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**INTER-AMERICAN DRUG ABUSE
CONTROL COMMISSION**

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**DRAFT FINAL REPORT
GROUP OF EXPERTS ON CHEMICAL SUBSTANCES AND PHARMACEUTICAL PRODUCTS**



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Secretariat for Multidimensional Security

**GROUP OF EXPERTS ON CHEMICAL SUBSTANCES AND
PHARMACEUTICAL PRODUCTS**

October 14-15, 2021

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DRAFT

I. BACKGROUND

The Group of Experts on Chemical Substances and Pharmaceutical Products of the Inter-American Drug Abuse Control Commission (CICAD/OAS) is the hemispheric technical forum for the exchange of information, experiences, and best practices on the control of chemical precursors used in the manufacture of illicit drugs in the region.

During the sixty-eighth regular session of CICAD, held in Bogotá, Colombia, from December 9 to 11, 2020, the Commission elected Chile and Guatemala to serve as Chair and Vice Chair, respectively, of the Group of Experts for 2021.

II. EXECUTIVE SUMMARY

The Group of Experts on Chemical Substances and Pharmaceutical Products of the Inter-American Drug Abuse Control Commission (CICAD/OAS) met virtually on October 14 and 15, 2021. The meeting was attended by more than 70 experts from the following 24 member states: Argentina, Antigua and Barbuda, Bahamas, Barbados, Belize, Bolivia, Brazil, Chile, Colombia, Costa Rica, Dominican Republic, Ecuador, El Salvador, Grenada, Guatemala, Honduras, Mexico, Nicaragua, Panama, Peru, Saint Lucia, Trinidad and Tobago, United States, and Uruguay; one (1) permanent observer of the OAS, South Africa; as well as two (2) international organizations: the International Narcotics Control Board (INCB) and the United Nations Office on Drugs and Crime (UNODC).

As established in the calendar of activities ([CHEM/AGE.1/21](#)), the meeting began with a round table in which participants had the opportunity to discuss the main trends observed during the COVID-19 pandemic regarding the use of precursor chemicals in the illicit manufacture of narcotic drugs and psychotropic substances, as well as the strategies being implemented to address this problem, including the incorporation of substances not under international control into domestic regulations.

The main objective of the meeting was to provide a forum for the exchange of information and best practices on the control of precursor chemicals among OAS member states. In this regard, innovative tools and reference materials were presented so that states parties are aware of them and can use them to support the strengthening of their regulatory and control frameworks in this area. More specifically, the thematic axes addressed by the exchange of experiences and best practices were:

- Actual cases of illicit trafficking and diversion of precursor chemicals: The United States, Ecuador, and Peru shared their experiences in this area, including the difficulties encountered and best practices acquired during the investigation and prosecution of those cases.
- Technical Guide to Gathering Evidence in Criminal Investigation of the Diversion of Controlled Chemical Substances: as *Pro Tempore* Chair of the Group of Experts, Chile presented this document, the preparation of which had been agreed upon at the 2019 meeting of the Group of Experts on Chemical Substances and Pharmaceutical Products. The Guide brings together a series of best practices and lessons learned and is available to member states to serve as an additional tool in the investigation and prosecution of cases of illicit trafficking and diversion of precursor chemicals.

- Sophistication of clandestine laboratories and the use of new substances not under international control in the illicit manufacture of drugs: Colombia and Mexico indicated that, in recent years, they had detected an increase in the efficiency of clandestine laboratories, as well as diversification with respect to the substances used in the illicit manufacture of drugs, of both natural and synthetic origin.
- The INCB described possible regulatory and operational courses of action open to States to address the proliferation of "designer" precursors and chemical substances not under international control used in the illicit manufacture of drugs.
- UNODC referred to the challenges that may arise in the handling and disposal of seized precursor chemicals and described best practices that can be pursued at the national and regional levels to address those challenges.

The final report of the meeting will be submitted for approval during the seventieth regular session of CICAD, which will be held virtually from November 16 to 19, 2021.

III. MINUTES

Thursday, October 14

The following authorities offered **welcoming remarks**:

- Adam Namm, Executive Secretary, CICAD/OAS
- Javier Valenzuela Riquelme, Deputy Chief, National Anti-Narcotics and Organized Crime Headquarters, Chilean Investigative Police (PDI)

During the **roundtable**, representatives of the delegations had the opportunity to share their experiences of challenges encountered in the control of precursor chemicals during the course of the COVID-19 pandemic. The discussion focused on the main trends observed in the use of new substances in the illicit manufacture of narcotic drugs and psychotropic substances and the tools available to help member states address this problem.

1. The main challenges in the illicit trafficking of precursors identified by the participants were as follows:

- With the onset of the COVID-19 pandemic, some States reported a decrease in route and facility controls. Consequently, in order to continue to keep as much track of controlled substances as possible during the pandemic, the authorities redirected their efforts towards strengthening documentary controls and communication with operators.
- The sophistication achieved in clandestine laboratories in recent years has allowed criminal organizations to employ various alternative methods for manufacturing illicit drugs. This situation has allowed them to stop using traditional precursor chemicals and instead use other substances that are not under international control and, in some cases, are not even on national control lists.
- Particularly notable, in this context, is the growing use of commonly used and non-controlled substances in the illicit manufacture of drugs, including some salts, cement, and *thinner*. This

situation poses challenges in deciding what control strategies should be applied, given the massive and widespread use of these substances.

- The detection of clandestine laboratories devoted to the last stage of cocaine hydrochloride processing in non-coca leaf producing countries, together with the smuggling of precursors and non-controlled chemical substances between neighboring countries, highlight the need to analyze illicit cocaine trafficking from a regional perspective.

2. With regard to the illicit manufacture of narcotic drugs and psychotropic substances, delegations detected the following substances not under international control:

- Calcium chloride, sodium metabisulfite, and acetate-based solvents were mentioned as substances used in the illicit manufacture of cocaine.
- In the illicit manufacture of synthetic drugs, reference was made to various fentanyl precursors (4-AP, propionic anhydride, propionyl chloride and benzylfentanyl).
- An incident involving the designer precursor PMK glycidate, which is used in the illicit manufacture of MDMA (ecstasy), was also reported. Although this substance was recently placed under international control, this is a new development in the region.

3. The successful measures and best practices mentioned by the participants to address the challenges posed were:

- Updating of the national control lists to include new substances that have recently been found to be used in the illicit manufacture of drugs.
- Implementation of watch lists: the purpose of such lists is to allow the monitoring of new substances, i.e., to track their movements in detail, without subjecting them to the strictest levels of control.
- Creation of interdisciplinary and interagency working groups for the technical evaluation of substances and updating of regulations, so that control decisions are evidence-based. Special attention was drawn to chemical profiling studies, especially for cocaine, to identify substances that are used as alternatives to the controlled substances.
- Use of warning systems for information exchange, such as the INCB Precursors Incident Communication System (PICS), which is an online platform that allows real-time information sharing among national competent authorities on incidents involving precursor chemicals.

4. Problems observed by the delegations in relation to non-precursor substances:

- Adulterants, like precursors, are often diverted from licit marketing channels or smuggled into countries and then directed to drug manufacturing laboratories. In response, some countries have included adulterants in their control schemes, while certain States include them under chemical precursor controls and others have placed them within the sphere of competence of their health agencies.
- Several countries reported an increasing number of seizures of ketamine, a new psychoactive substance often marketed as other drugs or as an adulterant. In this regard, some delegations pointed out that ketamine is often found on the illicit market dyed in different colors and is therefore sometimes marketed as "pink cocaine". In this scenario, the delegations commented

on the different ways in which this substance is controlled in their countries. Participants also noted that seized ketamine often stems from its diversion from licit channels.

Presentation: Trends in illicit trafficking of precursor chemicals and the keys to successful evidence gathering

- John F. Farmer, Senior Analyst, Drug Enforcement Administration (DEA), United States

Mr. John F. Farmer commented that in the United States the pandemic did not substantially impact the illicit distribution of precursor chemicals, as criminal organizations managed to get their hands on them despite the border closures. However, the pandemic had other repercussions, with nearly 20% more drug overdose deaths reported in 2020 than in the previous year. According to the speaker, many of those deaths were the result of the use of synthetic opioids, such as fentanyl, and stimulants, such as methamphetamine, which enters the USA mainly through the southwest border and is usually seized in liquid form (hidden in gasoline, alcoholic beverages, water, etc.). Mr. Farmer explained that the process of converting liquid methamphetamine into crystals is quite simple and only requires the precursor acetone and that, as of the start of the DEA's methamphetamine chemical profiling program, it has been detected that this drug is recently once again being made from phenylacetic acid. The speaker then indicated that the fentanyl chemical profiling program has found that most of the precursors used in the manufacture of this drug are not under international control and, for that reason, the United States will propose the inclusion of three fentanyl precursors (4-AP, t-Boc-AP and norfentanyl) in Tables I and II of the 1988 Convention.

Presentation: Actual cases of illicit trafficking and diversion of chemical precursors: difficulties encountered during investigation and prosecution

- Trotsky Gustavo Santamaria Lucero, Chief Specialist, Directorate for the Control of Classified Substances Subject to Control, Ministry of the Interior, Ecuador.

Mr. Trotsky Gustavo Santamaria Lucero commented that the control of precursor chemicals in Ecuador is governed by the 1988 Convention and detailed the national regulations governing these substances. He then shared two actual cases involving illicit trafficking of precursor chemicals that occurred in 2021. The first, called operation "rising sun", was initiated following an en-route operation in which, after the detention of a suspicious shipment, intelligence activities were initiated that led to a raid and the seizure of more than half a ton of calcium chloride. Mr. Santamaria Lucero emphasized that the people involved in this case used to work in the chemical industry, so they knew how to handle the substances and obtained them through "technical" smuggling. The second case, called "binational operation", involves n-propyl acetate, a substance that was recently included in the national watch list, and requires binational and private sector cooperation. As the speaker explained, the fact that a substance is included on the watch list implies that the industry must alert the competent authorities if it receives an order for it in large quantities and, if the destination mentioned in the request is a border area, that notification must be made immediately. After receiving one of those alerts, the Ecuadorian authorities contacted their Colombian counterparts and, as a result of a joint operation, a vehicle carrying approximately 208 liters of n-propyl acetate was intercepted.

Presentation: Detection of cases of chemical diversion

- Marcelo Ushñahua Amand, Manager Responsible for Overseeing Controlled Goods, National Superintendency of Customs and Tax Administration (INIQBF - SUNAT), Peru

Mr. Ushñahua Amand began his presentation by stating that the agencies in charge of administrative and criminal control of precursor chemicals in Peru are, respectively, SUNAT and the national police. Peru controls the movement of more than 11 million tons of precursor chemicals, of which an estimated 0.2% is used to make cocaine. In this regard, the speaker commented that, in order to redirect efforts and have a greater impact, control activities have been designed to prioritize certain substances, activities, and zones. He added that the substances prioritized for control are sulfuric acid and its substitutes, hydrochloric acid, potassium permanganate, sodium metabisulfite, and acetone and its substitutes. In relation to territorial control, Mr. Ushñahua Amand mentioned that the three coca-growing areas that have been prioritized - out of a total of 19 - are the VRAEM (the valley of the Apurímac, Ene, and Mantaro rivers), Inambari Tambopata, and La Convención, noting that after placing checkpoints at the entrance to these areas, several cases of diversion of precursors such as potassium permanganate, sulfuric acid, acetone, and calcium chloride were identified. Finally, he mentioned that criminal organizations are looking for camouflaged ways to introduce chemical substances into coca growing areas, usually by hiding the precursors inside concrete blocks or labeling them as if they were non-controlled substances.

Technical guide to gathering evidence in criminal investigation into the diversion of controlled chemical substances

- Patricio Navarro, PDI, Chile, Chair of the CICAD Group of Experts on Chemical Substances and Pharmaceuticals

To close the first day of the meeting, one session was dedicated to the presentation of a Technical Guide for the Gathering of Evidence in Criminal Investigation into the Diversion of Controlled Chemical Substances. The presentation of the aforementioned Technical Guide was made by Mr. Navarro on behalf of the *Pro Tempore* Chair of the CICAD Group of Experts on Chemical Substances and Pharmaceutical Products. Mr. Navarro commented that the document contains a series of recommendations for gathering evidence in cases of diversion of chemical substances. The commitment to prepare this document was one of the recommendations made during the last meeting of the Group of Experts, held in Buenos Aires, Argentina, in August 2019, aimed at supporting member states to investigate and prosecute cases of trafficking of chemical substances used in the illicit manufacture of narcotic drugs and psychotropic substances. The document contains best practices and lessons learned that were identified through the analysis of real cases of illicit trafficking of precursors, as well as the difficulties encountered during their investigation and prosecution.

Friday, October 15

Presentation: Increased yield of precursor chemicals and the use of new essential substances in the illicit manufacture of drugs of natural and synthetic origin - Experience in Colombia

- Isaac Urrutia Bermúdez, Early Warning System (EWS) Team Leader, Strategic and Analysis Sub-Directorate, Ministry of Justice and Law, Colombia

Mr. Urrutia Bermudez commented on the main challenges that the Colombian Ministry of Justice and Law faces in controlling the production of drugs of natural origin, since there is no production of synthetic drugs in the country (as he explained, those substances enter the country illicitly and are manufactured and sold by criminal organizations). In this context, Mr. Urrutia Bermudez indicated that, despite the recent reduction of illicit coca leaf cultivation areas, the potential for cocaine hydrochloride production

has been increasing significantly. He also indicated that the chemicals used in the illicit manufacture of cocaine are often obtained through smuggling, although due to increased controls on these substances, organized crime is trying to become self-sufficient and manufacture its own precursor chemicals in a rudimentary manner. That is the case, for example, of the “home-made” manufacture of hydrocarbons, potassium permanganate, hydrochloric acid, sulfuric acid, and ammonia. Finally, the speaker mentioned some of the actions that the Colombian government is undertaking to counteract this problem and highlighted the preparation of technical reports that help to identify the substances being used in the illicit manufacture of cocaine with a view to strengthening existing controls.

Comments by delegations

Costa Rica: requested access to the technical reports referred to by Mr. Urrutia Bermúdez and he commented that, although they are confidential, they can be shared if formally requested.

Panama: indicated that large volumes of *thinner* are marketed in the country and expressed interest in learning about Colombia's experience in controlling shipments entering and leaving the country, as this substance is not subject to international control. Mr. Urrutia mentioned that due to the vast licit uses of *thinner*, the substance in Colombia is controlled as a precursor chemical when it exceeds 110 gallons (approximately 416 liters).

Argentina: asked about the origin of the sodium metabisulfite found in clandestine laboratories and about the “home-made” process for manufacturing sulfuric acid. Mr. Urrutia Bermudez replied that sodium metabisulfite is used in the oxidation process to improve the purity of cocaine and that it usually stems from diversion from licit channels, as it is widely used in sugar cane production. Regarding the illicit manufacture of sulfuric acid, he mentioned that a catalytic converter is used to obtain the final chemical precursor from sulfur.

Presentation: Overview of the criminal drug market in Mexico

- Óscar Ángel Talledos, Deputy Director General of the National Center for Planning, Analysis, and Information to Combat Crime (CENAPI), Mexico

Mr. Talledos began his presentation by commenting that, although the size of the areas under cultivation remains large, there has been a downward trend in Mexico in the cultivation of cannabis and opium poppy, as criminal organizations have shifted towards the synthetic drugs market. These substances generate higher profits in less time and their illicit manufacture - especially of methamphetamine - takes place in the Pacific area. As for precursor chemicals used in the illicit manufacture of synthetic drugs, the main substances that were being used in clandestine laboratories began being regulated in 2018. However, the speaker recalled that criminal organizations make quick and effective adjustments to their modes of production in order to use alternative, unregulated inputs, so that the supply chain is not disrupted. To address this situation, Mr. Talledos explained that the Mexican authorities have drug profiling programs, participate in international early warning systems, and update national regulations. They have also established a Technical Group for Synthetic Drug Control (composed of several government institutions). Mr. Talledos also referred to the implementation of a program to monitor markings, pictograms, and logos on seized drugs in order to detect destination areas, routes of origin, as well as transnational criminal organizations and their links.

Comments by delegations

Costa Rica: asked if the fentanyl tablets detected in Mexico are diverted from licit channels and Mr. Talledos responded that the origin of these tablets is usually illicit (most are from Asia). The Costa Rican delegation also asked whether the decline in cannabis cultivation can be attributed to the non-medical use regulation in several U.S. jurisdictions, to which Mr. Talledos responded that no study had yet been conducted to demonstrate a correlation between those two factors.

El Salvador: commented that a law was being drafted in the country to regulate tableting machines and pointed out the difficulties encountered when trying to keep track of those that fall into disuse because, if they are not destroyed, they could enter the illicit market. Mr. Talledos mentioned that Mexico was facing similar challenges and that, in his opinion, the destruction of these machines should be contemplated in the regulations to be created on the subject.

United States: asked the speaker if he was aware of any illicit manufacture of fentanyl in the country and if the origin of the machines used to obtain fentanyl pills was known. In this regard, Mr. Talledos indicated that the clandestine laboratories discovered in the country were dedicated to the illicit packaging of such pills (not their manufacture), and that he had no information on the origin of the seized tableting machines.

Chile: mentioned that Interpol has an online analytical database, called Relief, which is used for comparative analysis of the markings and logos found on the surface of drug packages. According to the Chilean delegation, this investigative police tool makes it possible to track drugs and uses information provided by the countries.

Presentation: Non-controlled chemical substances and designer precursors: options for global action

- Barbara Remberg, Senior Technical Advisor, Precursors Control Section, INCB

Ms. Remberg indicated that from the information provided by member states to the INCB, it can be seen that 3 out of every 4 chemical substances seized are not under international control. The speaker also indicated that this phenomenon does not involve only one region or only the manufacture of synthetic drugs, but is a global problem that applies to the manufacture of both synthetic and natural drugs. In addition, she mentioned that the addition of substances to the international schedules had accelerated in recent years and that, between 2014 and 2020, seven substances had been added to the Tables of the 1988 Convention, five of which correspond to so-called "designer" precursors. In closing, Ms. Remberg mentioned the tools that the INCB offers to member states for the control of precursor chemicals and underscored that, as of early 2020, a document was being drafted, compiling options for addressing the use of non-controlled chemical substances and designer precursors. According to Ms. Remberg, this document will be presented and submitted for approval during the 2022 CND meeting.

Comments by delegations

Chile: mentioned that it was very important to have tools to deal with the tableting machines issue and indicated that it had seized machines from Asia that are illegally acquired over the Internet.

Costa Rica: indicated that the UN Toolkit on Synthetic Drugs was being used in the country, especially the module on precursor chemicals.

United States: asked about the possible courses of action that the INCB could pursue in response to the challenges mentioned in the presentation. Ms. Remberg stated that the document being drafted will include all available options for States to address the use of non-controlled chemical substances and designer precursors in the illicit manufacture of drugs.

Presentation: Best practices and challenges in the handling and disposal of seized precursor chemicals

- Martin Raithelhuber, Coordinator of the Global SMART Programme, United Nations Office on Drugs and Crime (UNODC)
- Héctor Hernán Bernal, Chemicals Expert, United Nations Office on Drugs and Crime (UNODC)

Mr. Raithelhuber pointed out that the seizure of precursor chemicals triggers a problem regarding the safe handling, storage and disposal of those substances. He added that the accumulation of tons of seized precursor chemicals in places that do not have adequate infrastructure poses a great risk and that final disposal procedures are usually costly. After describing the problem, the speaker indicated that UNODC was carrying out a project on the subject in Colombia, Ecuador, Peru, and Guatemala that seeks to strengthen national legislation for the final disposal of precursor chemicals, provide training, and create specialized groups on the subject. Mr. Bernal pointed out that, sometimes, chemical substances cannot be eliminated for years because they are considered evidence and the regulations do not allow them to be destroyed, in addition to other difficulties that countries face in this area. He also mentioned that, to address these kinds of challenges regarding the disposal of precursor chemicals it is important to increase collaboration with the private sector, based on the principle of common and shared responsibility. Finally, the UNODC expert invited CICAD to join in the activities to be carried out within the framework of the project, since this problem had recently worsened in the region and joint and sustainable solutions were needed.

Comments by delegations

Chile: asked whether the focus of the project is on precursor chemicals involved in the illicit manufacture of drugs of natural origin or whether substances used in the illicit manufacture of synthetic drugs will also be considered. The speakers replied that the project covers both precursors used in the illicit manufacture of cocaine and substances used in the manufacture of synthetic drugs, as clandestine laboratories for ecstasy, fentanyl, and methamphetamine have been detected in the region.

Closing remarks:

In closing remarks, **Mr. Rafael Parada**, Chief of the Supply Reduction Unit of CICAD/OAS, highlighted the main challenges referred to by the member states during the meeting with regard to the control of precursor chemicals, including notably diversion from licit channels at the domestic level, "home-made" manufacture, and the use of both non-controlled chemical substances and so-called "designer" precursors. In addition, he highlighted best practices for strengthening the administrative and operational work of control agencies, emphasizing the importance of partnerships with the private sector and international cooperation. On this point, he stressed the need to continue strengthening CICAD's collaboration with the INCB and UNODC in order to bolster the search for synergies and maximize the

impact of activities to be carried out in this field. In conclusion, Mr. Parada reiterated the Supply Reduction Unit's commitment to continue helping member states effectively address the challenges they face in controlling precursor chemicals and pharmaceutical products, in accordance with their own realities and needs.

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