### Part 9. Understanding the Market – Contextual Knowledge Regarding Modi Operandi and Specific Substances

<table>
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<th>Recommendation</th>
<th>Reference (source)</th>
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<tr>
<td><strong>A) Specific methods and modi operandi in the diversion of precursors</strong></td>
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<td>There is a need to enhance the exchange of experiences and lessons learned by Governments experimenting with different approaches in order to decrease the likelihood of the Internet becoming a major vehicle for the unregulated supply of precursor chemicals.</td>
<td>(PRE/2012/P149)</td>
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<td>The Board […] urges Governments to exercise vigilance with regard to the possible “chemical masking” of scheduled precursors for illicit purposes.</td>
<td>(PRE/2009/P84)</td>
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<td>While the smuggling of concealed ephedrine and pseudoephedrine still appears to be isolated, authorities should be aware of the possibility of traffickers turning increasingly to such modi operandi (Australian authorities have discovered ephedrine and pseudoephedrine concealed in underwater breathing apparatus, decorative wall plaques, tiles and, during 2005, in the bases of statues imported from Viet Nam) in reaction to improved controls over illicit trade.</td>
<td>(PRE/2005/P26)</td>
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<td>It can therefore be concluded that diversion of potassium permanganate from domestic distribution channels with subsequent cross-border smuggling is still another source of the substance for use in the illicit manufacture of cocaine.</td>
<td>(PRE/2010/P70)</td>
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<td><strong>B) Substances</strong></td>
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<td><strong>Chemicals used in the illicit manufacture of amphetamine and methamphetamine</strong></td>
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<td>Governments currently confronted with significant illicit manufacture of amphetamine or methamphetamine should be aware that traffickers may already be attempting to obtain, through additional sources, large amounts of those new chemicals and should proactively monitor those chemicals through partnerships with industry.</td>
<td>(PRE/2012/P158)</td>
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<td>Governments should be aware that as traditional precursors of amphetamine-type stimulants come under closer scrutiny, it may be more common for trafficking to turn to alternative substances such as styrene use in the illicit manufacture of amphetamines.</td>
<td>(PRE/2012/P92)</td>
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<td>The Board encourages all Governments to remain alert in regard to Ephedra and other natural sources of ephedrine and pseudoephedrine, and to consider adopting adequate measures to monitor them in the same way as is done for the</td>
<td>(PRE/2010/P53) (PRE/2015/P80) (PRE/2005/P15)</td>
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substances themselves, thus reducing the risk of their use in illicit drug manufacture.

The Board commends the Governments of all countries concerned for their promptness in adopting control measures that assisted in preventing the diversion of ephedra shipments. Nevertheless, the Board advises Governments to remain vigilant with regard to shipments of ephedra extracts. (PRE/2007/P44)

While attempts to divert ephedra extracts apparently decreased in 2007, the Board encourages all Governments to remain vigilant and to duly investigate any shipments of that substance going to or transiting through their territory. (PRE/2007/P88)

INCB wishes to remind Governments to remain vigilant regarding the possibility of ephedra, a natural source of ephedrine, or ephedra-based products being illicitly used on their territory. (PRE/2015/P80)

The Board urges Governments to exercise vigilance over substances such as norephedrine that could be substituted for [ephedrine and pseudoephedrine] with little modification of the illicit manufacturing process. (PRE/2010/P52)

Because of the risk of diversion to illicit drug manufacture, the Board advises against the use of P-2-P, a prime precursor of amphetamine-type stimulants, in unregulated industrial and household products. Such diversion can be eliminated by substituting that precursor with one of many alternative chemicals available for the formulation of cleaning and disinfection products. (PRE/2009/P65)

The Board notes that no seizure of any type [of P-2-P] was reported in or adjacent to the region of West Asia, where reports of interceptions of very large quantities of tableted amphetamine products are increasing. As amphetamine is almost invariably manufactured from P-2-P, the unrestricted availability in that region of industrial and domestic products containing P-2-P must be considered as a likely source of the diversion of the precursor. (PRE/2009/P70) (PRE/2009/P107)

The Board urges competent authorities to raise awareness among all concerned national authorities and industries that attempts are being made to obtain esters of phenylacetic acid for illicit purposes and to ensure that mechanisms are in place that enable industry to fully cooperate in identifying and investigating suspicious orders. Governments are encouraged to treat the esters of phenylacetic acid the same way they treat phenylacetic acid. (PRE/2011/P90)

The Board recommends that Governments analyse the history of patterns of trade in phenylacetic acid (and its esters) so that attempts at diversion may be identified and thwarted. The Board stands ready to assist Governments where required. (PRE/2012/P69)

Although the frequency of the seizures of esters of phenylacetic acid and the amounts seized have decreased since then, the scale of legitimate trade in those substances and the ease with which they can be converted into phenylacetic acid warrant continued awareness by the industries concerned and national authorities. In Mexico, the substances have been under national control since November 2009. (PRE/2012/P90)

The Board encourages all Governments to place special emphasis on the identification of chemicals that can be used to convert phenylacetic acid and its esters into P-2-P, in particular acetic anhydride. (PRE/2011/P94) (PRE/2010/P65)
The Board urges Governments to closely monitor movements [piperonal and phenylacetic acid] in both international and domestic trade. (PRE/2010/P55)

Chemicals used in the illicit manufacture of fake “captagon”

INCB thanks those Governments that actively participated in the activities [under Operation “Missing Links”] and encourages them to continue to provide information about substances that could be used in the illicit manufacture of fentanyl and the drugs found in “captagon” tablets currently trafficked as well as about the modi operandi of traffickers, to allow for a comprehensive analysis of this issue and devise adequate measures to address it. (PRE/2016/P42)

INCB also wishes to encourage all Governments to be vigilant with respect to shipments of amphetamine precursors under international control, as well as non-scheduled chemicals, to countries in West Asia, as a contribution to establishing the missing links, which would help for understanding and addressing the sources of chemicals that feed the illicit production of “captagon”. (PRE/2016/P83)

Chemicals used in the illicit manufacture of MDMA and its analogues

The Board […] urges Governments to ensure that every effort is made to identify which precursors are actually being used in the illicit manufacture of MDMA. In particular, techniques such as impurity profiling of seized samples by forensic laboratories can yield valuable intelligence which can then be used to guide investigations or policymaking bodies. (PRE/2006/P100) (PRE/2006/P135)

Given the prevalence of MDMA abuse throughout the world and the fact that safrole is a key precursor used in the illicit manufacture of that substance, the lack of seizures indicates that Governments’ responses to trafficking in precursors of MDMA need to be more effective. (PRE/2006/P99)

Governments are urged to exercise vigilance in monitoring the trade in [piperonal] because the globally traded tonnage is high and because, as controls on safrole are strengthened, illicit demand for piperonal will likely increase. (PRE/2008/P58)

The Board encourages the Governments of countries with plant species rich in safrole and/or safrole production to remain vigilant to the possibility of their diversion for illicit drug manufacture. (PRE/2011/P86) (PRE/2010/P61) (PRE/2005/P45)

The Board urges the Governments of those countries [in which the diversion or seizure of safrole oils have taken place] to determine the amounts of such oils produced and traded, both internationally and domestically, and to examine what controls are, at present, exercised over those oils, with a view to standardizing necessary international actions. (PRE/2002/P115)
### Chemicals used in the illicit manufacture of heroin and cocaine

The lack of reported seizures of acetic anhydride and other chemicals required to manufacture heroin remains a concern worldwide. (PRE/2016/P137)

Follow-up investigations into some of those cases revealed weaknesses in the international precursor control regime, which have since been rectified. Much work still needs to be done to identify the trafficking routes used to smuggle the acetic anhydride through the countries concerned. (PRE/2005/P62)

Governments of countries in regions where the illicit manufacture of cocaine takes place should also note that the substance may also be encountered in illicit laboratories. (PRE/2006/P104)

The fact that fewer attempts to divert the substance from international trade are also being uncovered serves as an indication that traffickers may have developed new methods and routes of diversion, utilizing domestic distribution channels in third countries not normally associated with the illicit manufacture of cocaine. (PRE/2006/P105)

As processing cocaine base into hydrochloride can occur anywhere along trafficking routes, the Board urges all Governments to pay particular attention to shipments of chemicals that can be used in the illicit manufacture of cocaine. (PRE/2012/P104) (PRE/2011/P108) (PRE/2010/P71)

Governments are recommended to maintain awareness of “indicator” substances such as L(+)-tartaric acid and dimethylsulfone that can help to identify suspicious activity related to illicit drug manufacture. (PRE/2008/P63)

### Other

The Board invites Governments to exercise vigilance as regards shipments of ergot alkaloids, including related substitutes not under international control. (PRE/2005/P71)

INCB encourages Governments to consider using information on cutting agents to trace the laboratories in which drugs are illicitly manufactured. Governments may also consider taking action against cutting agents in accordance with article 13 of the 1988 Convention. (PRE/2016/P180)