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**Statement by Ms Jagjit Pavadia, President,
International Narcotics Control Board (INCB)
Sixty-fifth session of the Commission on Narcotic Drugs**

Item 5(a): Changes in the scope of control of substances

16 March 2022

Mr Chair, Excellencies, Ladies and Gentlemen,

1) The International Narcotics Control Board has the **responsibility under article 12 of the 1988 Convention** to assess chemicals used in the illicit manufacture of drugs in order to determine whether they should be placed under international control. In discharge of its mandate, the Board submitted to the Chair of the Commission a recommendation to place three fentanyl precursors in Table I of the 1988 Convention.

2) To begin with, let me just recall that the substances which INCB has recommended for scheduling are **precursors**, that is, **chemicals** used to produce fentanyl and some of its analogues.

3) **Fentanyl and a number of these analogues** are included in the schedules of the 1961 Convention. They are very potent narcotic drugs, typically 10-100 times stronger than heroin. Their **high potency** continues to result in overdose deaths in users and in inadvertent exposure of law enforcement personnel and other persons along the distribution chain.

4) Let me now turn to the three chemicals recommended for scheduling. Because of the similarities, I will cover all three chemicals together in one statement, while the voting will be separate, substance by substance. In my statement, I will refer to them by their short names which you will see on the slides during the voting, together with the full chemical names.

- The first is **4-AP**, a substitute chemical for NPP to synthesize ANPP which itself is an immediate precursor for the manufacture of fentanyl and some of its analogues. NPP and ANPP were included in Table I of the 1988 Convention in 2017.
- The second substance is **1-Boc-4-AP**, a chemically protected derivative of 4-AP, which can be converted to 4-AP, norfentanyl or a number of norfentanyl analogues. All these substances can then further be converted to fentanyl and several of its analogues.

- And finally, **norfentanyl** is an immediate precursor of fentanyl and a number of fentanyl analogues.
- 5) In making its assessment pursuant to article 12, paragraph 4, of the 1988 Convention, the Board finds that:
- a) 4-AP, 1-boc-4-AP and norfentanyl are substances which are **very suitable for the illicit manufacture** of fentanyl and a number of fentanyl analogues. Evidence exists, including from forensic profiling analysis, that most illicitly manufactured fentanyl is manufactured via synthesis methods involving these chemicals.
 - b) **Legitimate manufacture and use** of 4-AP, 1-boc-4-AP and norfentanyl are limited to small amounts, typically for research, analysis and reference purposes and there is no known **legitimate trade** in the three substances other than small amounts for the afore-mentioned purposes.
- 6) 64 Governments and the European Commission provided comments on **all three proposals**. Of these, 63 Governments communicated that they did not foresee any difficulty placing the three substances in the Tables of the 1988 Convention.
- 7) In light of its findings, **the Board recommends adding 4-AP, 1-boc-4-AP and norfentanyl to Table I of the 1988 Convention**. International control of the three substances will limit their availability for illicit drug manufacture and subsequently reduce the quantity of fentanyl and fentanyl analogues manufactured illicitly from them.
- 8) The Board is of the view that the proposed controls will have **no adverse effect** on the availability of the three substances for any of the limited known legitimate uses.
- 9) **Placement in Table I** will provide Governments with the possibility to request pre-export notifications as a means of monitoring shipments entering their territory.

I thank you for your attention.

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