laboratories, and other points of investigation in order to determine the source of substance, point of diversion, transport routes and methods, and other data, all of which can facilitate case preparation and international cooperation.

In terms of successful measures and good practices, the delegations highlighted the importance of:

   — Maintaining good and effective inter-agency coordination such as through the creation of inter-institutional technical working groups to monitor the precursors and NPS in the illicit market;
   — Making regulatory changes, as applicable, and developing updated legislation on the subject;
   — Strengthening coordination among states – particularly border states – for example, by promoting bilateral or multilateral investigations;
   — Promoting the use of international cooperation resources, such as the United Nations Toolkit on Synthetic Drugs and CICAD’s Model Regulations for the Control of Chemical Substances Used in the Illicit Manufacture of Narcotic Drugs and Psychotropic Substances;
   — Strengthening cooperation mechanisms with the private sector;
   — Strengthening technical and operational capacities, for example, specialized and undercover agents; training K-9 dogs to detect fentanyl and its analogues; granting border agencies the authority to open packages; launching real-time data-sharing systems; establishing programs to register devices; sharing samples of seized substances among agencies involved, and other measures;
   — Streamlining and optimizing processes to classify precursor chemicals, for example, through generic classification of precursors and making decisions based on their “chemical structure class” and not based on the substance itself.
Presentation: Trends in New Psychoactive Substances in Argentina, the Challenge of Designer Chemical Precursors, and Control Initiatives to Address the Problem

- Deborah Maestre, Coordinator, National Registry of Chemical Precursors, Under-Secretariat for Narcotrafficking Control, Ministry of Security of Argentina

Mrs. Maestre gave a presentation (DOC.2) on trends in NPS, the challenges that designer chemical precursors pose, and control initiatives implemented in Argentina to address the situation. She presented the different existing approaches in terms of models for the regulation of NPS and focused on the “generic” control system and the new legislation to be implemented in the country. Regarding chemical precursors, Mrs. Maestre indicated that the increasing availability of designer precursor substances has a large impact on the illicit synthetic drug market. Similarly, she indicated that the production methods used in clandestine laboratories are constantly evolving to evade controls. Finally, she discussed the detection of new substances utilized in the manufacture of narcotic drugs and designer chemical precursors, as in the cases of alpha-phenylacetoacetamide (APAA), which is used to obtain P-2-P for later production of illicit amphetamine and methamphetamine, and ether acid 3, 4- MDP-2-P methyl glycidic acid, and sodium salt, which are used to obtain 3, 4-MDP-2-P for later illicit production of MDMA. As she explained, following INCB recommendation, in 2019 these chemical precursors were added to Table I of the 1988 Convention.

Presentation: Precursor Chemical Trends: the U.S. Perspective

- Liqun L. Wong, Unit Chief, Drug and Chemical Evaluation Section, U.S. Drug Enforcement Administration (DEA)

Mrs. Wong (DOC.5) gave a presentation on the subject of synthetic drugs in the United States, with particular emphasis on the fact that synthetic opioids, primarily fentanyl and its analogues today present a public health crisis in the country. During her presentation, she stressed that in the last year the enforcement agencies have reported more than 90,000 synthetic opioid encounters/reports and that the Siegried method is being used in the clandestine production of fentanyl. The presenter added that one of the seized fentanyl laboratory was producing counterfeit pills containing dangerous fentanyl reaching production levels of up to 20,000 tablets per day, which are later sold on the illicit market as oxycodone. Mrs. Wong also mentioned that another challenge that enforcement authorities currently face is the variety of ways in which fentanyl is being marketed to the consumer, not only in the form of tablets/pills but also nasal atomizers, nasal aerosols, injections, and on blotting paper. In closing, she mentioned the useful data generated by the “U.S. Fentanyl Signature and Profiling Program.” The information assists authorities to identify synthesis routes, precursors and pre-precursors being used in the illicit production of fentanyl.
**Wednesday, August 14**

**Presentation:** United Nations Toolkit on Synthetic Drugs
- Martin Raithelhuber, Illicit Synthetic Drugs Expert, Laboratory and Scientific Section, United Nations Office on Drugs and Crime (UNODC)

Mr. Raithelhuber presented (DOC.4) the strategy on opioids and the UNODC toolkit on synthetic drugs. During his presentation, he also referred to other resources available from his organization to support countries in monitoring synthetic drugs and NPS, such as the early warning system and the Toxicology Portal. Regarding the opioid strategy, he emphasized the importance of establishing early warning systems, ensuring access to opioids for medical purposes, and establishing treatment and prevention systems. As for the toolkit on synthetic drugs, he explained that it is an online resource that gathers and brings together guidelines and good practices on the subject, including modules on forensic capacities, access to medicines, precursors, early warnings, prevention and treatment, and other areas. According to the presenter, the purpose of the toolkit is to strengthen the capacity for detection, identification, and safe handling of synthetic drugs, including synthetic opioids; to increase the judiciary’s capacity to prosecute cases on illicit manufacture and trafficking in synthetic opioids; as well as to strengthen public-private cooperation, including with the pharmaceutical industry, to prevent the diversion of precursors.

**Presentation:** Chemical Investigations: Keys to Success
- John F. Farmer, Senior Program Analyst, U.S. Drug Enforcement Administration (DEA)

Mr. Farmer began his presentation (DOC.6) by describing the Diversion Control Division within the DEA. The objective of this Division is to prevent, detect, and investigate the diversion of controlled chemical substances and pharmaceutical controlled substances as well as to guarantee their adequate and uninterrupted supply to meet legitimate medical, commercial, and scientific needs. He then made reference to the DEA’s Sensitive Investigative Units (SIUs) programs, which includes SIUS on a global level. The SIUs seek to train, equip, and support specialized units within the antinarcotics forces of the host country, as well as to develop and share intelligence for detecting, counteracting, dismantling, and prosecuting international organizations engaged in drug trafficking. In this sense, he put special emphasis on the Chemical Sensitive Investigative Units operating in certain countries of the region, mentioning the main types and quantities of substances recently seized by those units. Finally, he indicated that to ensure success in chemical investigations, it is essential to obtain and preserve evidence and intelligence. In certain cases, this makes it possible to do “reverse engineering” of the source of chemical products, so as to be able to determine the point of diversion, sources involved, transport routes and methods, and other data. The presenter detailed protocols that are used by the United States in this regard, as well as different devices used to take samples.
Thursday, August 15

**Presentation: COPOLAD Update on Chemical Precursors Control**
- Gabriela Sosa, Consultant, Cooperation Programme between Latin America, the Caribbean, and the European Unit on Drugs Policies (COPOLAD)

Mrs. Sosa (DOC.3) presented an update of the work by COPOLAD in the area of precursors, particularly with regard to a bibliographical review being done to identify updated publications on the subject that can be used to support the technical work of states participating in the project. She also commented that, based on those materials, a final publication is being prepared that gathers lessons learned and good practices so that relevant authorities can take them into account when designing, updating, and developing evidence-based policies for the control of chemical precursors. As Mrs. Sosa noted, through a working method that combines virtual and in-person meetings, COPOLAD has compiled information of real and representative cases that control authorities in the participating countries have worked on, that highlight the difficulties encountered in the region when prosecuting cases of illicit trafficking of chemical precursors. In addition, such cases allow for reflection on the important role played by inter-agency cooperation as well as collaboration between states and the private sector.

**Conclusions, commitments, and recommendations**

During the meeting, it was determined that the CICAD Executive Secretariat will do a final review, in both English and Spanish, of the text that was worked on by the delegates and will send them the final version of the Model Regulations. In addition, those Model Regulations (Attachment I) will be submitted for approval during the sixty-sixth regular session of the Commission, to be held November 19-21 of this year in the city of Miami, with the United States serving as chair.

After the approval of the Model Regulations by the commissioners, the Executive Secretariat will dedicate efforts to provide technical assistance and training to the member states that require support in the implementation of those regulations, as they request, including with regard to the strengthening of forensic laboratories in order to increase their capacity for detecting illicit drugs and new psychotropic substances (NPS) and synthetic drugs in particular.

In addition to working on the review and update of that document, the meeting included important presentations provided by Argentina, the United States, COPOLAD, and the United Nations Office on Drugs and Crime (UNODC). Those presentations were very well received by the delegates, who emphasized the need for the group to continue addressing technical-operational topics and facilitate the coordination of efforts among the various agencies involved in the supervision and control of chemical precursors.

Moreover, the participants emphasized how important it is for the group to have a working dynamic that bears fruit continually and not just once a year when the group meets in person. They also emphasized the importance of the countries’ participation in the programs led by the UNODC Laboratory and Scientific Section, in the context of its Opioid Strategy, such as the International Collaborative Exercise (ICE) Programme.
To achieve this, it was proposed that the group work during the next few months on creating a **technical guide on collecting evidence when investigating the diversion of chemical precursors** to be used to support the member states in the investigation and prosecution of cases. It will be presented to the group during its next meeting.

It was also proposed that the Executive Secretariat of the CICAD continue working with its strategic partners based on what already exists, avoiding duplication of efforts and maximizing existing resources.

Along these lines, it was suggested that the **technical guide on collecting evidence when investigating chemical precursors** take into consideration the advances the working group has made on chemical precursors in the Cooperation Programme between Latin America, the Caribbean, and the European Union on Drugs (COPOLAD), to be presented officially at the Fourth Precursors Week at the end of the year.

Thus, the design of the guide shall take into account good practices and lessons learned that were identified through the analysis of real cases of illicit trafficking of chemical precursors, as well as the difficulties encountered during investigation and prosecution in various ECLAC countries.

The Executive Secretariat will explore the possibility of presenting such cases at the next meeting of the group of experts in order to illustrate significant examples of challenges faced by various agencies when prosecuting cases of the diversion of chemical substances used in the illicit manufacture of narcotic drugs and psychotropic substances.

Based on those case studies and information-sharing, dialogue and working sessions can be generated to enable delegates to incorporate good practices and lessons learned in their control work, under the pillars of inter-agency cooperation and cooperation among states, to include industry.

In addition to the Guides, the delegates considered it important to take up the recommendations made during the last meeting of the group of experts, held in Panama City, Panama in the month of May 2018, allowing for follow-up on the following topics:

- Principal challenges currently faced by the member states to control illicit trafficking in substances that can be used for the manufacture of illicit drugs;
- Measures for oversight/control of chemical precursors that are being carried out to mitigate those challenges, identifying those that have a novel or innovative component;
- Strengths and weaknesses of the current system of control of chemical precursors in the region and at the international level;
- Information-sharing mechanisms the countries use with regard to the international flow/control of chemical precursors;
- Names of chemical precursors the countries control at the national level that are not currently included in the 1988 U.N. Convention.

For this purpose, the Executive Secretariat will circulate a questionnaire that can be used to gather input from the member states on those topics, as well as invite them to provide additional inputs that can be used as the working basis for reference documents on them at the regional level.
With regard to the deadlines for compiling the information and next steps to be taken to ensure information-sharing on key topics in the control of precursor chemicals – not just during the group’s meetings but on a sustained basis, the Secretariat, in coordination with the Chair Pro Tempore will prepare a work schedule to be used as the basis for coordinating activities during the year.
Draft of CICAD’s Model Regulations for the control of Chemical Substances Used in the Illicit Production of Narcotic Drugs and Psychotropic Substances

Version 2019
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Part I. Purpose and Scope of Application

Article 1
The purpose of these Model Regulations is to monitor and control the manufacture, formulation, preparation, transformation, storage, import, export, selling, packaging, transportation, possession, recovery, recycling, use, destruction or other type of domestic or international operation, act, or transaction involving chemical substances that can be used in or intended directly or indirectly for the illicit manufacturing, preparation or extraction of narcotic drugs or psychotropic substances, as well as to prevent and penalize the diversion and illegal manufacture of these chemical substances.

Article 2
The controlled chemical substances shall correspond, as a minimum, to the chemical substances included in Tables I and II of the 1988 United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances. The chemical substances included in the present Model Regulations will be automatically updated in accordance with the modification of Tables I and II of the Convention. In addition, other chemical substances may be included in accordance with national requirements or regional concerns.

Article 3
The provisions for the control of chemicals substance used in the illicit manufacture of narcotic drugs, psychotropic substances, and chemical substances shall apply in all areas of national jurisdiction.

Part II. Definitions

Article 4
The definitions of these Model Regulations shall be subject to the provisions of the domestic law of the Member States. Except where otherwise expressly indicated or where the context otherwise requires, the following definitions shall be applicable throughout the text of these Model Regulations:

- Selling: Any transaction, direct or indirect, among operators or brokers involving the transfer of ownership of chemical substances that can be used in the manufacture of other chemical substances, narcotic drugs, or psychotropic substances.
• Operator: Any natural person, or entity, that engages in or intends to perform operations, acts or transactions with chemical substances.

• Broker: A natural person or entity that assists in arranging or executing a transaction involving a chemical substance by: a) Negotiating contracts; b) Serving as an agent or intermediary; or c) Bringing together a buyer and a seller, a buyer and a transporter, or a seller and a transporter.

• Entity: Should be understood as any “community” considered as a unit, taken as a public or private legal entity. It may include, but is not limited to being, a corporation, company, partnership, firm, trust, unincorporated association, society, or other organization that conducts operations, acts or transactions with chemical substances, no matter how it is constituted.

• Distribution: The process of supplying, selling, transferring, or otherwise making available chemical substances through one or more Parties involve in the various stages of delivering chemical substances to the final user or consumer.

• Manufacture: Any form or stage of preparation, processing or direct or indirect acquisition of narcotic drugs, psychotropic substances or chemical substances, either by extraction, preparation, formulation, purification, processing, refinement, chemical synthesis or other treatment of raw materials.

• Import and Export: In their respective connotations, entry into or exit from one country or territory to another, including temporary customs jurisdiction.

• Mixture: Any combination or aggregation of one or more chemical substances in the Tables I, II or III of these Model Regulations among themselves or with another chemical or chemicals, and that can be used in the illicit manufacture, preparation or extraction of narcotic drugs, psychotropic substances, or chemical substances.

• Preparation: The means needed for manufacturing or packaging a substance in whatever physical state; in pure state, in bulk or in a dosage form, containing one or more narcotic drugs, psychotropic substances or chemical substances mixed or not mixed with other non-controlled components.

• Processing: The means of changing the structure of a chemical to convert it to a new chemical.

• Storage: To store under the control of an operator in bulk or separate containers of chemical substances in either a closed or open space.
- Transportation: To take chemical substances from one place to another using any means within a country or territory or from one country or territory to another.

- Possession: Having chemical substances, tools, materials or equipment to produce narcotic drugs, psychotropic substances or other chemical substances.

- Chemical substance: Chemical compound or product that can be used directly or indirectly in the manufacture of narcotic drugs, psychotropic substances or other chemical substances. The term chemical precursor will be considered synonymous with chemical substance, unless the national regulation considers another definition. The term includes non-controlled chemical substances designed, modified, and manufactured to be closely related to the chemical substance in Tables I, II and III and can be converted into controlled substances or precursor chemicals by readily applicable means. Unless precluded by national law or constitutional provision, such chemical substances include common derivatives, stable intermediates, masked chemical substances, and other related chemical substance where there is substantial reason to believe that such items may be used, directly or indirectly, for illicit manufacture, preparation or extraction of narcotic drugs, psychotropic substances or other precursor chemicals that are in turn used for such illicit purposes.

- Transshipment: Under customs control, the transfer of goods from one means of transport to another, within a Customs zone.

- Transit: Under Customs control, the shipment of goods from one Customs zone to another within a country or from one country to another.

- Packaging: Operations necessary to pack, repack, package, repackage, and weigh narcotic drugs, psychotropic substances or chemical substances or mixtures of one or more of manufactured products.

- Traffic: Actions by individuals or entities to illegally manufacture, market, distribute, import, export, transship, prepare, process, or package narcotic drugs, psychotropic substances or chemical substances.

- Authorizations: Administrative act that consists of the granting, by the competent authorities, of licenses, registrations, permits or other similar documents to carry out operations with chemical substances.

- Irregular Movements or suspicious transactions: Unusual or unjustified movements or actions related to chemical substances. In context, this refers to activities, that may indicate potential actions that contravene these Model Regulations, as set forth in greater detail in Part IX, Article 34.
Part III. Tables of Chemical Substances

Article 5
The chemical substances subject to controls established in the provisions of these Model Regulations that are incorporated into domestic law shall be arranged in three Tables where Table I and II contain at least the same chemical substances in Tables I and II of the Annex to the 1988 United Nations Convention Against Illicit Traffic in Narcotic Drugs and Psychotropic Substances and Table III is to include the chemical substances referred to in Article 8 of the Model Regulations.

Article 6
Chemical substances shall be identified by the names and corresponding numeric codes under which they are listed in the Harmonized Commodity Description and Coding System (HS) of the World Customs Organization (WCO), and the number assigned by the Chemical Abstracts Service (CAS), if member states consider it appropriate.

These classification systems should also be used in statistical records and in documents pertaining to importation, exportation, transit and transshipment and apply to other customs operations and in free trade zones and free ports.

Article 7
Member states may, through their competent authority or other appropriate body, add, delete or transfer chemical substances in the pertinent tables under their domestic legal systems, in accordance with national needs and circumstances, respecting the provisions of Article 2.

Member states shall report, through their competent authority or other appropriate body, these decisions to the Executive Secretariat of the Inter-American Drug Abuse Control Commission (CICAD), so that it can inform member states of current dynamics related to the use of chemical substances, in order for them to adopt the relevant control measures.

Part IV. Chemical Substances under Surveillance

Article 8
There is hereby established a Table III containing, as a minimum, chemical substances included in the special surveillance list of INCB, which includes chemical substances not found in Tables I and II that, in the experience of some competent authorities of member countries, are being diverted to or are being used as substitutes in the manufacture, preparation, or extraction of narcotic drugs, psychotropic substances, or other controlled chemical substances.

In accordance with their respective national legal systems and constitutional principles, member states may, as they deem appropriate, adopt, with respect to chemical substances included in Table III, some of the measures in Parts VI, VII and IX of these
Article 9
The competent authority may take the necessary measures to control and monitor suspicious transactions related to chemical substances not included in Tables I, II and III of the Model Regulations, when there is evidence of their use in the illicit manufacture of narcotic drugs, psychotropic substances and chemical substances.

Part V. Mixtures

Article 10
Mixtures of chemical substances that can be used in the manufacture, of narcotic drugs and psychotropic substances as well as other chemical substances that are incorporated into domestic law shall be subject to the control or monitoring measures set out in Parts VI, VII, VIII and IX. In determining the controls or measures of surveillance to be applied, countries shall take into consideration the following:

a) A mixture that contains one or more substances included in Table I shall be subject to the controls applicable to Table I; in percentage of individual or combined level of concentration, as the case may be, above the percentage determined by the competent authorities shall be subject to the controls applicable to Table I;
b) A mixture that contains one or more substances included in Table II at an individual or combined level of concentration, as the case may be, above the percentage determined by the competent authorities shall be subject to the controls applicable to Table II;
c) A mixture that contains one or more substances included in Table III at an individual or combined level of concentration, as the case may be, above the percentage determined by the competent authorities shall be subject to the controls applicable to Table III.

Article 11
The competent authority shall determine, based on scientific information, which of the mixtures including chemical substances in Tables I, II and III will not be subject to the suggested controls or measures, if it is determined that the mixture is readily be extracted for, or that it is unlikely to be used as such for illicit manufacture, preparation or extraction of narcotic drugs, psychotropic substances or other chemical substances.
Part VI. Control Measures

A. Authorizations

Article 12
Whosoever manufactures, formulates, distributes, stores, markets, packages, imports, exports, transports, uses, recovers, recycles, destroys, or engages in any other type of transaction involving substances included in Table I shall be subjected to controls by the competent authority consisting of a permit, licensing or similar measures.

Article 13
Whosoever, manufactures, formulates, distributes, stores, markets, packages, imports, exports, transports, uses, recovers, recycles, destructs, or engages in any other type of transaction involving substances included in Table II, shall at a minimum register with the competent authorities so that the scope and nature of the activities they conduct may be known.

Article 14
The competent authorities shall require periodic updates to the licenses, permits and registrations provided in this part. The competent authorities shall maintain a record of all permits, licenses and registrations, either granted, denied, suspended or revoked.

Article 15
Competent authorities may stipulate exceptions to the licensing, permit or registration requirements of this Part in accordance with their national needs and circumstances, provided that such exceptions are not inconsistent with the objectives of these Regulations.

When competent authorities stipulate such exceptions they shall take into account regulatory needs and differing trafficking trends in neighboring countries, their respective regions, and the global context.

Article 16
With respect to the issuance of all forms of government authorization, in accordance with domestic law, competent authorities should take into account background information relating to the applicant, such as:

1. Evidence of the applicant’s ability to maintain effective controls over the chemical substances;
2. The applicant’s compliance with applicable national laws for the control of chemical substances as well as health and environmental laws;
3. The need of the chemical substances in relation to the activities of the company;
4. The existence of formal charges or convictions of an offense relating to illicit trafficking of narcotic drugs and psychotropic substances or diversion of chemical
substances, or money laundering and related offenses that have been imposed on administrators, owners or associates;
5. The recurrence of the commission of administrative infractions duly sanctioned, in a certain period of time, or the existence of uncorrected sanctions.

Factors such as the foregoing may be taken into account in order to suspend or revoke an existing license, permit or other authorization.

B. Records

Article 17
The persons referred to in Articles 12 and 13 shall keep, for a period of not less than two years, a complete, accurate and up-to-date record of each of the chemical substances listed in Tables I and II and any other chemical substances specified by the competent authority, including the following information at a minimum:

1. Initial inventory;
2. Amounts received, including any difference from the amount invoiced;
3. Amounts manufactured and packaged;
4. Amounts imported and their origins and destination;
5. Amounts used for any other activities or purposes;
6. Amounts marketed or distributed domestically and their destination;
7. Amounts exported and their originators and their destination;
8. Existing stocks and in the case of chemical constituencies, their status (e.g. quarantine, storage, expired, rejected, waste, others);
9. Surplus amounts or amounts lost during operations, acts or transactions; and amounts destroyed or transferred for destruction or final disposal;
10. Amounts lost due to pilferage, theft or other causes unrelated to operations, acts or transactions, with appropriate documentation;
11. Amounts recycled and recovered;
12. Any other movement of the chemical substances, with appropriate documentation to explain it.

Article 18
Records of the amounts of substances referred to in items 2, 4, 6 and 7 of the preceding Article shall include the following information, at a minimum:
1. Date of the issuance of the invoice or bill of sale and date of the respective operation, act, or transaction with delivery of chemical substance;
2. Name, address, telephone, e-mail address, as well as authorization number of each and every party involved in the operation, act, or transaction, and those of the final consignee if not one of those parties involved in the operation, act, or transaction;
3. Chemical name, Harmonized System (HS) code, CAS number (if possible) or other form of identification method, physical form of, and packaging of the chemical...
substance (level of detail and nature of the information to be recorded will be defined by the competent authority);

4. Means of transportation and identification of the transport company, route lists, itinerary, origin, destination and all other documents required related to the transport of the chemical substance.

**Article 19**

Operators shall submit periodic reports on chemical substances based on the records maintained in accordance with Articles 17 and 18. The information to be reported, the form and the frequency will be defined by the competent authority.

Records required by Articles 17 and 18 shall be made available for inspection and provided to the competent authority upon request.

**C. Inspections**

**Article 20**

1. The competent authorities may inspect applicant operators or current holders of licenses, registration or permit for the purpose of:
   a. Verifying the existence, location and legitimacy of the individual or entity and its activities with respect to the use of chemical substances; or
   b. Confirming compliance with applicable laws and regulations including security and internal control measures.

2. The inspection carried out prior to the acquisition of license, registration or permit will include confirmation of the location, provisions for physical security and procedures, physical assets, capacity of the facility, and other relevant elements of the operation.

**Article 21**

The inspections of operators that already possess licenses, registrations and permits may be carried out on the stocks, security systems, required records, relevant financial/accounting documentation, and computer systems.

The inspections may include non-authorized operators with the aim of preventing operations outside the control system. The competent authorities may inspect such operators where there is reason to believe they are not authorized to conduct operations, acts or transactions with chemical substances.

The competent authorities may also inspect operators handling chemicals not listed in any Table who are suspected of engaging in conduct that is contrary to these Model Regulations.
Article 22
The competent authority may apply administrative sanctions, if the operators obstruct, prevent or refuse to allow a regulatory inspection. The administrative authority that carries out inspections and investigations that detect or verify irregularities that in the administrative authority’s opinion could constitute a crime will report the findings to the competent criminal authority, without prejudice to the corresponding administrative measures.

The competent authority may take precautionary or executive measures, as appropriate, on the chemical substances at any stage of the operation, when conduct violates the regulations relating to such operations.

The competent authority and operators may, as they deem necessary, designate sensitive areas or routes within the national territory, where there is greater incidence of traffic of narcotics drugs, psychotropic substances, or chemical substances, such that greater scrutiny of the route or area is warranted by the competent authorities.

Part VII. Import, Export Transit and Transshipment Requirements

Article 23
In addition to the authorization, but without prejudice to any other authorizations required by the respective foreign trade system, importers and exporters of the substances listed in Table I shall obtain an import, export, transit or transshipment permit from the competent authorities.

The competent authorities may subject all or some of the substances listed in Table II to the same system as above.

Article 24
The competent authorities may also determine which of the substances included in Tables II and III shall be subject to an import, export, transit or transshipment notification.

Article 25
The competent authority should define a minimum and maximum period of time by which applications for permits and notifications should be submitted prior to the import or export in question.

Article 26
Import or export permits shall expire not later than 180 days to one year after the date of their issue. Such permits shall be issued for a single substance only and may not be used more than once. If the 180-day or one year period has passed and no importation or exportation has occurred, application for a new permit must be made.
Article 27
The application for a permit or notification shall contain the following information, at a minimum:

1. The importer’s or exporter’s name and address, license, registration or permit, telephone, telex and fax numbers and e-mail address, where available;
2. The name, address, telephone, and e-mail address of the agent of the importer or exporter and of the freight forwarder;
3. The name and corresponding numeric codes under which each chemical substance is listed in the Harmonized Commodity Description and Coding System (HS Code) of the World Customs Organization (WCO), as well as the description on the label of drums, CAS number (if possible), barrels or other containers or packaging;
4. Quantity and gross weight of the drums, barrels or packaging;
5. Identification of containers or their description, if applicable;
6. Scheduled shipping and import or export date, place of origin and the points of shipment, stopover ports, place of entry into the country and final destination;
7. Means of transportation and identification of the carrier;
8. Names, addresses and telephone, telex and fax numbers and e-mail addresses of the supplier and purchaser;
9. Name, address and telephone and e-mail address of the final user or consignee, if known, or ascertainable;
10. If known and applicable, the permit or authorization number or another reference number issued by the competent authority of the other country that can be used to identify the importing or exporting transaction.

Article 28
As required by the competent authority, within [a period of time defined by the competent authority] days after the import or export of all or any part of the chemical substances that were the subject of a permit application, the importer or exporter shall file a declaration with the following information:

1. Date of import, export or border clearance;
2. Quantity and universally accepted unit of measurement;
3. Identification of chemical substance, HS code and CAS number (if possible);
4. Name of authorized dealer (importer or exporter) and permit number related to the transaction in question;
5. Port of entry or exit;
6. For imports, and where practicable for exports, the name(s) of any known or intended recipients of all or any part of the chemical substance shipment ("downstream" customers);
7. The authorization number issued by the competent authority of the exporting and importing country (or countries).
Article 29
The competent authorities may deny the permits or authorizations, or suspend a transaction when:
1. They can verify that the competent authority of the other country:
   a. Has not issued the proper authorization for the transaction or
   b. Has not issued the proper authorization to the operator engaging in the transaction, or
2. There exists a substantial reason to believe that such items may be used for illicit manufacture of narcotic drugs, psychotropic substances, or chemical substances.

Member states, through the corresponding customs authority, may deny entry to the destination country, proceed to re-embark or enforce administrative forfeiture, when the circumstances indicated in points 1 and 2 above are met.

If domestic law allows, the competent authority may:
- suspend an import, export, transshipment or other transaction involving chemical substances; or
- seize the chemical substances used or intended to be used in the illicit activities, where there is substantial reason to believe that such chemical substances may be used, directly or indirectly, for illicit manufacture, preparation or extraction of narcotic drugs, psychotropic substances or other precursor chemicals that are in turn used for such illicit purposes.

Part VIII. Pre-Notification

Article 30
Before exporting a substance included in Table I, a country intending to export such a substance shall provide, through its competent authorities, the information required under Article 27 to the competent authorities of the importing country.

Article 31
The information required by Article 27 may also be applied to all or some substances specified in Table II and III, where countries participating in the respective transactions so decide, or when the importing country so requires.

Article 32
Within 15 calendar days of receipt of pre-notification by the exporting country, the competent authority of the importing country shall advise the exporting country whether or not the transaction is legitimate. Failure by the competent authority of the importing country to duly advise the exporting country within the above noted timeframe shall signify acceptance of the transaction.
**Article 33**
Regarding pre-export notifications, as specified in Article 12, paragraph 11 of the 1988 UN Convention, where a Party furnishes information to another Party in accordance with paragraph 9 and 10 of said article, the Party furnishing such information may require that the Party receiving it keep confidential any trade, business, commercial or professional secrets or trade process.

**Part IX. Reports of Irregular Movements**

**Article 34**
Operators engaged in the manufacture, preparation, formulation, processing, storage, importation, exportation, selling, providing, packaging, transportation, possession, recovery, recycling, use, destruction, or any other operation involving chemical substances listed in Tables I, II, and when applicable, those listed in Table III shall immediately report to the competent authorities any unusual or unjustified transaction made or proposed to which they are parties, or solicitations concerning an actual or proposed transaction, whether occasional or repeated, when they have reasonable grounds to suspect that such substances may be used in the manufacture, preparation or extraction of narcotic drugs, psychotropic substances or chemical substances.

Operations, acts, or transactions, as well as solicitation concerning actual or proposed transactions, may be considered unusual or unjustified, when:

a. The chemical substances or quantities requested do not coincide with the industrial or commercial activity of the applicant, or if when combined they are part of the manufacturing process of narcotic drugs or psychotropic substances;

b. The destination to which the merchandise is requested to be sent, or the means used for its transport is strange, abnormal or unusual;

c. The form of payment proposed is suspicious, abnormal or unusual;

d. The prices offered are significantly different from market prices;

e. The characteristics of the applicant are extraordinary or do not coincide with the information registered by the competent authority;

f. The operation is paid in cash, cryptocurrency or any other anonymized payment method, and the applicant requests the omission of documentation of the transaction;

g. Any of the data related to the name of the substance, the amount or the recipient of the invoice is falsified;

h. A suspicious, abnormal or unusual increase in orders is verified;

i. Any other circumstances that lead authorities to suspect that the chemical substances could be used for illicit purposes.

If the administrative control authority encounters information indicating irregular movements it shall promptly notify law enforcement or prosecuting authorities, who
shall determine whether and what form of investigation or other appropriate legal process is appropriate.

**Article 35**
If operators detect losses, or irregular or significant disappearances of chemical substances under their control, they shall communicate the information to competent authorities through appropriate means, as soon as it becomes known. The report must contain detailed information of the incident, and be delivered within the period of time defined by the competent authority.

Once the information has been verified, the competent authorities shall undertake the corresponding measures. In the case of international trade, they shall notify the competent authorities of the country of origin, destination or transit, as soon as possible, providing them with all available information.

**Article 36**
All information release to the competent authorities under the rules and provisions of these Model Regulations for the sole purpose of domestic control measures shall be treated as confidential and not divulged to any person except for law enforcement, judicial and prosecuting officials, or members of competent authorities.

**Part X. Offences**

**Article 37**
The following acts shall be considered as a punishable offence:

1. The manufacture, formulation, preparation, processing, storage, importation, exportation, selling, packaging, transportation, possession, recovery, recycling, use, destruction or any other operation, act, or transaction involving chemical substances if the party knows, should have known, or is intentionally ignorant that it could be used in or is intended directly or indirectly for the illicit manufacturing of narcotic drugs, psychotropic substances, or controlled chemical substances within the country or abroad;

2. The introduction to the country, manufacture, storing, provision, sale or transportation of raw materials of controlled or non-controlled chemical substances, with knowledge of, or presuming, the purpose being the illicit manufacturing of narcotic drugs, psychotropic substances, or controlled chemical substances and / or the promotion, facilitation or financing of said acts;

3. The possession of controlled chemical substances with diversion possibilities, without objective justification and without having the authorizations, licenses, inscriptions or permits granted by the competent authority, in areas or routes where there is incidence
of illicit manufacture or trafficking of narcotic drugs or psychotropic substances, declared by the competent authorities, and if domestic law allows;

4. Any of the actions specified above that may have been done when the party knows, when it should have known or when intentionally ignorant that the chemical substances could be intended for use in any illicit conduct, whether it be within the country or abroad;

5. Acts, transactions and operations that are done with intent to falsify or omit material information from any license registration, permits, registrations or any other documents, whether they have been done with or without intention to illicitly traffic or hinder the detection of illicit traffic of chemical substances;

6. Any actions specified above that have been done due to inexcusable negligence;

7. Manufacturing, importation, exportation, selling, transport, or possession of instruments, materials, or equipment when the party knows, should have known or is intentionally ignorant that these will be illicitly used for the manufacture, formulation, preparation, processing, packaging, recovery, recycling, and destruction of narcotic drugs, psychotropic substances, or chemical substances;

8. The organization, management, or financing of the offences referred to in this Article;

9. The use of any means to incite or induce to commit the offences referred to in this Article;

10. Participation in, concealment of, association or conspiracy to commit, attempts to commit and aiding, abetting, facilitating and counseling to commit the offences referred to in this Article.

For the purposes of this article, chemical substances not included in Tables I, II and III of the Model Regulations may be taken into account, when there is evidence of their use in the illicit manufacture of narcotic drugs, psychotropic substances and chemical substances, unless precluded by national law or constitutional provision.

Part XI. Investigation and Proof of Offences

Article 38
The competent authorities shall be entitled to use the following investigative techniques, among others, in the investigation and proof of offences cited in the previous Article, as permitted by national law:

1. Monitored or controlled deliveries of chemical substances and machines and equipment;
2. Interception, the opening, registration and recording of all types of private communication and documents and electronic or other types of surveillance pursuant to the corresponding authorization;
3. Undercover operations using police agents or civilian informants and the use of cooperating individuals or defendants in exchange for concessions in prosecution or penalties;
4. Undercover operations using private entities, created or modified for investigation purposes, under competent authority control.
5. Investigation of financial activities of operators suspected of involvement in unlawful activities.
6. Postponement of the detention of persons or seizure of assets and company intervention, when it is considered that the immediate execution of such measures may compromise the success of the investigation.

Article 39
Knowledge, intention or purpose required as elements of any of the offences mentioned in Article 37 could be inferred from indirect or circumstantial evidence pertaining to the case.

Part XII. Extradition and Mutual Legal Assistance

Article 40
The offences referred to in Part X of these Model Regulations shall be extraditable, in accordance with the constitutional and legal principles of each Member State.

Article 41
Such offences shall be afforded the widest possible mutual legal assistance under the international treaties subscribed by the Member State.

Part XIII. Civil, Administrative and Other Criminal Offences

Article 42
Contraventions of the control measures set out in the provisions of these Model Regulations that are incorporated into domestic law may result in the application of the following measures:

1. Civil proceedings which can lead to the application of financial sanctions or injunctions;
2. Administrative proceedings which can lead to the application of financial sanctions or the revocation, suspension or application of other sanction involving granted authorizations;
3. Criminal sanctions in cases where the contravention is considered as an offence punishable under corresponding national law.
The application of any one or combination of sanctions with respect to an operator shall not exclude or bar the application of other sanctions available under this law, as permitted by the constitution and domestic legal system.

Part XIV. Final Disposition of Seizure and/or Forfeiture of Chemical Substances

Article 43
Each competent authority shall establish the final disposition of seized proceeds and/or forfeiture of chemical substances by implementing measures such as: transfer, sale, donation, transformation, disposal or destruction, among other strategies, under environmental security, industrial and public health safety criteria, ensuring that the chemical substances do not re-enter the illicit market cycle.

Each competent authority shall establish a protocol for the process of final disposal of seized or confiscated chemical substances.

Part XV. Competent Authorities for International Cooperation

Article 44
Member states shall designate, as a focal point(s), representative(s) of the competent authority(ies), to respond to requests for international cooperation and information pursuant to these Model Regulations or to convey them to the authority responsible for their execution.

The focal points for these purposes and any changes of such shall be notified to the OAS-CICAD Executive Secretariat in order to facilitate inter-institutional coordination processes among member states.

Part XVI. Cooperation with Operators and with the Private Sector

Article 45
Competent authorities shall promote the creation and adoption of cooperation measures in collaboration with the entities of the private sector that carry out activities related to the subject matters covered by the provisions of these Model Regulations that are incorporated into domestic law. Within these cooperation measures can be considered, among others, the creation of joint working groups, the establishment of a voluntary code of conduct and cooperation, agreements, training, guidelines and/or programs to encourage good business practices.
In addition to this article, voluntary cooperation should not be limited to the chemical industry, but should also be extended to sectors related to technology, finance, transport and distribution, among other related activities.

**Recommendations:**

That each member state:

1. Enact or update its pertinent legal or administrative norms and promote the application of these norms to prevent and control the diversion and traffic of chemical substances from legitimate purposes to the illicit manufacture of narcotic drugs, psychotropic substances or chemical substances;

2. Establish legislation or update its current legislation, to control national and international transactions of chemical substances. Insofar as possible, such laws should be compatible with those of the other countries, taking into account the Model Regulations;

3. Adopt expeditious measures to review or update their control lists of chemical substances;

4. Establish / improve its national and international communication systems for the exchange of information on transactions of chemical substances;

5. Ensure the application of a surveillance system of any movement of chemical substances at crossings and borders wherever traffic between or border trade with neighboring countries takes place;

6. Ensure that the authorities entrusted with border control exercise a close watch over any chemical substances held there that are not used for consumption in the area or for a licit purpose;

7. Enact or update its pertinent legal norms to prevent and control the diversion of tablet pressers, encapsulating and packaging machines and, as appropriate, materials, instruments and laboratory equipment from legitimate purposes to the illicit manufacture of narcotic drugs, psychotropic substances, or chemical substances;

8. Consider requiring brokers of the chemical substances regulated by CICAD’s Model Regulations to notify the competent authorities of suspicious transactions or
proposals, and maintain records of all transactions involving chemical substances on the Tables;

9. Incorporate best practice measures for the public and private sectors relating to the proper handling, storage and final disposal of chemical substances;

10. Should respond promptly to requests for information from another country concerning suspicious transactions or alleged traffic and illicit uses chemical substances, machines, materials and equipment;

11. Consider classifying traffic of chemical substances as a felony in domestic legislation;

12. Exchange information on chemical substances not subject to control in the Model Regulations, encouraging the use of available information exchange platforms for incidents involving chemical substances;

13. Establish interagency coordination / working groups to improve capacity for control of chemical substances used in illicit manufacture of narcotic drugs, psychotropic substances or chemical substances;

14. Establish controls at the final distribution level or eliminate exemptions from administrative control in those countries where the domestic use of certain controlled chemical substances poses a problem that could lead to illicit manufacture and trafficking of narcotic drugs, psychotropic substances or chemical substances;

15. Consider establishing a policy of “know your customer” that allows operators that handle chemical substances to have a better basis for identifying and reporting irregular movements and transactions as provided in Part IX, Article 34 of the Model Regulations;

16. Consider implementing evidence based technical and scientific research projects to support the creation of policy guidelines and the update of control mechanisms;

17. Provide timely information to the Executive Secretariat of CICAD on the dynamics of the illegal production of controlled chemical substances in the context of these Model Regulations, so that the authorities of the parties can be informed;

18. Establish risk profiling mechanism for suspicious transactions and operators;
19. Strengthen control measures for operations, acts or transactions of chemical substances that are carried out through electronic commerce services;

20. Establish protection protocols for public officials who participate in the processes of reporting or investigating irregular activities related to the trafficking of chemical substances;

21. Establish processes for monitoring and evaluating national policies on the control of chemical substances;

22. Consider as indication of illicit trafficking in the chemical substances that are the subject of the Model Regulations any conduct that tends to prevent the reconstruction of the supply chain or the identification of said substances;

23. Consider strengthening customs measures and controls to prevent chemical substances with an individual tariff code designation from being declared under a general tariff code or residual item designation;

24. Consider the use of masking, adulterant, and diluent chemical substances as a felony;

25. Member states should establish practices and procedures for processing information and evidence from seized chemical substances, dismantled clandestine laboratories, and other instances of apparent chemical precursor diversion. This in order to preserve the evidence (such as packaging, labels, markings, and containers, among others), to increase data exchange with other member states for further investigations and legal actions.
## Chemical Substances List

### Table I

<table>
<thead>
<tr>
<th>CAS Number</th>
<th>Harmonized Code</th>
<th>Substance</th>
<th>Synonym</th>
</tr>
</thead>
<tbody>
<tr>
<td>109-79-7</td>
<td>2914.31</td>
<td>1-Phenyl-2-propanone</td>
<td>P-2-P</td>
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<td>4676-39-5</td>
<td>2932.92</td>
<td>3,4-Methylenedioxyphenyl-2-propanone</td>
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<tr>
<td>89-52-1</td>
<td>2924.23</td>
<td>N-acetylanthranilic acid and its salts</td>
<td>2-carboxy acetalide</td>
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<tr>
<td>89-52-1</td>
<td>2933.39</td>
<td>4-Anilino-N-phenethylpiperidine</td>
<td>ANPP</td>
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<tr>
<td>14838-15-4</td>
<td>2922.19</td>
<td>Phenylpropanolamine its salts, optical isomers, and salts of its optical isomers</td>
<td>PPA</td>
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<tr>
<td>120-58-1</td>
<td>2932.91</td>
<td>Isosafrole and its optical isomers</td>
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<tr>
<td></td>
<td>2932.94</td>
<td>Safrole</td>
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</tr>
<tr>
<td>82-58-6</td>
<td>2939.63</td>
<td>Lysergic Acid</td>
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<tr>
<td>299-42-3</td>
<td>2939.41</td>
<td>Ephedrine, its salts, optical isomers, and salts of its optical isomers</td>
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<td>Ergonovine and its salts</td>
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<td>Ergotamine and its salts</td>
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<td>39742-60-4</td>
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<td>N-Phenethyl-4-piperidone</td>
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<td>alpha-Phenylacetoacetonitrile</td>
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<td>Piperonal</td>
<td>Heliotropine</td>
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<td>CAS Number</td>
<td>Harmonized Code</td>
<td>Substance</td>
<td>Synonym</td>
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<td>---------</td>
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<td>PMK glycidate</td>
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<td>PMK glycidic acid</td>
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<td>90-82-4</td>
<td>alpha-phenylacetoacetamide</td>
<td>APAA; 3-oxo-2-phenylbutanamide; 2-Phenylacetoacetamide</td>
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<td>7722-64-7</td>
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<td>Phenylacetic acid and its salts</td>
<td>PAA and its salts</td>
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Table II

<table>
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<tr>
<th>CAS Number</th>
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<tr>
<td>89-52-1</td>
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<td>Hydrochloric acid</td>
<td>Muriatic Acid, Hidrogen Chloride</td>
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<td>7664-93-9</td>
<td>2807.00</td>
<td>Sulfuric Acid</td>
<td>Hydrogen Sulfate</td>
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<td>7664-41-7</td>
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<td>Ammonia (anhydrous or in aqueous solution)</td>
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<td>Potassium Hydroxide</td>
<td>Caustic Potash</td>
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<td>CAS Number</td>
<td>Harmonized Code</td>
<td>Substance</td>
<td>Synonym</td>
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<td>Caustic Soda/</td>
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<td>Soda Cáustica</td>
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<td>Sodium Sulfate/</td>
<td>Disodium Sulfate/</td>
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<td>Sulfato de Sodio</td>
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<td>Carbonato Neutro de Potasio</td>
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<td>Soda Ash, Washing Soda/</td>
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<td>Carbonato Neutro de Sodio, Soda Solvay</td>
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<td>2902.41</td>
<td>Xylene/</td>
<td>o-Xylenes, m-Xylenes, p-Xylenes, xilol</td>
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<td></td>
<td></td>
<td>(isomers mixture) / 1,2 dimethyl benzene, 1,3</td>
</tr>
<tr>
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<td></td>
<td></td>
<td>dimethyl benzene, 1,4 dimethylbenzene.</td>
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<tr>
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<td></td>
<td></td>
<td>o-xileno, m-xileno. P-xileno, xilol (mezcla</td>
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<td>de isómeros), 1,2-Dimeltibenceno, 1,3</td>
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<td>Dimeltibenceno, 1,4 Dimeltibenceno.</td>
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### Table III

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<th>Substance</th>
<th>Synonym</th>
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<tr>
<td>75-09-2</td>
<td>2903.12</td>
<td>Methylene Chloride</td>
<td>Dichloro-metane</td>
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<td>2914.11</td>
<td>Acetone</td>
<td>2-Propanone</td>
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<td>78-93-3</td>
<td>2914.12</td>
<td>Methyl Ethyl Ketone</td>
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<td>2915.31</td>
<td>Ethyl Acetate</td>
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<tr>
<td>101-97-3</td>
<td>2916.35</td>
<td>Ethyl phenyl acetate</td>
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<td>110-89-4</td>
<td>2933.32</td>
<td>Piperidine</td>
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