



Chemical Investigations Section (DOC)

Industry Outreach and Liaison Projects



DOC Industry Liaison Projects

Industry Liaison Project (ILP)



Shipping Company Liaison Outreach



Domestic Industry Education & Outreach



ILP Mission Statement

To provide informational outreach to E-commerce platforms and other companies that are involved in the sales of regulated products and scheduled listed chemical products over the internet.

Regulated Products of Concern

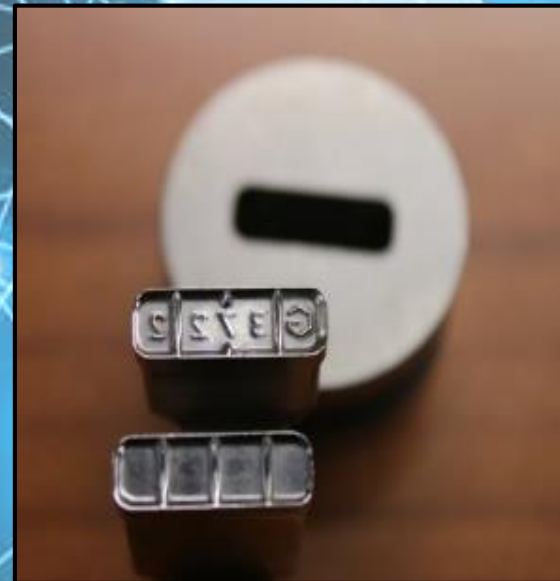
Tableting Machines



Encapsulating Devices



Punches and Dies



Scheduled Listed Chemical Products





Vision: What Success Looks Like

E-Commerce platforms include relevant regulatory information regarding chemicals, pill presses, and tableting and encapsulating machines on vendor landing pages

E-Commerce platforms ban and remove trademark violating punches and dies

On-going, mutually beneficial relationship between DOC and industry compliance personnel established



Applicable Federal Laws & Regulations

United States Code	Code of Federal Regulations
18 U.S.C. § 2- Principles	21 C.F.R. § 1310.05(b)(2)- Reports of Machines-Domestic Transactions (DEA Form 452)
21 U.S.C. § 802(38)- Regulated Person Definition	21 C.F.R. § 1310.05 (c)- Reports of Machines- Imports & Exports (DEA Form 452)
21 U.S.C. § 802 (45)(A)- Scheduled Listed Chemical Production Definition	21 C.F.R. §1310.07- Records & Reporting of Listed Chemicals and Machines– Proof of Identity
21 U.S.C. § 830 (a);(b)- Recordkeeping and Reports of Regulated Transactions	21 C.F.R. § 1314.03- Mail-Order Sale Definition
21 U.S.C. § 830 (e)(2)- Mail-Order Sales Reporting Requirements	
21 U.S.C. § 843 (a)(5)- Trademarked Punches & Dies (6,7) Possession & Distribution of Machinery	
21 U.S.C. § 863 (d)- Drug Paraphernalia Definition	



What Industry Can Do

Include information about reporting requirements for vendors **BEFORE** they list a regulated item for sale

Employ people to review vendors selling regulated items for accuracy before allowing an item to be listed in order to mitigate the picture-description mismatch technique

Place information (which can link directly to the relevant DEA website) that customers must click to acknowledge they have reviewed the reporting requirements for purchasing/importing regulated items.



Success

On August 3, DEA issued a Press Release announcing its e-commerce outreach program and the fact that Amazon, Inc, has agreed to ban all sales on its platform of tableting and encapsulating machines as well as punches and dies.

DEA implements ecommerce outreach program to combat counterfeit drug production

WASHINGTON – The U.S. Drug Enforcement Administration has developed an e-commerce outreach program aimed at reducing the availability of dangerous, often deadly, counterfeit prescription drugs in the United States. This DEA-led initiative focuses on educating online retailers about the sale of pill presses and components used in the production of illicit and deadly counterfeit pills.

Online retailers frequently offer items commonly used in the manufacture of illicit pills, unaware of the regulations and other restrictions involved in the sale and possession of these items. Examples include regulated tableting machines, also known as “pill presses;” encapsulating devices; punches, or “dies,” which imprint markings and trademark logos onto the pill as it is pressed; and regulated chemical products used to synthesize illicit drugs. Drug trafficking organizations use these tools of the trade to produce counterfeit pills that closely resemble legitimate prescription pills, but often include fentanyl, heroin, methamphetamine, or other dangerous illicit substances.

“DEA recognizes the importance of collaborative efforts between government and the private sector to battle the drug crisis that claims more than 67,000 American lives annually,” said Acting Administrator Timothy J. Shea. “DEA strongly encourages all online retailers to take the steps necessary to help disrupt the illicit manufacturing of dangerous counterfeit pills that are nearly indistinguishable from controlled prescription medications.”



DOC Industry Liaison Projects

Shipping Company Liaison Outreach



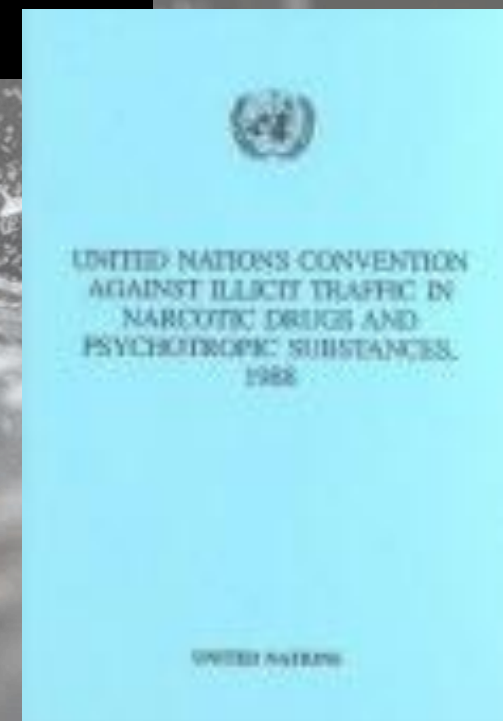
UN Controls



1988 UN Convention, Article 15: Commercial Carriers

Pursuant to article 15 para. 2 of the 1988 Convention, Parties are to require commercial carriers to take “reasonable precaution” to ensure that their means of transport are not used for the commission of offences established in accordance with article 3, paragraph 1

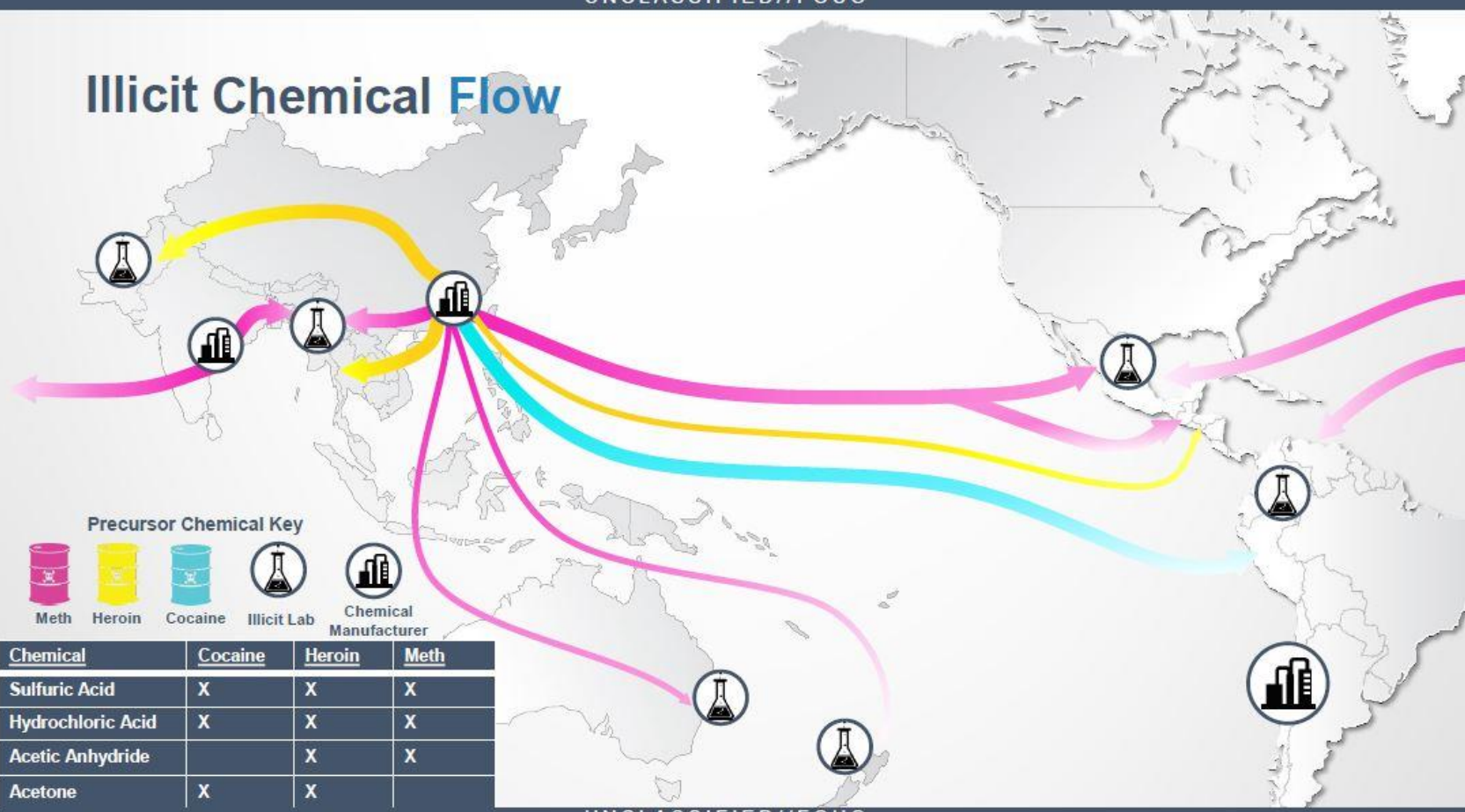
In addition, article 15 also requires Parties to seek to ensure that commercial carriers and the appropriate authorities at points of entry and exit and other customs control areas co-operate, with a view to preventing unauthorized access to means of transport and cargo and to implementing appropriate security measures.



DEA

UNCLASSIFIED//FOUO

Illicit Chemical Flow



Precursor Chemical Key

Meth
 Heroin
 Cocaine
 Illicit Lab
 Chemical Manufacturer

Chemical	Cocaine	Heroin	Meth
Sulfuric Acid	X	X	X
Hydrochloric Acid	X	X	X
Acetic Anhydride		X	X
Acetone	X	X	

UNCLASSIFIED//FOUO

Methamphetamine

Azobisisobutyronitrile (AIBN)

- Readily ignited by sparks or flames
- Burns intensely and persistently
- Toxic oxides of nitrogen produced during combustion
- Risks of explosion if heated under confinement

Methylamine

- Risk of serious damage to eyes
- Irritating to respiratory system and skin
- Extremely flammable
- Vapors potentially cause drowsiness and dizziness

Hydrochloric Acid

- Fumes irritate the eyes and mucous membranes
- Corrosive to metals and tissues
- Causes severe skin burns and eye damage (Danger Skin corrosion/irritation)

Phenylacetamide

- Incompatible Materials: Oxidizing agent
- Risk of serious damage to eyes

Heroin

Tartaric Acid

- Irritating to eyes, respiratory system and skin

Toluene

- Irritating to eyes and skin
- Vapors may cause dizziness, suffocation, or drowsiness
- Highly flammable

Cocaine

Hydrochloric Acid and Hydrogen Chloride

- Highly corrosive liquid
- Toxic by inhalation
- Causes burns

Sulfuric Acid

- Corrosive to metals and tissue
- Will char wood and most other organic matter on contact, though unlikely to cause fire

Multiple Drugs

Heroin & Methamphetamine

Acetic Anhydride

- An irritant and flammable
- Vapors of acetic anhydride are harmful
- Causes burns
- Risk of serious damage to eyes
- Skin contact may produce health damage

Heroin, Meth, Cocaine & Other Synthetics

Acetone

- Irritating to eyes
- Vapors may cause dizziness, suffocation, and drowsiness
- May produce discomfort of the respiratory system and skin



DOC Industry Liaison Projects

Domestic Industry Education & Outreach



DOC Industry Liaison Projects

- Identify largest domestic exporters of List II chemicals
 - Acetone
 - Toluene
 - Methylethyl ketone (MEK)
- Visit companies to explain alternate uses of the chemicals
- Ensure that they are complying with all applicable regulations and record keeping requirements, including “know your customer” provision



Questions

Chemical Investigations Section (DOC)

Senior Program Analyst John F. Farmer
John.F.Farmer@usdoj.gov

Program Analyst Amy Peacock
Amy.M.Peacock@usdoj.gov

